



Planning Statement, including Heritage Assessment

Planning Application

Erection of a part 2-storey, part 3-storey building comprising
R/O Duval House, High Street, Harmondsworth

DLA Ref: 20/224
November 2020

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1.0 INTRODUCTION

1.1.0 Background

1.1.1 This report relates to a planning application for the erection of a building comprising 6 flats at land rear of Duval House, High Street, Harmondsworth.

1.2.0 Scope

1.2.1 This document comprises an overarching Planning Report incorporating a Design and Access Statement. Sections 2 to 4 consider the physical, economic, social and historical context of the site, identifying the relevant local, regional and national planning policy framework; Section 5 sets out the details of the proposal; and Section 6 details the consultations undertaken prior to the submission of the application. All these sections inform the evaluation of the proposal in Section 7 against the identified planning policy framework. The overall conclusions are set out in Section 8 and which are summarised below at paragraph 1.3.0.

1.3.0 Summary

1.3.1 The report will demonstrate that the proposal would deliver a high-quality development that would preserve the character and appearance of the Conservation Area and the locality of the site. Future occupiers would be afforded good living conditions and the residential amenity of neighbouring occupiers would be preserved. An appropriate level of off-street car parking would be provided and the proposal would not be prejudicial to highway conditions in the surrounding area.

2.0 SITE & CONTEXT ANALYSIS

2.1.0 Location

2.1.1 The site is located on the northern side of High Street and is on the northern edge of the village of Harmondsworth. The site is accessed via Meadowlea Close.

2.2.0 Application Site

2.2.1 The site comprises a former office block, Duval House, and its car park. Duval House is predominantly three-storey, but with a two-storey element fronting High Street and a single-storey element to the rear. The building has a hipped roof and brick elevations to the first two floors and render above. Works are currently underway to convert the building into 24 flats following the grant of prior approval (17762/APP/2019/3373).

2.3.0 Context

2.3.1 The rear section of the site is bounded to either side by two-storey housing. To the east are a group of detached and semi-detached dwellings that front Meadowlea Close. To the west is a terrace of properties in Acacia Mews. To the north the site is bordered by open land.

2.4.0 Proposals Map Notation

2.4.1 The Hillingdon Policies Map shows the site to be within a Conservation Area. Land within the Metropolitan Green Belt is located to the north.

2.5.0 Local Services

2.5.1 The site is within easy walking distance of services on High Street, which include two general stores, one of which incorporates a post office, and two public houses.

2.6.0 Accessibility

2.6.1 The site is also within very close proximity to bus stops on Hammondsworth Lane, which provide regular services to surrounding settlements and transport hubs, including West Drayton and Hayes railway stations, Uxbridge underground station and Heathrow airport.

3.0 RELEVANT PLANNING HISTORY

3.1.0 Application Site

3.1.1 There have been numerous applications relating to the construction and use of Duval House. The most relevant of these is 17762/PRC/2020/4 which granted prior approval to convert the building into 24 flats.

3.1.2 A further application seeks to convert a former plant room / loft area to an additional studio unit. This application is currently awaiting determination.

4.0 POLICY CONTEXT

4.1.0 National Policy / Guidance

The National Planning Policy Framework (NPPF) 2019, sets out the Government's planning policies for England. The following sections are considered directly relevant:

- 2. Achieving sustainable development
- 5. Delivering a sufficient supply of homes
- 9. Promoting sustainable development
- 11. Making effective use of land
- 12. Achieving well-designed places
- 16. Conserving and enhancing the historic environment

4.2.0 The London Plan

Policy No.	Title
3.3	Increasing housing supply
3.4	Optimising housing potential
3.5	Quality and design of housing developments
7.4	Local Character
7.6	Architecture
7.8	Heritage assets and archaeology

4.2.0 Hillingdon Local Plan

4.2.1

Policy No.	Title
PT1.BE1	Built Environment
PT1.HE1	Heritage
PT1.H1	Housing Growth
DMHB 1	Heritage Assets
DMHB 4	Conservation Areas
DMHB 11	Design of New Development
DMHB 14	Trees and Landscaping
DMHB 16	Housing Standards
DMHB 17	Residential Density
DMHB 18	Private Outdoor Amenity Space
DMT 1	Managing Transport Impacts
DMT 2	Highway Impacts
DMT 6	Vehicle Parking

5.0 DESCRIPTION OF DEVELOPMENT

5.1.0 Use

- 5.1.1 The proposal is for a Class C3 residential use. A total of 6 dwellings are proposed, comprising 3 studio or one-bed units and 3 two-bed units.

