HILLINGDON
LONDON

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Our Ref: 41903/PRC/2017/59

Ggc Design Ltd
Cedar House
Vine Lane
Hillingdon
Middlesex UB10 0NF

Dear Ggc Design Ltd

RE: Demolition of existing bungalow and outbuildings and erection of a two store building to provide 4 x two-bed flats

SITE: 1 Alpha Road Hillingdon

I refer to your request for pre-application planning advice dated 12.4.17 and our subsequent meeting on 17 May 2017 relating to the above development. The advice provided is based on the following drawings and documents issued to the Local Planning Authority for consideration:

Plan Numbers:
1/AR/P/04 Rev. B - received 12 Apr 2017
1/AR/P/05 Rev. A - received 12 Apr 2017
1/AR/P/06 Rev. F - received 12 Apr 2017
1/AR/P/07 Rev. C - received 12 Apr 2017
1/AR/P/08 Rev. D - received 12 Apr 2017
1/AR/P/09 - received 12 Apr 2017
1/AR/P/03 Rev. B - received 12 Apr 2017
1/AR/P/02 Rev. A - received 12 Apr 2017

Outlined below is a preliminary assessment of the proposal, including an indication of the main issues that should be addressed should you choose to submit a formal planning application. Please note that the views expressed in this letter represent officer opinion only and cannot be taken to prejudice the formal decision of the Council in respect of any subsequent planning application, on which consultation would be carried out which may raise additional issues. In addition, the depth of analysis provided corresponds with the scope of information made available to Council officers.

The Site and Surrounds

The application site is located on the Northern side of Alpha Road and comprises a bungalow

with accommodation in the roof space. The site is bordered to the South East by 3 Alpha Road and to the North West by 32 Pole Hill Road (comprising two flats, one at ground level, the other at first floor). Along the rear boundary lies amenity space and a parking area for a block of flats (Pole Hill Court, 32A Pole Hill Road). The rear gardens of 28 and 30 Pole Hill Road and 15 and 17 Butler Street are located opposite the application site. The application site has a PTAL of 2.

The Proposal

The application seeks pre-application advice with regard to the demolition of the existing bungalow and outbuildings and erection of 4 x two-bed flats.

The application follows a refusal of application reference 41903/APP/2016/3865 for the erection of a two storey building to provide 4 x 2-bed self contained flats with associated parking and amenity space involving extensions to existing crossovers to front and demolition of existing bungalow which was refused for the following reasons:

1. The proposed two storey building by reason of its size, scale bulk and proximity, with inadequate separation distances between the proposed dwelling and the existing ground floor flat at 32 Pole Hill Road, would be detrimental to the amenities of the occupiers of this property by reason of overdominance, overshadowing, visual intrusion, loss of light and loss of outlook. Therefore the proposal would be contrary to policies BE19, BE20 and BE21 of the Hillingdon Local Plan: Part Two - Saved UDP Policies (November 2012) and the Council's adopted Supplementary Planning Document HDAS: Residential Layouts.

2. The proposed development by reason of the inadequate depth of the proposed parking spaces fails to provide sufficient off street parking provision which meets the councils approved parking standards to service the proposed dwellings. The development would therefore lead to additional on street parking, in an area where such parking is at a premium, to the detriment of public and highway safety and is therefore contrary to Policies AM7 and AM14 of the Hillingdon Local Plan: Part Two - Saved Unitary Development Plan Policies (November 2012), the Councils adopted car parking standards and the Council's adopted Supplementary Planning Document HDAS: Residential Layouts.

3. The proposed development by reason of the excessive width of the proposed crossovers, would make inadequate provision for pedestrian refuge and would therefore prejudice the safety of pedestrians and vehicles using the highway. As a result it would be contrary to policy AM7 of the Hillingdon Local Plan - Saved UDP Policies (November 2012) and the Council's adopted Supplementary Planning Document HDAS: Residential Layouts.

The current proposal seeks advice as to whether the refusal reasons have been overcome.

Planning Policy

The proposed development would be assessed against the Development Plan Policies contained within Hillingdon Local Plan: Part 1, Saved Unitary Development Plan policies, the London Plan 2015, the NPPF and supplementary planning guidance prepared by both LB Hillingdon and the GLA.

Part 1 Policies:

PT1.BE1	(2012) Built Environment

Other Policies:

AM7	Consideration of traffic generated by proposed developments.
AM14	New development and car parking standards.
BE13	New development must harmonise with the existing street scene.
BE15	Alterations and extensions to existing buildings

BE19	New development must improve or complement the character of the area.
BE20	Daylight and sunlight considerations.
BE21	Siting, bulk and proximity of new buildings/extensions.
BE22	Residential extensions/buildings of two or more storeys.
BE23	Requires the provision of adequate amenity space.
BE24	Requires new development to ensure adequate levels of privacy to neighbours.
BE38	Retention of topographical and landscape features and provision of new planting and landscaping in development proposals.
HDAS-LAY	Residential Layouts, Hillingdon Design & Access Statement, Supplementary Planning Document, adopted July 2006
LPP 3.3	(2016) Increasing housing supply
LPP 3.4	(2015) Optimising housing potential
LPP 3.5	(2016) Quality and design of housing developments
LPP 3.8	(2016) Housing Choice
NPPF1	NPPF - Delivering sustainable development
NPPF6	NPPF - Delivering a wide choice of high quality homes
NPPF7	NPPF - Requiring good design

Main Planning Issues

1. Principle of development

   In terms of the principle of the proposed development, there is no material objection to the replacement of an already established residential use on the site, and which is within an established primarily residential area.

