

11 Swakeleys Road, Ickenham

Planning Statement

ON BEHALF OF SWAKELEYS LTD.

September 2026

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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 existing ground floor use of the site as a public house is to be retained. 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 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;
- 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 for all residents; 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 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;
- Fire Strategy Statement and Drawings, prepared by Marcus Beale Architects;
- Water Efficiency Statement, prepared by UKSAPS and
- Commercial Statement, prepared by Swakeleys Ltd.

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) (2026) and the Development Plan.

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

- Section 2 describes the Site, and its surroundings;
- Section 3 sets out the Site’s planning history;

- Section 4 summarises the proposed development;
- Section 5 summarises the key national and Development Plan policies relevant to the proposals;
- Section 6 sets out the key considerations and explains why planning permission should be granted; and
- Section 7 sets out the planning balance and concludes the planning statement.

2. The Site and the 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.



Figure 2.1.1 Location of the Site

- 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 are 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.

3. Planning History at the Site

- 3.1 This section of the Planning Statement outlines the previous planning application submitted for the Site and the subsequent appeal that was determined by the Planning Inspectorate.

Application ref. 6626/APP/2024/3040

- 3.2 In November 2024, application ref. 6626/APP/2024/3040 was submitted to the LPA for “Change of use of the rear first floor from Sui Generis and construction of a second-floor extension to provide residential dwellings, alongside associated works. Retention of the ground floor use with minor internal alterations” at the Site.
- 3.3 The application sought to deliver five additional residential units at the Site, alongside the retention of the existing flat, resulting in a total of six dwellings at the Site. The proposed residential mix comprised five two-bedroom flats and one one-bedroom flat.
- 3.4 The application was refused in January 2025 for the following reasons:

Reason for Refusal 1

The development, by reason of its height, bulk, and proximity, would unduly harm the residential amenity of the neighbouring occupiers at 13-15 Swakeleys Road due to loss of daylight/sunlight. The development, therefore, conflicts with Policy BE1 of the Hillingdon Local Plan: Part One - Strategic Policies (2012), Policy DMHB 11 of the Hillingdon Local Plan - Part Two (2020) and Policy D3 of the London Plan (2021).

Reason for Refusal 2

The development, by reason of its height, depth, size, bulk, design, massing, and balconies, would unduly harm the character and appearance of the area and the visual amenities of the street scene. The development, therefore, conflicts with Policy BE1 of the Hillingdon Local Plan Part 1 - Strategic Policies (2012), Policies DMHB 11 and DMHB 12 of the Hillingdon Local Plan Part 2 - Development Management Policies (2020), Policy D3 of the London Plan (2021) and Paragraph 135(b) and (c) of the National Planning Policy Framework (2023).

Reason for Refusal 3

The development, by reason of its failure to provide an appropriate provision of a good quality outlook, private outdoor amenity areas, and daylight and sunlight to habitable rooms, would be unduly harmful to the living conditions of future occupants. The development, therefore, conflicts with Policies DMHB 11, DMHB 16, and DMHB 18 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020) and Policies D3 and D6 of the London Plan (2021).

Reason for Refusal 4

The cycle parking, by reason of the first-floor location, would be poorly accessible, potentially restricting or preventing the use of the parking by some future occupants and being detrimental to the overall uptake of cycling by future occupiers, contrary to Policy DMT 5 of the Hillingdon Local Plan: Part 2 (2020) and Policy T6 of the London Plan (2021).

Reason for Refusal 5

The proposed refuse layout, by reason of its inaccessible location and long carry distances, raises safety and accessibility concerns for future residents and is contrary to Policies SI7 and D6 of the London Plan (2021) and Policy DMHB 11 of the Hillingdon Local Plan: Part 2 (2020).

Reason for Refusal 6

In the absence of water usage and design information, it has not been demonstrated that the proposal would achieve sufficient water efficiency contrary to Policy DMEI 10 of the Hillingdon Local Plan Part 2 - Development Management Policies (2020).

Reason for Refusal 7

The proposal has not demonstrated the existing public house use would not be adversely affected by the development in accordance with the Agent of Change principle by reason that the remediation of the significant loss of existing public house floorspace has not been detailed and insufficient noise information has been provided to confirm the proposed residential flats would not restrict the ongoing noise generation and use of the public house. The development is, therefore, contrary to Policies HC7 and D13 of the London Plan (2021).

Reason for Refusal 8

In the absence of satisfactory acoustic information, it has not been demonstrated that the proposed residential flats would not be exposed to excessive internal noise levels from the ground floor public house use that could result in ongoing harm to onsite residential amenity, contrary to Policies D13 and D14 of the London Plan (2021).

