

# Planning Statement

## Manor Lodge

Relating to site at  
Manor Lodge, Rickmansworth Road, Northwood, HA6 2QT  
April 2023



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Appendix 1: Pre-application Response (Ref: 49436/PRC/2022/180)

## 1.0 Introduction

- 1.1 This Planning Statement has been prepared by hgh Consulting on behalf of Merchant Land Investments Limited (the “Applicant”), in support of a full planning application submitted to the London Borough of Hillingdon (“LBH” or “the Council”) for the demolition of existing structures and creation of six family houses together with alterations to the means of access and associated landscaping and parking at Manor Lodge, Rickmansworth Road, Northwood, HA6 2QT (“the Site”). The Site is identified in Figure 1 below.



Figure 1: Aerial Image of the site (outlined in red)

- 1.2 Full planning permission is sought for:
- Demolition of the existing structures and creation of 6 residential units together with alterations to existing access points, associated parking and landscaping.***
- 1.3 The proposed development seeks to demolish the existing structures, inclusive of a dilapidated garage and a 2-storey detached property known as Manor Lodge, and the construction of six semi-detached family houses with access off Rickmansworth Road and provision of 12 car parking spaces on site. The majority of the existing boundary treatment is to be retained, with an enhanced landscape and planting scheme forming part of the proposed development.
- 1.4 This application submission follows pre-application engagement with the Council in November 2022 (ref: 49436/PRC/2022/180), a public consultation event for the local community on the 2<sup>nd</sup> February 2023 and separate discussions between the applicant and architect with Northwood College. The response to the public consultation event is set out in the accompanying Statement of Community Involvement.

- 1.5 This Planning Statement provides a detailed assessment of the scheme in relation to the statutory development plan and other material considerations. It provides a reasoned justification as to why planning permission should be granted and demonstrates how the proposed development complies with the development plan and planning policy.

#### **The Applicant and Consultant Team**

- 1.6 hgh Consulting are the appointed planning consultants to prepare this Planning Statement and submit the planning application on behalf of the applicant, Merchant Land Investments Limited, in respect of this proposal. Seabrook Architects are the appointed architects.

- 1.7 The submission is accompanied by the following documents:

- Application and CIL forms;
- Statement of Community Involvement (hgh Consulting);
- Plans and Drawings (Seabrook Architects):
  - Site Location Plan (drawing ref: 5819 PLLP);
  - Existing Site Plan (drawing ref: 5819 PL05);
  - Proposed Site Plan (drawing ref: 5819 PL06);
  - Existing Plans, Elevations and Sections (drawing ref: 5819 PL07);
  - Proposed Ground Floor Plan (drawing ref: 5819 PL10);
  - Proposed First Floor Plan (drawing ref: 5819 PL11);
  - Proposed Loft Floor Plan (drawing ref: 5819 PL12);
  - Proposed Roof Plan (drawing ref: 5819 PL13);
  - Proposed Elevations (drawing ref: 5819 PL15);
  - Proposed Short Sections (drawing ref: 5819 PL16); and
  - Proposed Long Sections (drawing ref: 5819 PL17).
- Design and Access Statement (DAS) (Seabrook Architects);
- Tree Survey and Arboricultural Impact Assessment, Arboricultural Method Statement, Arboricultural Implications Plan, Tree Constraints Plan, Tree Protection Plan, Tree Removal Plan (Rainford Tree Care);
- Landscape Strategy Plan (ES Landscape Planning);
- Landscape & Visual Appraisal (LVA) (ES Landscape Planning);
- Preliminary Ecological Appraisal and Preliminary Roost Assessment (Arbtech);
- Transport Statement (JBA);
- Energy and Sustainability Statement (Love Design Studios);

- SUDS Report (Michael Barclay Partnership LLP);
- Draft Construction Management Plan (South Downs Safety); and
- Ground Investigations - Site Solutions Report (Argyll Environmental) and Letter (Erda Associates Ltd).

#### 1.8 Structure of Statement

- Section 2 details the site and surroundings;
- Section 3 outlines the planning history relating to the site;
- Section 4 summarises the main details of the proposed development;
- Section 5 outlines the relevant planning policy framework to assess the proposed development;
- Section 6 provides an assessment of the proposed development against the relevant policies; and
- Section 7 concludes the statement.

## 2.0 The Site and Surroundings

### The Site

- 2.1 The site is approximately 0.18 ha and comprises land on the eastern side of Rickmansworth Road, that is currently occupied by a two-storey detached house and a small garage/outbuilding that is in a dilapidated and poor condition. The property is externally finished in a mixture of render and brickwork and has a double hipped roof profile. It is set-back from the highway by approximately 36 metres and is surrounded by an unmanaged grassed area (as shown in Figures 2 and 3 below).



Figure 2 & 3: Site Photographs

- 2.2 The site is accessed off Rickmansworth Road and benefits from two existing entrances. The first is a vehicle entrance along the northern section of the site frontage, used as the main site access. The second entrance to the southern part of the site frontage appears to have been last used as a pedestrian access point.
- 2.3 The site frontage onto Rickmansworth Road is dominated by a brick wall which runs along the western boundary of the site (between the aforementioned existing entrances), behind which lies a mature hedge and a line of low-quality conifer trees (Figure 3) and which screens much of the site from views on Rickmansworth Road. The remainder of the site is largely featureless with a predominately flat topography.
- 2.4 The nearest bus stops are located on Rickmansworth Road approximately 75m from the site access with services towards Uxbridge (route 331). Northwood station, which is served by London Underground Metropolitan Line services, is located approximately 750m to the northeast of the site, with a journey time to Central London (Kings Cross St. Pancras) of approximately 35 minutes.

### Site Context

- 2.5 The site is located in an area predominantly characterised by residential properties to the north and south, with Northwood College to the east and Northwood Golf Course to the west. Immediately to the north of the site is Moray House, a four-storey apartment block, which is set-back from Rickmansworth Road by a private driveway. The south-eastern boundary of the site comprises Kiln Farm, a detached property within a large plot (Figure 1).
- 2.6 The site has good accessibility to a number of services and amenities in Northwood town centre located approximately 800m to the northeast of the site.



- 2.7 There are several green spaces accessible from the site via non-vehicular modes (walking / cycling). The closest and most convenient green space in the vicinity of the site is Northwood Recreation Ground, located approximately 1.2km to the southeast of the site, along Chestnut Avenue. Northwood Golf Club is opposite the site, on Rickmansworth Road.

## Planning Designations

- 2.8 LBH's Local Plan Part 2 Proposals Map (Figure 4) identifies the site as 'white-land' without any specific site / area designation with the Northwood / Green Lane Conservation Area located to the north-east (black line), as shown below:

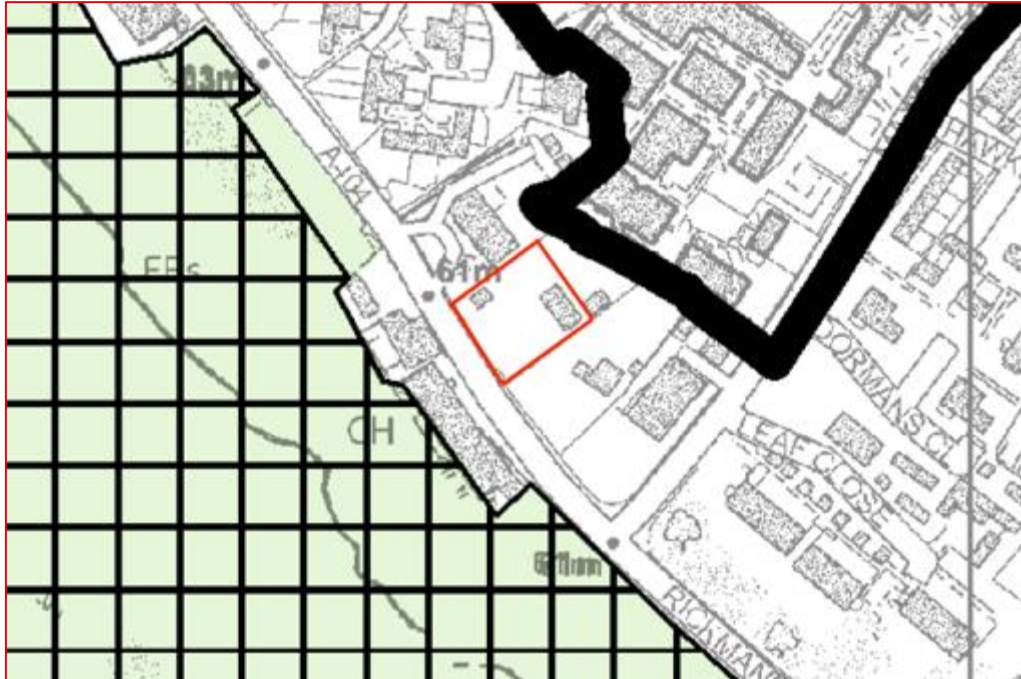


Figure 4: Extract from LBH's Local Plan Part 2: Policy Map (site indicated in red)

## Other Designations

- 2.9 In relation to other locational, political and environmental designations, the following are considered relevant:
- This site has PTAL rating of 2, with Northwood Underground Station located 750m north east (8-minute walk), with several bus routes on Rickmansworth Road and Maxwell Road.
  - The site is located within Flood Zone 1.
  - The site is not subject to any Tree Preservation Orders (TPOs).
  - The application site is sited directly opposite to a proposed Nature Conservation Site (i.e. Haste Hill & Northwood Golf Courses & Cemetery).
  - The site is not located within a conservation area nor is the existing property statutorily or locally listed.

