

ROLFE JUDD
/ PLANNING

/ The Dower House

PLANNING STATEMENT

January 2026

/ The Dower House

The Dower House,
393 High Street,
Harlington,
UB35DH

OC/P09422

January 2026

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01. INTRODUCTION

01.1 SUMMARY

01.1.1 This Planning Statement has been prepared by Rolfe Judd Planning Ltd, on behalf of the Applicant, Komfort Services Ltd. The statement is in support of a Full Planning and Listed Building Consent application submitted to the London Borough of Hillingdon, the Local Planning Authority (herein referred to as the Council or the LPA).

01.1.2 Central to the application is a development proposal which secures the restoration of The Dower House, a Grade II listed building on Historic England's 'Heritage at Risk' Register following a fire in 2011. To support the extensive, complex and comprehensive restoration works required to secure a future for this heritage asset, an "enabling development" is required, with the construction of 18 homes at the rear of the site, as well as the subdivision of The Dower House itself into 3 homes. The enabling development is essential to deliver a viable development scheme.

01.1.3 The development proposal for both the Full Planning and Listed Building Consent application is described as follows:

'Subdivision of The Dower House to provide 3 residential homes (Use Class C3) along with restorative works. Partial Demolition of the Forecourt Wall to The Dower House to enable rear site access. Erection of 18 residential homes (Use Class C3) at the rear of the site. Associated landscaping works.'

01.1.4 Key benefits of the development proposal are identified to comprise:

- / Restoration of a Grade II listed building and its removal from the Heritage at Risk Register,
- / Delivery of 21 high-quality market homes addressing an identified need and within the context of declining housing delivery in the borough,
- / Meeting identified needs of the borough in a sustainable location as part of a net-zero carbon development,
- / Enhancement to the wider townscape, and sense of pride and place, by restoring the prominently positioned Dower House, which has otherwise been behind hoarding and under scaffold and metal roof since the fire,
- / Reducing anti-social behaviour which has troubled the site since its vacancy,
- / Providing public access to parts of the site, as well as allowing a greater appreciation of The Dower House from different vantage points,
- / Meeting the biodiversity net-gain mandate,
- / Construction training and recruitment support, particularly skilled work in the case of diligently restoring a heritage asset.

01.2 PLANNING STATEMENT

01.2.1 The purpose of this statement is to examine the planning issues raised by the development proposals for the application site. In particular, this statement identifies and describes the key opportunities presented by the development, assesses potential harms, and weighs the planning balance of the development proposal.

01.2.2 This assessment is made in accordance with the National Planning Policy Framework which identifies that the purpose of the planning system is to contribute to the achievement of sustainable development, including the provision of homes, commercial development and supporting infrastructure in a sustainable manner. At a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs. So that sustainable development is pursued in a positive way, at the heart of the Framework is a presumption in favour of sustainable development.

01.2.3 The statement is structured as follows:

- Section 1: Introduction
- Section 2: The Application Site and Surrounding Area
- Section 3: Pre-Application Discussions
- Section 4: The Proposal
- Section 5: Planning Policy Context
- Section 6: Planning Considerations
- Section 7: CIL and Heads of Terms
- Section 8: Conclusion

01.3 SUPPORTING APPLICATION DOCUMENTS

01.3.1 This Planning Statement includes the Heads of Terms, Community Engagement and a UGF calculation. It should be read in conjunction with the following additional documents, which accompany the application:

- / Application Form (prepared by Rolfe Judd Planning)
- / Community Infrastructure Levy Form (prepared by Rolfe Judd Planning)
- / Site Location, Existing, Demolition and Proposed Drawings (prepared by Morse Webb Architects)
- / Landscaping Plans (prepared by Ubu Design)
- / Structural Engineering Plans (prepared by SFK Consulting)
- / Design and Access Statement (prepared by Morse Webb Architects) incl:
 - o Accessibility Statement
 - o Child-Playspace Assessment
- / Air Quality Assessment (prepared by Komfort Services)