   Subject to normal development control criteria, which have been assessed in the sections above and having regard to The London Plan (2016) and the Council's policies and guidelines, it is considered that the proposal would provide an increase in smaller to medium scale housing stock within an area of low public transport accessibility in the Borough.

   Therefore, the principle of new residential development in this location is considered to be acceptable.

2. Design

   Policy BE1 of the Hillingdon Local Plan (November 2012) requires that all new development achieves a 'high quality of design in all new buildings, alterations and extensions'. In addition, Policy BE13 of the Hillingdon Local Plan (November 2012) acknowledges that 'development will not be permitted if the layout and appearance fail to harmonise with the existing street scene'. The emphasis placed on the impact of a development upon the character of the surrounding area is further emphasised under Policy BE19 of the Hillingdon Local Plan (November 2012), which recognises that 'The Local Planning Authority will seek to ensure that new development within residential areas complements or improves the amenity and character of the area'. Paragraph 4.14 of the Residential Layouts HDAS SPD specifies that developments should incorporate usable, attractively laid out and private garden space conveniently located in relation to the property or properties it serves. It should be of an

appropriate size, having regard to the size of the dwelling and character of the area. Paragraph 4.27 of the HDAS SPD gives advice that building lines within a new development should relate to the street pattern of the surroundings whilst the height of the development is best determined by reference to the proportions, siting and lines of surrounding buildings.

The current building on the site is a single storey dwelling. The surrounding area is characterised by two-storey buildings with a mixture of terraced and semi-detached dwellings along with blocks of flats. The orientation and positioning of the proposed building would reflect the existing property with the front building line set back slightly from the existing front building line. The scale of the proposed development would be in keeping with the character of the surrounding area and would not appear as an overly dominant addition to the street scene. As a result it is considered that the proposed building would not have a negative impact upon the visual amenity of the site or the surrounding area in compliance with Policy BE1 of the Hillingdon Local Plan: Part One - Strategic Policies (November 2012) and policies BE13 and BE15 of the Hillingdon Local Plan: Part Two - Saved UDP Policies (November 2012).

3. Amenity

Policies BE20, BE21 and BE22 of the Hillingdon Local Plan: Part Two - Saved UDP Polices (November 2012) give advice that buildings should be laid out so that adequate daylight and sunlight can penetrate into and between them, and the amenities of existing houses are safeguarded.

Policies BE23 and BE24 of the Hillingdon Local Plan (Part Two) stress the importance of new buildings and extensions providing adequate amounts of external amenity space, that not only protects the amenity of the occupants of the proposed development, but also of those of the surrounding buildings, as well as protecting both parties privacy.

The Council's adopted HDAS SPD: Residential Layouts (July 2006) specifies in paragraph 4.9 that where a two or more storey building abuts a property or its garden, a minimum acceptable distance of 15 m should be maintained, so as to overcome possible over-domination, overbearing and overshadowing. Paragraph 4.11 of the HDAS SPD specifies that the Council's 45 degree principle will be applied and is designed to ensure that adequate daylight and sunlight is enjoyed in new and existing dwellings. The principle involves drawing a line from the mid-point of an existing/new window that is potentially affected by a new dwelling at an angle of 45 degrees towards the new building. Paragraph 4.12 of the HDAS SPD specifies that new residential development should be designed so as to ensure adequate privacy for its occupants and that of the adjoining residential property. It gives advice that the distance should not be less than 21 m between facing habitable room windows.

The previous application raised concerns in terms of the impact that the erection of the two storey building would háve on the light and outlook to the ground floor windows serving the lounge and dining area on the occupants of 32 Pole Hill Road. It is acknowledged that the roof of the proposed building has been amended to reduce the overall bulk of the building with the roof being hipped away from the boundary with this property. However the height, bulk and proximity remains similar to that which was previously considered unacceptable by the Council. It is noted that the outlook from the living room window and dining room window to this ground floor flat is currently restricted, but the increase in height and bulk of the building would have an unacceptable impact on the occupants.

The ground floor windows of the flats are located 5.8 m away from the side boundary of the site and 6.8 m away from the proposed flank elevation of the building. Given the orientation, the erection of a two storey building 6.8 m away from these windows would have a significant impact upon the levels of light and outlook enjoyed by the occupants of this ground floor flat. As such the proposal would result in an unneighbourly form of development in conflict with policies BE19, BE20 and BE21 of the Hillingdon Local Plan - Saved UDP Policies (November 2012) and the Council's adopted Supplementary Planning Document HDAS: Residential Layouts.

