

## **TOWN AND COUNTRY PLANNING ACT 1990 (AS AMENDED)**

### **PLANNING, DESIGN AND ACCESS STATEMENT**

Demolition of existing buildings and erection of new staff facilities  
with education hub and recycling stalls and associated alterations

### **THE BUNGALOW, NEW YEARS GREEN LANE, HAREFIELD, LONDON UB8 6LX**

REFERENCE: 2022/D/334/P

AUGUST 2022 – VERSION 1



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**Members of the Royal Town Planning Institute**

Registered in England 7911049 at 32 Woodstock Grove, Shepherds Bush, London W12 8LE

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## **1 SITE AND SURROUNDINGS**

- 1.1 The application site is a previously developed land in the Green Belt and it comprises a detached bungalow previously used by a farmer who passed away in 2008. Then the entire site reverted to London Borough of Hillingdon. Since then, the site has been vacant and suffered frequent fly tippers, anti-social behaviours, unauthorised intruders, etc. There are also outbuildings which were used as stables by the previous farmer and are in very poor and structurally unsound condition currently. There are also existing hardstanding areas across the site.
- 1.2 The surrounding area is predominantly undeveloped but the directly adjacent site to the west is the Civic Amenity Site and Recycling Centre. The application site temporarily accommodated a Civic Amenity Facility for a year for use during the redevelopment of the Civic Amenity Site and Recycling Centre in early 2010s.
- 1.3 The application site is not located in a Conservation Area and there are no listed buildings on-site. Although there are Grade II Listed Buildings to the south of the site, these are located well away from the application site and heavily screened by landscaping and therefore the application site would not form the setting of these Grade II Listed Buildings.
- 1.4 The application site is located in the Flood Risk Zone 3.

## **2 RELEVANT PLANNING HISTORY**

- 2.1 In July 2010, planning permission 29665/APP/2010/617 was granted in relation to the construction of a temporary Civic Amenity Facility for use during redevelopment of the Harefield Civic Amenity Site including temporary change of use of bungalow to office and staff welfare facility. This planning permission was a temporary permission for a year.

## **3 PROPOSED DEVELOPMENT**

- 3.1 Demolition of existing buildings and erection of new staff facilities with education hub and recycling stalls and associated alterations.

## **4 PLANNING POLICY**

- 4.1 National Planning Policy Framework (2021)
- 4.2 London Plan (2021)
- 4.3 Hillingdon Strategic Policies (2012)
- 4.4 Hillingdon Development Management Policies (2020)

## **5 COMMENTS**

### USE

#### *Provision of proposed development at loss of housing*

- 5.1 Policy H8 of the London Plan (2021) and Policy DMH 1 of the Development Management Policies (2020) note that the loss of existing housing would be resisted and should be replaced by at least equivalent residential floorspace.
- 5.2 However, Paragraph 4.5 of the Development Management Policies (2020) also notes that the Council recognises that exceptional circumstances may exist which outweigh the loss of residential units and each case for exceptional circumstances will be assessed on its merits.
- 5.3 The existing bungalow has not been used for residential purposes for well over a decade and it is no longer fit for purpose (see below image). As such, the proposed development would not necessarily result in the loss of existing housing in real terms.