- / Archaeological Assessment (prepared by Wessex Archaeology)
- / Bat Activity Report (prepared by Elite Ecology)
- / Bat Assessment (prepared by Elite Ecology)
- / Preliminary Ecological Appraisal (prepared by Elite Ecology)
- / Reptile Method Statement (prepared by Elite Ecology)
- / Biodiversity Net Gain Report (prepared by Elite Ecology)
- / Biodiversity Metric Calculation (prepared by Elite Ecology)
- / Arboricultural Survey, Impact Assessment & Method Statement (prepared by RMTTree)
- / Noise Impact Assessment (prepared by Sound Advice Acoustics)
- / Phase I Contamination (prepared by Earth Environmental and Geotechnical)
- / Phase II Contamination (prepared by Earth Environmental and Geotechnical)
- / Energy and Overheating Statement (prepared by Eight Versa)
- / Fire Statement (prepared by M1 Building and Fire Consultancy)
- / Flood Risk and Drainage Statement (prepared by Eight Versa)
- / Transport Assessment (prepared by Transport Planning Associates) inclu:
 - o Swept Path,
 - o Road Safety Audit,
 - o Refuse & Recycling and Cycle Storage Arrangements
 - o Car Parking
 - o Draft Travel Plan
- / Heritage Assessment including:
 - o Heritage Statement (prepared by Morse Webb Architects)
 - o Condition Survey Report (prepared by Morse Webb Architects)
 - o Structural Engineering Appraisal (prepared by SFK Consulting)
 - o Preliminary Budget Estimate (prepared by N T Surveying)
 - o The Dower House Schedule of Works (prepared by Morse Webb Architects)
 - o Conservation Deficit Assessment (including Affordable Housing Statement) – prepared by Colliers

02. THE APPLICATION SITE AND SURROUNDING AREA

02.1 SITE DESCRIPTION & LOCATION



Site Location Plan and Satellite Image

- 02.1.1** The application site is known as The Dower House. It is a Grade II listed historic house dating from the sixteenth century located on High Street Harlington, in Harlington within the London Borough of Hillingdon, west London. The property has a large forecourt, setting it back from High Street Harlington but broadly aligned with the prevailing build-line of neighbouring properties. Land associated with the property extends significantly towards the rear with a boundary demarcated by mature tree. Beyond the property's curtilage, to the east, are agricultural fields.
- 02.1.2** Directly north of The Dower House are residential properties also fronting High Street Harlington (but with a further two residential properties (nos. 391-393) directly behind. Behind this housing is a light industrial/business estate of 6 linear warehouses. Directly to the south of The Dower House is a 3-storey residential apartment block roughly in the shape of an L.
- 02.1.3** The existing building was severely damaged by fire in 2011 and has remained unoccupied and in a derelict condition ever since. It is a single dwelling in private ownership, recently acquired at auction by the applicant.
- 02.1.4** A photograph of the house before the fire is provided below:



Pre-Fire Dower House

- 02.1.5** The building is structurally unsound, dependant on structural supports and extensive scaffolding internal and external to the property. A temporary scaffold frame roof was erected over the building in 2018. Whilst the site is hoarded, it has proved challenging to secure with signs of various trespasses.
- 02.1.6** The term 'dower house' historically refers to a house intended for use by the widow of the previous owner of an English, Scottish or Welsh estate. The widow, often known as the "dowager", usually moves into the 'dower house' from the larger family house on the death of her husband if the heir is married, and upon his marriage if he was single at his succession. The new heir occupies the now vacated principal house.
- 02.1.7** Historic England's search engine records 210 entries under the term Dower House across England. This is therefore a relatively rare remaining historical asset.
- 02.1.8** The forecourt wall to the Dower House has been designated in its own right, comprised of a one brick 9" brickwork boundary wall built in Flemish bond with a brick coping which runs along the front west boundary (parallel with High Street Harlington) and returns for a short distance along the south boundary of the site (perpendicular to High Street Harlington). Parts of the wall date from the late seventeenth or early eighteenth century but generally the wall has been much altered, rebuilt, increased in height and repaired since, particularly from the mid twentieth century onwards, resulting in original or earlier brickwork being lost. There is evidence of a former pedestrian access through the wall along the west boundary with the remains of two brickwork gate piers. This was probably the principal pedestrian access to the Dower House from High Street.
- 02.1.9** Historical maps indicate that the property had several outbuildings to the north, likely coach house, stables and ancillary stores as well as a large garden. The far rear of the plot opened onto a wider