### Planning History

- 2.10 No relevant planning history is published on the Council's website.
- 2.11 As noted in section 1 above, the pre-application discussions were held with the Council in September 2022 (ref: 49436/PRC/2022/180) and detailed feedback was received following the meeting in November 2022.
- 2.12 Table 1 below outlines how key elements of officer feedback has been considered and responded to by the design team to inform the proposed application scheme:

Pre-app Feedback	Design Response
Consideration to the loss of garden and criteria set out by Local Plan Policy DMH6.	Table 2 of Section 5 of this Statement outlines the applicant's detailed response to the DMH6 criteria and acceptability of the proposed scheme.  The design and layout of the proposed residential units has been informed by the local character of Northwood. Ecological enhancement has been proposed throughout the landscape strategy, as detailed later in this Statement and within Section 4 of the Preliminary Ecological Appraisal.
The proposed build line in relation to Moray House (north) and Kiln Farm (south).	The proposed build line for the development has been increased from Rickmansworth Road: 16.5m (Plot 1) and 19m (Plot 6) to ensure that the proposed new homes, particular Plot 1 has a positive relationship with Moray House.
If a crown roof design is pursued, justification is required.	Notwithstanding the similarities in a crown roof design at the existing Manor Lodge, there are multiple examples of the use of crown roofs and other roof design in the locality of the site.  Page 5 and 6 of the DAS identifies such examples.
The proposed dwellings must be provided with at least 100 square metres of private amenity space.	Through the provision of individual private gardens at the rear of the plots (no less than 12m long) and balconies to the first-floor front bedrooms, each unit will have access to total of 97 sqm of privacy amenity space.  Each unit will also have access to 100sqm of communal amenity space at the front of the site.

Table 1: Design Response to Pre-app Feedback

- 2.13 Further details of the design rationale are outlined in Section 5 of this Statement.



## 3.0 Proposed Development

### The Proposed Development

3.1 This planning application is for:

***Demolition of the existing structures and creation of 6 residential units together with alterations to existing access points, associated parking and landscaping.***

3.2 A summary of the proposed development is provided below:

#### Proposed Development

- The provision of six residential units to provide 4-bedroom family semi-detached homes, each with a GIA of 165sqm.

#### Amenity

- The development includes the provision of private amenity space comprising individual private gardens at the rear of the plots and balconies to the first-floor front bedrooms.
- Each unit will have access to total of 97 sqm of privacy amenity space with a further 100sqm of general frontage amenity space.

#### Design and Appearance

- The dwellings will be two storeys in height, with accommodation in the roof;
- The design adopts traditional forms, materials and detailing.
- All units will exceed the minimum floorspace requirements and nationally described space standards.

#### Landscaping

- Landscaping scheme incorporating the existing mature hedge at the Rickmansworth Road frontage, removal and replacement of low-quality trees and new tree and shrub planting across the site.

#### Access and Parking

- Utilises for vehicular purposes both existing access points from Rickmansworth Road;
- The access points will be gated (electronically controlled) with sufficient room between the access gate and the back of footway for vehicles to be clear of Rickmansworth Road.
- Provision of 2 car parking spaces with electric charging per residential unit totalling 12 car parking spaces; and
- 2 long-stay cycle parking spaces within a cycle store (5sqm each) are provided for each residential unit with 2 short-stay spaces, totalling to 14 cycle parking spaces.

#### Waste and Recycling

- Communal refuse / recycling waste storage at the front of site adjacent to the southern access point.

## 4.0 Planning Policy Framework

- 4.1 Section 38(6) of the Planning and Compulsory Purchase Act (2004) requires planning applications to be determined in accordance with the Statutory Development Plan unless material considerations indicate otherwise.

### Development Plan

- 4.2 The statutory development plan for LBH comprises:
- The Local Plan: Part 1 – Strategic Policies (2012);
  - The Local Plan: Part 2 – Development Management Policies (2020);
  - The Local Plan: Part 2 – Site Allocations and Designations (2020);
  - The West London Waste plan (2015); and
  - The London Plan (2021).
- 4.3 Other material considerations include:
- The Major's Housing SPG (2016);
  - The National Planning Policy Framework (NPPF) (2021); and
  - The Planning Practice Guidance (2019).

### Relevant Planning Policies

- 4.4 The development plan policies relevant to this application are summarised below.
- Local Plan: Part 1 – Policy BE1: Built Environment;
  - Local Plan: Part 1 – Policy EM7: Biodiversity and Geological Conservation;
  - Local Plan: Part 1 – Policy H1: Housing Growth;
  - Local Plan: Part 2 – Policy DMH6: Garden and Backland Development;
  - Local Plan: Part 2 – Policy DMEI7: Biodiversity Protection and Enhancement;
  - Local Plan: Part 2 – Policy DMHB14: Trees and Landscaping;
  - Local Plan: Part 2 – Policy DMHB16: Housing Standards;
  - Local Plan: Part 2 – Policy DMHB18: Private Outdoor Amenity Space;
  - Local Plan: Part 2 – Policy DMT2: Highway Impacts;
  - Local Plan: Part 2 – Policy DMT5: Pedestrian and Cyclists;
  - Local Plan: Part 2 – Policy DMT6: Vehicle Parking;
  - London Plan Policy D3: Optimising site capacity through the design-led approach;
  - London Plan Policy D5: Inclusive design;
  - London Plan Policy D6: Housing Quality and standards;
  - London Plan Policy GG2: Making the best use of land;
  - London Plan Policy H2: Small sites;



- London Plan Policy T5: Cycling;
- London Plan Policy T6: Car parking; and
- London Plan Policy T6.1: Residential parking.

## 5.0 Planning Justification

5.1 This section assesses the proposals against the development plan and other material considerations and provides the planning justification for the proposed development.

5.2 The key matters for assessment comprise:

- Principle of Development;
- Residential Design;
- Residential Standards;
- Heritage;
- Trees, Visual Amenity and Landscaping;
- Ecology;
- Transport;
- Drainage;
- Energy and Sustainability;
- Contamination; and
- Community Infrastructure Levy (CIL).

### Principle of Development

5.3 Section 5 of the NPPF sets out that the Government is committed to increase the overall level of supply and mix of housing in order to meet local needs. Paragraph 69 recognises that small and medium sized sites can make an important contribution to meeting the housing requirement of an area and are often built-out relatively quickly.

5.4 Furthermore, Chapter 11 promotes the effective use of land. Planning decisions should give substantial weight to the value of using suitable brownfield land within settlements for homes and promote and support the development of underutilised land and buildings, especially if this would help to meet identified needs for housing. This sentiment is reiterated at policies D3 and GG2 of the London Plan.

5.5 NPPF paragraph 11 outlines that planning decisions should apply a presumption in favour of sustainable development. The proposed development would see the creation of six family homes that would make a meaningful, albeit modest, contribution towards Hillingdon's housing target which has increased by the London Plan Policy H1 by 94% (from 559 homes per annum) to 1,083 homes per annum or 10,830 new homes over the 10-year period.

5.6 Policy H1B(2) sets a list of criteria to ensure that these 10-year targets are achieved. The proposals comply with Policy H1B(2) by optimising housing delivery on a suitable and available underutilised sites, with particular regard to the following criteria:

- a) sites with existing or planned public transport access levels (PTALs) 3-6 or which are located within 800m distance of a station or town centre boundary. Whilst it is noted the site has a PTAL of 2, the site is an underutilised urban site within 750m of an underground station and a number of local bus services. The site is considered to be both accessible and sustainable.

- e) further, with a site area of 0.18 ha, by definition under the London Plan, the site is a '*small site*', which means that London Plan Policy H2 applies. 295 homes per annum are required for delivery on small sites in Hillingdon. London Plan Policy H2 seeks LB Hillingdon to proactively support well-designed new homes. The provision of six residential units would make a positive contribution towards meeting the objectives of Policy H2.
- 5.7 The NPPF paragraph 69 further supports the development of small and medium sized sites and (c) the development of windfall sites, noting that such sites make an important contribution to meeting the housing requirement of an area. The proposed scheme is for a small urban windfall site, which should be supported accordingly.
- 5.8 Local Plan: Part 2 policy DMH 6 outlines the presumption against the loss of gardens due to the need to maintain local character, amenity space and biodiversity. In exceptional cases a limited scale of backland development is accepted. The site constitutes the garden of Manor Lodge and as confirmed by the pre-application feedback, policy DMH 6 needs to be considered in the context of the acceptability of the proposed development scheme.
- 5.9 The criteria set out by policy DMH 6 has been considered throughout the design progression of the proposed development, as outlined in Table 2 below:

	Policy Criteria	Proposed Development Compliance
i	<i>Neighbouring residential amenity and privacy of existing homes and gardens must be maintained, and unacceptable light spillage avoided.</i>	<p>The proposed development is set well back from the road frontage and maintains the streetscene through the use of existing access points and retention of the existing wall and mature hedge.</p> <p>The orientation and design of the proposed units ensures that there is no direct overlooking nor material loss of light to any neighbouring property and the build lines ensures a positive relationship with both Moray House to the north and Kiln Farm to the south are maintained.</p>
ii	<i>Vehicular access or car parking should not have an adverse impact on neighbours in terms of noise or light. Access roads between dwellings and unnecessarily long access roads will not normally be acceptable;</i>	<p>The existing entrance points at the north and south (most recently used as pedestrian access) are maintained and used to create an entry and exit point to safely allow vehicular movements off Rickmansworth Road, with on-site parking and adequate turning capacity to allow vehicular movement to enter and exit the site in a forward gear.</p> <p>Appropriate set back at both access points is safeguarded to ensure that vehicles waiting to enter or exit the site at the gates are clear of Rickmansworth Road.</p>
iii	<i>Development on backland sites must be more intimate in mass and scale and lower than frontage properties; and</i>	<p>The application site forms part of the garden of Manor Lodge. This is not a <i>backland</i> site as referred to in criterion (iii) nor a proposed layout with a tandem arrangement of a dwelling in the front with proposed development to the rear.</p>

		As explored and justified in the DAS and LVA submitted with this application, the scale and mass of the proposed development is in keeping with a single alignment of residential form and character of the area and ensures that the proposed height of the development is consistent the site's immediate neighbours of Moray House and Kiln Farm, as illustrated on the Proposed Streetscene (plan ref: 5819 PL017)
iv	<i>Feature such as trees, shrubs and wildlife habitat must be retained or re-provided.</i>	The mature hedge fronting Rickmansworth Road is retained as part of this application. The low-quality and unmanaged conifers that lie behind the hedge are to be removed to improve setting, outlook and townscape benefits and replaced with more modest and native species of trees. Further ecological measures, planting and landscape works are proposed that will enhance the biodiversity of the site.