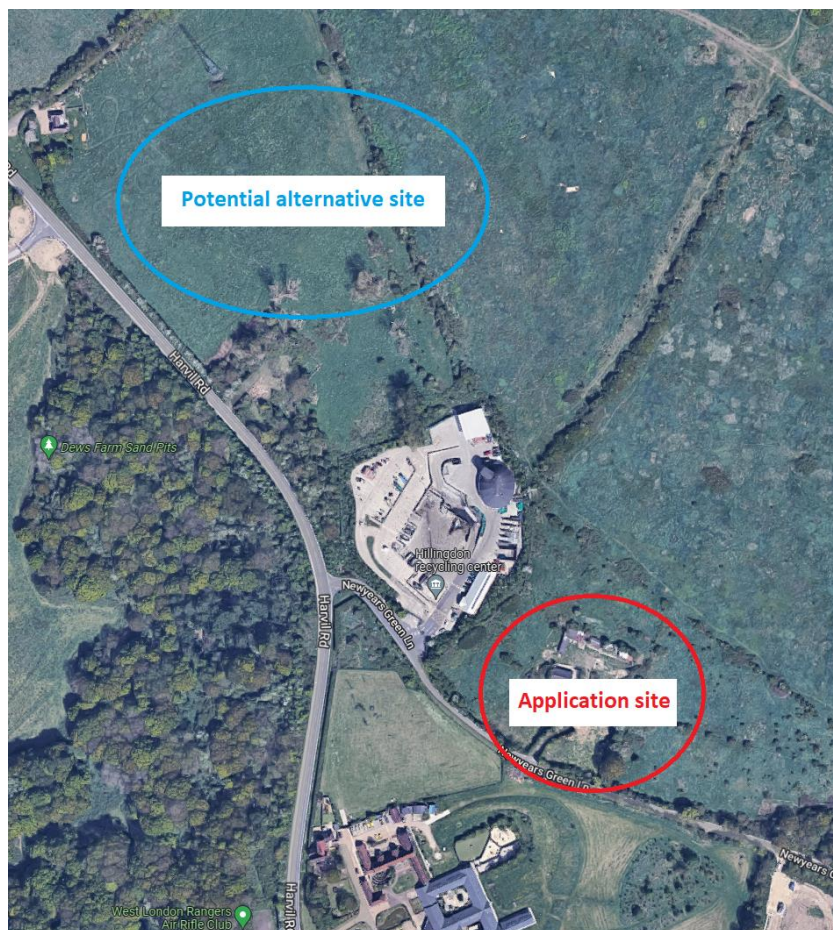


- 5.4 Furthermore, there is a significant need for the proposed development because the demand for household waste and recycling at the Civic Amenity Site and Recycling Centre have increased to the extent that the traffic frequently queue into Harvil Road. The relocation of the ancillary staff facilities and car parking to the adjacent site will release space to increase more recycling area and safe traffic flow, whilst also bringing back the long-term vacant site back into active use.
- 5.5 The proposed development would generate increased employment opportunities of circa 15 full time jobs.
- 5.6 As such, there are exceptional circumstances that outweigh the loss of the existing bungalow in line with the Paragraph 4.5 of the Development Management Policies (2020).

#### *Flood risk*

- 5.7 In accordance with the National Planning Policy Framework (2021) and Policy DMEI 9 of the Development Management Policies (2020), the use of the application site for the proposed development would be subject to the Sequential Test and the Exception Test due to the site being located in the Flood Risk Zone 3.
- 5.8 Paragraph 162 of the National Planning Policy Framework (2021) states that the aim of the sequential test is to steer new development to areas with the lowest risk of flooding from any source. It goes on to note that development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding.
- 5.9 The proposed development is needed to provide additional facilities that are functionally linked to the Civic Amenity Site and Recycling Centre. This means that the potential sites for the proposed development must be physically adjacent to the Civic Amenity Site and Recycling Centre to satisfy the Applicant's operational and functional requirements.
- 5.10 Given that this area is widely subject to the Flood Risk Zone 3, the only potential alternative site with a lower risk of flooding than the application site is the undeveloped greenfield site located to the northwest of the

Civic Amenity Site and Recycling Centre (see below image). However, this potential alternative site is also in the Green Belt and it is not a previously developed land. As such, the proposed development at this potential alternative site would be inappropriate development and this site would therefore not be a reasonably available site appropriate for the proposed development as described in the Paragraph 162 of the National Planning Policy Framework (2021). In this context, the only reasonably available site appropriate for the proposed development is the application site. Therefore, the application site is the most sequentially preferable as there are no other sequentially preferable sites. On this basis, the Sequential Test is passed.