expanse of forested area which over the years was progressively reduced for farmland or urban development.

02.2 SITE PHOTOS (CURRENT CONDITION)



Dower House from High Road



Front of Dower House



Rear of Dower House



Rear of Dower House (building), towards the rear of the site, overgrown by vegetation. Far treeline marks the plot boundary



Typical internal condition – property supported by extensive scaffolding



Forecourt Wall to Dower House where opening for site access is proposed

02.3 SURROUNDING AREA

- 02.3.1** Harlington today is framed between the M4 to the north and the A4 (Bath Road) to the south. Beyond the M4 is Hayes and beyond the A4 is Heathrow Airport. The central route through Harlington is the north-south road of High Street Harlington. A ribbon of development along the high street was the historical pattern of development until the later 20th century where significant westward, and some eastward expansion occurred. Beyond the settlement boundaries to the east and west, is agricultural land. Overall, however Harlington maintains a north-south urban character, focused on High Street Harlington.
- 02.3.2** Harlington is a predominantly residential town, contrasting to the mixed residential and distribution uses of Hayes and the international airport, hotel and trading uses around Heathrow.
- 02.3.3** Via Harlington High Street, four regular TfL bus routes operate (90, 278, H98 and N140). These link into Hayes & Harlington train station, where the Elizabeth line and Great Western Railway line operates.



Harlington within the wider context

02.4 PLANNING HISTORY

02.4.1 The site has a relatively limited planning history, of which none are considered relevant to the development proposal.

APPLICATION REFERENCE	DESCRIPTION OF DEVELOPMENT	DETERMINATION	DATE
6648/TRE/2020/235	To remove One False Acacia T1 on TPO153a.	No Further Action	01/10/2020
6648/APP/2010/1658	Change of use from Class C3 (Residential) to Class C1 (Hotels and halls of residence) for use as hotel, with conversion of detached garage to side to habitable use involving a link extension and internal and external alterations.	Refused	29/03/2011
6648/APP/2010/1659	Internal and external alterations and the erection of a link extension in connection with the change of use from Class C3 (Residential) to Class C1 (Hotels and halls of residence) for use as hotel and conversion of detached garage to side to habitable use (Application for Listed Building Consent.)	Refused	29/03/2011
6648/APP/2004/2864	Erection of two storey rear extension to form new gallery/studio space with gym and bathroom	No Further Action	24/07/2008
6648/APP/2004/2865	Erection of two storey rear extension to form new gallery/studio space with gym and bathroom (LBC application)	No Further Action	24/07/2008

