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# Town Planning Statement

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Harefield Grove, Rickmansworth Road, Harefield, UB9 6JY

# Planning Statement

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## 1. Introduction

- 1.1. This revised Town Planning Statement (the 'Statement') has been prepared by Savills on behalf of Comer Homes Group ('the Applicant') in support of the ongoing applications for full planning permission and listed building consent (refs. 28301/APP/2022/2205 and 28301/APP/2022/2206), submitted to the London Borough of Hillingdon Council ('LBH') for the redevelopment of Harefield Grove, Rickmansworth Road, Harefield UB9 6JY ('the site').
- 1.2. This Statement has been prepared in response to the change in planning policy context following the publication of the new NPPF in December 2024 and to support amendments to the applications submitted following extensive engagement with LBH Officers since the submission of the previous revisions in November 2022 and October 2023 respectively.
- 1.3. This Statement supersedes the Town Planning Statement dated November 2022 submitted with the original applications.
- 1.4. Harefield Grove itself is a Grade II listed building set in landscaped grounds. The House, its extension and stable block had been used as offices from 1982–2002. The Applicant acquired the site in 2003 and since then the office use progressively reduced with the House and grounds currently used sporadically for film and television sets.
- 1.5. The principle for the conversion of the Main House back into residential use, associated works to the existing extension and stable block, and retention / conversion of the ancillary buildings within the site to residential has been long established with full planning permission and listed building consent granted in 2016 under refs 28301/APP/2013/3104 and 28301/APP/2013/3105 for a total of 23 homes (hereafter referred to as 'the 2016 Planning Permission').
- 1.6. The 2016 Planning Permission has been implemented through the reinstatement of the former Entrance Lodge as two dwellings. Full details of the 2016 Planning Permission can be seen within the Planning History (Section 3 of this Statement).

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1.7. These revised proposals seek to build upon the established principle of residential redevelopment of the site. Through extensive engagement with LBH Officers, the proposals have addressed concerns raised since the submission of the applications and will deliver a viable form of development that will ensure the restoration and preservation of the listed buildings and its landscape setting.

1.8. Overall, the development will provide 38no. residential dwellings (Use Class C3) through conversion, demolition and new build works, along with reinstatement of the former sports pitch on site and associated landscaping and parking improvements.

1.9. The description of development is:

*“Subdivision and conversion of the Main House into 6no. residential units; demolition of the existing extension of the Main House and erection of a three storey ‘stable block’ building containing 28no. residential units; construction of a new dwellinghouse to the south-east (Orchard House); extension of Garden House to provide a new single storey dwelling; internal alterations to Cottage House to provide a new two storey dwelling; demolition of Conservatory building and replacement with a new two storey dwelling (Lake View House); and associated alterations to landscape, access and parking.”*

## Supporting Documents

1.10. This Statement describes the development proposals and relates them to the relevant planning policy framework. It should be read in conjunction with the accompanying Application Drawings and a number of specialist reports which have been prepared to address the full range of planning considerations, as follows:

- Air Quality Assessment Technical Note, prepared by Mayer Brown;
- Car Park Management Plan, prepared by Mayer Brown;
- Internal Daylight and Sunlight Report, prepared by T16 Design;
- Design and Access Statement, prepared by Plus Architecture;
- Flood Risk Assessment, prepared by Stomor;

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- Heritage Statement, prepared by Orion Heritage;
- Indicative Drainage Strategy, prepared by Stomor;
- Landscape Design Strategy, prepared by James Blake Associates;
- Transport Statement, prepared by Mayer Brown; and
- Travel Plan, prepared by Mayer Brown.

## Structure of this Statement

1.11. This Statement comprises the following sections:

- **Section 2** - background to the site and its context within the surrounding area;
- **Section 3** - overview of the planning history for the site and the pre-application engagement undertaken;
- **Section 4** - a summary of the development proposals;
- **Section 5** - sets out the relevant planning policy framework for the site;
- **Section 6** - provides an assessment of the material planning considerations arising from the proposals; and
- **Section 7** - presents our conclusions in respect to the proposals.

## 2. Site and Surroundings

- 2.1. The site is situated some 1km to the north of Harefield Village on the eastern side of Rickmansworth Road. The site extends to approximately 7.8 hectares and is accessed via a long driveway from Rickmansworth Road.
- 2.2. The site is currently vacant, although it is used sporadically for film and television sets. The site's last permanent use was for office purposes in c. 2002.
- 2.3. Harefield Grove itself is a Grade II listed building set in a parkland setting, although the current garden is considerably reduced from its original form.
- 2.4. The site is covered by Tree Preservation Order No. 1.
- 2.5. The original house is of late 18<sup>th</sup> or early 19<sup>th</sup> century origin which was extended in the latter part of the 19<sup>th</sup> century and more recently in the 1980s. The building is included on the Historic England Buildings at Risk Register.
- 2.6. Within the extensive grounds are a series of associated buildings and structures, including the Stable Building (two storeys with clock tower), Cottage House (two storey dwelling), Conservatory (single storey greenhouse) and Gardener's Cottage (two storey dwelling). A large gravel car park serves the site providing c. 120 spaces.
- 2.7. The site has a Public Transport Accessibility Level ('PTAL') of 0, representing the lowest level of public transport accessibility. However, local facilities and amenities are located within Harefield Village, a short distance from the site and the residential character of Harefield is conducive to encouraging trips by active travel modes once in the village. Bus services accessible from Harefield provide access across the wider area, especially towards Uxbridge where connections can be made to London Underground services. The site is also well-located for access to a number of rail stations, providing frequent services across north-west London and into Central London via London Underground services.

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- 2.8. The site lies within the Metropolitan Green Belt. It forms part of a Nature Conservation Site of Grade I and Grade II Importance and falls within a Countryside Conservation Area.
- 2.9. The site is located within Flood Zone 1, meaning a low overall risk of flooding (annual probability <0.1%).

## 3. Background

### Planning History

- 3.1. A desktop search of the planning history records held by LBH has been conducted. The applications which are of relevance are detailed in **Table 1** and have been taken into account, as far as necessary, in the preparation of the application proposals. A summary of the planning application which is considered to be a key consideration in this assessment is also provided below.