- 5.11 Given that the Sequential Test is passed with an identified risk of flooding, the use of the application site for the proposed development would be acceptable if the Exception Test is also passed. Paragraph 164 of the National Planning Policy Framework (2021) states that to pass the Exception Test it should be demonstrated that: a) the development would provide wider sustainability benefits to the community that

outweigh the flood risk; and b) the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall.

- 5.12 The proposed development would indeed deliver wider sustainability benefits to the community when compared to the current, poorly maintained vacant state of this derelict previously developed land. Some examples of the sustainability benefits as a result of the proposed development are listed below.

Economic:	<ul style="list-style-type: none"><li>- Increased employment opportunities</li><li>- Increased essential infrastructure provision</li></ul>
Social:	<ul style="list-style-type: none"><li>- Training and education opportunities</li><li>- Site rejuvenation to reduce anti-social behaviours</li></ul>
Environmental:	<ul style="list-style-type: none"><li>- Improved flood management via modern systems</li><li>- Site rejuvenation to repair local environment</li></ul>

- 5.13 Moreover, the proposed development would be safe for its lifetime without increasing flood risk elsewhere as outlined in the Flood Risk Assessment.

- 5.14 As such, the use of the application site for the proposed development would pass both the Sequential Test and the Exception Test in line with the National Planning Policy Framework (2021) and Policy DMEI 9 of the Development Management Policies (2020).

#### *Green Belt*

- 5.15 The National Planning Policy Framework (2021) and Policy DMEI 4 of the Development Management Policies (2020) notes that inappropriate development should not be approved in the Green Belt except in very special circumstances.

- 5.16 However, whilst Paragraph 149 of the National Planning Policy Framework (2021) notes that the construction of new buildings is to be treated as inappropriate in the Green Belt, it also sets out exceptions. One of the exceptions to inappropriate development is limited infilling or the partial or complete redevelopment of previously developed land,

whether redundant or in continuing use, which would not have a greater impact on the openness of the Green Belt than the existing development.

- 5.17 The proposed development would make use of the existing hardstanding areas at the application site. The proposed buildings would be built on the existing hardstanding areas and would not encroach on to undeveloped greenfield areas. The only small increase in the area of hardstanding would be improvements related to the safe ingress and egress of the site by way of the proposed link with the Civic Amenity Site and Recycling Centre which would use permeable gravel in any event. This is a small increase in hardstanding at ground level and would not have a greater impact on the openness of the Green Belt than the existing development.
- 5.18 The actual building footprint at the application site as existing is 563.9 sqm. The existing barn building (105 sqm) would be retained and the remaining buildings (458.9 sqm) would be demolished. The proposed buildings would have a total footprint of 650 sqm. As such, the net increase in the total building footprint arising from the proposed development would be only 191.1 sqm. In any event, this footprint increase would take place on the existing hardstanding areas at the application site. Therefore, the small increase in the building footprint would not materially increase the total area of hardstanding at the application site. Therefore, the small increase in the building footprint would not have a greater impact on the openness of the Green Belt than the existing development.
- 5.19 The proposed buildings would remain single storey structures and would not be materially taller than the existing buildings. In any event, the views into the application site are heavily screened by way of mature landscaping. In this context, the height of the proposed development would not have a greater impact on the openness of the Green Belt than the existing development.
- 5.20 As such, the proposed development would not be an inappropriate development in the Green Belt as it is a redevelopment of previously developed land which would not have a greater impact on the openness of the Green Belt than the existing development. This accords with the Paragraph 149 of the National Planning Policy Framework (2021).

### *Summary*

- 5.21 The use of the application site for the proposed development would be wholly acceptable in accordance with the relevant planning policy provisions, particularly given that the proposal would bring the long-term vacant site back into active use.