02.5 PLANNING POLICY DESIGNATIONS

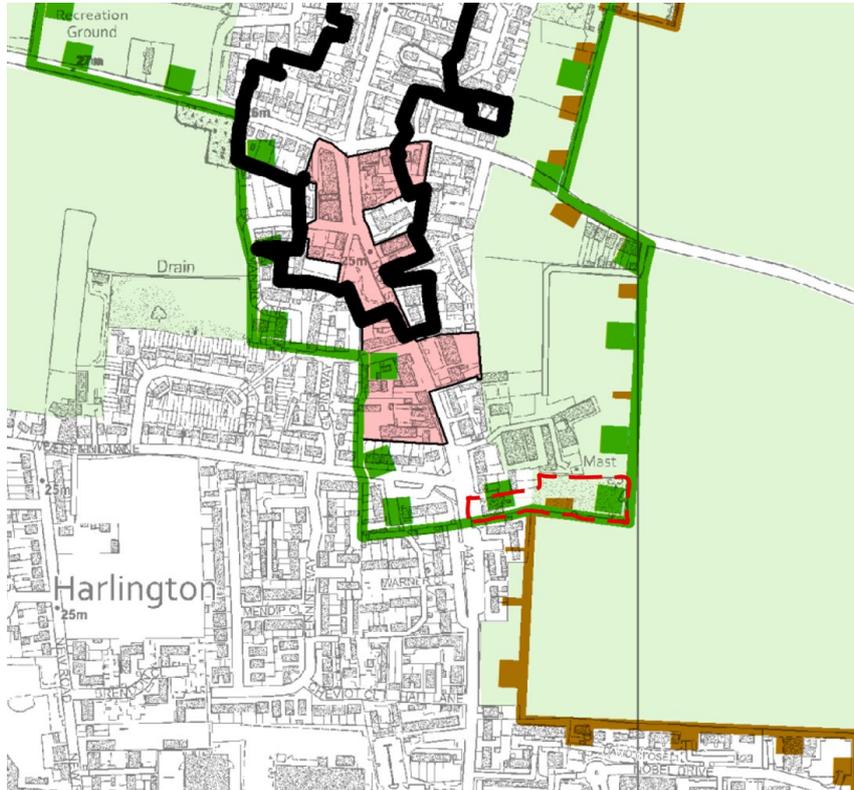
02.5.1 The adopted planning policy map identifies the following specific planning policy designations over the application site:

- / Green Belt (rear portion of the site).
- / Harlington Archaeological Priority Area.
- / Heathrow Archaeological Priority Zone.
- / Air Quality Management Area.

/ Harlington Air Quality Focus Area.

02.5.2 For clarity, the site is located outside of the conservation area (black-outline) and the local centre (pink area).

02.5.3 A Tree Preservation Order Area covers the whole of the application site along with properties to the north (373-393 High Street and Poultry Farm).



Local Plan Part 2 Adopted Policy Map with Application Site Highlighted

03. PRE-APPLICATION DISCUSSIONS

03.1 SUMMARY

03.1.1 The National Planning Policy Framework, paragraphs 39-46 encourages pre-application engagement with local authorities and the local community, particularly recognising that *'Early engagement has significant potential to improve the efficiency and effectiveness of the planning application system for all parties. Good quality preapplication discussion enables better coordination between public and private resources and improved outcomes for the community.'*

03.1.2 The applicant has engaged with the Local Planning Authority and Historic England in advance of this submission, as well as discussed the proposals with neighbours to the site.

03.2 LOCAL PLANNING AUTHORITY

03.2.1 In advance of submission, the applicant has engaged the pre-application advice services of the Local Planning Authority. The pre-application request was made 28th October 2021, and a meeting held 2nd

November 2021. The formal advice was issued 26th May 2022. The enquiry was referenced: 6648/PRC/2021/241.

- 03.2.2** It should be noted that the pre-application engagement occurred prior to the current version of the National Planning Policy Framework (now 2024)
- 03.2.3** The pre-application scheme follows the broad principle of this planning submission, including that the housing development is to enable the restoration of The Dower House. The proposal was for 17 homes rather than 18. It was comprised of 5x3bed homes and 12x2bed homes as the enabling development, with The Dower House still converted into 3 apartments. The site plan of the pre-application proposals is presented below:



Pre-application proposals. 2bed homes in yellow, 3bed homes in blue.