4. Highways

Policy AM7 of the Hillingdon Local Plan: Part Two - Saved UDP Policies (November 2012) considers whether the traffic generated by proposed developments is acceptable in terms of the local highway and junction capacity, traffic flows and conditions of general highway or pedestrian safety. Policy AM14 of the Hillingdon Local Plan: Part Two - Saved UDP Policies (November 2012) states that developments should comply with the Council's Car Parking Standards; 1.5 parking spaces are required per dwelling.

Alpha Road is an unclassified, residential road located a short walking distance from Uxbridge Road and its local shop parades and amenities. The speed limit is 30 mph. On-street parking is unrestricted; however, the streets surrounding the application site (also including Alpha Road itself) have narrow carriageways and experience high parking demand. As a result, local parking stress appears to be high. The PTAL for the site is 2, which is considered poor. The reason for this is the relatively long distance of the site from rail services. A number of local bus routes are available along the Uxbidge Road.

The Highways Officer has confirmed that the current proposed site layout is shown on drawing no. 1AR/P/06/ Rev F.
It is considered that the previous reasons for refusal from a highway perspective have now been overcome in that:
- All proposed parking bays have dimensions of 2.4 m x 4.8 m, in line with current standards;

- Parking bays 3 and 6 could potentially be used by blue badge holders, as it has a clear strip of pavement to the driver's side of sufficient width;

- The maximum length of the crossovers has now reduced to 4.8 m. While this still exceeds the maximum suggested by the council's technical guidance, a refusal solely on these grounds could not be sustained in appeal.

No objection is raised in Highway terms to the revised proposals which are considered to comply with policies AM7 and AM14 of the Hillingdon Local Plan - Saved UDP Policies (November 2012).

5. Other

On 25 March 2015, the Government introduced new technical housing standards in England, which comprise of new additional 'optional' Building Regulations on water and access, and a nationally described space standard (referred to as "the new national technical standards"). These new standards came into effect on 1 October 2015. The Mayor of London has adopted the new national technical standards through a minor alteration to The London Plan.

The Housing Standards (Minor Alterations to the London Plan) March 2016 sets out the minimum internal floor spaces required for developments in order to ensure that there is an adequate level of amenity for existing and future occupants. A two bedroom (3 person) flat is required to provide an internal floor area of 61 m2 which the proposal complies with. The habitable rooms on the ground floor would not comply with the council's minimum requirements of 15 m from a blank wall or fence. However, given that habitable rooms within the existing bungalow do not currently comply it is considered that a refusal on this ground would be difficult to justify in this particular case.

The Council's HDAS: Residential Layouts SPD establishes external amenity space standards for residential development. Flats with two bedrooms should be provided with a minimum of 25 square metres of amenity space. The proposal involves the provision of 4 x separate private amenity spaces to serve the proposed flats which meet this standard.

6. Planning Obligation and CIL (Mayor and LBH)

The Council adopted its own Community Infrastructure Levy (CIL) on August 1st 2014 and the Hillingdon CIL charge for residential developments is £95 per square metre of additional floorspace. This is in addition to the Mayoral CIL charge of £35 per sq metre.

7. Application Submission

List of documents to be submitted:
Application Form
Location Plan
Block Plan/Site Plan
Existing Floor Plan
Existing Elevations
Existing Roof Plan
Proposed Floor Plans
Proposed Elevations
Proposed Roof Plan
Designg & Access Statement
CIL Form

8. Conclusion

There is no objection in principle to the demolition of the existing building and the redevelopment of the site to provide additional residential units, in accordance with NPPF and Policy H3 of the Hillingdon Local Plan: Part Two - Saved UDP Policies (November 2012). The proposed units would comply with the internal floor space standards set out in Policy 3.5 and Table 3.3 of the London Plan (2016), would not result in an incongruous addition to the street scene and have overcome the previous concerns in terms of the parking layout. However, despite a reduction in the bulk of the roof, the concerns previously raised in terms of the the overshadowing and loss of outlook to the occupants of the ground floor flat in Pole Hill Court have not been fully and acceptably addressed. The proposed two storey building by reason of its size, scale bulk and proximity, with inadequate separation distances between the proposed dwelling and the existing ground floor flat at 32A Pole Hill Road, would be detrimental to the amenities of the occupiers of this property by reason of overdominance, overshadowing, visual intrusion, loss of light and loss of outlook. Therefore the proposal would be contrary to policies BE19, BE20 and BE21 of the Hillingdon Local Plan: Part Two - Saved UDP Policies (November 2012) and

the Council's adopted Supplementary Planning Document HDAS: Residential Layouts.Thus, in the form submitted, the proposal could not be supported.

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

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

Nicola Taplin
Planning Consultant
Major Applications Team
London Borough of Hillingdon

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

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

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