Appeal ref. APP/R5510/W/25/3368336

- 3.5 Following the refusal, an appeal was submitted to the Planning Inspectorate in July 2025 against the Council's decision.
- 3.6 The Appeal was accompanied by a number of updated, or new reports and drawings that sought only very minor amendments or included additional information to support the Applicants case. These included:
- Revised Drawings prepared by Marcus Beale Architects
 - Fire Strategy Plans by Marcus Beale Architects
 - Conservation and Heritage Appeal Statement (12 May 2025), prepared by Marcus Beale Architects
 - Daylight and Sunlight Appeal Statement (23 April 2025), prepared by Point 2
 - Acoustic Appeal Statement (May 2025), prepared by Anglia Consultants
 - Commercial Statement, prepared by Swakeleys Ltd
 - Transport Appeal Statement (May 2025), prepared by Pulsar Transport Ltd
 - Water Efficiency Statement (15 April 2025), prepared by UKSAPS
 - Water Efficiency Calculations, prepared by UKSAPS
- 3.7 On 22 August 2025, the Local Planning Authority ("LPA") issued its Statement of Case in response to the Appellant's Statement of Case. In summary, the LPA confirmed that seven of the original reasons for refusal were being maintained. It was accepted, however, that the submitted Water Efficiency Statement and associated calculations satisfactorily addressed refusal reason 6 in respect of water efficiency.
- 3.8 The appeal was subsequently dismissed by the Inspector in a decision issued on 16 September 2025.
- 3.9 The Inspector concluded that:

"...the proposal would fail to provide its occupants with acceptable living conditions in respect of outlook, daylight, the provision of private amenity space and noise. I have also identified harm in relation to the longevity of the public house through an increased risk of noise complaints and that the proposal would fail to provide suitable opportunity for

sustainable modes of transport. These matters bring the proposal into conflict with the development plan when read as a whole, and material considerations do not indicate that a decision should be taken other than in accordance with the development plan.”

- 3.10 These findings correspond to refusal reasons 2, 3, 4, 7 and 8 as set out in the Council’s decision notice. The Inspector did not uphold refusal reason 1, concluding that “...the proposal would have an acceptable effect on the living conditions of the occupants of 13–15 Swakeleys Road, with regard to daylight and sunlight.” The Inspector also dismissed refusal reason 5, finding that the proposed location of the bin store for refuse collection was acceptable. Refusal reason 6 was similarly found to have been satisfactorily addressed through the submission of the Water Efficiency Statement and associated measures, as previously acknowledged by the Local Planning Authority.
- 3.11 The Appeal decision therefore establishes a clear baseline position against which any future proposals for the Site must be developed. In particular, the Inspector’s findings highlight the need to address matters relating to outlook, internal daylight levels and the provision of private amenity space for future occupiers, the relationship with the ground-floor public house (including potential noise impacts), and the provision of appropriate cycle parking to support sustainable modes of transport.

The Site’s Other Relevant Planning History

- 3.12 An overview of the Site’s other relevant planning history, prior to the submission of application ref. 626/APP/2024/3040, as recorded on the Council’s website, is provided below:

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.

4. Development Proposals

- 4.1 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).
- 4.2 The proposed scheme consists of the conversion of the rear first floor to provide two 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.
- 4.3 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

- 4.4 The residential element of the proposal relates to the provision of an additional two self-contained two-bedroom flats. These will be positioned on the existing first floor level. Given that the Site currently contains one unit on the first-floor level which is to be reconfigured, the proposal will result in the delivery of three units.
- 4.5 All three units will enjoy private outdoor amenity space in the form of terraces, which have been designed to improve and optimise residential amenity for the current and future occupants while ensuring there are minimal impacts on the Site's heritage significance. These three private outdoor amenity space standards each exceed the London Plan minimum space requirements.
- 4.6 The two proposed 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.
- 4.7 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

- 4.8 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.
- 4.9 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.
- 4.10 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.
- 4.11 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.
- 4.12 The outdoor seating area along Swakeleys Road is not proposed to be amended.

Building Alteration Proposals

- 4.13 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.
- 4.14 The proposals seek to introduce additional windows to the existing building at first floor level, to ensure the residential units benefit from sufficient access to daylight and sunlight.
- 4.15 At ground floor level, the existing bin storage area and rear entrance to the Site will be reconfigured to provide a dedicated bin store serving both the Public House and the residential units, together with separate secure cycle parking facilities for the dwellings.

Parking Proposals

- 4.16 The scheme incorporates 3 bicycle parking spaces within a secure storage area at the ground floor, in line with the requirements of Policy DMT6 of the Local Plan Part 2. These spaces will be exclusively for the use of the occupiers of the residential units and will be accessed from the secure footpath that runs adjacent to the building from Swakeleys Road.
- 4.17 Given the highly sustainable location, car parking is not provided on Site.

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) (2026) 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 Policy S3 of the NPPF outlines a presumption in favour of sustainable development, which means that Policy S4 should be applied when considering development proposals within settlements. Policy S4(1) states that development proposals within settlements should be approved unless the benefits of doing so would be substantially outweighed by any adverse effects, when assessed against the national decision-making policies in the Framework.
- 5.4 Policy S4(2) further sets out the circumstances in which the benefits of approving development are likely to be substantially outweighed by adverse effects, which include (but are not limited to) situations where the development proposal would:
- a. Have a substantial adverse impact in relation to:
 - 1. The allocation or safeguarding of land or buildings for particular uses in the development plan, unless there is no reasonable prospect of an application coming forward for the allocated use, or there is evidence that the safeguarding is no longer appropriate; or
 - 2. The application of the policies in this Framework for existing recreational land and facilities (HC7), Local Green Space (HC8), areas of particular importance for biodiversity and geodiversity (N6), Protected Landscapes (N4) and development within residential curtilages (L2(1)(d)).
 - b. Involve the whole or partial loss of undeveloped land which is used for a cemetery or burial ground; or for water storage and/or flood risk management (unless suitable compensatory provision is made that does not increase the risk of flooding either on or off-site); or
 - c. Fail to comply with one of the national decision-making policies which state that development proposals should be refused in specific circumstances.
- 5.5 Chapter 8 of the NPPF sets out a number of policies which have an objective to promote the long-term vitality and viability of town centres by prioritising them as locations for main town centre uses and allowing them to adapt to changing community and business needs, in a way which reflects their locally distinctive roles and opportunities.
- 5.6 Policy TC2(1) considers proposals for development in town centres, and indicates that substantial weight should be given to the benefits of supporting the overall vitality and viability of a centre, including where this can be achieved through the provision of residential accommodation to diversify and intensify uses.
- 5.7 The Site is an urban brownfield site as it is located within a town centre, so in this respect, Chapter 12 of the NPPF 'Making effective use of land' needs to be considered. According to Policy L2(1), substantial weight should be given to development proposals that achieve one or more of the following:
- a. *"Remediating despoiled, degraded, derelict, contaminated or unstable land;*