- 03.2.4** The pre-application advice identified the majority of the proposed housing falls on Green Belt land, and concluded that the development proposal would need to make a 'very special circumstances' (VSC) case for it to be supported. With the level of information provided at pre-application stage it was not concluded that a VSC case had been made. Officer's advice noted the proposal represented a spatial and visual harm to the Green Belt, as well as conflicts with the purposes of Green Belt policy.
- 03.2.5** The advice also noted the potential for 'other harms' which would need to be evaluated accordingly in any forthcoming submission. These other harms were noted to be important trees, archaeology, setting of the listed building, ecology, land contamination and highways network. For clarity, the pre-application proposals had not provided reports on these aspects, meaning judgement on these matters is reserved.
- 03.2.6** The principal of the development had therefore not been demonstrated (at this stage) but this in part was concluded over insufficient information and evidence.
- 03.2.7** In respect of design, the loss of private open space was observed to be contrary to policy and represent significant amenity, character and appearance, biodiversity, ecological connectivity, cooling effect and/or flood alleviation harm. The restoration of The Dower House was however observed to represent a welcome improvement to the character and appearance of the area, as well as the landscaping also

having the potential for enhancing the area. The new access via the opening to the forecourt wall of The Dower House was also considered to likely be visually acceptable. The pre-application advice acknowledged that past attempts to encourage the repair of the building with the previous owner had proved fruitless. The advice also concludes that supporting the restoration of The Dower House is a paramount objective of the LPA which would be ascribed significant support in principle.

- 03.2.8** The number of homes to be provided should be dictated by the enabling development test, with every effort made to retaining the site's greenery and vegetation. It was considered that unit P.1 (gatehouse) may need to be removed due to its impact on the setting of the heritage asset (The Dower House). The advice also raised that there is the potential for overlooking between this building and occupiers of The Dower House. Overlooking potential between other dwellings, such as P2 and P3 were also noted, as well as potential harms to existing neighbouring residential properties.
- 03.2.9** The design period style was supported, but noted that the height of the dwellings should be below that of the frontage properties. The advice also noted that the proposal represented a unique opportunity to create a high quality, residential development which complements the setting of the nearby listed building and demi-rural setting whilst also providing a diverse ecological environment.
- 03.2.10** In respect of highways, the pre-application advice commented that details of a segregated footway should be provided for the rear access. EV charging should be provided to the parking spaces. The S106 should restrict residents from being able to secure parking permits in the wider area. The design of the access should demonstrate that it is safe to access for service vehicles and that entry and exit to the site should be in forward gear. The means of preventing speeding and additional parking on the access road should also be detailed. A public right of way should also be secured to link to the public footpath.

HISTORIC ENGLAND

- 03.2.11** The LPA raised with Historic England that pre-application proposals for the site had been received as part of the pre-application enquiry. Historic England acknowledged this, but did not provide any substantive feedback and noted that feedback is no longer provided via the council's pre-application feedback process.
- 03.2.12** The applicant has subsequently engaged with Historic England via their pre-application request. The request was submitted on the 16th April 2025 with a site visit held 18th June and 20th August 2025. The formal advice was received 1st October 2025.
- 03.2.13** The advice recognised that The Dower House is a good example of an early modern timber framed house. It noted that the site's historic association with agricultural land and its former rural setting contribute to its significance, even as the surrounding area has become increasingly urbanised.
- 03.2.14** The advice viewed that the enabling development would sever the last tangible link to the wider rural landscape, however it was viewed that this constitutes less than substantial harm to the setting and significance of the asset.
- 03.2.15** The subdivision of The Dower House undermines the integrity of the building as a single historic dwelling. Retaining the building as a single building, or a maximum sub-division of two separate dwellings was recommended as this would mitigate harm to the plan form and minimise loss of historic fabric.
- 03.2.16** The loss of historic timbers, the 19th century extension and works to the façade will lose historic fabric but was concluded to be less than substantial harm to the significance of the listed building.