5.2.0 Layout

- 5.2.1 The proposal would comprise a single block with a staggered building line to reflect neighbouring development. A gap of 1.2m would be provided to the boundary with No 1 Meadowlea Close and 2.2m to the building itself. A minimum distance of 3.4m would be retained to the boundary with No 11 Acacia Mews and 4.6m between the buildings.

- 5.2.2 The ground floor would comprise an undercroft car parking area and the entrance to the flats. The first floor would contain two 2-bed units, 1 one-bedroom unit and a studio apartment. The second floor would comprise 1 two-bed unit and a studio apartment.

5.3.0 Appearance & Scale

- 5.3.1 The proposed building would be part two-storey, part three-storey in scale. The flank two-storey elements would have an eaves height of 4.9m and a ridge height of 7.2m. The central three-storey section would have an eaves height of 7.5m and a ridge height of 10.3m.

5.4.0 Landscaping and amenity

- 5.4.1 The existing trees and landscaping strip will be retained and protected during the construction process. Each of the units would be provided with a private balcony.

5.5.0 Access

- 5.5.1 The proposal would utilise the existing access arrangements from Meadowlea Close. 7 off-street car parking spaces and 6 secure cycle spaces would be provided to serve the proposed development.

6.0 CONSULTATIONS

- 6.1 A request for pre-application advice was submitted to the Council on 10 January 2020 and a meeting held on 19 February 2020. A detailed written response was provided on 9 March 2020.
- 6.2 The pre-application schemes comprised a new building for 8 flats on the first and second floors with undercroft car parking below. The building would have reflected the appearance of the existing Duval House and was three-storey in scale with a crown roof.
- 6.3 The Council's response can be summarised as follows:

Principle There is no objection to the principle of additional housing on the site subject to other considerations.

Design The existing building is an anomaly and should not influence future design. The existing gap provides a relief in the Conservation Area. The proposed building would fail to respect the character of the area, the crown roof would appear bulky and the proposal would harm the sense of openness in the streetscene. The scale of the building should reflect the neighbouring dwellings, particularly in height.

Neighbouring amenity A separating distance of less than 21m would be provided between the new building and the existing office building. Significant concerns raised in respect of the impact on No 1 Meadowlea Close due to size and siting.

Highways 22 retained spaces for the offices and 11 spaces for the 8 flats would be acceptable.

Landscaping An application should include an arboricultural report, including details of how any trees with merit will be protected.

7.0 **PLANNING CONSIDERATIONS**

Based on the analysis set out in Sections 2 to 5, I consider that the application proposal raises the following issues, which I will consider in turn below:

1. Principle
2. Heritage
3. Layout & Design
4. Highway Safety & Access

7.1.0 **Issue No 1: Principle**

- 7.1.1 National and regional planning policy all support the provision of additional housing. Paragraph 59 of the NPPF seeks to significantly boost the supply of housing. Paragraph 117 advises that planning policies and decisions should promote an effective use of land in meeting the need for homes. The London Plan advises that the Mayor recognises the pressing need for more homes in order to promote opportunity and choice. This guidance is also reflected in local planning policy. Policy H1 of the Local Plan: Part 1 states that Council will meet and exceed its minimum strategic dwelling requirement.
- 7.1.2 As set out at 2.5.0 – 2.6.0 above, the site is in a very sustainable location with excellent access to public transport links, shops and other facilities. The site therefore offers a suitable location for additional housing and the proposal is acceptable in principle. Nonetheless, it is also acknowledged that any proposal for housing must comply with other relevant Local Plan policies and this will be discussed below.

7.2.0 Issue No 2: Heritage

7.2.1.0 Policy Backdrop

7.2.1.1 National Planning Policy Framework (NPPF)

Paragraph 189 of the NPPF requires applicants to describe the significance of any heritage assets affected by a proposal. It explains that the level of detail should be proportionate to the asset's importance and no more than is necessary to understand the potential impact.

7.2.1.2 In determining the impact of a proposed development on the significance of a designated heritage asset, the NPPF paragraphs 193 and 194 state respectively as follows:

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

Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification."