Table 2: Assessment of the policy DMH 6 against the proposed development scheme

- 5.10 The site is located within a distinctive residential area of Northwood and is not constrained by historic, environmental or physical designations. This is consistent with the Framework's presumption in favour of sustainable development, the optimisation of the site's capacity and the efficient use of small sites as required by the London Plan.
- 5.11 The proposal for six semi-detached residential units in this location is considered to be acceptable in principle, as supported by officers at pre-application, recognising the proposed development is well located to Northwood and its range of local services and transport networks within 750m of the site. The proposed development would enhance the existing character of Northwood and the immediate streetscene whilst on site ecology and landscape proposals will ensure that the biodiversity of the site is improved through habitat creation and enhancement, (as discussed below within the Ecology sub-section of this Statement).
- 5.12 The requirement set by Local Plan Policy DMH6 have been clearly met as outlined in Table 2 and as such the principle of the creation of six semi-detached family homes on this under-utilised urban site should be supported, being consistent with national, London and local planning policy objectives. The proposed development will make a valuable contribution towards housing supply within the LBH in accordance with London Plan Policy H1 and proposes larger family sized dwellings that are appropriate given the location and characteristics of the application site and its environs, in accordance with Local Plan Policy DMH2.

## Residential Design

- 5.13 The Framework, London Plan and local planning policies attach great weight to high quality design. The NPPF particularly establishes that great importance is given to the design of the built environment and recognises that it is a key aspect of sustainable development. The Framework at chapter 12 seeks to achieve well-designed places. Paragraph 130 requires planning decisions to ensure that developments function well and add to the overall quality of the area. This is reflected in Local Plan Policy BE1.
- 5.14 London Plan Policy D4 and Local Plan policy DMHB11 further requires new development to be of the highest quality design and to enhance the built environment of local places by considering their physical context, local character, density, tenure and land mix.



- 5.15 Development should and will make a positive contribution to the streetscape and will incorporate high quality materials and landscaping appropriate to its context.

Layout

- 5.16 The design of the proposed scheme reflects the context in which the site is located. The Landscape and Visual Appraisal (LVA) undertaken to support this application (discussed further at page 19) confirms that the nature of the proposed development is in keeping with the existing residential land use surrounding the site. The demolition of the existing on-site buildings, which are currently unoccupied, and the proposed construction of six high quality semi-detached residential units, would complement the existing townscape character, and re-introduce activity and interest to the site on Rickmansworth Road, supporting the prevailing characteristics of the local landscape.
- 5.17 The proposed development would be set back from the Rickmansworth Road, with the retention of the existing yew hedge, to maintain the current composition of the streetscene as being well vegetated, with the associated built form not appearing prominent. This approach is similar to the site layout of Moray House to the north of the application site. The low-quality and unmanaged frontage trees will be replaced with more complementary native species to improve the existing streetscene along Rickmansworth Road and the westerly outlook from the immediate neighbours of Moray House and Kiln Farm.
- 5.18 As a direct response to the feedback received by officers at the pre-application meeting set out in Table 1 above and also commented upon in the accompanying DAS, the build line for the development has been moved further back to be approximately 16.5m (Plot 1) and 19m (Plot 6), from Rickmansworth Road, to align with the differing build lines of Moray House and Kiln Farm.
- 5.19 This improves the relationship of the development and safeguards the residential amenities of the occupiers at Moray House (compliance with 45 degree line between Moray House and Plot 1). The proposed build line for the proposed development also reflects the set back and relationship with Kiln Farm to the south, although it was noted by officers in the pre application response that:
- “Due to the separation distances involve, it is not considered that the proposal would cause harm to the living conditions of the occupiers at Kiln Farm”.*
- 5.20 Policy DMHB1 of the Local Plan permits single storey rear extensions up to 3.6 metres deep on semi-detached properties. Whilst this proposal is not for an extension, the rear projection of the proposed residential units has been reduced to 2 metres. A 1-metre-wide path has also been incorporated between the flank walls and boundary lines, as advised by officers during pre-application consultation.
- 5.21 The form and scale of the proposed development respects the existing pattern of development in the surrounding area which consists of semi-detached and detached houses. The proposed residential units are all two storeys in height with rooms in the roof and are in keeping with the scale, form and height of the prevailing built form of the wider area. With the change in levels across the site this means that the dwellings can be accommodated without any material harm caused on the wider area.
- 5.22 The proposed design, materiality and appearance of the development will have a neutral to positive contribution to the setting of the adjacent Northwood Conservation Area and enhance the townscape character of Northwood (refer to Heritage / Townscape sections of the DAS – Iceni Projects).

## Design and materials

- 5.23 The pre-app feedback received by the Council in November 2022 was supportive of the traditional architectural approach to the design and appearance of the proposed residential units with the proposed pitched tiled roof and gabled feature to the front elevation. The use of a crowned roof form was queried by officers and if an alternative design was not appropriate, justification for this design approach is sought.
- 5.24 Within the immediate vicinity of the site, the building heights and roof designs vary widely with a large number of flat-roofed / crown roofed buildings both immediately adjacent at Moray House and Northwood Golf Club to those a little further afield on the Northwood College campus. The deviation towards a different roof design, this would result in the loss in the quality of the living accommodation created at the loft level. In order to preserve the high-quality residential standard, the ridge height to accommodate a revised roof design would need to be increased, however, any increase to the proposed height was not supported by officers at pre-app.
- 5.25 The proposed street-scene (Figure 5) shows how the use of a crown-roof profile at the site would incorporate well within the context of Moray House and Kiln Farm and assist in the creation a well-designed, functional family home with suitable accommodation throughout. The use of a crown roof in this location is therefore sympathetic, appropriate and considered justified.



*Figure 5: Proposed Street Scene (fronting Rickmansworth Road)*

- 5.26 The choice of materials and elevational detailing has been influenced by the character and appearance of the local area and utilises a variety of traditional building materials to reflect those employed within the vicinity of the site and Northwood in general.
- 5.27 The semi-detached residential units comprise brickwork and clay tile hung elevations, traditional casement windows, clay roof tiling to a central gable feature. The elevations feature a brick soldier coursing over the window heads and a gable to the front elevation providing a covered porch area before the elevation is stepped back form up to first floor level. Additional domestic features include a chimney stack at each flank elevation.
- 5.28 The approach to design and layout of the proposed development ensures the residential units take account of the physical context and local character in which the site is located and are therefore consistent with paragraph 130 of the NPPF, in addition to policy D4 of the London Plan and Local Plan policy BE1 and DMHB11.

## **Residential Standards**

### Housing Mix

- 5.29 Policy H10 of the London Plan (2021) states that new development should consist of a range of unit sizes. Local Plan Policy DMH 2 states that the Council will require the provision of a mix of housing units of different sizes in schemes of residential development to reflect the Council's latest information on housing need.

- 5.30 The Council's current information on housing need indicates a substantial borough-wide requirement for larger affordable and private market units, particularly 3-bedroom or larger properties, as identified in the Strategic Housing Market Assessment 2016.
- 5.31 The proposed development would create six 4-bedroomed residential units. As part of the pre-application consultation with the Council, the proposed housing mix was supported by officers and declared consistent with Local Plan policy DMH2.

#### Internal Amenity

- 5.32 The London Plan encourages inclusive design at policy D5 as well as the provision of suitable housing and a genuine choice for London's diverse population (policy D7).
- 5.33 The internal layouts of the proposed new homes have been designed to achieve a functional and attractive configuration that will contribute towards providing a high-quality of accommodation, suitable for modern family life.
- 5.34 Standards Internal space standards are set out on the Technical Housing Standards – Nationally Described Space Standards (NDSS) 2015 and requires a minimum of 103sqm for a three storey, 4-bedroom, 5-person property. The size of all the proposed residential units exceeds the NDSS standards, providing 165sqm of accommodation, and are policy compliant.
- 5.35 As the Council noted at the pre-app meeting, each new home includes the provision of a study or playroom within the roof space. This has been proposed to assist with the shift in the working environment, which has seen an increase in the 'working from home' culture in recent times and is provided reflect this socio-economic change and to enhance modern family life.
- 5.36 Paragraph 5.60 of the Hillingdon Local Plan: Part 2 states:
- "When assessing the size of households the Council will assume that any bedroom over 11.5 sqm is capable of being occupied by two persons. Similarly, any "study", "bonus room" or third living/reception room that is not annotated as a bedroom will be assumed to be capable of serving as a bedroom".*

- 5.37 Parts 3) and 4) of Policy D6 of the London Plan further requires double bedrooms to have a floor area of at least 11.5 square metres, and for single bedrooms to have a floor area of at least 7.5 square metres. For the avoidance of doubt, as set out in the DAS, the proposed study or playroom is below the standards for a single bedroom.
- 5.38 The proposed units are designed to be accessible and inclusive, with all units are designed to meet the Mayor's housing standards. The scheme therefore complies with the Major's Housing SPG (Standard 11), Local Plan policy DMHB16 and London Plan policies D5 and D7.

#### External Amenity

- 5.39 Local Plan Policy DMH 18 and table 5.3 sets out that there should be a minimum amenity space provision of 100sqm for four+ bed units. This requirement was confirmed by the Council during pre-application discussions and within the written feedback received (Appendix 1).
- 5.40 In addition to local policy standards, the Mayor's Housing SPG Standard 26 requires a minimum of 5sqm of outdoor amenity space to be provided for 1-2 person dwellings and an extra 1sqm for each additional occupant, requiring 8sqm for each of the 4-bedroom, 5-person residential units proposed. The proposed private amenity space for all residential units far exceeds the London standards.
- 5.41 Each new home is provided with a private rear garden and first floor balcony area, providing 97sqm of private amenity space per unit. A further 100sqm of communal amenity space is provided at the

front of the site, in line with the requirements of Local Plan policy DMHB 15 and secured by design principles.

