



11 Swakeleys Road, Ickenham

Planning Statement

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1. Introduction

1.1 This Planning Statement has been prepared by Nexus Planning on behalf of Swakeleys Ltd. (the 'Applicant') in support of a full planning application submitted for residential development at 11 Swakeleys Road, Ickenham (the 'Site'). The application is submitted to the London Borough of Hillingdon (LB Hillingdon) as the Local Planning Authority (LPA) for the following development:

Change of use of rear first floor from sui generis and erection of second floor extension to provide new residential dwellings, alongside associated works. Retention of ground floor use with minor internal alterations.

1.2 As demonstrated through this report, the development proposal has the following key benefits:

- Provision of a mix of high-quality residential units in a sustainable, town centre location to meet the housing need within the Borough;
- Providing a high-quality sustainable design and improving the sustainability of the existing building fabric;
- Optimising the capacity of the Site by using the airspace above an existing commercial premises;
- Retaining the existing Public House on the ground floor level;
- Providing a generous amount of bicycle parking to encourage sustainable transportation;
- Ensuring there is no harm to the historic environment;
- Providing an excellent amenity outcome for future occupants, with regard to access to sunlight/daylight, protection from external noise and air pollution sources, and an adequate provision of internal space;
- Providing useable external amenity space where practical; and
- Providing convenient and practical storage areas for refuse and recycling.

1.3 The following documents are submitted in support of this application:

- Application forms;
- Ownership Certificate;
- Community Infrastructure Levy forms;
- Application drawings, prepared by Marcus Beale Architects;
- Design and Heritage Statement, prepared by Marcus Beale Architects;
- Daylight and Sunlight Assessment, prepared by Point 2;
- Noise Impact Assessment, prepared by Anglia Consultants;
- Demolition and Construction Management Statement, prepared by Pulsar;
- Air Quality Assessment, prepared by Aether; and
- Fire Strategy Statement and Drawings, prepared by Marcus Beale Architects.

Structure of this Planning Statement

1.4 The purpose of this Planning Statement is to appraise the scheme within the context of the allocations that apply to the Site and the policies set out in the National Planning Policy Framework (NPPF) (2023) and the Development Plan.

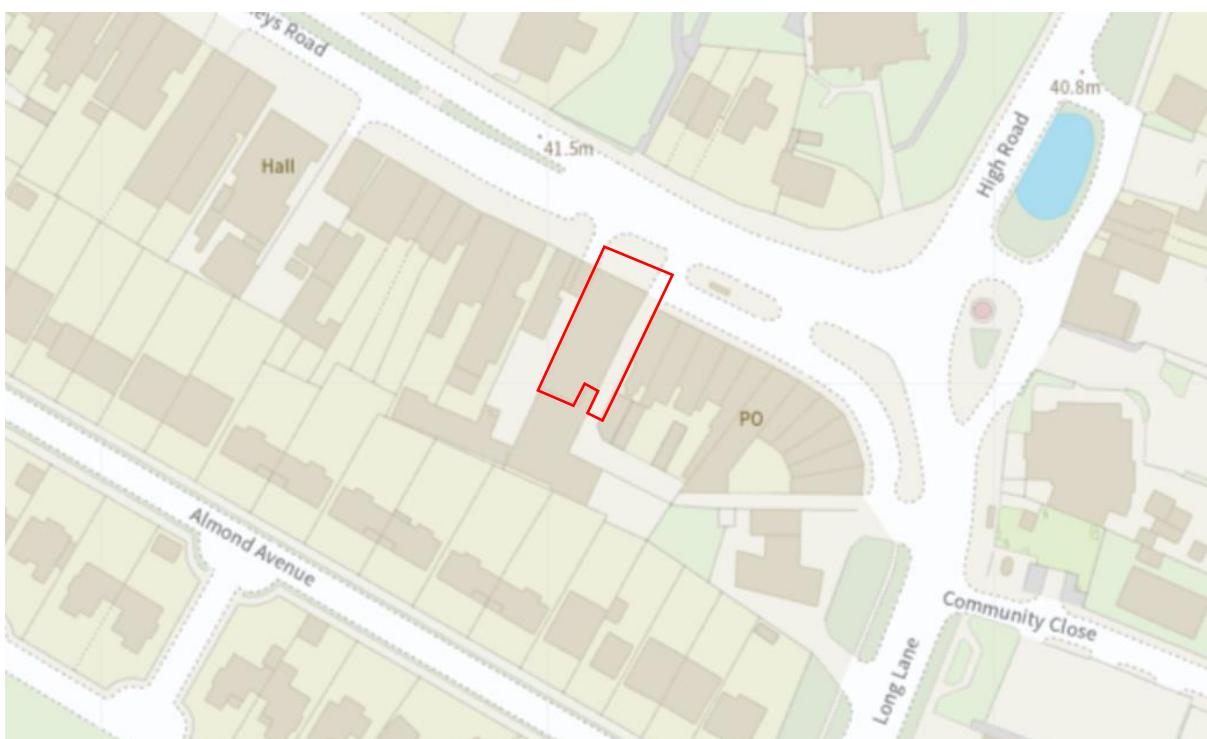
1.5 The remainder of this Statement is set out as follows:

- Section 2 describes the Site, surroundings and planning history;
- Section 3 summarises the proposed development;
- Section 4 sets out the engagement undertaken prior to the submission of an application;
- Section 5 summarises the key national and Development Plan policies relevant to the proposals; and
- Section 6 sets out the key considerations and explains why planning permission should be granted.

2. Site Context

The Site and Surrounding Area

2.1 The Site comprises approximately 486 square metres of brownfield land, relatively centrally within the Borough of Hillingdon. The Site currently contains a two-storey building with a public house at the ground floor level. The first-floor level contains office space and facilities ancillary to the public house as well as a two-bedroom residential flat. It is bordered by Swakeleys Road to the north, a service road to the east, and commercial businesses to the south and west. There is also a two-bedroom flat on the first-floor level of 13 & 15 Swakeleys Road, which immediately adjoins the Site's west boundary.



2.2 No planted vegetation currently exists on the Site.

2.3 Pedestrian access to the public house is provided to the Site via the main building entrance from Swakeleys Road, and the first-floor level residential flat has independent access on the west side of the building fronting Swakeleys Road. There are also service entrances via the service road that runs along the Site's east boundary. There is no on-site car parking is provided.

2.4 The Site is positioned within the Primary Shopping Area of the Ickenham 'Local Centre', which comprises predominantly commercial and retail tenancies at ground floor level. Residential areas surround the Local Centre and there are also some residential dwellings that exist amongst the commercial uses.

2.5 The Local Centre as well as the land to the south, east and west is contained within a Conservation Area. There are no Statutorily Listed Buildings within or adjacent to the Site, however, there are various Grade II and II* Listed Buildings on the north side of Swakeleys Road and east of High Road. The Site is also within an Archaeological Priority Area and an Air Quality Management Area (AQMA).