### SCALE

- 5.22 As discussed above, the scale of the proposed development would be contained within the existing hardstanding areas and would not be materially taller than the existing buildings. As such, the scale of the proposed development would not have a greater impact on the openness of the Green Belt.
- 5.23 Policy DMHB 11 of the Development Management Policies (2020) protect the amenity of neighbours.
- 5.24 The scale of the operation of the proposed development would not be overly intensive. The proposed development would offer up to 15 additional full time jobs, but, only up to 10 members of staff at any one time would likely be present at the proposed offices and the adjoining Civic Amenity Site and Recycling Centre. The proposed recycling stalls are for salvaging range of items, such as furniture, small electrical items, bikes that are in good condition and that can be repaired and sold to general public. The stalls would each have one or two members of staff and would have up to 30 visitors per week across 4 days on average. The proposed offices would only open Monday-Friday in line with the operating hours of the Civic Amenity Site and Recycling Centre and the proposed recycling stalls would open Monday-Sunday in line with the Civic Amenity Site and Recycling Centre although its weekend use is not anticipated to be popular.
- 5.25 As such, the scale of the operation of the proposed development would be proportionate and relatively modest. The site is not located adjacent to any noise or disturbance sensitive neighbours (e.g. residential houses) in any event. Therefore, the scale of the operation of the proposed development would be wholly acceptable as it would not be harmful to

neighbouring amenities in line with the Policy DMHB 11 of the Development Management Policies (2020).

#### AMOUNT

- 5.26 As discussed above, the actual building footprint at the application site as existing is 563.9 sqm. The existing barn building (105 sqm) would be retained and the remaining buildings (458.9 sqm) would be demolished. The proposed buildings would have a total footprint of 650 sqm. As such, the net increase in the total building footprint arising from the proposed development would be only 191.1 sqm. In any event, this footprint increase would take place on the existing hardstanding areas at the application site. Therefore, the small increase in the building footprint would not materially increase the total area of hardstanding at the application site. Therefore, the small increase in the building footprint would not have a greater impact on the openness of the Green Belt than the existing development.

#### LAYOUT

- 5.27 The submitted drawings show the layout of the proposed development.

#### LANDSCAPING

- 5.28 The overgrown landscaping at the application site would be regularly maintained and managed properly to establish a pleasant environment.

#### APPEARANCE

- 5.29 Policy DMHB 11 of the Development Management Policies (2020) promotes good design and seeks to ensure that all development is designed to the highest standards.
- 5.30 The proposed development would promote good design. Its design is functional and simple, yet it would also be architecturally proportionate and in keeping with the surroundings. It would also be modest in its appearance in the setting of the surrounding mature landscaping so as to preserve the openness of the Green Belt. The proposed development

would represent a significant architectural and visual improvement to the existing situation which is an unsightly, unmanaged long-term vacant site.

- 5.31 As such, the proposed development would improve the appearance of the application site and would have a positive impact on the character and appearance of the area in line with the Policy DMHB 11 of the Development Management Policies (2020).

### ACCESS

- 5.32 The existing access from New Years Green Lane would continue to be used and there would be an additional access that would link with the Civic Amenity Site and Recycling Centre. The car parking spaces would be increased to cater for the proposed development, using the existing hardstanding areas at the site. The car spaces would increase from 10 to 20 spaces, the light goods vehicle spaces from 5 to 7 spaces, the motorcycle spaces from 0 to 4, the disability parking spaces from 0 to 3, and there would also be 5 cycle parking spaces.

## **6 CONCLUSION**

- 6.1 The use of the application site for the proposed development would be wholly acceptable in terms of its loss of housing, flood risk and Green Belt designation, particularly given that the proposal would bring the long-term vacant site back into active use.
- 6.2 The scale of the proposed development would not have a greater impact on the openness of the Green Belt. The scale of the operation of the proposed development would be wholly acceptable as it would not be harmful to neighbouring amenities.
- 6.3 The proposed development represents good design. It would represent a significant architectural and visual improvement to the existing situation which is an unsightly, unmanaged long-term vacant site. It would have a positive impact on the character and appearance of the area.

- 6.4 The proposed development would provide sufficient car parking spaces to cater for the demand, using the existing hardstanding areas.
- 6.5 The proposal would be consistent with the aims and provisions of the Council's Development Plan.
- 6.6 The Council is respectfully requested to grant planning permission for the proposed development.