- b. Making better use of vacant and underutilised land and buildings (such as: by bringing back into residential use empty homes and other suitable buildings; converting space above shops; redeveloping underutilised retail and business sites; and building on or above service yards, lock-ups, car parks and other transport infrastructure which are no longer required);*
- c. Making effective use of previously developed land and buildings through temporary uses, in situations where alternative development is anticipated within a reasonable period (including as a result of the land being allocated for an alternative purpose in the development plan); or*
- d. Creating additional homes or floorspace within settlements by using the airspace above existing residential and commercial premises, or through sensitive redevelopment or additional development within existing plots (including, but not limited to, the addition of mansard roofs, proposals to fill gaps in the existing roof line, 56 the introduction of higher buildings at street corners and additional units within residential curtilages). Such proposals should:*
 - 1. Be consistent with the overall street scene, other than where: it is appropriate to have larger buildings (such as at street corners, or where building upwards would not cause substantial harm to the character of a building and its surroundings); the development would not be visible from the street frontage; or where specific changes are provided for through a design code which forms part of the development plan;*
 - 2. Maintain safe access and egress for occupiers and users, and acceptable living standards for residents and neighbours in terms of access to daylight, sunlight, privacy and external amenity space; and*
 - 3. Where the development would involve the use of residential curtilages, not occupy more than twice the footprint of all the existing buildings on the site, and, following development, would retain at least 50% of the non-developed area within the curtilage of the existing buildings³⁸; unless additional development can be accommodated without harm to the overall character of the area, and taking into account the availability of infrastructure and the importance of locating development in sustainable locations (in accordance with policy TR3)."*

5.8 Policy L3(1) of the NPPF states that development proposals should make efficient use of land, taking into account the identified need for different types of housing and other development, local market conditions, the availability of infrastructure (including that supporting sustainable transport modes) and its scope for improvement, a site's connectivity and the importance of securing well-designed, attractive and healthy places.

5.9 Chapter 14 of the NPPF sets out policies specific to promoting high quality, healthy, inclusive and sustainable places. Policy DP3 sets out the key principles for well designed places. DP3(1) sets out that development proposals should respond to their context (the history, character and features of their site and its setting), so that they integrate with and enhance their surroundings).

5.10 Policy DP3(2) requires development to contribute to the creation of well-designed places, with design responding appropriately to the nature and location of the proposal. The Policy states that development should promote liveable and inclusive communities, respond positively to climate change, enhance nature and green infrastructure, support sustainable movement, achieve an appropriate and coherent built form, provide safe and accessible public spaces, and create a distinctive local identity and sense of place. Proposals should therefore consider matters including energy and resource efficiency, climate resilience, landscaping and tree cover, sustainable drainage, walking and cycling connections, the relationship between buildings and spaces, natural surveillance, accessibility, and the appropriate use of materials, planting and design features.

5.11 Policy HE9(1) states that development proposals within or affecting the significance of conservation areas should

- a. Retain and conserve buildings and other features which make a positive contribution to the character or appearance of the conservation area where possible; and
- b. Consider the area's special architectural or historic interest (as identified as part of the designation of the conservation area) in the design of development.

5.12 However, Policy HE9(2) proceeds to note that not all elements of conservation area will necessarily contribute to its significance. Where a development proposal would result in the loss of a building or other element which contributes to the character or appearance of a conservation area that is desirable to conserve, the assessment of impact should take into account the relative significance of the element affected and its contribution to the significance of the conservation area as a whole, and the effects of this considered in accordance with policies HE5 and HE6.

The Development Plan

5.13 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.

5.14 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

5.15 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

5.16 The Local Plan Part 2: (sustainable 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

5.17 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.

5.18 The Site is not identified as an allocated site.

The London Plan

5.19 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 S11: Improving air quality
- Policy S14: Managing heat risk
- Policy S112: Flood risk management
- Policy S113: 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

5.20 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 Consideration

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;
- Housing Land Supply and Delivery;
- 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 National planning policy seeks to ensure that development makes the most effective use of land, as set out in the National Planning Policy Framework (NPPF, 2026). Chapter 6 of the NPPF supports the delivery of a substantial increase in the supply of homes by ensuring that a sufficient amount and variety of land can come forward where needed. Chapter 12 further promotes the effective use of land in meeting the need for homes, while safeguarding and improving the environment.
- 6.3 Within this context, Policy L2 of the NPPF seeks to make effective use of land. In particular, Policy L2(b) supports making better use of vacant and underutilised land and buildings, including by bringing empty homes and other suitable buildings back into residential use; converting space above shops; redeveloping underutilised retail and business sites; and building on or above service yards, lock-ups, car parks and other transport infrastructure that is no longer required.
- 6.4 Policy L2(d) also supports the creation of additional homes within settlements through the use of airspace above existing residential and commercial premises, or through sensitive redevelopment or additional development within existing plots.
- 6.5 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.
- 6.6 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 two 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.
- 6.7 The proposal to convert the existing surplus space of the public house to create two additional dwellings will contribute to meeting the demand of housing on a suitable brownfield site and will make a meaningful contribution towards the LB Hillingdon strategic housing targets in a sustainable location and should therefore be favourably considered.