2.6 The Site is well serviced by public transport, with the Ickenham Tube Station being approximately 300 metres to the south-east, and multiple bus stops along Swakeleys Road and High Road/Long Lane. It has a Public Transport Accessibility Level (PTAL) of 3, with 1a being the worst and 6 being the best, and is therefore considered to have a good level of access to public transport.

2.7 The Site is also well-located for local services including employment, shopping areas, schools, health care, and outdoor and indoor leisure facilities., and is considered to be an excellent location for residential development.

Planning History

2.8 An overview of the Site's planning history that is relevant to the proposals and available on the Council's website is outlined in Figure 2.8.1 below:

Figure 2.8.1

Reference	Decision	Date of Decision	Description of Development
6626/Z/97/1661	Approval	07 October 1997	Erection of a two storey building for a traditional ale, food and wine house and residential accommodation (involving demolition of existing petrol filling station).
6626/AF/98/2466	Approval	23 December 1998	Installation of a new shopfront and entrance.
6626/AH/99/0546	Approval	18 March 1999	Details of noise insulation and ventilation scheme in compliance with conditions 3,4 and 5 of planning permission ref.6626Z/97/1661 dated 27/02/97; Erection of a two storey building for a traditional ale, food and wine house and residential accommodation.
6626/APP/2020/3949	Refusal	30 November 2020	Installation of a fixed glazed barrier system around the external seating area.
6626/APP/2021/1403	Withdrawn	08 April 2021	Installation of cast iron railing around external seating area.

3. Development Proposals

3.1 This section provides an overview of the proposals. Full details of the proposals are contained within the drawings and technical supporting information which accompany this planning application (set out in Paragraph 1.3 above).

3.2 The proposed scheme consists of the conversion of the rear first floor and a second floor extension to provide five new units in addition to the existing residential unit at the first floor level, which will be reconfigured as part of the proposals. The existing public house (Sui Generis) on the ground floor will be retained, with internal alterations to the rear extent of the ground floor.

3.3 The proposed scheme has been designed to optimise the use of the Site, while delivering a high-quality architecturally led scheme that is respectful of the heritage elements of the existing building and wider Ickenham Village Conservation Area.

Residential Proposals

3.4 The residential element of the proposal relates to the provision of an additional five self-contained flats, ranging in size between one-and two-bedrooms. These will be positioned over the first and second floor levels. Given that the Site currently contains one unit on the first floor level which is to be reconfigured, the proposal will result in the net delivery of six units.

3.5 Three of the six units will enjoy private outdoor amenity space in the form of terraces or balconies, which have been designed to optimise residential amenity for the future occupants while ensuring there are minimal impacts on the Site's heritage significance. These three private outdoor amenity space standards each meet or exceed the London Plan minimum space requirements.

3.6 All the flats will either be double or triple aspect, and access to natural daylight is maximised through the positioning of windows and incorporation of skylights where practical. Windows for the residential units have been positioned to ensure a high level of privacy is achieved for both adjoining dwellings and future occupants of the new units. Where required, some windows are obscured to restrict views.

3.7 Access to all residential units will be provided via the independent existing staircase immediately to the west of the public house entrance along Swakeleys Road. An additional stair lobby will be incorporated to provide access to the second floor.

Pub Alteration Proposals

3.8 The existing public house at the ground level is proposed to be retained, with minor alterations proposed which will enable the development of additional residential units above.

3.9 The rear extent of the ground floor is proposed to be reconfigured to provide a kitchen, WCs and storage, which will replace the respective amenities that will be removed from the first floor level to allow for the conversion of this space to residential dwellings. The staircase adjoining the Site's western boundary wall will be removed to increase the area available to the public house.

3.10 A service entry for the pub as well as a separate entry for the bin store area will be retained along the service road to provide independent access for the Site's servicing requirements.

- 3.11 It is expected that the number of staff employed within the pub operation will not change, and as such there is no anticipated loss of employment on the Site.
- 3.12 The outdoor seating area along Swakeleys Road is not proposed to be amended.

Building Extensions and Alterations Proposals

- 3.13 In order to accommodate the five additional residential units, some building alterations will be required. These are outlined below.

Rear extension and change of use

- 3.14 Within the rear extent of the Site, the existing 'back-of-house' uses ancillary to the pub on Level 1 will be converted to residential uses, accommodating 2no. new two-bedroom flats. The area that previously accommodated a ground level roof light will be used as terrace areas for Flat 1 and 2 on Level 1.
- 3.15 The residential use will also be extended to Level 2, including within the roof pitch at the front of the property as well as with a building extension to the rear. Three new residential units will be accommodated at this level. The second floor rear extension will incorporate a flat roof, consistent with the rear of adjoining buildings. It has been designed to minimise visibility of the extension when viewed from Swakeleys Road.

Building Frontage Alteration

- 3.16 In order to ensure Flat 4 achieves appropriate internal measurements, minor reconfigurations of the building frontage are required, including alterations to the roof slope and existing gable and the addition of a new dormer. The level of the eaves will not be altered.
- 3.17 The proposed alterations will provide greater architectural consistency with the buildings within the surrounding area, including the immediate adjoining building to the west.
- 3.18 The materiality of the front façade along Swakeleys Road is proposed to be updated, to bring the building in line with the character of the conservation area. This will include covering the white painted render with new tile-hanging, incorporating traditional timber window frames, and covering the new roof with clay tiles.

Parking proposals

- 3.19 The scheme incorporates 12 bicycle parking spaces within a secure storage area on the first floor, in line with the requirements of the London Plan. These spaces will be exclusively for the use of the occupiers of the residential units and will be accessed from the pedestrian entrance from Swakeleys Road.
- 3.20 Given the highly sustainable location, car parking is not provided on Site.

4. Pre-application Engagement

4.1 Pre-application advice was sought from the London Borough of Hillingdon in June 2021 and a subsequent meeting was held in July 2021. In August 2021, a revised scheme was submitted in response to comments received at the pre-application meeting.

4.2 Written advice was issued in September 2021 (planning ref. 6626/PRC/2021/128). A summary of the key feedback received from the LPA is provided at Figure 4.2.1, alongside how each point has been addressed within the proposed development.