- 5.42 Whilst marginally below the 100sqm of private amenity space required by officers at pre-app, the provision of a further 100sqm of communal amenity space would provide sufficient and varied amenity space for the future occupiers of this residential development. Also relevant are the green spaces accessible from the site by non-vehicular modes (walking / cycling), with the Northwood Recreation Ground located approximately 1.2km to the southeast of the site, along Chestnut Avenue.

### **Heritage**

- 5.43 The site is not located within a conservation area, nor is it a designated heritage asset. However, the site is near to the Northwood / Green Lane Conservation Area. As set out in NPPF paragraphs 200 and 206, weight and consideration should therefore be given to the setting of heritage assets including conservation areas:

*'Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably.'*  
(paragraph 206)

- 5.44 Section 5 of the DAS includes this assessment by Iceni, which confirms that as a whole the proposed residential units are of a high quality that will integrate successfully with the neighbouring context. The residential units will make a positive contribution towards the character and distinctiveness of the local area. This is consistent with the approach required by paragraph 13 of the NPPF, policy D3 of the London Plan and Local Plan policy BE1.
- 5.45 The existing site is underused and dilapidated which is considered to detract from the setting of the nearby Conservation Area. The proposed development provides an opportunity to introduce high-quality family homes to the Site. With its use of variety, articulation, and materiality, the proposal would provide a sensitive architectural addition to the townscape and setting of the Conservation Area, which would enhance the townscape character of Northwood while respecting its Victorian and Edwardian heritage.
- 5.46 No harm is anticipated to the setting of the Conservation Area (and heritage assets within it) from the demolition of the existing site and new development in its setting. Therefore, the proposed scheme from a heritage perspective is deemed to be in line with NPPF paragraphs 197 to 202; London Plan Policy HC1 and D3; Local Plan Part 1 Policies HE1: Heritage and BE1: Built Environment; and Local Plan Part 2 Policies DMHB 1: Heritage Assets and DMHB 4: Conservation Areas.

### **Trees, Visual Amenity and Landscaping**

- 5.47 The NPPF (2021) states that trees make an important contribution to the character and quality of urban environment and that existing trees should be retained wherever possible. This is reinforced by Policy G7 of the London Plan (2021) which states that development proposals should ensure that, wherever possible, existing trees of value are retained.

#### Trees

- 5.48 Rainfords Tree Care have carried out tree survey work at the site and have prepared the associated tree reports and plans listed in Section 1 above, which have been submitted in support of this planning application.
- 5.49 Local Plan Policy DMHB 14 states that all developments will be expected to retain or enhance existing landscaping, trees, biodiversity or other natural features of merit. Planning applications for proposals

that would affect existing trees will be required to provide an accurate tree survey showing the location, height, spread and species of trees.

- 5.50 As detailed by the Tree Report, there are no Tree Preservation Orders (TPOs) at the site and the general health of the trees is good. The trees within this development are not considered to be aged or veteran, rendering the principles within paragraph 175 of the NPPF not applicable in this situation.
- 5.51 Looking specifically at the coniferous trees (Lawsons cypress) to the front of the site, the survey reveal that the trees have been historically topped and as such their forms have recovered to a more “normal” state, however this has resulted in competing that creates a dense tree appearance and future failure risk.
- 5.52 Management options for the Lawsons cypress is limited, as their crown form does not lend well to height reduction. The suitable future management option for these trees would be to remove and replace these trees. This will result in increasing the light and space within the site.
- 5.53 As detailed by the accompanying SCI, the prospect of replacing these trees was discussed with the community at the public exhibition and no objections were raised, subject to the replacement of the trees. The removal of the Lawsons cypress at the front of the site is considered justified and locally supported, such that it is now proposed as part of the scheme proposals. This creates an exciting opportunity to plant new, healthy and native species on site as proposed in the Landscape Strategy Plan (ES Landscape Planning) as required and in accordance with Local Plan Policy DMHB14 and London Plan Policy G7(c).

#### Visual Amenity

- 5.54 A Landscaping and Visual Appraisal (LVA) has been prepared by ES Landscape Planning to accompany this application and looks to objectively assess the proposed development in the context of the existing character, visual environment and landscape within Northwood and more locally, Rickmansworth Road.
- 5.55 The LVA identifies 10 viewpoints (see Appendix 3 of the LVA) within the local area to assess the proposed development and any impact that may be attributed. The assessment concludes that while the proposed development would introduce “*additional components into the localised visual environment*”, this would be balanced with the removal of the existing vacant Manor Lodge and unmanaged grounds and would not be at odds with the existing features within these views.
- 5.56 In the long term, the proposals would not affect the overall perception of built form along Rickmansworth Road, with a well vegetated existing streetscene and built form set back from the road edge. The nature of the proposed development is in keeping with the existing residential land use of the site, as well as with the surrounding land uses.
- 5.57 The proposed creation of 6 high quality semi-detached residential units would not be at odds with the existing townscape character, nor would it detract from the overall characteristics of the local landscape, as required by London Plan policy D4. For residential properties that overlook the site, it is considered that the proposed development would give rise to positive effects upon the character and appearance of the site and its localised setting, through the redevelopment of a vacant site.
- 5.58 The proposed development will not introduce any uncharacteristic features into the local landscape and overall, it is considered that the proposals would be sensitively located within the site and its urban context, to ensure that the existing character of Northwood is not adversely affected. The proposed development has been carefully considered to ensure that the 6 new residential units are sympathetic to their location within Northwood and the surrounding built environment. The proposed



development therefore complies with the aims and objectives set out within the national and local planning policy framework from a landscape and visual perspective.

## Landscaping

- 5.59 In line with the tree and visual amenity considerations, together with the ecological enhancements, a landscaping plan has been prepared by ES Landscape Planning and sets out a comprehensive strategy (see Figure 6 below).



Figure 6: Landscape Strategy Plan (Rev. B)

- 5.60 As detailed by the Landscape Strategy Plan and as outlined by the accompanying tree reports, the development will replace of the existing, low-quality conifers at the form of the site, fronting onto Rickmansworth Road with a new native tree. The Landscape Strategy Plan provides details of the likely species and age of the trees to be planted, ensuring that the species are akin to the existing tree frontages along Rickmansworth Road and the specimens to be planted are of suitable age and maturity to positively contribute towards the street scene immediately. The applicant accepts that details of the tree species and landscape management are to be secured via planning condition.
- 5.61 The rear gardens of each plot will comprise lawn, with shrub planting proposed at the front of each property and on the north-western boundary of the site incorporating an ornamental shrub mix. Green roofs are proposed above each of the cycle and ASHP store facility. The landscape plans propose additional hedgerow planting at the rear of plots 1- 6, as well as some tree planting at the school site, beyond the application boundary on school land, for which there is a separate contractual arrangement between Merchant Land and Northwood College.
- 5.62 The proposed development, with the retention of the exiting wall and hedge frontage and introduction of new trees, will reinforce the existing character of the site assist to assimilate the development and



will protect views into the site. The AIA concludes that the scheme is acceptable from arboricultural perspective and that it complies and is compatible with national and local policies in relation to trees. The scheme is compliant with London Plan policy G7 and Local Plan policy DMH6.

### **Ecology**

- 5.63 Paragraph 174 of the NPPF requires planning decisions to enhance the natural and local environment by protecting sites of biodiversity value and minimising impacts on biodiversity. Paragraph 180 advises that biodiversity in and around developments should be incorporated into their design.
- 5.64 As set out earlier in this Section, Local Plan Policy DMH 6 outlines the presumption against the loss of gardens due to the need to maintain local character, amenity space and biodiversity. Local Plan Policy DMEI 7 further states that if development is proposed on or near to a site considered to have features of ecological or geological value, applicants must submit appropriate surveys and assessments to demonstrate that the proposed development will not have unacceptable effects.
- 5.65 Arbtech Consulting Limited have undertaken a Preliminary Ecological Appraisal (PEA) and Preliminary Roost Assessment (PRA), which is submitted as part of this application. The assessment is clear that there are no notable habitats within the site but there is low potential for roosting bats. As such the study conclude that one bat emergence survey is required, to confirm recent or likely absence of a bat roost in the existing building.
- 5.66 In addition to the bat emergence survey, the assessment further outlines the opportunities for habitat creation and enhancement through the planting of native trees, shrubs and hedgerows to encourage foraging. The installation of two bat boxes and at least 2 bird boxes is also proposed to be incorporated within the development.
- 5.67 The development provides a positive contribution to the protection and enhancement of the site's ecological value and as such is consistent with the requirements set out by Local Plan policy DMEI 7. The enhancement to tree and shrub planting on site with proposed bat and bird boxes, as well as the consideration to the character of the area and residential amenity, demonstrate that the development is in accordance with the criteria set out by Local Plan policy DMH6 (as per Table 2 of this report) and is therefore acceptable in policy terms.

### **Transport**

- 5.68 A Transport Assessment (TA) has been prepared in support of the planning application. It sets out in detail the transport and highways considerations related to the proposals and confirms the site's PTAL 3 rating.

### Access

- 5.69 Local Plan policy DMT 2 expects proposals to provide safe and suitable access for all users whereas as policy DMT 5 requires safe, direct and inclusive provision of access for pedestrians and cyclists on the site connecting it to the wider network.
- 5.70 The two existing access points will provide the pedestrian, cycle and vehicle access from Rickmansworth Road. The access points will be gated, with sufficient room between the access gates and back of the footway to ensure a vehicle can stop at the gate without impeding the free flow of traffic along Rickmansworth Road.
- 5.71 This approach will create an entrance and exit loop through site, creating a safe layout arrangement throughout the site, with adequate tracking and turning capacity to ensure vehicle enter and exit in a forward gear. This approach was accepted in principle at pre-application consultation and is similar to that at Moray House.