- 6.8 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.
- 6.9 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.
- 6.10 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 the borough housing targets, and support the vitality and viability of Ickenham Local Centre by retaining the existing pub.
- 6.11 Furthermore, in determining application ref. 626/APP/2024/3040, the LPA raised no objection to the principle of residential development at the Site. Similarly, in determining Appeal Ref. APP/R5510/W/25/3368336, the Inspector did not identify any concerns in respect of the principle of residential use. In light of these previous decisions, it is considered that the acceptability of residential development at the Site is established and that this position should be maintained in the determination of the current application.

Public House

- 6.12 Retention of existing community facilities (including public houses) to enhance the sustainability of communities and residential environments is supported by planning policy at Policy HC6(1) 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.
- 6.13 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.
- 6.14 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.
- 6.15 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 (the 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.
- 6.16 In determining application ref. 626/APP/2024/3040, the LPA raised concerns under Reason for Refusal 7 in relation to the Agent of Change principle. The LPA considered that insufficient information had been provided regarding the remediation of the significant loss of existing public house floorspace, nor information that the proposed residential units would not prejudice the continued operation of the public house through noise constraints.

- 6.17 As part of Appeal Ref. APP/R5510/W/25/3368336, a Commercial Statement was prepared by the Applicant and is resubmitted in support of this application. The Statement identifies the clear commercial need for the proposed development to support the ongoing operation of the public house. It demonstrates that revenue generated from the additional residential units would assist in meeting operating costs and funding improvements, at a time when the business is vulnerable due to financial pressures and rising overheads. The proposal would therefore enhance the long-term viability of this valued community facility, and ensure that this key community facility can be retained for the long-term in accordance with Policy HC6(1) of the NPPF.
- 6.18 In determining the Appeal, the Inspector concluded that there was limited evidence to suggest that the remaining public house floorspace would be unduly compromised. The Inspector further noted that the relocation of plant to the roof would not be inappropriate and that the reconfiguration would result in a more consolidated and efficient layout.
- 6.19 The Inspector did express concern regarding the potential for future occupiers of the proposed flats to experience adverse noise impacts arising from the public house. This, in turn, could give rise to pressure for restrictions on the operation of the business. Whilst acknowledging the presence of an existing residential flat above the premises, the Inspector noted that the appealed proposal would intensify residential use on the site, increasing the number of sensitive receptors and the potential risk of noise complaints. These concerns were primarily attributed to the absence of robust supporting evidence at that time, particularly in relation to the Noise Impact Assessment.
- 6.20 In response, a comprehensive and updated Noise Impact Assessment has been prepared in support of this application. The assessment provides detailed analysis and identifies appropriate mitigation measures to ensure that residential amenity is protected without imposing unreasonable constraints on the operation of the public house. This is addressed further later in this section.
- 6.21 Accordingly, subject to the proposed mitigation, it has been demonstrated that the development would have a negligible impact on the operation of the public house while materially improving its commercial sustainability. The Inspector's findings in relation to the acceptability of the reconfiguration and retained floorspace further support this conclusion.

Housing Land Supply and Delivery

- 6.22 Policy HO3(1) of the NPPF requires LPAs to maintain a supply of specific, deliverable sites sufficient to provide a minimum of five years' worth of housing, together with any appropriate buffer. This is measured against the housing requirement set out in adopted strategic policies or, where appropriate, against the local housing need figure calculated using the Standard Method. This requirement applies unless the adopted plan is less than five years old and was found, at examination, to identify at least a five-year supply of specific, deliverable housing sites.
- 6.23 More than five years have now elapsed since the adoption of the Hillingdon Local Plan (Part 2). Accordingly, the Council's ability to demonstrate a five-year supply of deliverable housing sites is of particular relevance to the determination of planning applications.
- 6.24 Furthermore, from March 2026, when the London Plan reached five years from adoption, the Council is required to calculate its five-year housing land supply position by reference to the Standard Method housing requirement. Applying the Standard Method, as set out in the Planning Practice Guidance (PPG), Hillingdon's current housing requirement is 2,292 dwellings per annum.
- 6.25 Hillingdon's latest 5 Year Supply of Deliverable Housing Sites, published in April 2026, identifies a five-year housing provision target equivalent to 2,184 dwellings per annum, amounting to a need for 10,919 homes over the five-year period. Against this requirement, the Council identifies capacity to deliver 5,498 homes. This equates to approximately 2.5 years' supply of deliverable housing sites and represents a significant shortfall against the five-year requirement.

- 6.26 Consequently, if an application were determined under the current NPPF, the ‘tilted balance’, as set out at Annex D, would be engaged. This gives effect to the presumption in favour of sustainable development, whereby planning permission should be granted unless the adverse impacts of doing so would significantly and demonstrably outweigh the benefits.