7.2.1.3 In assessing an application which it is considered would lead to 'less than substantial harm' to a heritage asset, the NPPF at paragraph 196 states:

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

7.2.1.4 Local Plan

Policy DMHB1 echoes the NPPF and advises that development that effects a heritage asset will only be supported if it enhances the significance of the asset, or it would not lead to significant harm and would provide a public benefit that would outweigh any harm.

7.2.1.5 Policy DMHB4 provides more detailed advice with regard to development in Conservation Areas. It advises that development is expected to preserve or enhance the character of a Conservation Area. It states that the Council will require new development to be of a high contextual design and that the loss of important features that make a positive contribution to the character and appearance of the Conservation Area will be resisted.

7.2.2.0 **Assessment of significance**

The Conservation Area as a whole contains many designated and undesignated buildings and features that contribute positively to its character, appearance and setting. However, not all buildings or areas make an equal contribution. A detailed analysis of the locality is provided by the Harmondsworth Village Conservation Area Appraisal (2007). It identifies several key views within the area, including one from the east of the High Street looking west which, it states, demonstrates the sense of open space at the heart of the Conservation Area. None of the identified important views incorporate the application site. Meadowlea Close is referred to as a 1990s development that involved the conversion and development of an historic building and the surrounding grounds.

7.2.2.1 With reference to scale, the appraisal notes that most of the properties in the area are 2 or 3 stories. It advises that large scale buildings fronting onto the village centre would be inappropriate and the retention of front and rear gardens is important to the character of the area. Green spaces in general are considered an important aspect of the Conservation and help to maintain its rural view.

7.2.2.2 Although it did not exclude the principle of some development on the site, the pre-application response stated that the gap and views to the rural landscape beyond, provided by the application site, contribute positively to the character and appearance of the Conservation Area. Whilst it is acknowledged that the gap may be of some value, it must also be recognised that the benefit is very location specific. Views towards the site from the historic core of the Conservation Area in High Street are obscured by existing buildings. The same is true when approaching from Holloway Lane to the north-east. The gap is partly apparent from Hatch Lane to the south, but from here it is mostly obscured by Duval House itself. Even from Meadowlea Close, the bend in the road means the application site is only visible from a very small section. Furthermore, the site is covered almost entirely in hardsurfacing and so does not represent an existing green space that is valued by the Village Appraisal.

7.2.2.3 In the above circumstances it is considered that the application site makes only a very modest contribution to the Character and Appearance of the Conservation Area as a whole.

7.2.3.0 **Assessment of impact**

Notwithstanding the above assessment of significance, it is acknowledged that the pre-application response made some perfectly reasonable points in respect of impact of the scheme that it was assessing. In particular the need to respect the scale of neighbouring buildings.

7.2.3.1 The proposal differs significantly from the pre-application scheme. The flank elements would be two-storey in scale and would reflect the size and proportions of the neighbouring properties. The building would also now incorporate a pitched roof rather than the bulkier crown roof proposed previously. The building increases to three storeys in the central part of the site, but this element would be located over 9m from the side boundaries of the site and would account for just one third of the total width. The scale of the building is therefore considered to represent an appropriate transition between the prominent Duval House and the neighbouring two-storey properties.

7.2.3.2 The proposal would partly obscure an existing gap but, as discussed above, this is considered to make a limited contribution to the character and appearance of the Conservation Area. A reasonable degree of spacing would be provided to the side boundaries and between buildings that would be reflective of the grain of development in the locality. The inclusion of undercroft parking is not a common feature in the locality, but this element would not be prominent in views from outside of the site. The proposed roof design and materials would ensure an attractive building that respects the appearance of neighbouring properties.

7.2.4.0 **Conclusion**

To conclude this issue, the size, siting and design of the building would respect the scale and appearance of neighbouring properties and the wider Conservation Area. The loss of an existing gap would have a limited impact on views from outside of the application site and would not harm any of the key views identified in the Conservation Area Appraisal. Even if there were considered to be some harm, it must be assessed as less than substantial in the context of Paragraph 196 of the NPPF. This would be outweighed by the clear public benefit of providing additional housing and making the most effective use of the site. The proposal would therefore accord with Local Plan Policies PT1.HE1, DMHB 1 and DMHB 4 and the provisions of the London Plan and the NPPF.

7.3.0 Issue No 3: Layout & Design

7.3.1.0 I will consider this issue with regard to the impact on the character of the area, the impact on neighbouring occupiers and future residential amenity.