Parking*Car Parking*

- 5.72 2 car parking spaces will be provided for each household, totalling 12 across the site. Electric Vehicle Charging Points (EVCP) are provided at each space, as required in the London Plan. The proposed parking provision accords with the maximum standards as required by Local Plan policy DMT6 and London Plan policy T6.1.

*Cycle Parking*

- 5.73 The scheme provides 12 long stay cycle spaces by way of cycle store at the front of each new residential unit. 2 short-stay spaces are also provided at the site. This provision is in line with the London Plan policy requirement and the cycle parking requirements set in the LB Hillingdon's Local Plan.
- 5.74 The approach to car and cycle parking is in line with Local and London Plan policies and was also endorsed by officers as part of the pre-application consultation.

Refuse & Recycling

- 5.75 Local Plan policy DMHB11 requires new development to provide sufficient facilities for the storage of refuse and recycling. Policy DMT 1 further requires proposals to, amongst other things, adequately address delivery, servicing and drop-off requirements.
- 5.76 Refuse collection will take place from Rickmansworth Road. This will reflect existing refuse collection arrangements for the majority of properties along the road and within the immediate area surrounding the site.
- 5.77 Each proposed residential unit would be provided with an individual bin store. On collection day, residents would be required to move their bins to the communal bin store on the site frontage adjacent to Rickmansworth Road for direct roadside refuse vehicle collection. The total capacity of the store is in accordance with the West London Waste Authority (WLWA) guidance.
- 5.78 The communal bin collection area is located at the southern access to the site and is positioned to ensure that waste collectors would not require internal site access beyond the gated area.

Deliveries & Emergencies

- 5.79 Delivery vehicles accessing the site would do so via the proposed one-way loop arrangement to enter and exit the site. The site access gate would be controlled by an intercom system, which would allow residents to remotely control access for authorised incoming delivery and servicing vehicles.
- 5.80 It is envisaged that the majority of deliveries would be undertaken by Light Goods Vehicles (LGVs). Vehicle swept path analysis, sets out at Appendix F of the Transport Assessment, demonstrates that delivery vehicles would be able to enter and exit the site in a forward gear.
- 5.81 In the event of a fire, all elements of the proposed development would be within the maximum permissible 45m distance from a fire tender stopping on Rickmansworth Road.

**Drainage**

- 5.82 Local Plan policy DME1 9 and DME10 requires applications to consider the possible risk of both flood risk mitigation and surface water flooding. This approach is consistent with London Plan policy SI 12 and SI 13.

- 5.83 As reference by Section 3 of this statement, the Environment Agency's (EA's) Flood Zone Mapping shows that the site is located entirely within Flood Zone 1 which is land assessed as having a very low risk (less than 0.1%) of flooding in any year.
- 5.84 MBP have assessed the impact of the proposed development on the drainage at the site Manor Lodge and establishes that the layout and use of materials will not give rise to an increased risk of flooding (both fluvial and surface water). As detailed by the plans, permeable paving will be utilised on the driveway and car parking areas to provide storage within the sub-base stone blanket.
- 5.85 A Controflow chamber will be utilised to restrict the discharge from the site to 1.0 l/s for all storms up to and including the critical 100-year return period plus 40% climate change allowance. The chamber will provide a storage volume of 78.4m<sup>3</sup>. The rear flat roofs will be green roofs and water butts will be positioned to the rear of the dwellings for irrigation purposes, albeit this has not been included within the calculations.
- 5.86 By virtue of the site's low probability of flood risk, the incorporation of SUDs principles and appropriate management arrangements, the proposed development complies with the policies within the Development Plan.

### **Energy and Sustainability**

- 5.87 The energy strategy has been carried out by Love Design Studios and is submitted in support of this planning application. The strategy follows the energy hierarchy; use less energy (Be Lean), supply energy efficiently (Be Clean), use renewable and low carbon energy (Be Green), as required by the London Plan policy SI2. The overall energy strategy capitals on passive design measures to maximise the fabric energy efficiency and energy demand.
- 5.88 The development proposes the use of Air Source Heat Pumps (ASHPs) for space heating and domestic hot water to remove the need for on-site combustion and will also utilise the proposed window reveals and balconies where feasible, to reduce the requirement for active cooling. Mechanical Ventilation with Heat Recovery (MVHR) will be included to further help reduce the operational energy demand of the residential units. This approach is consistent with Local Plan policy DMEI 2.
- 5.89 The proposed development utilises sustainable and energy efficiency building techniques, as set out in the energy strategy, to accord with the Building Regulations. The strategy confirms that the proposed development currently demonstrates a combined on-site regulated carbon dioxide reduction of 65%, which far exceeds the requirement of a 35% reduction as set out by London Plan policy SI2(C).
- 5.90 The strategy therefore demonstrates that maximised energy efficiency measures and minimised carbon emissions accord with the national, London and local planning policy objectives.

### **Contamination**

- 5.91 As advised by the Council's Land Contamination Officer within the pre-app feedback (Appendix 1), the Council's GIS records identified that other structures may have been present on site, prior to the construction of Manor Lodge. Therefore, there is a possibility some contaminative substances including asbestos material may be present at the site.
- 5.92 The ground investigations letter and report confirm that there is no significant contamination at the site and as such, further remediation is not necessary.

**Community Infrastructure Levy (CIL)**

- 5.93 The approved CIL Schedule of the Mayor of London (MCIL2) requires a contribution of £60 per sqm for development in Hillingdon (index linked, at £64.55 for 2023) and the Council's adopted 2014 CIL Schedule requires a contribution of £95 per sqm in this location (index linked, at £142.30 in 2023).
- 5.94 The existing floor space accounts for 367 sqm (GIA) (including 319sqm for Manor Lodge and 48sqm for the garage) and when considered against the proposed development comprising 1,020 sqm (GIA) of floorspace (including 990sqm for the proposed 6 residential units and 30sqm of the cycle stores), the net increase equates to 653 sqm (GIA).
- 5.95 At the time of writing, the proposal is therefore expected to contribute approximately £135,073.05 towards CIL (both Mayoral and LBH) which will be payable on implementation of the development.

## 6.0 Conclusion

- 6.1 The application proposal is for the demolition of the existing structures and the construction of six new family sized dwellings with associated parking and landscaping on land at Manor Lodge, Rickmansworth Road, Northwood.
- 6.2 The high-quality design is in keeping with the built form and appearance of the area and takes architectural inspiration from the existing residential character of Northwood, including the adjacent conservation area.
- 6.3 The site is located on former garden land and as outlined by the pre-application response, Local Plan policy DMH6 is engaged. With reference to the policy exceptions criteria, the proposed development is considered to be acceptable for the following reasons:
- The proposed development is set back from the road frontage to align with the prevailing build line and maintains the streetscene with the use of existing access points and retention of the existing wall and mature hedge.
  - The orientation and design of the proposed units ensures that there is no direct overlooking to any neighbouring property and the build line ensures a positive relationship with both Moray House to the north and Kiln Farm to the south are maintained.
  - The existing north and south crossovers will be re-used to create an entry and exit point off Rickmansworth Road, with on-site parking and adequate turning capacity to allow vehicular movement to enter and exit the site in a forward gear.
  - The scale and mass of the proposed development is in keeping with the residential character of the area and the proposed height of the development is consistent and complements the site's immediate neighbours of Moray House and Kiln Farm.
  - The low-quality conifers along the frontage will be removed (hedge retained) and replaced with native tree species. Further planting, hedgerows and landscape works are proposed for ecological and biodiversity enhancement.
- 6.4 An assessment of the proposed development confirms that there would be no adverse impacts in terms of design, heritage, residential amenity, access, parking and servicing, trees and ecology. The proposals would therefore be compliant with policies in the adopted Local Plan, London Plan and NPPF.
- 6.5 This statement has demonstrated that there would be no materially adverse impacts of the proposed development. The proposals will provide benefits including the provision of much needed high quality (family) housing in a sustainable location, on a previously developed urban site, with good access to local shops and services and public transport contributing to the Borough's housing land supply.
- 6.6 Based on the detailed assessment presented in support of this scheme and in accordance with the sustainable development, design and housing objective the NPPF, the applicant contends that the case in support of the proposed residential development is compelling and as such the scheme should be supported by the Council and planning permission granted.



## **Appendix 1: Pre-application Response (Ref: 49436/PRC/2022/180)**





Richard Henley  
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Date: 14th November 2022  
Our Ref: 49436/PRC/2022/180

Dear Richard Henley

**RE:** Erection of 6 dwellings together with means of access and associated landscaping and parking, following demolition of existing building

**SITE:** Manor Lodge Rickmansworth Road Northwood

I refer to your request for pre-application planning advice and our subsequent meeting on 20th September 2022 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:**

LR1 (Site Plan) - received 09 Aug 2022  
Pre-application Planning, Design & Access Statement - received 09 Aug 2022  
5819-SK10 Rev. A - received 09 Aug 2022  
5819-SK11 Rev. A - received 09 Aug 2022  
5819-SK12 Rev. B - received 09 Aug 2022  
5819-SK13 - received 09 Aug 2022

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 eastern side of Rickmansworth Road and is occupied by a two-storey, detached house. The property is externally finished in a mixture of render and brickwork and has a double hipped roof profile. It is set-back from the highway by approximately 36 metres, and is surrounded by a generously sized front and side garden. The site benefits from a single vehicle crossover along the northern section of the site frontage. Whilst there appears to have been a second vehicle crossover along the southern section of the site frontage, this has not been used for a substantial period of time as evident by the absence of a dropped kerb. There are mature trees and a high level brick wall along the site frontage, which screens views into the site.

To the north of the site is Moray House, a four-storey apartment block which is set-back from the highway by a private driveway. A detached two-storey property known as Kiln Farm is located to the east of the site. The rear site boundary adjoins the grounds of Northwood College School. On the opposite side of Rickmansworth Road is Northwood Golf Club, which is a designated Nature Conservation Site.