Residential Unit Mix

- 6.27 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.
- 6.28 In line with the policy objectives outlined above, the scheme proposes a tenure and unit breakdown as outlined as follows:
- 3 x 2-bed, 3 person units

- 6.29 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 two-bedroom units.
- 6.30 This position was accepted by the LPA in determining application ref. 626/APP/2024/3040 and was not disputed by the Inspector in determining Appeal Ref. APP/R5510/W/25/3368336. In neither decision was objection raised to the principle of providing two-bedroom flats at this location. Whilst the quantum of development now proposed has been reduced, the principle of delivering two-bedroom residential units on the Site has been established. In the interests of consistency and sound decision-making, this position should be maintained in the determination of the current application.

Design and Character

- 6.31 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.
- 6.32 The NPPF addresses design of new developments through policies contained within Chapter 14, which have an objective to promote high quality, healthy, inclusive and sustainable places. Policy DP3 of the NPPF states that development should respond positively to its local context and create high-quality, sustainable and distinctive places, while allowing appropriate innovation, increased scale or density. Proposals should promote liveability, climate resilience, nature, sustainable movement, good built form, inclusive public spaces and a strong sense of identity; poor design that fails these principles without clear justification should be refused.
- 6.33 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.
- 6.34 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.

- 6.35 The design of the proposal has been carefully considered with regard to the Site's context, to ensure it 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.
- 6.36 The proposed building alterations demonstrates design excellence, providing an additional two 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.
- 6.37 The building's primary façade (north elevation) including the public house and external seating area will not be altered, which ensures there is very limited impact for the pedestrian experience.
- 6.38 In line with the relevant planning policy as discussed above, the proposed design will not impact the built environment and streetscape character along Swakeleys Road, ensuring street harmony and local distinctiveness is maintained.
- 6.39 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

- 6.40 Chapter 20 of the NPPF sets an objective to conserve and enhance the historic environment. Policy HE9(1) encourages development proposals within or affecting the significance of conservation areas to retain and conserve buildings and other features which make a positive contribution to the character or appearance of the conservation area where possible; and consider the area's special architectural or historic interest (as identified as part of the designation of the conservation area) in the design of development.
- 6.41 Part 2 of Policy HE9 proceeds to state that not all elements of a conservation area will necessarily contribute to its significance.
- 6.42 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.
- 6.43 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.
- 6.44 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.
- 6.45 Policy DMHB7 of the Local Plan Part 2 addresses Archaeological Priority Areas and seeks to ensure these areas are not disturbed.
- 6.46 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.

- 6.47 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.”.
- 6.48 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.
- 6.49 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.
- 6.50 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

- 6.51 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.
- 6.52 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.
- 6.53 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

Private External Amenity Space

- 6.54 Policy D6 of the London Plan sets housing quality and standards. It sets out that a minimum of 5 square metres of private outdoor space should be provided for 1-2 person dwellings and an additional 1 square metre should be provided for each additional occupant.
- 6.55 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. For two-bedroom apartments, the policy target for outdoor amenity space is 25 square metres. The supporting text to this local policy indicates that these enhanced standards are particularly relevant to houses and gardens in Hillingdon’s ‘Metroland’ and other suburban areas.
- 6.56 The London Housing SPG states at Paragraph 1.3.49 “where it can be demonstrated that infrastructure and amenity space requirements arising from development of a small site can be met outside the site, consideration should be given, subject to meeting other planning policy requirements, to developing it at the higher end of the appropriate density range. This is

likely to be a particular consideration for housing intensification in town centres, high streets and areas/corridors with high public transport connectivity”.

- 6.57 The two proposed flats and the existing flat will all enjoy high-quality and usable private external amenity space in the form of 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 London Plan Policy D6.
- 6.58 Whilst the enhanced standards set out in the Local Plan are not met, the supporting text to the relevant policy acknowledges that these standards are less relevant to flatted development in central locations. With specific relevance to the proposed development which involve the conversion of an existing building in an urban, Local Centre location, full compliance with these space standards would be neither practical nor proportionate, particularly given the overarching national objective to promote sustainable development and housing delivery.
- 6.59 There are also 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). The proximity of these spaces add to the benefits of the proposal.
- 6.60 We therefore consider that an adequate amount of external amenity space will be available for existing and 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

- 6.61 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.
- 6.62 A Daylight and Sunlight Assessment has been produced in support of the application, to ensure a high-quality living environment for future occupiers.
- 6.63 The assessment confirms that all neighbouring properties experience no worse than negligible changes to their daylight and sunlight as a result to the proposed development, and also internally, all rooms meet their target daylight illuminance level and all dwellings will meet the target sunlight exposure level.
- 6.64 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

- 6.65 A Noise Impact Assessment has been prepared by Anglia Consultants (January 2026). The assessment considers the potential impact of noise from the public house and other nearby commercial sources on the proposed residential units. It also evaluates predicted noise levels within the proposed external amenity areas.
- 6.66 This Assessment has been prepared in response to concerns raised by the LPA in determining application ref. 626/APP/2024/3040 which were subsequently reiterated by the Inspector in determining Appeal Ref.

APP/R5510/W/25/3368336 regarding potential noise impacts arising from the public house. In particular, the Officer and Inspector considered that the introduction of additional residential units would increase the number of sensitive receptors on the Site, thereby heightening the risk of noise complaints which could, in turn, affect the long-term operation and viability of the public house.