- 03.2.17** The timber mullioned window, revealed by the fire, is an extraordinary survivor and should remain visible on both sides. It is recommended that the small section of remaining lath and plaster covering a portion of the mullioned window is retained in situ, as it provides important evidence of the building's historical development.
- 03.2.18** The metal bracket fixture, which once held a gas lamp, should be either retained in situ or reinstated upon the reconstruction of this extension.
- 03.2.19** Historic England acknowledges that the instability of the brick façade presents a critical issue. The brickwork is bowing and leaning in several locations, most notably on the front façade, where one section leans outward by approximately 300mm. This deformation is likely attributable to inadequate foundations beneath the added brickwork and insufficient tying into the original timber frame, compounded by fire damage and water ingress.
- 03.2.20** Additional concerns include large vertical cracks at some returns and cracking above window heads. It is therefore proposed to rebuild the sections exhibiting significant lean and to stitch across the cracks to restore structural integrity. Remedial works to the foundations, such as underpinning, may be necessary, subject to further investigation.
- 03.2.21** Historic England recognises that a significant proportion of historic timbers are too damaged to reuse in the reconstruction of the roof. It is recommended that as many timbers as possible are retained and/or reused (e.g., by splicing with new timbers). It was also recommended that the historic, characterful undulating profile of the roof ridge is maintained as closely as possible.
- 03.2.22** In summary, while the proposals could potentially secure the future of the Dower House, they will also result in less than substantial harm to its significance. It was recommended that the harm is minimised through sensitive design and further retention of historic fabric.

LOCAL COMMUNITY

- 03.2.23** The applicant has raised that development proposals have been prepared with neighbours to the site. It has been positively received that actions to remedy the condition of the site and restore The Dower House.
- 03.2.24** The applicant provided a petition for neighbours to sign, copies of which are appended to this statement.

04. THE PROPOSAL

04.1 DESCRIPTION OF DEVELOPMENT

04.1.1 The proposed development requires Full Planning permission and Listed Building Consent. The Description of Development for both applications are:

‘Subdivision of The Dower House to provide 3 residential homes (Use Class C3) along with restorative works. Partial Demolition of the Forecourt Wall to The Dower House to enable rear site access. Erection of 18 residential homes (Use Class C3) at the rear of the site. Associated landscaping works.’

04.1.2 Section 1(5) of the Planning (Listed Buildings and Conservation Areas) Act 1990 states that “any object or structure within the curtilage of the building which, although not fixed to the building, forms part of the land and has done so since before 1st July 1948 shall be treated as part of the [listed] building”.

04.1.3 The rear of the site has always been in association with The Dower House, often as its orchard. This has been the case prior and post its listing in 1949. It is therefore viewed that the proposed 18 homes towards the rear of the site are within the curtilage of the heritage asset, as defined by the Act, hence why these also feature in the description of development for the Listed Building Consent application. It was also the view of Historic England that the rear of the site is part of the asset’s curtilage.

04.2 DEVELOPMENT PROPOSALS



Site Plan of Proposals

04.2.1 The development proposals seek to clear the far rear of the site and erect 17 new homes. Within part of the previous gardens of The Dower House, it is proposed to erect a further 1 homes. The Dower House itself will be subdivided into 3 apartments.

04.2.2 The unit mix for the 21 home development is comprised of 2x 4bed houses, 14x3bed houses, 2x2bed houses and 3x2bed apartments (within The Dower House).

04.2.3 The unit sizes and the private amenity space afforded to the properties are as tabled below:

PLOT	BEDS	OCCUPANCY	UNIT SIZE GIA SQM	AMENITY SPACE SQM
1	2	4	87	84
2	4	7	139	110
3	3	6	115	59
4	3	6	115	60
5	3	6	115	63
6	3	6	115	66
7	3	6	115	67
8	3	6	115	99
9	3	6	115	102
10	3	6	115	75
11	3	6	115	77
12	3	6	115	77
13	3	6	115	79
14	3	6	115	80
15	4	7	139	198
16	3	5	125	170
17	2	4	87	95
18	3	5	125	130
19 (DH)	2	3	104	92
20 (DH)	2	3	112	42
21 (DH)	2	3	85	118

04.2.4 The housing development will support the restoration of The Dower House itself. It should be noted that even with this enabling development, the Conservation Deficit Assessment is still identifying a rate of return to the developer below the typical level acceptable for planning proposals and the developer will need to make their own commercial decision as to proceed. Given the position on the viability, the development is wholly for homes under market tenure.