7.3.2.0 Factor 1. Impact on the character of the area

7.3.2.1 Policy Backdrop

NPPF paragraph 124 advises that the creation of high-quality 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. Likewise, paragraph 127 seeks to ensure that developments function well and add to the overall quality of the area; are visually attractive and sympathetic to local character and history; and establish or maintain a strong sense of place. Paragraph 127 c) also cautions that planning policies and decisions should not prevent or discourage appropriate innovation or change.

7.3.2.2 London Plan Policy 7.4 requires that development has regard to the form, function, and structure of an area, place or street and the scale, mass and orientation of surrounding buildings and should be of '*human scale*'. Policy 7.5 requires that development should make the public realm comprehensible at a human scale. Policy 7.6 requires that architecture should make '*a positive contribution to a coherent public realm, streetscape and wider cityscape*', incorporating '*the highest quality materials and design appropriate to its context.*'

7.3.2.3 Local Plan Policy BE 1 requires that all new development achieves a high quality of design. DMHB 11 lists a number of '*principles of good design*' that all development should incorporate. This includes harmonising with local context by respecting the scale of adjacent structures, building lines and architectural detailing. Policy DMHB 16 states that development proposals will be expected to retain or enhance existing landscaping.

7.3.2.4 Assessment

This factor has largely been considered under the preceding issue. The siting and scale of the building has been designed to reflect the nature of surrounding development. The part two-storey, part three-storey approach is considered to be an appropriate compromise between the substantial size of Duval House and the more traditionally domestic scale of the properties to both sides. By reflecting its context the proposal would deliver a comprehensible development of a '*human scale*'. The design details and materials would be of a high standard and would ensure that the development is in keeping with its surroundings.

7.3.2.5 The site is currently covered predominantly by hardsurfacing, with some trees located to the rear of the site and landscape strip to the western boundary. These features will be retained in accordance with Policy DMHB 16. The arboricultural report and Tree Protection Plan submitted with the application demonstrate how the trees will be protected during the construction process.

7.3.3.0 **Factor 2. The Impact on neighbouring occupiers**

7.3.3.1 **Policy Backdrop**

The London Plan advises that buildings should not cause unacceptable harm to the amenity of surrounding residential land and buildings. Local Plan Policy DMHB 11 states that development should not adversely impact on neighbouring amenity, daylight and sunlight.

7.3.3.2 **Assessment**

The pre-application response raised concerns over the potential impact on No 1 Meadowlea Close and the future occupiers of Duval House. To address these concerns the proposed building has been reduced considerably in scale. The flank elements would now align with the neighbouring properties in Meadowlea Close and Acacia Mews. The proposal would comfortably avoid impinging upon a 45-degree line drawn from the neighbouring ground floor windows. By reducing the flank elements of the building to two-storey the proposal would not appear overbearing when viewed from these properties.

7.3.3.3 The application is accompanied by a daylight and sunlight report, which assesses the impact of the proposal on surrounding occupiers. The report found that the proposed development would comfortably meet the requirements of the BRE guidance and would not have a noticeable impact on the light received by any neighbouring properties. It also found that the proposal would not cause any unreasonable overshadowing of the neighbouring garden areas.

7.3.3.4 The front elevation of the new building would be within 21m of the rear of Duval House. Given that the offices are currently being converted to a residential use this could potentially give rise to overlooking. However, all of the main living areas in the proposed flats either face to the rear of the site or are dual aspect. Therefore it would not be unreasonable for any facing windows to be conditioned to be either fully or part obscure glazed in order to ensure that privacy is maintained.

7.3.4.0 **Factor 3. Future residential amenity**

7.3.4.1 **Policy Backdrop**

London Plan Policy 3.5 seeks housing developments with a high-quality internal space and provides minimum space standards for all types of dwellings. Local Plan Policy DMHB 16 also requires compliance with these space standards. Policy DMHB 18 seeks private outdoor amenity space for new developments, but the supporting text advises that a communal provision of outdoor space is generally not supported.

7.3.4.2 **Assessment**

The proposal would provide a mix of studio, 1-bedroom and 2-bedroom apartments. All of the units would meet or exceed the minimum floorspace requirements as set out in both the London Plan and Hillingdon Local Plan. The siting of the proposed building would also ensure good levels of outlook and daylight to all habitable rooms.