#### The 2016 Planning Permission

- 3.2. In September 2016 full planning permission was granted for redevelopment of the Harefield Grove site, comprising:

*“Conversion of majority of historic main house into single dwelling unit, alteration and conversion of existing east and west wings and southern part of main house into 15 residential units and conversion of 'stable building' into 4 residential units. Demolition of glazed link and canopy including outbuilding to south. Restoration of historic landscape including reinstatement of garden wall, retention of cottage house, conversion & extension of existing conservatory and adjacent building to form single dwelling, conversion and extension of existing outbuilding/store to form single dwelling house and construction of new house with garage to the southeast linked with garden wall reinstatement and reinstatement of former entrance lodge as two dwelling units.”*

- 3.3. The Applicant has commenced works on the 2016 Planning Permission with the reinstatement of the entrance lodge as two dwellings having been completed. The 2016 Planning Permission has therefore been implemented and is an extant planning permission on the site.

**Table 1: Site Planning History**

LPA Reference	Description of Development	Decision
28301/APP/2022/2205 and	Subdivision and conversion of the Main House from office to residential uses alongside	<b>Ongoing [This</b>



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28301/APP/2022/2206 (LBC)	demolition of the existing east and west wing extensions and the subsequent erection of a three storey residential building. The proposal also includes converting and extending the Garden House for use as a single dwelling, extending and converting Lake View House for use as a single dwelling, restoration of the Cottage House for use as a single dwelling, the construction of a new dwelling to the southeast (the Orchard House), and associated landscaping and parking.	<b>Application]</b>
28301/APP/2018/2768	Application for a non-material amendment to planning permission ref: 28301/APP/2013/3104 dated 23/09/2016 (residential conversion and development) to delete condition 22 (biomass specification details) and to alter the wording of condition 23 (omitting details of noise mitigation from biomass plant).	Application granted 17 <sup>th</sup> October 2018
Full Planning Application: 28301/APP/2013/3104  Listed Building Consent Application: 28301/APP/2013/3105	Conversion of majority of historic main house into single dwelling unit, alteration and conversion of existing east and west wings and southern part of main house into 15 residential units and conversion of 'stable building' into 4 residential units. Demolition of glazed link and canopy including outbuilding to south.  Restoration of historic landscape including reinstatement of garden wall, retention of cottage house, conversion & extension of existing conservatory and adjacent building to form single dwelling, conversion and extension of existing outbuilding/store to form single dwelling house and construction of new house	Full Planning permission granted 23 <sup>rd</sup> September 2016.  Listed Building Consent granted 23 <sup>rd</sup> September 2016.

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	with garage to the southeast linked with garden wall reinstatement and reinstatement of former entrance lodge as two dwelling units.	
<p>Full Planning Application: 28301/APP/2012/2598</p> <p>Listed Building Consent Application: 28301/APP/2012/2599</p>	<p>Conversion of majority of historic house into a single dwelling unit. Alteration and conversion of existing glazed link including east &amp; west wings and southern part of main house into 13 residential flats. Conversion of Stable Building into 4 self-contained flats. Reinstatement of entrance lodge house as 2 No. dwelling units. Retention of Cottage House. Conversion and extension of existing conservatory and adjacent building into a single dwelling unit. Demolition of glazed link and canopy including outbuilding to south. Conversion and extension of southern outbuilding into a single dwelling with garage. Construction of new house with garage to southeast.</p>	<p>Full planning application refused 4<sup>th</sup> March 2013.</p> <p>Listed building consent application refused 10<sup>th</sup> April 2013.</p> <p>Both applications dismissed at appeal 28<sup>th</sup> February 2014 relating solely to failure to provide maximum viable level of affordable housing.</p>
28301/APP/2006/1059	Conversion of original house and stable block from offices to 49 residential apartments and erection of a new residential block to provide 49 apartments and associated parking (involving demolition of existing greenhouse, wall, gardener's store and garage)	Refused 30 <sup>th</sup> June 2006
28301/D/83/1551	Mixed development on 7.03 hectares	Planning permission granted 17 <sup>th</sup> February 1984
28301/80/0400	Change of use to offices	Planning permission granted 26 <sup>th</sup> February

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## Pre-Application Consultation

3.4. The importance of pre-application engagement and frontloading is emphasised in the National Planning Policy Framework ('NPPF') and in the accompanying planning practice guidance ('PPG'). The NPPF highlights that there is significant potential to improve the efficiency and effectiveness of the planning application system for all parties through early engagement. Paragraph 40 states:

*“Good quality preapplication discussion enables better coordination between public and private resources and improved outcomes for the community.”*

3.5. The NPPF urges local planning authorities to encourage developers to engage with them prior to the submission of a planning application.

### Consultation with the Local Planning Authority

3.6. The scheme has been developed in light of detailed pre-application discussions held with officers at LBH.

3.7. In December 2019, pre-application advice was sought in regards to the subdivision and conversion of the Main House into multiple residential units, along with the demolition of the existing extension and erection of a new residential stable block. A meeting took place in January 2020 with attendees including LBH officers in Development Management, Planning Policy, Conservation and Urban Design, Landscape and Highways. This discussion identified numerous matters of agreement and those requiring further consideration, as detailed within the original Town Planning Statement submitted, dated November 2022.

3.8. In October 2023, the following documents were submitted to LBH to support a revised proposal (as detailed in **Table 2**) prompted by the feedback received through the statutory consultation process.