Figure 4.2.1

Topic	Comment	Proposal Response
Protecting Public Houses	<p>The proposed development involves the loss of the first floor of the public house. As such, any future application submission must demonstrate that this would not compromise the current or future operation or viability of the public house.</p>	<p>The public house floorspace is proposed to be consolidated in order to provide a more efficient use of space. This will involve reconfiguring the rear of the ground floor level to accommodate the relocated washroom areas from the first floor level. The loss of Level 1 floor space will be compensated to some extent by removing the existing staircase and lift.</p> <p>While this will result in a minor loss of public house floorspace, the scheme seeks to retain the existing public house at the ground floor level, with no alterations proposed to the bar, or indoor and outdoor seating areas. There is also no anticipated loss of employment as a result.</p> <p>As such, the proposed alterations will have a negligible impact on the operation of the public house.</p>
Front Building Design (raising the height)	<p>The principle of raising the height of the building would not be supported from a conservation perspective. It would unacceptably exacerbate the presence of the building, within such a sensitive context.</p>	<p>The design scheme seeks to increase the overall height of the front roof addressing Swakeleys Road by 1.58 metres, which will be achieved by raising the roof pitch while retaining the height of the eaves. This alteration is necessary in order to optimise the capacity of the Site in line with London Plan Policy D3.</p> <p>With regard to the Site's heritage context, the Design and Heritage Statement prepared by Marcus Beale Architects notes that the</p>

		<p>buildings on the south side of Swakeleys Road have for the most part a neutral effect on the character of the area. It also notes that the Site's effect on the heritage setting is marginal because it sits behind the much larger three storey parade of shops to the east. The Heritage Impact Statement explains:</p> <p><i>"Although it can be seen from the assets, there are few views of the assets that would have the application site in the foreground, and they are separated by a busy road."</i></p> <p>Please refer to Section 6 of this Statement as well as the Heritage Impact Statement for further discussion on design and character in the heritage setting.</p>
Front Building Design (new dormer)	Front facing dormers are not generally deemed to be acceptable, particularly within conservation areas, and the articulation of the dormer would fail to lack any distinctive quality.	<p>Front facing dormers are common throughout the Ickenham Village Conservation Area and are therefore appropriate on the Site. Of note, the Heritage Impact Statement outlines that the buildings on the south side of Swakeleys Road '<i>exhibits some variety: mostly pitched roofs, gables, hips and dormer windows, of which there are many examples, old and new, throughout the conservation area</i>'. It also states that '<i>there are many dormers and gables throughout the conservation area. These features are typical, even characteristic, occasionally quirky</i>'.</p> <p>Please refer to the Heritage Impact Statement for further detail.</p>
Rear Building Design	In combination with the proposed rails and lift core structure, [the flat roof] design feature at third storey level would appear incongruous. Notably, it would actually extend higher than the front building and would be considered unacceptable for this reason.	<p>The design has been revised to reduce the overall height of the rear building by removing the communal amenity space from the roof. This ensures the rear building does not extend higher than the front building and remains inconspicuous in the streetscape setting.</p>
Dormer Design (rear)	it is observed that [the rear-facing dormer] would not be subservient to the existing roof. As noted above, the proposed dormer should	<p>Council's concerns reference Policy DMHD of the Local Plan Part 2, though this policy is relevant only to householder development</p>

	<p>be amended to a traditional design and should be well proportioned and appropriately sited within the roof face.</p>	<p>which is not applicable to the proposed scheme. However, we note that the rear dormer has been carefully designed to ensure it is well proportioned to the existing building and will not be visible from Swakeleys Road.</p>
Impact on Neighbours	<p>It is not anticipated that a detrimental impact would arise [on residential properties] in terms of overdominance, daylight and sunlight or overlooking.</p> <p>Regarding the receipt of daylight and sunlight and the impact of the development on neighbouring residential properties in terms of daylight and sunlight, the proposed development may have an impact.</p>	<p>A Daylight and Sunlight Assessment has been completed by Point 2. The assessment determines that all neighbouring properties will achieve target daylight and sunlight levels with the exception of two rooms within the first floor flat at 13 & 15 Swakeleys Road.</p> <p>However, it is noted within the report that the two affected rooms will still meet the recommended levels for daylight when considering daylight distribution (NSL), and are above levels described as reasonable by the GLA. The report concludes that the impact to the two rooms should be considered acceptable as the reductions in daylight result in only a minor adverse impact to the dwellings.</p> <p>In addition, the two rooms are served by windows that face over the shared boundary, where different criteria may be appropriate for assessing the impact of a proposal. This is particularly true within a Town Centre context, where some impact is unavoidable in order to make the most efficient use of the site. There will also be good levels of daylight distribution and sunlight achieved to the living room, ensuring a high level of amenity is achieved for the dwelling.</p>
Internal Living Conditions for Future Occupiers	<p>The single bedroom for Flat 2 provides a single bedroom which measures less than 7.5 square metres in floor area.</p> <p>Given the location of the Site next to the vehicle repair shop, it is recommended that a noise impact assessment is submitted.</p>	<p>The design has been revised to ensure all single bedrooms have an area of 8 square metres, which meets the minimum requirement outlined at Policy D6 of the London Plan.</p> <p>A Noise Impact Assessment has been prepared by Anglia Consultants, which assesses the potential impact of internal noise from the pub activities and from other</p>

		commercial sources. The assessment concludes that the guidance on internal noise levels can be achieved through appropriate glazing and ventilators. Additionally, it was recommended that the need for mitigation measures should be verified when the first-floor demolition works have been completed.
Private Amenity Space	<p>Given that the location of the Site is next to commercial premises, it is emphasised that the proposed private balconies would need to be designed with measures to mitigate the impact of noise.</p> <p>The applicant is encouraged to explore further ways of incorporating more good quality and useable amenity space into the proposed design.</p>	<p>The Noise Impact Assessment prepared by Anglia Consultants confirms that noise levels in the proposed balcony and terrace areas would meet the external noise guidelines.</p> <p>Three of the six flats will benefit from high-quality and usable private external amenity space. However, and as discussed at Paragraph 6.42 of this Planning Statement, the outdoor amenity space standards of the Local Plan are not practically achievable for all proposed flats. Given that there are numerous public amenity spaces within a short walking distance of the Site, we do not consider that the alteration of the design to provide outdoor amenity space for all units would outweigh the benefit of providing greater housing supply.</p>
Operational Refuse Requirements	Accepted 'waste distance' collection standards encourage waste collection distances to be within 10m from the point of collection by refuse vehicle. Also carrying distances from each flat to the bin storage area should not exceed the recommended standard of 30m.	Refuse and recycling storage will be provided at ground floor level adjacent to the service road to the east of the Site. Waste collection will be able to occur from directly adjacent to the storage area, which is approximately 30 metres from the entrances to the residential units.
Access	In terms of accessible housing provision, particular attention should be paid to the approach, hard and soft landscape materials, amenity space, entrance lobby arrangements within flats, and to spatial requirements within the bedrooms, bathrooms and kitchen areas.	Given the constraints of the Site being an existing building with upper floor conversions and extensions, it is not feasible for ground floor accessible housing to be provided.
Energy	As currently presented, the proposed development would not constitute a major scale form of development. Notwithstanding the above, the development should still be	A sustainable outcome will be achieved by constructing the building extensions using lightweight timber frame or metal stud and by