- 6.67 The Noise Impact Assessment concludes that internal noise levels can be achieved in accordance with the guidance set out in ProPG: Planning & Noise (2017), having regard to BS8233:2014 and relevant WHO guidelines. Compliance can be secured through the specification of appropriate glazing and acoustic ventilators.
- 6.68 Assessment of internal noise levels at the rear façade, adjacent to the garage, identified occasional low-level peak noise events, likely associated with the garage or other external sources. Additional sound insulation measures are recommended; however, the necessity for these should be confirmed following completion of first-floor demolition works.
- 6.69 Measured sound reduction of 61dB between the bar and the first-floor flat indicates that peak noise from the bar may be perceptible within the proposed units. Mitigation in the form of floating floor construction is therefore recommended through the assessment to ensure acceptable internal living conditions are achieved.
- 6.70 The potential impact of noise from the refurbished kitchen on the first-floor apartments will be assessed once detailed kitchen design information is available. Any additional mitigation required will be identified at that stage.
- 6.71 The predicted noise levels within the proposed terrace areas are compliant with the external amenity criteria set out in BS8233:2014.
- 6.72 Full details are provided within the submitted Noise Impact Assessment.

Outlook

- 6.73 It is important to recognise that all proposed units are either dual- or triple-aspect and incorporate minimal areas of obscure glazing. This represents a strong design outcome, particularly for 1- and 2-bedroom homes within a Local Centre location. In this regard, the scheme aligns with Policy D6 of the London Plan, which only seeks to avoid single-aspect dwellings that face north. No such units are proposed.
- 6.74 The Site comprises previously developed land within a Local Centre, where promoting residential development on brownfield and underutilised sites is a key strategic objective. In such urban contexts, it is common for outlook to be influenced by the surrounding dense built form, which frequently includes rear yards, servicing areas and access routes. As such, the outlook from the proposed development is typical of, and appropriate to, an urban brownfield site within a Local Centre setting.
- 6.75 It is also relevant to acknowledge that residents who choose to live in Local Centre locations often prioritise accessibility and convenience, including proximity to shops, services and public transport connections. These occupiers are generally less likely to place primary weight on expansive or idyllic outlooks, which are more commonly associated with out-of-centre or suburban locations. In determining this application, the Local Planning Authority should therefore apply a realistic and context-led assessment of residential outlook, giving full weight to the Site's urban characteristics and the lifestyle expectations of future occupants who actively choose to live in such a well-connected Local Centre environment.

Existing Residential Amenity

Daylight and Sunlight

- 6.76 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.
- 6.77 As no additional massing is proposed as part of the development proposals, there is not expected to be any impact on the amenity, daylight and sunlight of the adjoining residential property at 13-15 Swakeleys Road. This property contains three habitable rooms which face towards the Site on the first floor.

Overlooking

- 6.78 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.
- 6.79 The proposal has been carefully designed to minimise any overlooking into the adjoining residential property at 13-15 Swakeleys Road, through carefully positioned windows.

Sustainability and Air Quality Management

- 6.80 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.
- 6.81 With specific regard to air quality, Policy P3(2)(c) of the NPPF states that development proposals should take account of Air Quality Management Areas and be consistent with the objectives of relevant Air Quality Action Plans, Clean Air Plans and Local Air Quality Strategies. 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.
- 6.82 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.
- 6.83 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 to accommodate much needed housing growth.
- 6.84 The materiality of the proposed alterations to the existing building has been carefully selected to ensure a sustainable development outcome. 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).

- 6.85 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.
- 6.86 We note that given the proposal is not considered to be a 'major development', demonstration of air quality neutrality is not required.
- 6.87 In determining application ref. 626/APP/2024/3040, the LPA raised concerns under Reason for Refusal 6 regarding insufficient information on water usage. The LPA concluded that it had not been demonstrated that the proposal would achieve the required level of water efficiency, contrary to Policy DMEI 10 of the Hillingdon Local Plan: Part 2 – Development Management Policies (2020).
- 6.88 In response, a Water Efficiency Statement was prepared by UKSAPS and submitted in support of Appeal Ref. APP/R5510/W/25/3368336. Within its Statement of Case, the LPA confirmed that it was satisfied with the submitted information, which demonstrated that the development would achieve a water consumption rate of no more than 105 litres per person per day, thereby complying with Policy DMEI10. The Inspector also accepted these findings in determining the Appeal.
- 6.89 The Water Efficiency Statement has been updated and is resubmitted in support of this application. In light of the previous Appeal decision at the Site, it is considered that the submitted details clearly demonstrate compliance with Policy DMEI10 and should be afforded significant weight in the determination of this application
- 6.90 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

- 6.91 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.
- 6.92 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.
- 6.93 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.
- 6.94 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 3 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 Local Plan requirements, including providing bicycle parking for the existing unit on the site. 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.

- 6.95 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

- 6.96 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.
- 6.97 The proposal provides secure refuse and recycling storage at the ground floor level, which 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 480 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.
- 6.98 The proposed refuse collection arrangements were previously considered by the Planning Inspector in determining Appeal Ref. APP/R5510/W/25/3368336 and were found to be acceptable. The Inspector noted that the refuse store would be positioned alongside the existing public house facility, where collection arrangements are already established. The extension of this arrangement to accommodate residential waste storage was therefore considered logical and compliant with relevant planning policy. Furthermore, the Inspector concluded that the limited frequency with which residents would need to access the store would not give rise to any material risk of conflict with vehicles, and therefore would not result in unacceptable safety concerns
- 6.99 In this context, the Inspector's conclusions should be afforded significant weight in the determination of the current application. This is particularly relevant given that, under Reason for Refusal 5 of application ref. 626/APP/2024/3040, the LPA had raised concerns that the proposed refuse layout, due to its location and carry distances, would give rise to safety and accessibility issues for future residents. The subsequent Appeal decision demonstrates that those concerns have been satisfactorily addressed.