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- Air Quality Assessment [Revised]
- Circular Economy Statement [Revised]
- Daylight and Sunlight Report [Revised]
- Design and Access Statement [Revised]
- Energy Statement [Revised]
- Flood Risk Assessment Addendum
- Heritage Statement [Revised]
- Historic Building Record
- Transport Statement Addendum
- Whole Life Carbon Assessment
- Viability Assessment [Revised]

**Table 2: Amendments comprising the revised submission (October 2023).**

Area of Site	Amendments
Stable Block	<ul style="list-style-type: none"><li>• Each unit within the new Stable Block will have access to private amenity space in the form of a garden or balcony.</li><li>• The revised elevation treatment seeks to provide a more tailored and contextually appropriate hierarchy of fenestration and finishing materials across the facades.</li><li>• A rusticated base sits below two storeys of brick cladding. The main entrance elevation is proposed to have arched windows with stone detailing, whereas the top floor has more humbly scaled windows and less detailing. This hierarchy allows for a more sensitive elevation which we believe is more appropriate for this location.</li><li>• The finishing materials of the balconies which were believed to be slightly incongruous in their previous glazed form - metal railings sitting more comfortably within this environment.</li></ul>
Orchard House	<ul style="list-style-type: none"><li>• Revised to more accurately reflect the architectural approach to scale</li></ul>



	<p>and massing as that proposed in the Stable Block.</p> <ul style="list-style-type: none"><li>• The plan has been adjusted to articulate the massing more appropriately and the fenestration, scale and brickwork echoes that used in the larger block.</li></ul>
Lake View House	<ul style="list-style-type: none"><li>• The layout revised to better reflect the context and to use the footprint of the existing conservatory currently on site.</li><li>• This footprint has been reimagined as a living and dining space for the proposed dwelling whilst the other small structure on site has also been amalgamated into the design to act as the garage for the property in this instance.</li><li>• The scale, massing and articulation of the revised dwelling is more in keeping with the overall architectural concept approach being proposed throughout the wider site.</li></ul>

3.9. Since the revised proposal was submitted, the Applicant has continued to engage with LBH Officers to address concerns, most notably relating to the scale and design of the new stable building and its associated impacts, alongside a revised landscaping proposal.

3.10. In December 2024, a design workshop took place with attendees including LBH Officers from Development Management, Planning Policy, Conservation and Urban Design. Following this engagement with Council Officers, the below amendments have been made to the previous proposals:

*Main House*

- Redesigned ground floor apartments to ensure the entrance foyer room remains fully intact;
- Re-siting of the units to sit more comfortably within the existing building’s fabric; and
- Retention and re-use of an increased number of the existing openings around the building.

*Stable House*

- Reduction in the number of units from 29 to 28;
- Redesigned elevations in terms of height and proportion to reduce impact on the setting of the listed building;

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- Reduction in the overall ridge height from +90.350 to +86.830;
- Altered proportion and positioning of fenestration openings;
- Revised approach to layout to rationalise access to the building by reducing the number of stair/lift cores from four to two;
- Redesigned levels around the building to provide better aspect to all lower ground floor units; and
- Revised access level to provide a 'front door' from the carpark, thus omitting the accessibility ramp within the landscape.

## *Lake View House*

- Layout revised to better reflect the context and to use the footprint of the existing conservatory currently on-site which has been reimagined as a living and dining space for the proposed dwelling, whilst the other small structure has been amalgamated into the design to serve as a garage.

## *Orchard House*

- Revised design to better reflect the architectural approach to the scale and massing of the Stable Block.

## 4. The Proposed Development

4.1. This planning application seeks full planning permission and listed building consent for the redevelopment of the site to provide a total of 380 residential dwellings. This section provides a brief summary of the proposed development. Further detail is included in the Design and Access Statement, Design and Access Statement Addendum and Application Drawings.

4.2. The revised description of development for the proposal is:

*“Subdivision and conversion of the Main House into 6no. residential units; demolition of the existing extension of the Main House and erection of a three storey ‘stable block’ building containing 28no. residential units; construction of a new dwellinghouse to the south-east (Orchard House); extension of Garden House to provide a new single storey dwelling; internal alterations to Cottage House to provide a new two storey dwelling; demolition of Conservatory building and replacement with a new two storey dwelling (Lake View House); and associated alterations to landscape, access and parking.”*

4.3. The Main House will be subdivided into six apartments (Use Class C3) in a mix of 1, 2 and 3 bed units, with two units proposed to each floor.

4.4. The existing 1980s extension to the Main House and the Stable Building will be demolished to allow for the erection of the new courtyard stable block. A total of 28 apartments (Use Class C3) in a mix of 1, 2 and 3 bed units are proposed over three floors (Ground Floor, First Floor and Second Floor). The building will be sited 20m from the Main House. Access will be provided from both Garden Level and Ground Floor with all residents having access to communal courtyard amenity space as well as balconies.

4.5. Cottage House will be converted into a 3 bed two storey dwelling (Use Class C3). Internal alterations are proposed.

4.6. The Conservatory is to be demolished to facilitate the erection of a new 4 bed two storey dwelling (Use Class C3) named ‘Lake View House’.

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4.7. A new 4 bed two storey dwelling (Use Class C3) named 'Orchard House' is proposed on the southern border of the site.

4.8. Garden House is to be extended and converted into a 3 bed single storey dwelling (Use Class C3).

## Housing Mix and Quality

4.9. **Table 3** below shows the proposed housing mix.

	1 Bed	2 Bed	3 Bed	4 Bed	TOTAL
<b>Main House</b>	2	2	2	-	<b>6</b>
<b>Stable Block</b>	12	8	8	-	<b>28</b>
<b>Cottage House</b>	-	-	1	-	<b>1</b>
<b>Lake View House</b>	-	-	-	1	<b>1</b>
<b>Orchard House</b>	-	-	-	1	<b>1</b>
<b>Garden House</b>	-	-	1	-	<b>1</b>
<b>TOTAL</b>	<b>14</b>	<b>10</b>	<b>12</b>	<b>2</b>	<b>38</b>
<b>TOTAL %</b>	<b>37%</b>	<b>26%</b>	<b>32%</b>	<b>5%</b>	<b>100%</b>

4.10. All dwellings will meet London Plan housing quality standards, including internal space standards.

## Access and Parking

4.11. The existing site access off Rickmansworth Road will be retained. A shared surface driveway will connect



the site access to the proposed dwellings and internal footways.

- 4.12. A total of 61 car parking spaces will be provided within the site, of which 20% will have access to active electric vehicle charging provision and all others (80%) will be provided with passive provision.
- 4.13. Three covered and secure cycle stores will provided parking space for 76 bicycles.

## **Landscape**

- 4.14. The landscape proposals are fully detailed within the Landscape Design Strategy and accompanying drawings which are submitted as part of this application. In summary, the landscape features include:
- Reinstatement of the original vehicular link to the front of the Main House;
  - Retention and reinforcement of the circuit walk giving access to the gardens;
  - Retention and emphasis of former kitchen garden area;
  - Restoration of the drive to its earlier alignment;
  - Restoration and enhancement of parkland elements; and
  - Retention of the existing tennis lawns as an informally managed grassland for residents' recreation.