	<p>designed in order to reduce greenhouse gas emissions.</p>	<p>providing high levels of thermal insulation and air tightness.</p>
Air Quality	<p>Although the number of units and associated parking is relatively low, there must be adequate protection of new occupiers from the road source emissions.</p> <p>After appropriate on-site mitigation measures have been incorporated, any remaining development emissions will be required to be off-set.</p> <p>Any formal planning application submission will require an air quality statement.</p>	<p>In line with Paragraph 192 of the NPPF, the proposal takes into account the presence of an Air Quality Management Area and has taken measures to reduce risk of exposure to poor air quality from the external environment.</p> <p>This has been achieved through the thermal lining of existing fabric to improve conditions, and through incorporating high levels of thermal insulation and airtightness throughout the building extensions.</p> <p>Further, the proposal promotes sustainable development through the provision of housing growth on a brownfield site in a sustainable town centre location.</p> <p>Please refer to Paragraphs 6.63-6.64 of this Planning Statement for further information on mitigation strategies regarding air quality.</p>
Crime Prevention	<p>Any grant of planning permission would be subject to a secure by design condition to achieve appropriate accreditation.</p>	<p>An appropriate accreditation for crime prevention can be secured by way of an agreed condition, which is to be determined through future discussions between the LPA and the applicant.</p>
Fire Safety	<p>Applicants are encouraged to consider fire safety early within the development process.</p>	<p>A Fire Statement is not required for minor applications. Notwithstanding this, fire safety has been considered throughout the design process to ensure future occupants are not exposed to unnecessary fire risk.</p>

5. Planning Policy

5.1 This section of the Planning Statement provides an overview of the key planning policies and other material considerations relevant to the Proposed Development.

National Planning Policy Framework

5.2 The National Planning Policy Framework (NPPF) (2023) represents a material planning consideration in the assessment of planning applications. The NPPF sets out the Government's planning policies and how these are expected to be applied.

5.3 At paragraph 11, the NPPF outlines a presumption in favour of sustainable development. For decision-taking this means 'approving development proposals that accord with an up-to-date development plan without delay'.

5.4 Paragraphs 47 of the NPPF seek to ensure that local planning authorities give weight to relevant policies in emerging plans and that applications are determined in accordance with the development plan.

5.5 Paragraph 60 sets out the Government's objective to significantly boost the supply of housing.

5.6 Paragraph 76 of the NPPF requires local planning authorities to annually identify and update, as a minimum, a five year supply of housing at specific deliverable sites unless the adopted plan is less than 5 years old and it has identified at least a five year supply of specific, deliverable sites at the conclusion of the examination.

5.7 Paragraph 90 of the NPPF provides that planning policies and decisions should support the role that town centres play at the heart of local communities. Further, paragraph 86(f) seeks to ensure that planning policies recognise that residential development plays an important role in ensuring the vitality of centres.

5.8 Paragraph 123 of the NPPF seeks to ensure that planning policies and decisions promote an effective use of land in meeting the need for homes and other uses, using brownfield land where possible. Further, at Paragraph 124(c) it states that planning policies and decisions should give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs.

5.9 Paragraph 124(e) of the NPPF supports opportunities to use the airspace above existing residential and commercial premises for new homes.

5.10 Paragraph 128 of the NPPF encourages development that takes into account the identified need for different types of housing, viability, availability of infrastructure services, maintaining the prevailing character, and the design of attractive places.

5.11 Paragraph 131 of the NPPF encourages the creation of high quality, beautiful and sustainable buildings.

5.12 Paragraph 135 of the NPPF seeks to ensure developments will function well and add to the quality of the area, are visually attractive, are sympathetic to local character, establish a strong sense of place- and optimise the potential of the Site to accommodate a mix of development.

5.13 Paragraph 139 of the NPPF considers that significant weight should be given to development that demonstrates outstanding or innovative designs which promote high levels of sustainability while fitting in with the overall form and layout of their surroundings.

5.14 Paragraph 212 of the NPPF encourages opportunities for new development within Conservation Areas, to enhance or better reveal their significance.

5.15 The NPPF is supported by the Government's Planning Practice Guidance (PPG), which provides further detail and context to the Framework.

The Development Plan

5.16 Section 38 (6) of the Planning and Compulsory Purchase Act 2004 requires that planning applications are determined in accordance with the Development Plan unless material considerations indicate otherwise.

5.17 The adopted Development Plan for the London Borough of Hillingdon comprises:

- Hillingdon Local Plan Part 1: Strategic Policies (November 2012);
- Hillingdon Local Plan Part 2: Development Management Policies (January 2020);
- Hillingdon Local Plan Part 2: Site Allocations and Designations (January 2020); and
- The London Plan (March 2021).

Hillingdon Local Plan Part 1: Strategic Policies

5.18 The Hillingdon Local Plan Part 1 is the key strategic planning document for Hillingdon and will support the delivery of the spatial elements of the Sustainable Community Strategy. The key policies from the Local Plan Part 1 considered relevant to the proposal include:

- Policy E5: Local Centres
- Policy H1: Housing Growth
- Policy HE1: Heritage
- Policy BE1: Built Environment
- Policy EM1: Climate Change Adaptation and Mitigation
- Policy EM6: Flood Risk Management
- Policy EM8: Land, Water, Air and Noise
- Policy EM11: Sustainable Waste Management
- Policy T1: Accessible Local Destinations

Hillingdon Local Plan Part 2: Development Management Policies

5.19 The Local Plan Part 2: Development Management Policies) seeks to provide detailed policies that will form the basis of the Council's decisions on individual planning applications. The key policies from the Local Plan Part 2: Development Management Policies considered relevant to the proposal include:

- Policy DMTC 2: Primary and Secondary Shopping Areas
- Policy DMTC 3: Maintaining the Viability of Local Centres and Local Parades
- Policy DMH 2: Housing Mix
- Policy DMHB 1: Heritage Assets
- Policy DMHB 2: Listed Buildings
- Policy DMHB 3: Locally Listed Buildings
- Policy DMHB 4: Conservation Areas
- Policy DMHB 7: Archaeological Priority Areas and Archaeological Priority Zones
- Policy DMHB 11: Design of New Development

- Policy DMHB 14: Trees and Landscaping
- Policy DMHB 15: Planning for Safer Places
- Policy DMHB 16: Housing Standards
- Policy DMHB 17: Residential Density
- Policy DMHB 18: Private Outdoor Amenity Space
- Policy DMEI 2: Reducing Carbon Emissions
- Policy DMEI 10: Water Management, Efficiency and Quality
- Policy DMEI 14: Air Quality
- Policy DMCI 7: Planning Obligations and Community Infrastructure Levy
- Policy DMT 1: Managing Transport Impacts
- Policy DMT 2: Highways Impacts
- Policy DMT 5: Pedestrians and Cyclists
- Policy DMT 6: Vehicle Parking

Hillingdon Local Plan Part 2: Site Allocations and Designations

5.20 The Hillingdon Local Plan Part 2: Site Allocations and Designations sets out sites for development to meet the Borough's needs to 2026, based on the level of growth and general locations set out in the Local Plan Part 1.