7. Planning Balance and Conclusions

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 to provide new residential dwellings, alongside associated works. Retention of ground floor use with minor internal alterations.

7.2 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the Development Plan unless material considerations indicate otherwise. The Proposed Development has therefore been assessed against the relevant policies of the Development Plan, the NPPF and all other relevant material considerations, including the planning history of the Site, the reasons for refusal of application ref. 6626/APP/2024/3040 and the findings of the Inspector in determining Appeal Ref. APP/R5510/W/25/3368336.

7.3 In summary, this application addresses the reasons for refusal of application ref. 6626/APP/2024/3040 and the findings of the Inspector in determining Appeal Ref. APP/R5510/W/25/3368336, as follows:

Application Ref. 6626/APP/2024/3040 Refusal Reason	Appeal Ref. APP/R5510/W/25/3368336 Inspectors Findings	Design Response of This Application	Details Submitted in Support
1. Neighbouring Amenity – Daylight and Sunlight	Not upheld. The Inspector concluded that the proposal would have an acceptable effect on the living conditions of the occupants of 13–15 Swakeleys Road with regard to daylight and sunlight.	The current proposal removes the previously proposed second-floor extension and is contained within the existing first-floor building envelope. The submitted assessment confirms that neighbouring properties would experience no worse than negligible changes in daylight and sunlight	Daylight and Sunlight Assessment, prepared by Point 2; and Application Drawings, prepared by Marcus Beale Architects.
2. Design, Character and Appearance	Upheld. The Inspector identified harm in respect of the design and character of the previous proposal.	The scheme has been substantially revised, most notably through the removal of the proposed second-floor extension. The development is now focused on the conversion of existing first-floor accommodation, with the primary Swakeleys Road façade and existing external seating area remaining unaltered. The revised approach substantially reduces the visual impact of the development and responds sensitively to the existing building and its heritage context.	Design Statement, prepared by Marcus Beale Architects; and Application Drawings, prepared by Marcus Beale Architects.
3. Future Occupier Amenity – Outlook, Daylight/Sunlight and Private Amenity Space	Upheld. The Inspector concluded that the proposal would fail to provide acceptable living conditions in respect of outlook, daylight and private amenity space.	The residential accommodation has been comprehensively redesigned. All units exceed minimum internal space standards, are dual or triple aspect and have been designed to achieve appropriate daylight and sunlight conditions. Each dwelling is also provided with usable private external amenity space.	Design and Heritage Statement, prepared by Marcus Beale Architects; Daylight and Sunlight Assessment, prepared by Point 2; and Application Drawings, prepared by Marcus Beale Architects.

4. Cycle Parking	Upheld. The Inspector concluded that the proposal failed to provide suitable opportunities for sustainable modes of transport.	The cycle parking has been relocated to ground-floor level. Three secure cycle parking spaces are proposed, providing one space for each dwelling, within a dedicated storage area that is directly and conveniently accessible.	Application Drawings, prepared by Marcus Beale Architects.
5. Refuse and Recycling	Not upheld. The Inspector found the refuse storage and collection arrangements acceptable, noting the relationship with the existing public house waste facilities and established collection arrangements.	The current proposal adopts the approach previously accepted by the Inspector. Secure refuse and recycling storage is provided at ground-floor level with direct access from the service road, from which collection will continue to take place.	Application Drawings, prepared by Marcus Beale Architects.
6. Water Efficiency	Resolved at appeal. The LPA accepted that the Water Efficiency Statement and calculations satisfactorily addressed the reason for refusal, a position subsequently accepted by the Inspector.	An updated Water Efficiency Statement is submitted with the current application, demonstrating a water consumption rate of no more than 105 litres per person per day and compliance with Policy DMEI10.	Water Efficiency Statement, prepared by UKSAPS.
7. Agent of Change / Continued Operation of the Public House	Upheld in respect of Agent of Change/noise. The Inspector identified harm to the longevity of the public house through an increased risk of noise complaints, although limited evidence was identified that the reconfiguration of the public house floorspace itself would unduly compromise its operation.	The public house is retained and its accommodation consolidated into a more efficient arrangement principally at ground-floor level. The revised scheme is supported by detailed acoustic evidence identifying appropriate mitigation to protect future occupiers while avoiding unreasonable restrictions on the continued operation of the public house.	Noise Impact Assessment, prepared by Anglia Consultants; Commercial Statement, prepared by Swakeleys Ltd.; and Application Drawings, prepared by Marcus Beale Architects.
8. Noise – Future Occupier Amenity	Upheld. The Inspector concluded that acceptable living conditions had not been demonstrated in respect of noise.	An updated Noise Impact Assessment has been prepared specifically in response to the previous concerns. It demonstrates that acceptable internal noise levels can be achieved through appropriate mitigation, including suitable glazing, acoustic ventilation and floating-floor construction. Predicted noise levels within the proposed external amenity areas also satisfy the relevant criteria.	Noise Impact Assessment, prepared by Anglia Consultants; Application Drawings, prepared by Marcus Beale Architects.