## **Comparison to 2016 Planning Permission**

- 4.15. This section of the Town Planning Statement makes a comparison between the extant planning permission (refs: 28301/APP/2013/3104 and 28301/APP/2013/3105) and the proposed scheme.
- 4.16. The Main House has planning permission to be converted to a single dwelling unit. This application proposes for the Main House to provide 6 residential apartments.
- 4.17. The 2016 Planning Permission retains the existing extension and stable block and converts them into a total of 19 units. In comparison, this application proposes to demolish the extension and existing stable block and rebuild a 'new stable block' consisting of 28 residential units.

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- 4.18. The other buildings within the site will also encounter change from the 2016 Planning Permission. The restoration of Cottage House will remain mainly the same, with minor changes to the external façade and reconfiguration of the ground floor plan.
- 4.19. The design of Orchard House has been revised to better reflect the architectural approach to the scale and massing of the stable block.
- 4.20. The layout of Lake View House has been amended to better reflect the site context and to use the footprint of the existing conservatory on-site, whilst amalgamating the other small structure on-site into the design to serve as a garage.
- 4.21. Overall this application proposes an increase of 14 units on site.
- 4.22. **Table 4** provides an overview of the existing, approved and proposed floor space calculations for the site.

	Existing		2016 Planning Permission		2022 Submission		Proposed 2025 Revision	
	Floorspace (sqm)	Volume (m3)	Floorspace (sqm)	Volume (m3)	Floorspace (sqm)	Volume (m3)	Floorspace (sqm)	Volume (m3)
<b>Main House</b>	1,260	4,284	1,260	4,284	1,260	4,284	1,260	4,284
<b>Stable Block</b>	2,600	7,410	2,670	7,610	3,180	9,063	2,866	8,869
<b>Conservatory (Lake View House)</b>	70	189	220	594	265	716	219	688
<b>Garden House</b>	110	374	170	459	170	459	170	459

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<b>Clock Tower</b>	635	1,810	540	1,458	-	-	-	-
<b>Cottage House</b>	185	527	135	365	135	365	135	365
<b>Orchard House</b>	-	-	250	675	250	675	250	675
<b>TOTAL</b>	<b>4,860</b>	<b>14,594</b>	<b>5,245</b>	<b>15,444</b>	<b>5,260</b>	<b>15,561</b>	<b>4,900</b>	<b>15,340</b>

## 5. Planning Policy Context

- 5.1. The development proposals for the site have taken account of relevant national, regional and local planning policy and guidance. This section of the Statement sets out a brief summary of the relevant planning policy documents, whilst the following section demonstrates compliance with the policies contained within.
- 5.2. Section 38(6) of the Planning and Compulsory Purchase Act 2004 (as amended) requires that development proposals be determined in accordance with the development plan, unless material considerations indicate otherwise.
- 5.3. For the purposes of Section 38(6) the Development Plan for LBH, in so far as is relevant to the proposals, comprises the following:
- The London Plan (2021);
  - Hillingdon Local Plan Part 1: Strategic Policies (2012);
  - Hillingdon Local Plan Part 2: Development Management Policies (2020); and
  - Hillingdon Local Plan Part 2: Site Allocations and Designations (2020).
- 5.4. Other material considerations include:
- The National Planning Policy Framework ('NPPF') (2024);
  - Planning practice guidance ('PPG');
  - Supplementary planning guidance ('SPG's) and supplementary planning documents ('SPDs');
  - Relevant emerging policy and guidance; and
  - Other site specific circumstances.

### **National Planning Policy Framework**

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- 5.5. The NPPF sets out the Government's planning policies for England and is a material consideration in determining planning decisions. The NPPF was most recently updated in December 2024, superseding previous versions.
- 5.6. At the heart of the NPPF is a presumption in favour of sustainable development (paragraph 11). In order to achieve sustainable development, the planning system is said to have three overarching objectives which are interdependent and need to be pursued in mutually supportive ways, these are:
- An economic objective;
  - A social objective; and
  - An environmental objective.
- 5.7. For decision making, the presumption in favour of sustainable development means that development proposals that accord with an up-to-date development plan should be approved without delay.
- 5.8. The NPPF seeks to support the Government's objective of significantly boosting the supply of homes through provision of a sufficient amount and variety of land (paragraph 61). Planning decisions should promote an effective use of land in meeting the need for homes and other uses, while improving the environment and ensuring safe and healthy living conditions (paragraph 124).
- 5.9. Paragraph 125 encourages planning decisions to promote the development of underutilised land and buildings, especially where this would help to meet identified needs for housing where land supply is constrained. Paragraph 129 and 130 states that planning decisions should support development that makes efficient use of land, while also creating beautiful and sustainable places.
- 5.10. Section 8 contains policies which promote healthy and safe communities and identifies the important role the planning system has in facilitating social interaction and creating healthy, inclusive communities.
- 5.11. Paragraph 116 states the development should only be prevented or refused on highway grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe. Within this context, applications for development are required to give priority

first to pedestrian and cycle movements; address the needs of people with disabilities and reduced mobility; create places that are safe, secure and attractive; and allow for the efficient delivery of goods, and access by service and emergency vehicles (paragraph 117).

5.12. Good design and the creation of high quality, beautiful buildings and places is a key aspect of sustainable development (paragraph 131) and development should be sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (paragraph 135).

5.13. As set out at paragraph 143, the Green Belt serves five purposes:

1. To check the unrestricted sprawl of large built-up areas;
2. To prevent neighbouring towns merging into one another;
3. To assist in safeguarding the countryside from encroachment;
4. To preserve the setting and special character of historic towns; and
5. To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

5.14. As per, paragraph 153, inappropriate development is, by definition, harmful to the Green Belt. Exceptions to inappropriate development are given at paragraphs 154 and 155 and include, amongst others, (Paragraph 154 (g)) the partial or complete redevelopment of previously developed land, which would not have a greater impact on the openness of the Green Belt than the existing development.

5.15. Section 14 contains policies which are designed to ensure that the planning system supports the transition to a low carbon future in a changing climate. Paragraph 164 encourages new development to: avoid increased vulnerability to the range of impacts arising from climate change; and help to reduce greenhouse gas emissions.