5.21 The Site is not identified as an allocated site.

The London Plan

5.22 The London Plan sets out an integrated economic, environmental, transport and social framework for the development of London over the next 20-25 years. The key policies from the London Plan which are considered to be relevant to the proposal include:

- Policy GG2: Making the best use of land
- Policy GG4: Delivering the homes Londoners need
- Policy GG6: Increasing efficiency and resilience
- Policy SD6: Town centres and high streets
- Policy D3: Optimising site capacity through the design-led approach
- Policy D4: Delivering good design
- Policy D5: Inclusive design
- Policy D6: Housing quality and standards
- Policy D7: Accessible housing
- Policy D11: Safety, security and resilience to emergency
- Policy D12: Fire safety
- Policy D13: Agent of change
- Policy D14: Noise
- Policy H1: Increasing housing supply
- Policy H2: Small sites
- Policy H10: Housing size mix
- Policy HC1: Heritage conservation and growth
- Policy HC7: Protecting public houses
- Policy G5: Urban greening
- Policy SI1: Improving air quality

- Policy SI4: Managing heat risk
- Policy SI12: Flood risk management
- Policy SI13: Sustainable drainage
- Policy T1: Strategic approach to transport
- Policy T4: Assessing and mitigating transport impacts
- Policy T5: Cycling
- Policy T6: Car parking
- Policy T6.1: Residential parking
- Policy T7: Deliveries, servicing and construction
- Policy DF1: Delivery of the Plan and Planning Obligations

Supplementary Planning Documents

5.23 Supplementary Planning Documents (SPDs) provide detailed advice to support the delivery of the local development plan. SPDs relevant to the proposed development include the following:

- Planning Obligations SPD (July 2014); and
- Hillingdon's Sustainable Community Strategy.

6. Planning Considerations

6.1 In this section, we assess the proposal against relevant policies identified in the local development framework above. The key planning considerations, as identified in pre-application discussions with the LPA and considered in further detail within this chapter, comprise the following:

- Principle of Development;
- Residential Unit Mix;
- Design and Character;
- Heritage and Archaeology;
- Residential Amenity;
- Sustainability and Air Quality Management;
- Transport and Highways; and
- Refuse and Recycling.

Principle of Development

Residential

6.2 Planning policies at National and local levels seeks to ensure that developments make the most effective use of land, consistent with guidance in the National Planning Policy Framework (NPPF, 2023). **Paragraph 60** of the NPPF aims to significantly boost the supply of homes, and **Paragraph 124** expands on this, requiring Local Planning Authorities (LPAs) to give substantial weight to the value of using suitable brownfield land within settlements for homes, including making the most of opportunities to use the airspace above existing residential and commercial premises. Similarly, **Policy H1** of the London Plan seeks to optimise the potential for housing delivery on all suitable and available brownfield sites, and **Policy H2** provides that Boroughs should pro-actively support well-designed new homes on small sites. Further to this, **Policy GG2** and **Policy D3** seeks to ensure development makes the best use of land by following a sustainable and design-led approach that optimises the capacity of sites. **Policy GG4** of the London Plan also seeks to ensure that more homes are delivered.

6.3 The Site is situated within the Ickenham 'Local Centre', being a localised catchment that is accessible by walking and cycling and where essential shops are protected by planning policy. The proposal for five additional residential units aligns with the purpose of the Local Centre as it will not result in noticeably reduced commercial/employment land and will contribute to meeting the strategic dwelling requirement in line with **Policy H1** of the Local Plan Part 1.

6.4 The proposed building extension above the existing pub will also closely align with the above-mentioned objectives of the NPPF and the London Plan, as it will contribute to meeting the demand of housing on a suitable brownfield site and will utilise the airspace above an existing commercial premises. The proposal to provide five additional residential units on a small site will make a meaningful contribution towards the LB Hillingdon strategic housing targets in a sustainable location and should therefore be favourably considered.

6.5 Being within the Ickenham Local Centre, the Site presents an exceptional opportunity for residential growth as it has excellent accessibility to local amenities and public infrastructure, which will cater for everyday shopping needs, community services and recreation grounds. It is also within walking distance to transport infrastructure, including local bus services, the London Underground network and National Rail. We note that the Site currently accommodates one unit, demonstrating its suitability for residential uses. In addition, residential uses on upper floors are encouraged within local centres as this provides opportunities for sustainable living.

6.6 The proposal implements a design-led approach which carefully considers the design and form of the existing building as well as the character of the streetscape and Conservation Area. In line with Policy GG2 and D3 of the London Plan, the proposal optimises the capacity of the Site and makes the best use of land in a sustainable and sensitive manner.

6.7 As such, it is evident that there is a wealth of policy support for the principle of residential development in this location, insofar as it would add to Hillingdon and Ickenham's housing stock, actively contribute towards borough housing targets, and support the vitality and viability of Ickenham Local Centre by retaining the existing pub.

Public House

6.8 Retention of existing community facilities (including public houses) to enhance the sustainability of communities and residential environments is supported by planning policy at **Paragraph 97** of the NPPF and **Policy DMCI1** of the Local Plan Part 2. In addition, **Policy HC7** of the London Plan seeks to protect public houses where they have a heritage, economic, social or cultural value to local communities.

6.9 The scheme seeks to retain the existing public house at the ground floor level, with some alterations proposed to consolidate the floorspace in order to enable a more efficient use of space. This will be achieved through reconfiguring the rear of the ground floor to accommodate the ancillary space, lavatories and storage which will be relocated from the first floor level.

6.10 Although the overall floor area of the pub will be reduced (ie. loss of Level 1 floor space), some of the lost floor space will be compensated by removing the existing staircase and lift. There is also no anticipated loss of employment on the Site. Given this, the existing public house will be sufficiently protected and the loss of floorspace will be inconsequential to the viability of its operation. As such, the proposal is in line with Policy outlined in the NPPF, the London Plan and the Local Plan.

6.11 Further to the above, it is important to acknowledge that smaller pubs with less overheads have historically been more viable, and provision of facilities on the ground floor level is more desirable for customers. The pub was previously operated by Wetherspoons, who found that the site was not feasible. The directors of Swakeleys Ltd (Applicant) has over 35 years' experience in the business of public houses, and is committed to protecting the existing pub through managing a successful business.

6.12 As such, the proposed alterations will have a negligible impact on the operation of the public house and will improve its overall commercial viability.

Residential Unit Mix

6.13 **Policy H10** of the London Plan outlines that schemes should generally consist of a range of unit sizes, and notes that well-designed one- and two-bedroom units in suitable locations which are closer to town centres or public transport have the ability to free up existing family homes. Further to this, **Policy DMH2** of the Local Plan Part 2 requires the provision of a mix of housing units of different sizes to reflect the Council's latest information on housing needs.