7.3.4.3 The Local Plan discourages communal amenity space but advises that private balconies might be acceptable. Each of the 6 flats would be provided with a private balcony and which would exceed the minimum dimensions referred to in the Local Plan. Whilst the total amenity provision would be below the guidelines in Policy DMHB 18, future occupiers would nonetheless benefit from a private sitting out area. Furthermore, the site is located close to Harmondsworth Moor, a 260-acre park with areas of maintained grass, paths and bridleways. Future occupiers would therefore have easy access to large expanse of good quality public open space. Given that the proposed units would not be attractive to families with children, it is considered that the shortfall of private amenity space is on this occasion acceptable.

7.3.5.0 **Conclusion**

To conclude this issue, the proposal would deliver a high-quality development that is in keeping with the size and scale of surrounding buildings, does not impact unduly on neighbouring occupiers and which would provide good living conditions for future residents. The proposal would therefore comply with Local Plan Policies PT1.BE1, DMHB 11, DMHB 14, DMHB 16, DMHB 17 and DMHB 18 and the provisions of the London Plan and NPPF.

7.4.0 **Issue No 4: Highway Safety & Access**

7.4.1 **Car parking**

The application site currently provides car parking for Duval House. The former offices are currently being converted into 24 flats, with the development having a total car parking requirement of 22 spaces. A proposal to convert part of the loft space at Duval House into an additional flat would require one additional space. The proposed development is for a combination of studio, one-bedroom and two-bedroom flats. The Local Plan sets a requirement of 1 space for every 2 studio flats and 1 - 1.5 spaces for one- and two-bedroom flats. As set out in the Transport Statement, it is considered appropriate to apply the higher threshold of 1.5 spaces for the non-studio flats given the relatively low PTAL rating for the site. This results in a requirement of 7 spaces, or 30 including the conversion of Duval House. A total of 32 car parking spaces would be retained, which would be sufficient to meet the Local Plan requirements and to provide 2 visitor spaces.

7.4.2 **Cycle Plan**

The Local Plan sets a requirement of 1 space for every unit of two-bedrooms or fewer. Six covered and secure spaces would be provided adjacent to the entrance to the flats. This would provide a safe and convenient location, and which would help to promote a sustainable form of transport in accordance with local, regional and national planning policy.

7.4.3 **Access**

The proposal would utilise the existing access arrangements from Meadowlea Close. The proposal would not be expected to generate more traffic than the former office use of the site and the amount of actual car parking spaces would decrease by two. The parking layout would allow all vehicles to manoeuvre safely within the site and exit in a forward gear. The proposal would therefore not be prejudicial to highway safety and capacity in the surrounding area.

7.4.4 **Conclusion**

To conclude this issue, the proposal would preserve highway safety in the vicinity in the site and an appropriate level of off-street carparking would be provided to serve both the new development and the conversion of Duval House. The proposal would therefore comply with Local Plan Policies DMT 1, DMT 2, DMT 6 and the provisions of the London Plan and NPPF.

8.0 CONCLUSIONS

8.1.0 Background

8.1.1 This report relates to a planning application for the erection of a building comprising 6 flats at land rear of Duval House, High Street, Harmondsworth. The proposal is promoted in the following circumstances:

- The principle of additional housing would comply with the overriding requirements of local, regional and national planning policy.
- The size, siting and design of the building would respect the scale and appearance of neighbouring properties and the wider Conservation Area. The loss of an existing gap would have a limited impact on views from outside of the application site and would not harm any of the key views identified in the Conservation Area Appraisal. Even if there were considered to be some harm, it must be assessed as less than substantial in the context of Paragraph 196 of the NPPF. This would be outweighed by the clear public benefit of providing additional housing and making the most effective use of the site. The proposal would therefore accord with Local Plan Policies PT1.HE1, DMHB 1 and DMHB 4 and the provisions of the London Plan and the NPPF.
- The proposal would deliver a high-quality development that is in keeping with the size and scale of surrounding buildings, does not impact unduly on neighbouring occupiers and which would provide good living conditions for future residents. The proposal would therefore comply with Local Plan Policies PT1.BE1, DMHB 11, DMHB 14, DMHB 16, DMHB 17 and DMHB 18 and the provisions of the London Plan and NPPF.
- The proposal would preserve highway safety in the vicinity in the site and an appropriate level of off-street carparking would be provided to serve both the new development and the conversion of Duval House. The proposal would therefore comply with Local Plan Policies DMT 1, DMT 2, DMT 6 and the provisions of the London Plan and NPPF.