5.16. Paragraph 193 requires opportunities to improve biodiversity in and around developments to be integrated, especially where this can secure measurable net gains for biodiversity.

5.17. When considering the impact of a proposed development on the significance of a designated heritage

asset, paragraph 199 states that great weight should be given to the asset's conservation, and the more important the asset, the greater the weight should be.

- 5.18. When considering the impact of a proposed development on the significance of a designated heritage asset, paragraph 212 states that great weight should be given to the asset's conservation, and the more important the asset, the greater the weight should be.

## London Plan

- 5.19. The London Plan, published March 2021, provides the spatial development strategy for London which deals with matters of strategic importance to Greater London. The London Plan is based upon three principle purposes for the Greater London area:

- Promoting economic development and wealth creation;
- Promoting social development; and
- Promoting the improvement of the environment.

- 5.20. **Policy H1** sets out a ten-year housing delivery target for LBH of 10,830 new homes. In order to achieve the housing targets, **Policy H1 B(2)** seeks to optimise the potential for housing delivery on all suitable and available brownfield sites.

- 5.21. As outlined by **Policy H4** and **Policy H5**, the strategic target is for 50% of new homes delivered to be affordable with the threshold level of affordable housing on gross residential development initially set at a minimum of 35%. Where an application does not meet the relevant affordable housing threshold, it must follow the Viability Tested Route and demonstrate that the maximum level of affordable housing is delivered.

- 5.22. Chapter 3 of the London Plan relates to design. **Policy D3** states the efficient use of land requires the optimisation of density, with consideration to local context, connectivity, planned infrastructure and capacity for growth.

- 5.23. In accordance with **Policy D6**, proposals must be of high quality design and meet, or exceed, the

nationally described space standards, as well as the additional internal and external space standards set out under the policy. Dual aspect dwellings are also favoured, while north-facing single aspect units are to be avoided.

- 5.24. Chapter 8 relates to green infrastructure and the natural environment. **Policy G1** and **Policy G5** require the inclusion of green infrastructure and urban greening as an integral part of development proposals. These can be achieved through design and landscaping. Proposals should meet a target Urban Greening Factor (UGF), to be set by each Borough. **Policy G6** requires a biodiversity net gain for development proposals.
- 5.25. **Policy G2** seeks to protect the Green Belt from inappropriate development.
- 5.26. Chapter 9 focuses on sustainable design and infrastructure, seeking the highest standards in order to improve the environmental performance of new developments and to adapt to the effects of climate change over their lifetime.
- 5.27. **Policies T5** and **T6** promote walking, cycling and set maximum parking standards for new development, outlining car-free development should be the starting point for well-connected development proposals, with developments elsewhere designed to provide the minimum necessary parking ('car-lite'). **Policy T6.1** provides maximum parking standards for residential development.

## Hillingdon Local Plan Part 1: Strategic Policies

- 5.28. The Hillingdon Local Plan: Part 1 - Strategic Policies document was adopted in November 2012 and provides the strategic context for the borough's policies.
- 5.29. **Policy H1** states that the Council will meet and exceed its minimum strategic dwelling requirement, against a target of 425 dwellings per year, significantly below the current London Plan target. **Policy H2** seeks that the affordable housing mix reflects housing needs in the borough on sites with capacity of 10 or more units.
- 5.30. In regards to heritage the local authority aims to '*conserve and enhance Hillingdon's distinct and varied*



*environment, its settings and the wider historic landscape*'. This is set out within **Policy HE1** and is achieved by encouraging the re-use and regeneration of such sites with a focus on listed buildings that are vacant or noted on the English Heritage's 'Heritage at Risk' register.

- 5.31. **Policy BE1** requires all new development to improve and maintain the quality of the built environment in order to create successful and sustainable neighbourhoods, where people enjoy living and working and that serve the long-term needs of all residents.
- 5.32. **Policy EM1** relates to climate change adaptation and mitigation and sets out a series of requirements to ensure that climate change mitigation is addressed at every stage of the development process.
- 5.33. Safeguarding open space, and existing tree and landscape features is prioritised under **Policy EMP4**.
- 5.34. **Policy EM2** outlines its compliance with policies relating to protection and enhancement of the Green Belt as set out in the London Plan.

## **Hillingdon Local Plan Part 2: Development Management Policies**

- 5.35. Hillingdon Local Plan: Part 2 – Development Management Policies was formally adopted in January 2020. It provides detailed development management policies that form the basis of the Council's decisions on individual planning applications.
- 5.36. **Policy DMH 2** states that provisions should be made for a mix of housing units of different sizes in schemes of residential development, including in particular units of three bedrooms. **Policy DMH 7** states that, subject to viability and if appropriate, a minimum of 35% of all new homes on sites of 10 or more units should be delivered as affordable housing.
- 5.37. **Policy DMHB 1** supports development that sustains and enhances the significance of heritage assets and puts them into viable uses consistent with their conservation. **Policy DMHB 2** states that applications which seek 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.

- 5.38. **Policy DMHB 11** states that all development will be required to be designed to the highest standards and to harmonise with the local context, responding to the scale of existing development and architectural composition amongst other things. **Policy DMHB 16** provides housing standards to ensure good quality living conditions.
- 5.39. **Policy DMHB 14** looks to retain or enhance existing landscaping, trees, biodiversity or other natural features of merit.
- 5.40. **Policy DMHB 18** sets private outdoor amenity space standards.
- 5.41. **Policy DMEI 4** relates to development in the Green Belt and aligns with national policy set out in the NPPF.
- 5.42. Chapter 8 relates to transport with parking standards set out at Appendix C.

## **Hillingdon Local Plan Part 2: Site Allocations & Designations**

- 5.43. The application lies within the Green Belt as identified in the Hillingdon Proposals Map. Aside from this, the site has no allocations or designations that are outlined in the Hillingdon Site Allocations and Designations policy document.