6.14 In line with the policy objectives outlined above, the scheme proposes a tenure and unit breakdown as outlined as follows:

- 1 x 1-bed, 2 person unit (16.7%)
- 5 x 2-bed, 3 person unit (83.3%)

6.15 The Site is located within a Local Centre and is within walking distance of services and infrastructure including multiple modes of public transport, that will meet the everyday needs of residents. The Site also has a PTAL rating of 3, which is classified as being of moderate to good accessibility and which the London Plan outlines is appropriate for incremental intensification. It is therefore considered that the Site is appropriately located to accommodate the proposed mix of one- and two-bedroom units.

6.16 We note that the pre-application written advice provided by LB Hillingdon on 28 September 2021 (ref. 6626/PRC/2021/128) confirmed their support for the proposed mix of units, stating:

"Given the constraints of the site, this is considered appropriate."

Design and Character

6.17 **Policy D3** of the London Plan states that development must make the best use of the land by following a design-led approach that optimises the capacity of sites. **Policy D4** supports this by stipulating that the design of development proposals must be thoroughly scrutinised by the LPA throughout the planning process to ensure high quality design.

6.18 The NPPF addresses design of new developments at **Paragraphs 131 and 139**, and encourages the creation of high quality, beautiful and sustainable buildings that demonstrates outstanding or innovative design while fitting in with the overall form and layout of their surroundings.

6.19 Similarly, **Policy BE1** of the Hillingdon Local Plan Part 1 requires that all new development improves and maintains the quality of the built environment in order to create successful and sustainable neighbourhoods. In order to achieve this, the Policy provides that new developments should enhance the area's local distinctiveness and contribute to community cohesion, as well as fit in with the context of Hillingdon's buildings and townscapes.

6.20 Further to this, **Policy DMHB11** of the Local Plan Part 2 requires that all development is designed to the highest standards and incorporates principles of good design, while ensuring the amenity of adjoining properties and open space is not adversely impacted.

6.21 The design of the proposal has been carefully considered with regard to the Site's context, to ensure it contributes to street beautification and is appropriate within its neighbourhood character context. The project architects, Marcus Beale Architects, are well-respected designers who take great care in quality and intricate detailing, and their designs are each carefully customised to ensure they are well suited to the Site and its setting.

6.22 The proposed building extension and alterations demonstrates design excellence, providing an additional five dwellings to support housing growth while ensuring visual impact from the street is limited. As such, the proposal optimises the capacity of the Site in line with Policy D3 of the London Plan.

6.23 One of the new units will be accommodated within the roof space, which will require a minor increase to the roof pitch. From a design perspective, the adjustment to the roof pitch will bring the currently uncharacteristically low pitched gable in line with the roof forms along Swakeleys Road. Further to this, the removal of white brick render from the building façade will ensure the building design coincides with the broader street character, where rendered facades are uncommon. The upper floor extensions will be set behind the pitched gable, and will only be visible when observed from obscure angles. As such, it will not disturb the existing built form pattern within the street. The building's façade at the ground level including the public house and external seating area will not be altered, which ensures there is very limited impact for the pedestrian experience.

6.24 In line with the relevant planning policy as discussed above, the proposed design will provide an overall improvement to the built environment and streetscape character along Swakeleys Road, creating greater street harmony and local distinctiveness.

6.25 Please refer to the submitted Design and Heritage Statement for further information on the design details and proposed materials. In addition, the proposed design is respectful of the Site's heritage context, which is discussed further in the following section.

Heritage and Archaeology

6.26 **Paragraph 203** of the NPPF requires that new development should take account of the desirability of new development making a positive contribution to local character and distinctiveness. Similarly, **Paragraph 205** considers that great weight should be given to a heritage asset's conservation, with greater weight given to more important assets.

6.27 **Paragraph 212** of the NPPF encourages opportunities for new development within Conservation Areas to enhance or better reveal their significance.

6.28 **Policy HC1** of the London Plan provides that development proposals affecting heritage assets and their settings should conserve their significance by being sympathetic to the assets' significance and appreciation within their surroundings.

6.29 **Policy HE1** of the Local Plan Part 1 seeks to conserve and enhance Hillingdon's distinct and varied environment, its settings and the wider historic landscape. Building on this, **Policy DMHB1** of the Local Plan Part 2 seeks to ensure development proposals avoid harm to the historic environment.

6.30 Similarly, **Policy DMHB4** of the Local Plan Part 2 provides that new development within a Conservation Area will be expected to preserve or enhance the character or appearance of the area and make a positive contribution to local character and distinctiveness.

6.31 **Policy DMHB7** of the Local Plan Part 2 addresses Archaeological Priority Areas and seeks to ensure these areas are not disturbed.

6.32 The Site's heritage context, being within the Ickenham Village Conservation Area, formed a strong consideration in the proposal's design development. The Site does not contain a Listed Building, though there are various Listed Buildings within the vicinity which the proposal has had regard to.

6.33 Of note, and as previously discussed, the building's existing roof has an uncharacteristically low pitch, and its façade has uncharacteristic white rendering on Level 1. These building features contrast from the other buildings along Swakeleys Road, making the building distinguished. Given that the building is not a Listed Building, these distinguishing features detract from the overall character of the Conservation Area and undeservedly re-direct attention away from the surrounding Listed Buildings. In response, the proposal seeks to correct these design anomalies by raising the pitch of the roof and covering the white painted render with new tile-hanging. The proposal therefore directly responds to the relevant planning policy outlined above by better revealing the significance of the Conservation Area.

6.34 Further, the LPA noted in a previous decision on the site (application ref. 6626/APP/2020/3949) that the existing building is a modern infill development, which "*is of an uninspiring design and fails to relate to its surrounding*

context. The building is a neutral part of the conservation area. However, the frontage of the site, comprising of the existing seating area is highly visible within the street scene.”.

6.35 A Heritage Impact Statement has been prepared by Marcus Beale Architects which assesses the significance of the Conservation Area and the proposal’s impact on heritage assets. It concludes that the development does not harm either the character of the conservation area nor the setting of listed buildings and other heritage assets. The review therefore determines that there is no harm in heritage terms resulting from the proposal. Given this, the proposal aligns with Policy HE1 of the Local Plan Part 1 and Policy DMHB1 of the Local Plan Part 2.

6.36 With regard to archaeology, we note that the proposal will not result in any ground disturbance, and therefore the Archaeological Priority Area within which the Site is located will not be impacted.

6.37 Please refer to the submitted Design and Heritage Statement for further information on the proposal as it relates to the Site’s heritage assets.

Future Occupier Amenity

Functional Layout

6.38 London Plan **Policy D6** states that housing development should provide adequately sized rooms in line with the nationally described minimum internal space standards, with comfortable and functional layouts which are fit for purpose. It states that development should maximise the provision of dual aspect dwellings and avoid single aspect unless it can be demonstrated to have adequate ventilation, daylight and privacy.