7.4 As demonstrated throughout this Planning Statement, there is strong policy support for the principle of the Proposed Development. The scheme represents the sensitive and efficient reuse of previously developed land and underutilised floorspace within an existing building in Ickenham Local Centre. It will deliver three homes, representing a net increase of two dwellings, while retaining the established public house at ground floor level.

7.5 The delivery of additional housing attracts significant weight in the planning balance. The Council is currently unable to demonstrate a five-year supply of deliverable housing sites, with its identified supply amounting to approximately 2.5 years. In this context, the presumption in favour of sustainable development is engaged. The contribution of two additional

dwelling represents a clear and tangible benefit, particularly where those homes can be delivered through the efficient reuse of an existing building without requiring the development of undeveloped land.

- 7.6 The Site is well located for residential development, benefiting from convenient access to shops, employment opportunities, schools, public transport, healthcare and leisure facilities. The proposal therefore makes effective use of surplus and underutilised floorspace in a sustainable and accessible Local Centre location and represents an appropriate form of small-scale residential intensification supported by national, London and local planning policy.
- 7.7 Importantly, the Proposed Development will retain the existing public house and consolidate its accommodation into a more efficient arrangement focused principally at ground floor level. While there will be a reduction in public house floorspace at first-floor level, this will not undermine the viability or continued operation of the use. The submitted Commercial Statement demonstrates that the residential development will support the ongoing commercial sustainability of the public house, with revenue from the additional residential units assisting with operating costs and future improvements. The Applicant also has substantial experience in the operation of public houses and is committed to securing the successful long-term future of the existing business. The retention and improved commercial sustainability of this valued community facility is therefore a further material benefit of the scheme.
- 7.8 Considerable weight should also be afforded to the planning history of the Site. The principle of residential development was not disputed by the LPA in determining the previous application and was similarly not identified as a matter of concern by the Inspector in determining the subsequent appeal. The Inspector also found limited evidence that the retained public house floorspace would be unduly compromised and considered that its reconfiguration would provide a more consolidated and efficient layout. The current proposal has been developed in direct response to the matters previously identified by both the LPA and the Inspector.
- 7.9 In particular, the application is supported by an updated Noise Impact Assessment which provides a detailed assessment of the relationship between the proposed residential accommodation and the retained public house. Appropriate mitigation measures are identified to secure satisfactory living conditions for future occupiers while avoiding unreasonable restrictions on the continued operation of the public house. The previously raised water efficiency matters have similarly been addressed through the updated Water Efficiency Statement, while the proposed refuse and recycling arrangements reflect an approach previously found acceptable by the Inspector.
- 7.10 The Proposed Development has also been informed by a sensitive, design-led approach which responds appropriately to the existing building and its heritage context. The primary Swakeleys Road façade and existing external seating area will remain unaltered, thereby limiting the visual effect of the development within the streetscene. The scheme makes effective use of the existing building fabric and, as demonstrated by the submitted heritage assessment contained within the Design Statement, will cause no harm to the character or appearance of the Ickenham Village Conservation Area or to the setting or significance of nearby listed buildings and other heritage assets.
- 7.11 The proposal will provide an appropriate and high-quality standard of accommodation for future occupiers. The proposed dwellings exceed the relevant minimum internal space standards, are dual or triple aspect and have been designed to achieve appropriate daylight and sunlight conditions. Each dwelling will also benefit from private external amenity space. Although the enhanced Local Plan amenity space standards are not achieved in full, the proposed provision represents an improvement for the existing dwelling and should be considered in the context of the constrained nature of the Site, its Local Centre location and the availability of nearby public open space.
- 7.12 The technical assessments submitted in support of the application further demonstrate that the Proposed Development can be accommodated without material harm. No unacceptable impacts have been identified in relation to neighbouring residential amenity, transport and highways, air quality, sustainability, archaeology, or waste and recycling. The car-free

nature of the development is appropriate having regard to the Site's Local Centre location and accessibility by sustainable modes of transport, while secure cycle parking is provided in accordance with the relevant standards.

7.13 Taken as a whole, the Proposed Development represents an appropriate, high-quality and sustainable form of development. In particular, the scheme will:

- deliver three homes, representing a net increase of two dwellings, contributing towards meeting the identified housing need and shortfall in housing land supply;
- make efficient use of previously developed land and underutilised floorspace within an existing building;
- provide new homes in a sustainable and accessible Local Centre location;
- retain the established public house and support its long-term commercial sustainability through a more efficient internal arrangement;
- provide good-quality residential accommodation for future occupiers;
- preserve the character and appearance of the Ickenham Village Conservation Area and the significance and setting of nearby heritage assets; and
- avoid material harm in respect of neighbouring amenity, highways, transport, environmental or other technical considerations.

7.14 These benefits should be afforded significant weight in the planning balance. Moreover, having regard to the Council's current housing land supply position, the presumption in favour of sustainable development is engaged. There are no adverse impacts arising from the Proposed Development which would significantly and demonstrably outweigh its identified benefits when assessed against the policies in the NPPF taken as a whole. Rather, the proposal represents sustainable development which accords with the Development Plan read as a whole and is supported by national planning policy.

7.15 The proposal has been carefully developed to respond positively to the previous reasons for refusal and the findings of the Inspector, with the current application supported by updated technical evidence addressing the matters previously identified. There are therefore no outstanding planning considerations which would justify withholding permission.

7.16 Accordingly, the planning balance falls firmly in favour of the Proposed Development. It is respectfully requested that the Local Planning Authority determines the application favourably and grants planning permission, subject to any necessary and appropriate planning conditions.

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