## 6. Planning Considerations

### Principle of Development

- 6.1. The principle of residential development on the site, including conversion of the Main House and retention / conversion of ancillary buildings, is established through the 2016 Planning Permission (LPA ref: 28301/APP/2013/3104). The principle of the conversion of the Main House to multiple apartments, demolition of the existing extension and construction of a new courtyard stable block has also been accepted by LBH officers as both part of the pre-application process and statutory consultation received to date. This is provided it can be demonstrated that the development does not amount to inappropriate development in the Green Belt, as discussed further below.

### Green Belt

- 6.2. Policy DMEI 4 of the Development Management Policies document and London Plan Policy G2 generally align with national guidance. That guidance is contained in chapter 13 of the NPPF which notes that the essential characteristics of Green Belts are their openness and permanence. Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. New buildings are generally inappropriate, but subject to a number of exceptions set out in paragraphs 154 and 155, including the limited infilling or the partial or complete redevelopment of previously developed land, provided the development has no greater impact on the openness of the Green Belt. Where it is demonstrated that a development proposal meets any one of these exceptions, development will be considered to have an acceptable impact in Green Belt terms.
- 6.3. Noteworthy also is that since the previous October 2023 revision, the updated NPPF (2024) has introduced greater flexibility in determining the use of Green Belt land, primarily to address housing shortages. This is chiefly from both the requirement for LPAs to review Green Belt boundaries if they cannot meet their local housing need (and have exhausted all options for development), and the introduction of the concept of a 'grey belt' for potential release for development. With the revised NPPF placing increased emphasis on meeting local housing needs, Green Belt land is now increasingly

associated with the ability of LPAs to meet such needs.

6.4. Policy DMEI 4 does provide additional guidance state that regard should be given to:

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

6.5. The site's planning history has established that the site constitutes previously developed land and, with the exception of the Entrance Lodges which do not form part of this application, the construction of new buildings set around a large courtyard would represent infill development. These conclusions were first set out at paragraph 9 of the 2014 appeal decisions (APP/R5510/A/13/2204776, APP/R5510/E/13/2204766).

6.6. Responding both to the GLA's Stage 1 Planning Report and LBH Officer comments, a Landscape and Green Belt Assessment, prepared by James Blake Associates, was submitted in 2023 to fully consider the potential impact on the openness of the Green Belt. In quantitative terms, this assessment demonstrates that the revised proposals constitute a 27% reduction to the existing building footprint. As such, in regard to paragraph 149 of the NPPF, exceptions to the Green Belt and '*(g) limited infilling or the partial or complete redevelopment of previously developed land*', the proposal would not therefore have a 'greater impact on the openness of the Green Belt than the existing development'.

6.7. The development would also see a reduction in hard surfacing, particularly through alterations to the existing large car park which would be softened by a central landscaped courtyard and amenity planting between the new stable block and Main House as well as to the west of the stable block. The harmful impact the use of the hard surfacing for car parking would have on openness was highlighted in the 2014 appeal decisions (paragraph 14) and the current proposals would achieve a reduction in car parking spaces from 120+ to 75 spaces, thus providing a distinct beneficial visual effect on openness which would

further outweigh the limited impact through additional built form.

- 6.8. Planning practice guidance also notes that impact on openness requires a consideration of the degree of activity likely to be generated, such as traffic generation. The last use of the site as offices is itself considered an inappropriate use in the Green Belt. Office use generates high trip numbers, on-site parking and general activity at the site. In comparison, the change of use of the site to residential would see a reduction, or at least comparable, impact in terms of activity.
- 6.9. As concluded within the site's submitted Landscape and Green Belt Assessment, it is considered that the proposals would constitute limited infilling and partial redevelopment of a previously developed site which actually provides the opportunity to improve the openness, in Green Belt terms, across the site. This is from a marked reduction in built form footprint, and restoration of the dominance in the landscape grounds of the Listed Mansion House. It is considered that this development represents a 'localised' improvement on the openness of the Green Belt with no effect on the wider designated Green Belt or harm to the five purposes of the Green Belt.
- 6.10. Further, such conclusions from the Green Belt Assessment were based on the October 2023 revision which as detailed in Section 3 of this Town Planning Statement, have seen a marked reduction in the scale and massing of the Stable Block and the site's outbuildings. This is considered to therefore further reduce the impact on the openness of the Green Belt.
- 6.11. Planning practice guidance states that openness is capable of having both spatial and visual aspects. In terms of the spatial impact of the development, Policy DMEI 4 also refers to the height, bulk and footprint of buildings. The proposals relating to the Main House and stable block buildings would represent a minor reduction in both floor space and volume compared to the existing built form and that approved under the 2016 Planning Permission. As demonstrated in **Table 4**, taking the development as a whole i.e. including the additional curtilage buildings, the development would represent a c. 7% decrease in floor space and 1% decrease in volume across the site, amendments therefore not materially different to the 2016 Planning Permission.
- 6.12. The height of new built form would remain below the clock tower of the existing Stable Building, but would

be approximately 1.34m taller than the stable block itself and 0.65m taller than the existing extension to the Main House. However, taken together and given their proximity to one another, the Main House, its extension, the Stable Building and other outbuildings represent a significant bulk and mass of built form in this part of the site. While the new stable block will be slightly taller than the buildings (albeit below the maximum height of the Stable Building), the building would be set below the ridge of the Main House and has been designed to be subservient to it. The development would represent a reduction in bulk and massing through the provision of a 20m separation to the Main House, providing relief from built form and a parcel of land returned to open land.

6.13. Turning to the visual aspects of the development and taking account Policy DMEI 4, the proposed buildings would remain set around a central courtyard, restricting built form to the part of the site currently developed and, subject to minor re-siting of Lake View House, in conformity with the 2016 Planning Permission. The distribution of buildings and developed proportion of the site would therefore have no greater impact on openness. Of particular note, the new stable block would be located within the footprint of the existing Main House extension and Stable Block, thus limiting any additional visual impact of the development on the Green Belt.

6.14. The development is therefore compliant with the exception to inappropriate development listed at NPPF paragraph 154(g), Policy DMEI 4 of the Hillingdon Local Plan Part 2: Development Management Policies document and London Plan Policy G2. Given that the development does not constitute inappropriate development it is not deemed to be harmful to the Green Belt and is acceptable in this regard.

## **Heritage, Design and Landscape**

6.15. The application is accompanied by a Heritage Statement, Design and Access Statement Addendum, and Landscape Design Strategy which should be read in conjunction with this section.