6.39 The above is supported by **Policy DMHB16** of the Local Plan Part 2, which seeks to ensure all housing development has an adequate provision of internal space in order to provide an appropriate living environment. This includes meeting the national space standards for minimum floorspace. Further to this, **Policy DMHB18** requires that all new residential development provides good quality and useable private outdoor amenity space which should be provided in accordance with the standards.

6.40 Each of the proposed units will exceed the minimum space standard requirements, as demonstrated in the accommodation schedule submitted as part of the enclosed Design and Heritage Statement. This would ensure a good quality living environment for all future occupants and provide a high standard of accommodation in line with Policy D6.

6.41 In addition, three of the six flats will enjoy high-quality and usable private external amenity space in the form of balconies or terraces. This is an improvement to the current circumstances where the existing unit does not incorporate any private outdoor amenity space. The available space within the Site has been carefully planned out to maximise the provision of outdoor amenity space for future occupants wherever possible, consistent with Policy D6.

6.42 The flats positioned towards the rear of the Site, being Flats 2, 5, and 6, are not provided with private outdoor amenity space due to the constraints of the Site. The proposal involves the conversion of an existing building which is within a Conservation Area and therefore has sensitivities with regard to design and building bulk. As such, the outdoor amenity space standards of the Local Plan are not practically achievable for all proposed units and a reduction of units to accommodate additional amenity space would result in the project becoming unfeasible. In order to meet housing targets, it is vitally important that Council support projects to increase housing stock which in some instances requires flexibility on design elements such as outdoor amenity space where there are legitimate site constraints.

6.43 Although Flats 2, 5, and 6 do not have private external amenity space, it is important to consider that these three flats are afforded between 1.2-4.4 square metres of additional internal floorspace exceeding the minimum standards. This will ensure all future occupants have high living standards, regardless of whether external amenity space is available. It is also important to remember that residential amenity should be balanced against the advantages of living in an urban context.

6.44 In addition, there are various public recreation spaces available within a short walking distance which will be accessible for use by future occupants. These include, but are not limited to, Milton Court Open Space (approximately 100 metres to the south) and Tweeddale Playing Fields (approximately 180 metres to the north-east). This approach has previously been considered acceptable by the Council at Chelmsine Court (LPA ref. 890/APP/2020/763). Here, the planning officers noted that the proposals provided less amenity space than required under Policy DMHB18, however there was an area of public open space 115m to the south and additional communal amenity space in the local area. As such it was considered that it would be unreasonable to refuse the proposals on this basis. Given that there is a wealth of public open space within walking distance of the Site, the level of private amenity space provision is considered to be appropriate in this location and to the scale of development.

6.45 We therefore consider that an adequate amount of external amenity space will be available for future occupants, and that the proposal appropriately balances the need for external amenity space with the need for new housing and internal amenity.

Daylight and Sunlight

6.46 **Policy D6** of the London Plan stipulates that development should provide sufficient daylight and sunlight to new and surrounding housing that is appropriate for its context, whilst avoiding overshadowing and maximising the use of outside amenity space.

6.47 A Daylight and Sunlight Assessment has been produced in support of the application, to ensure a high-quality living environment for future occupiers. The assessment confirms that all flats achieve recommended sunlight levels and 82.4% (14 of the 17) of rooms achieve recommended daylight levels. While three rooms do not meet their target daylight value, one room is a bedroom that comes close to the target and two are living rooms which both have direct access to an external balcony.

6.48 Of note, the BRE Guidelines specify that the daylight and sunlight results be considered flexibly and in the context of the Site, particularly in urban areas. It is therefore determined that these sunlight levels are reasonable for flats in an urban setting such as this and should be considered acceptable. Please refer to the enclosed assessment for additional information on this matter.

Noise

6.49 A Noise Impact Assessment has been prepared by Anglia Consultants, which assesses the potential internal noise impact from the pub activities and from other commercial sources. It also assesses the noise levels for the outdoor amenity spaces of the proposed units.

6.50 The assessment concludes that the guidance on internal noise levels can be achieved through incorporating mitigation measures, including appropriate glazing and ventilators. It was also recommended that the need for mitigation measures should be verified when the first-floor demolition works have been completed. Further, the assessment confirms that noise levels in the proposed balcony and terrace areas for Flats 1, 3 and 4 would meet the external noise guidelines.

6.51 Please refer to the submitted Noise Impact Assessment for further information.

Existing Residential Amenity

Daylight and Sunlight

6.52 In addition to the London Plan Policy D6 outlined above, **Policy DMHB11** of the Local Plan Part 2 provides that development proposals should not adversely impact on the amenity, daylight and sunlight of adjacent properties and open space.

6.53 The Daylight and Sunlight Assessment prepared by Point 2 analysed the impact of the proposed development on the adjoining residential property at 13-15 Swakeleys Road. This property contains three habitable rooms which face towards the Site on the first floor.

6.54 The assessment determines that all neighbouring properties will achieve target daylight and sunlight levels with the exception of two rooms within the first floor flat at 13 & 15 Swakeleys Road. However, these two affected rooms will still meet the recommended levels for daylight when considering daylight distribution (NSL), and are above levels described as reasonable by the GLA. The report concludes that the impact to the two rooms should be considered acceptable as the reductions in daylight result in only a minor adverse impact to the dwellings.

6.55 It is important recognise that the affected windows are close to, and face toward the Site's shared boundary, and given the Site's Town Centre context, some minor impact to these windows should be considered acceptable. This is supported by the NPPF, which states at **Paragraph 129(c)** that authorities should take a flexible approach in applying policies or guidance relating to daylight and sunlight, where they would otherwise inhibit making efficient use of a site (as long as the resulting scheme would provide acceptable living standards).

6.56 Point 2's assessment demonstrates that the proposal will have negligible impact on access to daylight and sunlight for 13-15 Swakeleys Road, and as such, the development aligns with Policy D6 of the London Plan and Policy DMHB11 of the Local Plan Part 2.

6.57 Please refer to the enclosed assessment for further information.

Overlooking

6.58 **Policy DMHB11** of the Local Plan Part 2 requires that development proposals should not adversely impact on the amenity of adjoining properties, including the requirement to prevent unreasonable levels of overlooking between habitable rooms.

6.59 The proposal has been carefully designed to minimise any overlooking into the adjoining residential property at 13-15 Swakeleys Road, and where deemed necessary, obscured glazing has been incorporated to ensure a reasonable level of residential amenity is maintained.

Sustainability and Air Quality Management

6.60 Point 10 of **Policy BE1** (Local Plan Part 1) sets out that all new developments should maximise the opportunities for new homes to contribute to tackling and adapting to climate change and reducing emissions of local air quality pollutants.