The site is not the subject of heritage policies. However, it is located within a Potentially Contaminated Land Zone designation. The site falls in Flood Zone 1 and has a Public Transport Accessibility Level of 2 (Poor).

### **The Proposal**

The application proposes the erection of 6 dwellings together with means of access, associated landscaping and parking, following the demolition of the existing building.

### **Planning Policy**

Development Plan:

Planning law requires that applications for planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise.

The Development Plan for the London Borough of Hillingdon currently consists of the following documents:

The Local Plan: Part 1 - Strategic Policies (2012)

The Local Plan: Part 2 - Development Management Policies (2020)

The Local Plan: Part 2 - Site Allocations and Designations (2020)

The West London Waste Plan (2015)

The London Plan (2021)

Material Considerations:

The National Planning Policy Framework (NPPF) (2021) is also a material consideration in planning decisions, as well as relevant supplementary planning documents and guidance.

Part 1 Policies:

PT1.BE1	(2012) Built Environment
PT1.EM7	(2012) Biodiversity and Geological Conservation
PT1.EM8	(2012) Land, Water, Air and Noise
PT1.H1	(2012) Housing Growth

Other Policies:

DMH 6	Garden and Backland Development
DMEI 7	Biodiversity Protection and Enhancement

DMEI 9	Management of Flood Risk
DMEI 10	Water Management, Efficiency and Quality
DMH 2	Housing Mix
DMHB 11	Design of New Development
DMHB 12	Streets and Public Realm
DMHB 14	Trees and Landscaping
DMHB 15	Planning for Safer Places
DMHB 16	Housing Standards
DMHB 17	Residential Density
DMHB 18	Private Outdoor Amenity Space
DMT 2	Highways Impacts
DMT 5	Pedestrians and Cyclists
DMT 6	Vehicle Parking
LPP D3	(2021) Optimising site capacity through the design-led approach
LPP D5	(2021) Inclusive design
LPP D6	(2021) Housing quality and standards
LPP D7	(2021) Accessible housing
LPP GG1	(2021) Building strong and inclusive communities
LPP GG2	(2021) Making the best use of land
LPP H2	(2021) Small sites
LPP SI12	(2021) Flood risk management
LPP SI2	(2021) Minimising greenhouse gas emissions
LPP T5	(2021) Cycling
LPP T6	(2021) Car parking
LPP T6.1	(2021) Residential parking
NPPF11	NPPF 2021 - Making effective use of land
NPPF12	NPPF 2021 - Achieving well-designed places
NPPF15	NPPF 2021 - Conserving and enhancing the natural environment
NPPF2	NPPF 2021 - Achieving sustainable development
NPPF5	NPPF 2021 - Delivering a sufficient supply of homes
NPPF9	NPPF 2021 - Promoting sustainable transport

## Main Planning Issues

### 1. Principle of development

#### A) Need for Housing:

Policy DMH 6 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020) states that there is a presumption against the loss of gardens due to the need to maintain local character, amenity space and biodiversity. In exceptional cases a limited scale of backland development may be acceptable, subject to the following criteria:

- i) neighbouring residential amenity and privacy of existing homes and gardens must be maintained and unacceptable light spillage avoided;
- ii) vehicular access or car parking should not have an adverse impact on neighbours in terms of noise

or light. Access roads between dwellings and unnecessarily long access roads will not normally be acceptable;

iii) development on backland sites must be more intimate in mass and scale and lower than frontage properties; and

iv) features such as trees, shrubs and wildlife habitat must be retained or re-provided.

Policy DMH 6 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020) does not define what constitutes an 'exceptional case' where a limited scale of backland development may be acceptable, nor does the supporting text contain a definition of this term. However, the supporting text to Policy DMH 6 explains that the Council's restrictive approach has been informed by the 2016 London Plan and reflects the direct and indirect value of gardens which includes their contribution to local character. Based on the wording of Policy DMH 6, it is considered that the policy presumption against development on residential gardens, is in the interest of maintaining local character, amenity space and biodiversity.

The development proposal encompasses the residential garden of Manor Lodge. As such, Policy DMH 6 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020) is applicable and should be given significant weight.

The proposal would conflict with the presumption against the loss of gardens under Policy DMH 6 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020). The Planning Statement submitted with any forthcoming planning application will need to present a case as to why the proposal should be acceptable to the Council. Planning Officers would expect the Planning Statement to justify why the proposal would not result in a harmful loss of visual openness, and to demonstrate compliance with criteria i) to iv) of Policy DMH 6.

The Council is currently able to demonstrate a five-year supply of deliverable housing sites. As such, the "tilted balance" as set out in paragraph 11(d) of the NPPF (2021) is not engaged.

#### B) Impact on Protected Species:

Policy DMEI 7 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020) states that if development is proposed on or near to a site considered to have features of ecological or geological value, applicants must submit appropriate surveys and assessments to demonstrate that the proposed development will not have unacceptable effects. The development must provide a positive contribution to the protection and enhancement of the site or feature of ecological value.

Paragraph 99 of the Government Circular 06/2005 states that: "It is essential that the presence or otherwise of protected species, and the extent that they may be affected by the proposed development, is established before the planning permission is granted, otherwise all relevant material considerations may not have been addressed in making the decision. The need to ensure ecological surveys are carried out should therefore only be left to coverage under planning conditions in exceptional circumstances, with the result that the surveys are carried out after planning permission has been granted."

The application site is sited directly opposite to a designated Nature Conservation Site (i.e. Haste Hill & Northwood Golf Courses & Cemetery). Also, the site itself includes mature trees, landscaping and vegetation. A Preliminary Ecology Report has not been included with the pre-application submission. In the absence of such report, there is insufficient information to demonstrate that the proposed development would not cause any harm to protected species (which includes bats).

A Preliminary Ecology Report should be submitted if the applicant decides to proceed with a formal planning application submission. If the report recommends that additional ecology surveys should be carried out, the reports for these additional surveys will also need to be submitted with any forthcoming

planning application.

#### C) Loss of trees:

The NPPF (2021) states that trees make an important contribution to the character and quality of urban environment and that existing trees should be retained wherever possible. This is reinforced by Policy G7 of the London Plan (2021) which states that development proposals should ensure that, wherever possible, existing trees of value are retained.

Policy DMHB 14 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020) states:

A) All developments will be expected to retain or enhance existing landscaping, trees, biodiversity or other natural features of merit.

B) Development proposals will be required to provide a landscape scheme that includes hard and soft landscaping appropriate to the character of the area, which supports and enhances biodiversity and amenity particularly in areas deficient in green infrastructure.

C) Where space for ground level planting is limited, such as high rise buildings, the inclusion of living walls and roofs will be expected where feasible.

D) Planning applications for proposals that would affect existing trees will be required to provide an accurate tree survey showing the location, height, spread and species of trees. Where the tree survey identifies trees of merit, tree root protection areas and an arboricultural method statement will be required to show how the trees will be protected. Where trees are to be removed, proposals for replanting of new trees on-site must be provided or include contributions to offsite provision.

It appears that some trees would need to be felled to facilitate the proposed development. An Arboricultural Impact Assessment, Method Statement and Tree Protection Plan has not been provided at this initial stage. In the absence of such information, the proposal's impact on the trees at the site cannot be fully assessed at this stage. It should be noted that it would be a validation requirement for an Arboricultural Impact Assessment, Method Statement and Tree Protection Plan to be submitted as part of any formal planning application submission. Planning Officers are unlikely to support a scheme which would involve the loss of trees of merit (i.e. high visual amenity value).

The Arboricultural Report would need to provide details on whether any of the proposed dwellings would encroach the Root Protection Area of the retained trees, and if so, to what extent. It must be able to demonstrate that there would be no post development pressure to lop, top or remove the trees by future occupiers in the interests of residential safety, damage to property or residential amenity. In respect to the latter, the Arboricultural Report must include an shadowing diagram to demonstrate that the proposed dwellings and associated external amenity space would achieve appropriate levels of natural light. The spread of leaf litter is a further matter that needs to be considered as it could compromise the useability of the proposed external amenity space provision.

#### HOUSING MIX:

Policy H10 of the London Plan (2021) states that new development should consist of a range of unit sizes.

Policy DMH 2 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020) states that the Council will require the provision of a mix of housing units of different sizes in schemes of residential development to reflect the Council's latest information on housing need. The Council's current information on housing need indicates a substantial borough-wide requirement for larger affordable and private market units, particularly 3 bedroom properties, as identified in the Strategic Housing Market Assessment 2016.

In accordance with Policy DMH 2 of the Hillingdon Local Plan: Part 2 - Development Management

Policies (2020), developments should demonstrate how the provision of family housing has been optimised to address local needs. The proposed housing mix comprises: 6 no. x four-bedroom (plus) houses. It is considered that the proposal would consist of an appropriate housing mix in accordance with Policy DMH 2 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020) and Policy H10 of the London Plan (2021).

#### DENSITY LEVELS:

Policy D3 of the London Plan (2021) states that all development must make the best use of land by following a design-led approach that optimises the capacity of sites. Policy DMHB 17 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020) states that all new residential development should take account of the Residential Density Matrix contained in Table 5.2.

Numerical density levels are considered to be more appropriate to larger sites and are not typically used in the assessment of schemes of less than 10 units. The key consideration is therefore whether the development would acceptably integrate with the character and appearance of the locality, and would respect residential amenity considerations. Please refer to the other sections of this report which assesses these planning considerations in further detail.

## 2. Design

#### CHARACTER AND APPEARANCE:

Paragraph 126 of the NPPF (2021) seeks the creation of high quality, beautiful and sustainable buildings. Parts b) and c) of paragraph 130 of the NPPF (2021) states that planning policies and decisions should ensure that developments are visually attractive as a result of good architecture and are sympathetic to local character and history, including the surrounding built environment.