6.16. The conversion and refurbishment of the Main House will see the retention and repair of the building's important features, such as staircase and the broad form of the main rooms. The property will be returned to its original purpose as residential accommodation which constitutes the building's optimum use and both limits necessary alterations and enhances its significance.

- 6.17. The demolition of the 1980s extension, including glazed link to the Main House will provide a considerable benefit in heritage terms. The link to the Main House is resulting in adverse impacts to the building fabric of Main House and its removal will remove the source of damage and water ingress to the building fabric. The extension itself is dominating on the Main House and its design does not respond to the House but overwhelms it. The removal of the extension will reinstate the Main House as a freestanding building and the proposed new stable block has been designed to respond to the scale and detail of the previous stables, without being a pastiche to them. The siting of the new stable building some 20m from the Main House is a very significant benefit of the proposals as it allows the south elevation of the House to be fully appreciated once more and for the listed asset to be the dominant building across the wider landscaped grounds.
- 6.18. Works to the curtilage buildings would bring these buildings back into a viable use and any minimal impact to the building fabric would be clearly outweighed by the benefits of securing the long-term retention of the buildings.
- 6.19. While the grounds are not listed, they provide the curtilage and setting of the heritage asset. As such, responding to both the GLA's and Historic England's comments received in 2023, it is considered that the revised design of the Stable Block renders it a '*subtler foil*' to the Listed Main House. This aspect has been enhanced furthermore through the creation of formal landscaping and recreational facilities in proximity of the Main House and expansion of a natural landscaping buffer between the two buildings comprising wooded vegetation.
- 6.20. Further, the Green Belt Assessment concludes that the revised scheme positively opens up the space immediately around the historic listed mansion house, through the proposed demolition of the 1980's office block. Through opening up this c. 20m separation distance between the main house and the new stable block, the setting of the listed building would be enhanced by restoring the historic listed mansion house as once again the dominant building in the wider landscape grounds, with the Stable Block subservient. These substantial heritage benefits are further achieved by the comparative building heights as discussed above.

- 6.21. Overall, the proposals implement both a reuse of the Listed Main House welcomed by the GLA and Historic England, and an overall beneficial impact on the designated heritage asset, with any minor harm, which would be at the lower end of the 'less than substantial' scale, being considerably outweighed by the benefits of the scheme. This is in accordance with NPPF paragraph 214 and Policies DMHB 1 and DMHB 2 of the Local Plan Part 2: Development Management Policies, as well as design related policies set out in the Development Plan.

## **Housing Mix**

- 6.22. Policy DMH 2 requires the provision of a mix of housing units of different sizes to reflect the Council's latest information on housing need. The Council's current evidence indicates a borough-wide requirement for larger units, particularly 3 bedroom properties, and this was also noted by officers through pre-application discussions.
- 6.23. The proposed housing mix is set out at Table 3 and will achieve 37% family (3B+) units across the site. The housing mix has sought to optimise the number of family units, whilst balancing the impact a high proportion of family units would have on the internal layout of the Main House, and openness of the Green Belt through potential increased pressure for car parking, outdoor play / amenity space, etc. The development will provide a series of traditional family houses through repurposing of the curtilage buildings, and a good mix of 1, 2 and 3 bed apartments to deliver a choice of housing typologies and optimise the use of the site.

## **Affordable Housing**

- 6.24. The application proposals are for a 100% market unit scheme. In accordance with London Plan Policy H5 and Development Management Policies Policy DMH 7, this application is accompanied by a Viability Assessment which was submitted in October 2023 and demonstrated that the maximum level of affordable housing deliverable on this scheme is nil. The application scheme will be subject to relatively high build costs, exacerbated by the significant costs that will be incurred in order to bring the historic buildings back into use.



## Residential Quality

- 6.25. All of the proposed homes have been designed to be of high quality in terms of internal layout and design, having regard to standards set out in the London Plan and Local Plan, and all will meet or exceed minimum internal space standards.
- 6.26. Policy DMHB 18 of the Development Management Policies requires amenity space to be provided in accordance with the standards set out in Table 5.3 of the Plan. For flats, 1, 2 and 3 bedroom units should be provided 20, 25 and 30sqm of amenity space respectively. For 3 bed houses 60sqm is required and for 4 bed houses 100sqm.
- 6.27. The proposals are set in extensive landscaped grounds which will provide far in excess of the minimum amenity space requirements. In addition to the wider grounds, each unit will be provided with access to private or communal amenity space, and all homes within the stable block will have access to its own balcony. Opportunities for play have also been incorporated into the landscape, including the reinstatement of the woodland walk and sports pitches.
- 6.28. The subdivision of the Main House does not raise any issues in terms of residential amenity, privacy or daylight and sunlight considerations. Paragraph A1.23 of the Development Management Policies document states that adequate distances should be maintained to any area from which overlooking may occur, with a guide that facing habitable room windows should be separated by a minimum of 21m. The proposed new stable block will be sited 20m from the Main House, which when taking account level and height differences between the buildings, would not give rise to overlooking issues. The internal stable block windows will face onto the courtyard and would be separated by 16.5m. Please note that only bedroom windows face onto this internal courtyard, with all main living rooms situated on the external faces of the Stable Block.
- 6.29. Responding to the GLA's Stage 1 Report received in 2023 which raised concern regarding the internal daylight / sunlight levels of the Stable Block's lower ground floor homes, a revised Internal Daylight Assessment was prepared by T16 Design and submitted as part of the updated pack in 2023. This concluded that all habitable rooms within the Stable Block have levels of natural light in excess of the

minimum standards and that future occupants will enjoy a well-lit environment with reduced reliance on artificial lighting.

- 6.30. Further, an addendum to this Internal Daylight Assessment, prepared by T16 Design, is submitted alongside this Planning Statement and demonstrates that the units comprising the revised Stable Block continue to meet daylight guidance levels and be therefore acceptable in planning terms.

## Transport

### Access

- 6.31. The existing site access off Rickmansworth Road will be retained. The revised Transport Statement submitted with the application demonstrates that the existing site access operates safely and provides suitable visibility splays to serve the development, including refuse vehicles and emergency vehicles.