6.61 With specific regard to air quality, **Paragraph 192** of the NPPF (2023) states that planning decisions should take into account the presence of Air Quality Management Areas and Clean Air Zones, and the cumulative impacts from

individual sites in local areas. Building on this, London Plan **Policy SI1** provides that development proposals should not lead to further deterioration of existing poor air quality, create any new areas that exceed air quality limits, or create unacceptable risk of high levels of exposure to poor air quality.

6.62 **Policy EM8** of the Local Plan Part 1 outlines that 'all development should not cause deterioration in the local air quality levels and should ensure the protection of both existing and new sensitive receptors'. Further, **Policy DMEI14** (Local Plan Part 2) provides that development proposals should demonstrate appropriate reductions in emissions to sustain compliance with and contribute towards meeting EU limit values and national air quality objectives for pollutants.

6.63 The proposed development will contribute to sustainable housing growth and reducing emissions of local air quality pollutants. The Site is in an excellent location being within a Local Centre and within close walking distance of local shops and public infrastructure including multiple modes of public transport. The proposal, being for car-free residential units, will promote the use of sustainable transport modes which will result in a reduction of car dependence within the town centre and broader neighbourhood, and therefore contribute to improved air quality conditions. This aligns with action no. 16 and no. 25 of the Air Quality Action Plan 2019-2024. Additionally, the proposal makes efficient use of a brownfield site by repurposing part of an existing building and utilising its available airspace to accommodate much needed housing growth.

6.64 The materiality of the proposed building extensions and alterations has been carefully selected to ensure a sustainable development outcome. The materials will comprise of a lightweight timber frame or metal stud construction and will provide high levels of thermal insulation and air tightness. The existing fabric will also be thermally lined to improve the existing conditions. In addition to contributing to a sustainable outcome, these measures will ensure there is a reduced risk of exposure to poor air quality from the external environment (ie. Swakeleys Road).

6.65 As outlined in the Demolition and Construction Management Statement (DCMS), emissions resulting from construction will be minimised, with the lowering of emissions being a key objective. This aligns with action no. 2 of the Air Quality Action Plan 2019-2024. Please refer to the enclosed DCMS for details.

6.66 We note that given the proposal is not considered to be a 'major development', demonstration of air quality neutrality is not required.

6.67 In line with the relevant planning policy outlined above, it is clear that the proposed development will provide an excellent contribution to tackling and adapting to climate change and reducing emissions of local air quality pollutants, as well as protecting future occupants from existing pollutants.

Transport and Highways

6.68 **Policy T1** of the Local Plan Part 1 seeks to reduce the impact of development on the transport network by encouraging access by sustainable modes. Similarly, **Policy DMT1** of the Local Plan Part 2 requires that development proposals meet the transport needs of the development and address its transport impacts in a sustainable manner.

6.69 **Policy DMT2** requires development proposals to provide safe, secure and convenient access and facilities for cyclists and pedestrians. Further to this, **Policy DMT5** requires that safe, direct and inclusive access for pedestrians and cyclists is provided on the Site.

6.70 With regard to vehicle parking, **Policy DMT6** requires that development proposals comply with Council's adopted parking standards. The parking standards require a maximum provision of 1-1.5 car parking spaces and 1 bicycle

parking space for each 1 or 2 bedroom unit. They also require that bicycle parking must be located in a safe, secure and accessible location.

6.71 In comparison, the London Plan car parking standards outlined at **Policy T6.1** require a maximum provision of 0.75 spaces for units with 1 or 2 bedrooms which are in an outer London PTAL 3 rated area. Further, bicycle parking standards outlined at **Policy T5** require provision of 1.5 bicycle spaces per 1 bedroom/2 person dwellings, and 2 spaces per all other dwellings.

6.72 The proposal seeks approval for a car-free development, which is appropriate in its Local Centre (PTAL 3) context with the Site having excellent access to public transport, walking and cycling facilities. To compensate for the lack of on-site parking provision, the proposal provides 12 bicycle parking spaces within a secure ground floor storage area which will be directly accessible from the service road and fitted with automatic closers to prevent them from being left open. This bicycle parking provision meets the London Plan requirements, and exceeds the Local Plan requirements by 6 spaces. Given this, the proposal will support and encourage sustainable modes of travel and will reduce reliance on motor vehicles, in line with the relevant planning policy outlined above.

6.73 We note that previously issued pre-application advice issued by Council provides support for a car-free development as is the case for the existing unit.

6.74 Safe and convenient pedestrian access is provided to all units, with access independent from the public house provided from both Swakeleys Road and the adjoining service road.

Refuse and Recycling

6.75 **Policy EM11** of the Local Plan Part 1 requires all new development to address waste management at all stages. Further to this, **Policy DMHB11** of the Local Plan Part 2 seeks to ensure development proposals make sufficient provision for well designed internal and external storage space for general, recycling and organic waste, with suitable access for collection.

6.76 The proposal provides secure refuse and recycling storage at the ground floor level, will be directly accessed from the service road to the east of the Site. In addition to commercial waste storage, the storage area will provide 1,440 litres of waste storage capacity for residents, split evenly between refuse and recycling. Collection will be from the service road, as is currently the case. The proposal therefore meets the requirements of the relevant planning policy.

7. Conclusion

7.1 This Planning Statement has been prepared by Nexus Planning on behalf of Swakeleys Ltd. in support of a full planning application submitted for residential development at 11 Swakeleys Road, Ickenham. The proposal comprises the following development:

*Change of use of rear first floor from *sui generis* and erection of second floor extension to provide new residential dwellings, alongside associated works. Retention of ground floor use with minor internal alterations.*

7.2 As we have demonstrated over the course of this Planning Statement, the proposal is considered to be in overall accordance with the Development Plan. The scheme would see the delivery of six homes, a net increase of five dwellings on the Site. The Site, which is well-located for most local services including employment, shopping areas, primary schools, public transport, GP surgeries, and outdoor and indoor leisure facilities, is considered to be in an excellent location for residential development, forming an appropriate, high-quality, and sustainable contribution to housing growth within Ickenham.

7.3 The proposed development has been carefully designed by Marcus Beale Architects to respond to the features of the Site and existing building fabric. The resulting layout and design respects and pays tribute to local heritage assets including the nearby Listed Buildings and the Ickenham Village Conservation Area more broadly.

7.4 The Public House use will remain viable, and there is no anticipated loss of employment on the Site. While there will be some loss in floor space to the public house at the first floor level, we note that smaller pubs with less overheads have historically been more viable, and provision of facilities on the ground floor level is more desirable for customers. It is also important to acknowledge that the previous pub operator, Wetherspoons, withdrew their involvement due to the Site not being feasible. The directors of Swakeleys Ltd (Applicant) have over 35 years' experience in the business of public houses and is committed to protecting the existing pub through managing a successful business.

7.5 The application is supported by various technical reports which demonstrate that local, regional and national policy, standards and guidance can be met. This proposal demonstrates that the works are consistent with all relevant planning policy and guidance.

7.6 Accordingly, we respectfully request that planning permission is granted for this application.



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