Policies D3 and D6 of the London Plan (2021) require development proposals to be a high quality and to enhance the local context and be delivering buildings and spaces that positively respond to local distinctiveness.

Policy BE1 of the Hillingdon Local Plan: Part One - Strategic Policies (2012) states that all new developments should achieve a high quality of design in all new buildings and the public realm contributes to community cohesion and a sense of place.

Policy DMHB 11 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020) states that all development will be required to be designed to the highest standards and incorporate principles of good design. Policy DMHB 12 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020) advises that development should be well integrated with the surrounding area.

The proposal in its current form is unlikely to be supported by Planning Officers. The forward projection of the proposed dwellings beyond the established front building line of this section of Rickmansworth Road would disrupt the prevailing pattern of development. This, in turn, would cause unacceptable harm to the character and appearance of the area.

One possible option to explore is setting back the proposed dwellings closer in alignment with the front building lines of Moray House and Kiln Farm. This would require the depth of the 4.8 metre single storey rear elements to be reduced as the rear building lines should not project any deeper into the plot than currently shown. For guidance purposes, it should be noted that Policy DMHD 1 of the Local Plan generally permits single storey rear extensions up to 3.6 metres deep on semi-detached properties.

The proposed dwellings must be set-in 1 metre from the side boundaries to ensure a comfortable separation distance and to permit views to the side of the buildings. As it currently stands, the



submitted drawings fails to meet this requirement. The proposed single storey rear elements should be reduced to 3.6 metres, in line with prescribed depth set by Policy DMHD 1 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020). This enable the proposed dwellings to be set-back as recommended in the preceding paragraph, whilst ensuring an adequate amount of external amenity space is retained (refer to Section 3 for further details).

There is a resistance to crown roof profiles as set out in Hillingdon Local Plan: Part 2 - Development Management Policies (2020). The Planning Statement should provide a case as to why the proposed crown roof profiles would be acceptable given the context of the site. Alternatively, the proposed crown roof profiles could be replaced with a hipped roof. However, the applicant would need to ensure any new hipped roof profile does not result in an substantial increase to the ridge height of the proposed dwellings as this could result in a visually dominant, bulky and top heavy design.

A street scene elevation drawing and topographical survey showing the changes in ground levels should be submitted with any forthcoming planning application.

Notwithstanding the above concerns, it is considered that the Arts and Craft design of the proposed dwellings would respect the suburban character of the area and is a welcomed design approach. The proposed choice of brickwork at ground floor level and cladding at first floor would help to break up the massing of the buildings, whilst providing a degree of visual interest. Furthermore, the proposed two-storey front gables and side chimney stacks replicates the characteristic features found on neighbouring properties.

### 3. Amenity

#### NEIGHBOURING RESIDENTIAL AMENITY:

Policy DMHB 11 of the Hillingdon Local Plan: Part Two - Development Management Policies (2020) states that all development will be required to be designed to the highest standards and incorporate principles of good design. It should also not adversely impact on the amenity, daylight and sunlight of adjacent properties and open space. The Council will aim to ensure that there is sufficient privacy for residents and it will resist proposals where there is an unreasonable level of overlooking between habitable rooms of adjacent residential properties or onto private opens spaces.

There are significant concerns about the breach of the 45-degree line of sight taken from the nearest front elevation windows at Moray House. In its current form, it is considered that the proposed development would cause an unacceptable loss of outlook, sense of enclosure and overbearing impact for the occupiers at Moray House. It is strongly recommended that this relationship is re-considered prior to the submission of any forthcoming planning application.

As mentioned during the meeting, the applicant might wish to consider exploring the option of setting the proposed dwellings back to broadly align with the front building line of Moray House. This would help to mitigate the impact on the residential amenities of the occupiers at Moray House. This would necessitate a reduction to the depth of the proposed single storey rear elements.

Due to the separation distances involve, it is not considered that the proposal would cause harm to the living conditions of the occupiers at Kiln Farm.

Any formal planning application submission would involve a consultation period and an Officer site visit which might further change the views of the Council.

#### INTERNAL AMENITY SPACE:

Policy D6 of the London Plan (2021) sets out the requirements for the gross internal floor area of new dwellings at a defined level of occupancy.

Policy DMHB 15 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020) states that the Council will require all new development to ensure safe and attractive public and private spaces by referring to the Council's latest guidance on Secured by Design principles.

Policy DMHB 16 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020) states that all housing development should have an adequate provision of internal space in order to provide an appropriate living environment. The space standards set out in Table 5.1 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020) are the same as those found in Table 3.1 of the London Plan (2021).

Paragraph 5.60 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020) states, "When assessing the size of households the Council will assume that any bedroom over 11.5 sqm is capable of being occupied by two persons. Similarly any "study", "bonus room" or third living/reception room that is not annotated as a bedroom will be assumed to be capable of serving as a bedroom.

Parts 3) and 4) of Policy D6 of the London Plan (2021) requires double bedrooms to have a floor area of at least 11.5 square metres, and for single bedrooms to have a floor area of at least 7.5 square metres.

The proposed 'play room' within the loft space of the proposed dwellings could be used flexibly as an additional bedroom. It is therefore considered prudent to assess their implications as bedrooms on the quality of living accommodation. The proposed dwellings would include habitable accommodation within their loft space, and would therefore constitute as three-storey dwellings for the purposes of assessing internal space standards.

Table 3.1 of the London Plan (2021) states 5 bedroom 7- person three-storey dwelling must have a GIA of at least 125 square metres. The proposed drawings submitted with any forthcoming planning application should : i) State the gross internal area of the proposed dwellings; ii) Include the floor area of each of the bedrooms including the attic rooms; iii) include section drawings to demonstrate that the minimum floor to ceiling height would be 2.5 metres for at least 75% of the GIA of each dwelling (as required by Policy D6 of the London Plan); and iv) indicate the headroom height above 1.5 metres on the proposed loft plans.

The requested tree report would need to include a shadow assessment to demonstrate that there would not be post-development pressure from future occupants to fell the trees along the site frontage on the grounds of loss of light.

#### EXTERNAL AMENITY SPACE:

Policy DMHB 18 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020) states that all new residential development and conversions will be required to provide good quality and usable private outdoor amenity space. Amenity space should be provided in accordance with the standards set out in Table 5.3, which requires houses with four bedrooms or more should provide a minimum of 100 square metres of private usable amenity space.

The proposed dwellings must be provided with at least 100 square metres of private amenity space. This would need to be taken into account when updating the drawings to show the proposed dwellings set-back in alignment with the established front building line on Rickmansworth Road.

The proposed site plan submitted with any forthcoming planning application should include measurements of the rear garden spaces for each of the proposed dwellings. It should be noted that the side passageways leading to the rear garden space should be discounted from the measurement as these areas do not constitute as useable private amenity space.

#### 4. Highways

The Council's Highways Officer has provided the following comments:

##### "Site Characteristics & Background:

The site is located on Rickmansworth Road which is a main thoroughfare in Northwood and is thereby designated as 'classified' in the borough's hierarchy of roads. The site consists of an existing substantive piece of land accommodating a detached and vacant 'lodge' which is to be demolished with the unaltered retention of the existing carriageway crossing (cc) located to north of the envelope. A second new cc is also proposed to the south facilitating a recessed gate into the site and vehicular 'flow-thru' the site.

In lieu of the existing build, 3 pairs of 3 or 4 bedroom semi-detached units are proposed with two on-plot parking spaces per dwelling. The location is partially covered with double yellow line on-street parking controls and exhibits a 'poor' PTAL level of 2 which inherently encourages a higher dependency of the use of private motor transport.

##### Parking Provision:

Hillingdon Local Plan: Part 2 Policy - DMT 6 requires that new development will only be permitted where it accords with the council's adopted parking standards unless it can be demonstrated that a deviation from the standard would not result in a deleterious impact on the surrounding road network. London Plan (2021): Policy T6.1 (Residential Parking) requires that new residential development should not exceed the maximum parking standards as set out in table 10.3.

The proposal would require an on-plot provision of up to 2 spaces for each of the dwellings to fully comply with Hillingdon's adopted parking standard. This would equate to 12 spaces in total and 2 spaces per unit are proposed which indicates conformity. The London Plan (2021) requires a lesser maximum quantum of 1 space per unit.

Although the level of proposed provision exceeds the regional parking standard, it is considered acceptable in this case as it reduces the potential for untoward on-street parking displacement resulting from the higher dependency on the private motor car due to the 'poor' PTAL rating.

##### Electric Vehicle Charging Points (EVCP's):

In line with the London Plan (2021), within the final parking quantum there is a requirement for a minimum 20% 'active' EVCP provision with all remaining spaces being designated as 'passive' provisions. In this case, it is recommended that 1 'active' and 1 'passive' space is provided for each of the new units to future proof for anticipated demand.

##### Cycle Parking:

In terms of cycle parking, there would be a requirement to provide 2 secure and accessible space per unit which should be detailed at the time of formal application submission.

##### Vehicular Trip Generation:

Local Plan: Part 2 Policies - DMT 1 and DMT 2 require the council to consider 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.

It is crucial that evidence of anticipated residential activity predicted for the proposal is presented to determine the likely net highway capacity/traffic assignment and safety impacts on the local network.

Trip analysis based on the 'industry recognised' assessment tool (TRICS - Land Use Database) should be applied. This will allow for an informed decision to be made on the acceptability (or otherwise) of this aspect of the scheme.

#### Vehicular Access and Internal Arrangements:

There is no objection in principle to the utilisation of the existing northern carriageway crossing (cc) for the purposes of vehicular access together with a new cc located at the southern extent of the envelope. The latter should conform to the council's 'Domestic Vehicle Footway Crossover' (DVFC) 2022 Policy i.e. with a maximum width of 5m at the back of footway and 6.2m at the edge of kerb.