### Parking Provision

- 6.32. A total of 61 car parking spaces will be provided on-site, comprising 57 residents space, plus 4 spaces for use by visitors.
- 6.33. The site is located in a PTAL 0 area and the London Plan states a maximum car parking standard of 1.5 spaces per dwelling for residential developments in such Outer London areas. This standard allows a maximum parking provision of 57 car parking spaces within the proposed development and therefore the proposals are compliant. The marginal increase above these standards is considered reasonable given the low PTAL rating of the site and its location in a rural area on the fringe of Outer London.
- 6.34. 20% of the proposed car parking spaces will have access to active electric vehicle charging provision, and all other spaces will be provided with passive provision in accordance with the London Plan.
- 6.35. Three covered and secure cycle stores will provide parking for 76 bicycles. The London Plan states a minimum cycle parking standard of 1.5 spaces per 1 bed unit and 2 spaces per all other sized units. For the proposed apartments within the Main House and new stable block the policy sets a minimum

requirement for 63 cycle parking spaces, as the cycle parking for the 4 detached houses will be accommodated within garden sheds. The proposals are compliant with cycle parking standards.

## Trip Generation

- 6.36. The revised Transport Statement concludes that the proposed development would generate similar levels of traffic movements during typical weekday peak periods as the 2016 Planning Permission. This level of traffic equates to approximately one traffic movement to/from site every three minutes at peak hours which is considered to be a minimal impact. The development will therefore not have any significant material impacts on the operation of the local highway network.

## **Flood Risk and Drainage**

- 6.37. The site is situated wholly within Flood Zone 1 and is at very low risk of surface water flooding. The use of the site for residential is therefore compliant with national, regional and local planning policy relating to flood risk.
- 6.38. An indicative drainage strategy for the development is provided in the accompanying Flood Risk Assessment. The strategy demonstrates a proposed layout of SuDS to provide sufficient source control and storage to avoid flooding within the site during all storms up to and including the 1 in 100 year storm event, plus 40% allowance for climate change. It is anticipated that planning permission would be subject to submission of a detailed drainage strategy.

## **Trees and Biodiversity**

- 6.39. The application is accompanied by an Arboriculture Impact Assessment which concludes that the proposals will improve and enhance the existing treescape on site, with only poor quality trees requiring removal for development purposes. This is fully compliant with Policy DMHB 14 of the Development Management Policies document and Policy G7 of the London Plan.

## **Energy and Sustainability**

- 6.40. Responding to the GLA's comment, a revised Energy Statement was submitted as part of the updated pack in 2023 which outlined both the proposed specification for the development and the resultant savings against each stage of the energy hierarchy, namely 'Be Lean', 'Be Clean', 'Be Green' and 'Be Seen'.
- 6.41. This Statement demonstrated how a 35% reduction in carbon emission is achieved through solar passive design measures and energy efficiency measures, detailed further within this technical report. In accordance with both the London Plan and Local Plan requirements, a fabric-first approach realises considerable savings against the current Building Regulations baseline.
- 6.42. In accordance with London Plan Policy SI2 and as raised by the GLA Stage 1 Report, a Whole Life-cycle Carbon Assessment was produced and submitted as part of the updated pack in 2023.
- 6.43. Responding to the GLA's comments, a revised Circular Economy Statement was also submitted as part of the updated 2023 pack assessing the proposal against the requirements of the latest Mayoral guidance document (March, 2022) and against London Plan Policy SI7.
- 6.44. This Statement concludes that the proposals will avoid unnecessary materials use arising from over specification without compromising structural stability, durability or the service life of the building. This will be achieved through reduced material usage in the buildings design; encouragement for the reuse of existing materials and those with higher levels of recycled content; and an improved understanding of alternative design and construction methods that result in lower material usage and waste levels.
- 6.45. Furthermore, the Circular Economy Statement details the Sustainable Procurement plan which will be developed for the proposal to set out its clear framework for the responsible sourcing of construction products to guide procurement by all those involved throughout the project.

## **Overheating**

- 6.46. An overheating assessment was submitted as part of the updated pack in 2023. This ran a thermal modelling assessment for the residential units comprising the Stable Block. From the simulations undertaken, these concluded that the proposal is compliant with all regulatory and planning requirements with regard to mitigating overheating risk, including Part O of the Building Regulations and the cooling

hierarchy and assessment guidance of both the GLA and LBH.

## **Waste and Recycling**

- 6.47. Refuse and recycling provision has been provided in two locations on-site to serve the residents of the Main House and the new stable block. The external bin storage will be in a sheltered, secure environment which fully complies with the requirements set out in Policy DMHB 11 of the Development Management Policies document and Policy D6 of the London Plan.

## **Fire Safety**

- 6.48. As concluded in the GLA Stage 1 Report, the Fire Statement comprising the 2022 submission demonstrates how the development will comply with London Plan Policy D12. This report remains appropriate to the revised proposals and should therefore be considered alongside them and retained as a live document comprising this application.

## 7. Conclusions

- 7.1. This Town Planning Statement has been prepared on behalf of Comer Homes Group to support an application for full planning permission and listed building consent for the redevelopment of Harefield Grove to provide 38 residential dwellings through conversion of existing buildings and new build development.
- 7.2. The redevelopment of the site for residential purposes has been established through the site's planning history, with planning permission being granted most recently in 2016 for 24 homes. The 2016 Planning Permission has been implemented.
- 7.3. The current proposals will achieve a viable form of development that ensures the restoration and preservation of the site's heritage assets, whilst not resulting in additional harm to the Green Belt. The demolition of the existing 1980s extension which overwhelms and is adversely affecting the building fabric of the Main House represents a considerable benefit. Similarly, the reuse of the Main House for residential use, its original purpose, is the optimum use of the building and enhances its significance. Associated works to improve landscaping of the grounds will enhance the significance of the heritage assets.
- 7.4. The proposals have been shown to not constitute inappropriate development in the Green Belt and in turn are not harmful to the Green Belt.
- 7.5. The report demonstrates that no significant adverse impact would occur to amenity and local character and the development would deliver good quality residential accommodation which complies with relevant standards.
- 7.6. The proposal has been assessed against the planning policy context and has been found to accord with both national, regional and local planning policies and guidance and planning permission should therefore be granted without delay in accordance with NPPF paragraph 11.