The internal parking layout should conform to best practice design standards (DfT's Manual for Streets - circa 2007 for new development road and parking layouts) so there is adequate turning space to allow for passenger vehicles using the site to enter and leave the plot in a forward gear which is recommended practice on safety grounds. As presented, this requirement is achieved by the provision of a second cc. A recessed gated provision would also accompany the new crossing and the proposed recession is considered acceptable as it allows for adequate stacking room for a vehicle discharging from the roadway. An effective electronic gated control is recommended as it helps to ensure a more rapid discharge of a vehicle entering the site from the public highway which promotes traffic fluidity and mutual safety for all road users.

Satisfactory highway visibility splays at both access points are also considered crucial given the status/heavily trafficked nature of Rickmansworth Road and should therefore be applied on safety grounds as per the above design standard.

#### Operational Refuse Requirements:

Refuse collection would be conducted via Rickmansworth Road. A bin storage location for each unit should be located in proximity of the public highway in order to conform to the council's 'waste collection' maximum distance parameter of 10m i.e. distance from a refuse vehicle to the point of collection. Irrespective of bin store positioning, adherence to this parameter is considered physically achievable by way of an informal on-plot regime ensuring that refuse is positioned within the above distance parameter on collection days. There are no further observations.

#### Synopsis:

In terms of transport/highways impacts, the acceptability (or otherwise) of a future planning application will be dependent on the evidence and detail provided within the submitted documentation together with an appropriate response to the comments and recommendations made within this appraisal."

The applicant might wish to consider submitting a Construction Management Plan with any future planning application. This would avoid having to discharge a pre-commencement condition, if planning permission were to be granted. The typical wording of the Construction Management Plan condition is as follows:

Prior to development commencing, a demolition and construction management plan shall be submitted to and approved in writing by the Local Planning Authority. The plan shall detail:

- (i) The phasing of development works
- (ii) The hours during which development works will occur
- (iii) Measures to prevent mud and dirt tracking onto footways and adjoining roads (including wheel washing facilities).
- (iv) Traffic management and access arrangements (vehicular and pedestrian) and parking provisions for contractors during the development process (including measures to reduce the numbers of construction vehicles accessing the site during peak hours).

(vi) Measures to reduce the impact of the development on local air quality and dust through minimising emissions throughout the demolition and construction process.

(vi) The storage of demolition/construction materials on site.

The approved details shall be implemented and maintained throughout the duration of the demolition and construction process.

Reason: To safeguard the amenity of surrounding areas in accordance with Policy DMHB 11 of the Hillingdon Local Plan Part 2 (2020).

5. Other

FLOODING AND DRAINAGE:

Policy SI 12 of the London Plan (2021) states that development proposals should ensure that flood risk is minimised and mitigated, and that residual risk is addressed. Policy SI 13 of the London Plan (2021) states that development proposals should aim to achieve greenfield runoff rates and ensure that surface water run-off is managed as close to its source as possible.

Policy DMEI 9 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020) states that proposals that fail to make appropriate provision for flood risk mitigation, or which would increase the risk or consequences of flooding, will be refused. Policy DMEI 10 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020) states that development within areas identified at risk from surface water flooding which fail to make adequate provision for the control and reduction of surface water runoff rates will be refused.

The site lies within Flood Zone 1 of the Environment Agency's Flood Risk Map. This means the site is classified as being at low risk and defined as having a less than 1 in 1,000 probability of fluvial and tidal flooding. As such, there are no restrictions on development, including more vulnerable uses such as Use Class C3 (dwellinghouses), in this location, in terms of fluvial and tidal flood risk.

It is recommended that a sustainable water management and water efficiency scheme is submitted with any forthcoming planning application to avoid having to discharge pre-commencement conditions, in the event that planning permission were to be granted. The scheme should:

- i. Provide information about the design storm period and intensity, the method employed to delay and control the surface water discharged from the site and the measures taken to prevent pollution of the receiving groundwater and/or surface waters;
- ii. Include a timetable for its implementation; and
- iii. Provide a management and maintenance plan for the lifetime of the development which shall include the arrangements for adoption by any public authority or statutory undertaker and any other arrangements to secure the operation of the scheme throughout its lifetime.

The scheme should also demonstrate the use of methods to minimise the use of potable water through water collection, reuse and recycling and will:

- iv. Provide details of water collection facilities to capture excess rainwater;
- v. Provide details of how rain and grey water will be recycled and reused in the development;
- vi. Provide details of how the dwelling will achieve a water efficiency standard of no more than 110 litres per person per day maximum water consumption (to include a fixed factor of water for outdoor use of 5 litres per person per day in accordance with the optional requirement defined within Approved Document G of the Building Regulations).

ENERGY EFFICIENCY

Policy SI 2 of the London Plan (2021) states that residential development should achieve 10% beyond

Building Regulation 2013.

Policy DMEI 2 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020) requires all developments to make the fullest contribution to minimising carbon dioxide emissions in accordance with London Plan targets.

It is recommended that a sustainability statement is submitted with any forthcoming planning application to avoid having to discharge pre-commencement conditions. The sustainability statement must demonstrate that the proposed dwellings would achieve an energy efficiency standard of 10% CO2 improvement over Building Regulations requirements Part L 2013 (TER Baseline).

#### LAND CONTAMINATION:

The Council's Land Contamination Officer has provided the following comments:

"Based on Ordnance Survey mapping and other data available in the Councils GIS records, this particular property is shown to be situated on the site of a former orchard there is also evidence that other structures were also present prior to the construction of the current building. Therefore, there is a possibility some contaminating substances including asbestos materials may be present at the site.

We have no detailed information on the precise ground conditions at the site, and would therefore advise persons working on site to take basic precautions in relation to any contamination they may discover.

Precautions should also be taken to minimise the mixing of any excavated contaminated made ground material with clean shallow soils that are to remain on site.

If asbestos is discovered this must be addressed in strict accordance with authoritative guidance and approved code of practice from the Health and Safety Executive.

I therefore recommend the following conditions should be imposed if planning permission is awarded:

#### Condition for land that may be affected by contamination

Before any part of this development is commenced a suitably structured site survey, to investigate and assess levels of any unacceptable land contamination that may be present, shall be conducted and reported to the satisfaction of the Local Planning Authority (LPA). If applicable a remediation scheme for removing or rendering unacceptable contaminants identified at the site shall be submitted to and approved by the LPA. The remediation scheme shall include an assessment of the extent of site contamination and provide details of remedial measures to be taken to avoid future risk to the occupiers and the buildings when the site is developed. All works which form part of the survey and remediation scheme shall be completed before any part of the development is occupied (unless otherwise agreed in writing by the Local Planning Authority). This condition will not be discharged until verification information has been submitted following completion of the required site survey and remedial works as applicable.

Reason To ensure occupants and users of the proposed development are not subject to any risks from contamination, all in accordance with Hillingdon Local Plan: Part 2 (January 2020) Policies - DMEI 11: Protection of Ground Water Resources and DMEI 12: Development of Land Affected by Contamination.

#### Imported Materials Condition

No contaminated soils or other materials shall be imported to the site. All imported soils for

landscaping and/or soil engineering purposes shall be clean and free of contamination. All imported soils shall be tested for chemical contamination, and the results of this testing shall be submitted, as a factual and interpretive report, to the Local Planning Authority for approval.

Reason To ensure that the occupants of the development are not subject to any risks from soil contamination in accordance with Hillingdon Local Plan: Part 2 (January 2020) Policies - DMEI 11: Protection of Ground Water Resources and DMEI 12: Development of Land Affected by Contamination"

The applicant might wish to consider submitting the Contamination Report with any future planning application. This would avoid having to discharge a pre-commencement condition, if planning permission were to be granted.

## 6. Planning Obligation and CIL (Mayor and LBH)

### S106 PLANNING OBLIGATIONS

Policy DMCI 7 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020) states that to ensure development is sustainable, planning permission will only be granted for development that clearly demonstrates there will be sufficient infrastructure of all types to support it. Infrastructure requirements will be predominantly addressed through the Council's Community Infrastructure Levy (CIL).

The proposed development is unlikely to generate requirements for planning obligations.

### COMMUNITY INFRASTRUCTURE LEVY (CIL)

The Council adopted its own Community Infrastructure Levy (CIL) on 1st August 2014. The Hillingdon CIL charge for residential developments is £95 per square metre of additional floor space. This is in addition to the Mayoral CIL charge of £60 per square metre. CIL rates are index linked. The proposal involves the erection of new dwellings and is therefore CIL liable if planning permission were to be granted.

Should you require further information please refer to the Council's Website  
<https://www.hillingdon.gov.uk/community-infrastructure-levy>

## 7. Application Submission

If an application were to be formally submitted, it would need to be supported by the following documentation:

- Application Form and associated fee
- CIL Form
- Location Plan (1:1250)
- Block Plan (1:500) and Proposed Site Plan (1:200), including private outdoor amenity space areas
- Proposed floor plans (including a roof plan), elevations and sections (including GIA of the houses and floor areas of the bedrooms)
- Proposed Street Scene Elevation
- Tree Survey, Arboricultural Impact Assessment, Method Statement and Tree Protection Plan
- Preliminary Ecology Assessment
- Construction Management Plan
- Landscaping Scheme
- Sustainability Statement
- Topographical Survey
- Contamination Report
- Planning Statement/ Design and Access Statement

## 8. Conclusion

It is unlikely that the proposal, in its current form, could be supported by the Council. There is an in principle objection to the loss of gardens. As such, further information would be required to justify why the proposal would meet the requirements of Policy DMH 6 of the Hillingdon Local Plan Part 2 (2020).

There are significant concerns that the proposed development would have a harmful impact to the character and appearance of the area, and upon the residential amenities of the neighbouring occupiers at Moray House. It has not been demonstrated that no harm would be caused to protected species, and that trees of merit and high visual amenity value would be retained.

The proposed development would therefore conflict with national, regional and local planning policies and guidance and could not be supported by the Council without amendments being made to the scheme as set out in the above report.

**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.

**Nesha Burnham  
Principal Planning Officer  
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 on a site by site basis.

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





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