04.2.5 Full works to The Dower House are detailed in the submitted Heritage Statement, Condition Survey Report, and Structural Engineering Appraisal. Core works include however:

- / Alter the internal layout of the Dower House at ground and first floor level to create three separate, two bedroom dwellings.

- / Construct new compartment walls to achieve vertical line separation from ground level up to the underside of the roof coverings in the roof voids.
 - / Remove the existing, later two-storey stair extension from the south elevation. Replace with new two-storey extension with brickwork external walls and a double pitched roof over to provide new internal vertical access.
 - / Remove the existing, later single storey extension and associated cut-slide roof from the north elevation. Replace with a new two-storey extension with brickwork walls and a double pitched roof to provide altered internal accommodation.
 - / Remove all existing mechanical (plumbing, heating and ventilation) and electrical services. Supply and install new mechanical and electrical services within each of the three proposed separate dwellings within the Dower House.
- 04.2.6** Given the unique complexity of the development, the application seeks a principal approach to how the restoration works will be carried out with an acceptance that final details will need to be reserved by condition once a full team is appointed and able to work on The Dower House. This was discussed with Historic England as part of pre-application discussions.
- 04.2.7** To support development at the rear of the site, part of the Forecourt Walls to the Dower House will need to be removed for site access, with a new access road running through the application site. The principal pedestrian access to The Dower House from High Street will be retained however, as will the impression of a forecourt property.
- 04.2.8** Communal gardens will be laid at the retained elements of The Dower House's rear gardens. All of the new houses will have their own private garden spaces.
- 04.2.9** A total of 42 long-stay and 2 short-stay cycle parking spaces will be provided. 15 car parking spaces will be provided at the site, 3 at the forecourt to The Dower House and 12 at the rear of the site for the new houses. All car parking spaces will feature active EV charging facilities.
- 04.2.10** Bin stores are located outside the properties with exception of plots 3-7 and plots 10-16 which have a communal bin storage area.
- 04.2.11** The onsite biodiversity net-gain score of the development is (-)91.38% in terms of habitats due to the existing vegetation and trees. There is a gain in linear habitats however as these units are not present onsite as existing the mandate does not apply. Off sight credits will be purchased to achieve the 10% net-gain mandate. Two Category B and Seven Category C or U trees will be removed.
- 04.2.12** The Urban Greening Factor score is estimated to be 0.21.
- 04.2.13** Communal amenity spaces will be provided, with 388sqm at the rear of The Dower House and 197sqm at the rear of the site which includes 138sqm of playspace.
- 04.2.14** The development achieves a 95% betterment from pre-developed peak runoff rates. This is supported by the inclusion of 137m³ attenuation tank which will be located under The Dower House communal amenity space.
- 04.2.15** The new build elements will achieve onsite carbon reductions beyond Part L of 60% and the refurbishment of The Dower House will be an 81% improvement.
- 04.2.16** A carbon offset contribution of £28,826 will be secured to achieve a net-zero carbon development.

04.2.17 All homes will be fitted with water-saving efficiency measures to meet the 105 litres of water per person per day target.

04.2.18 The design approach of the new dwellings is to appear as barn and gatehouse buildings, akin to the ancillary structures which historically existed at the site.



Design of proposed rear buildings

05. PLANNING POLICY CONTEXT

05.1 SUMMARY

- 05.1.1** Section 38(6) of the Planning and Compulsory Purchase Act 2004 and Paragraph 12 of the National Planning Policy Framework requires planning applications to be determined in accordance with the development plan unless material considerations indicate otherwise. Materiality can be of law or judgement.
- 05.1.2** Section 38(5) of the Planning and Compulsory Purchase Act 2004 is also material, identifying that '*If to any extent a policy contained in a development plan for an area conflicts with another policy in the development plan the conflict must be resolved in favour of the policy which is contained in the last document to be adopted, approved or published (as the case may be).*' Given that the London Plan was adopted in 2021, against the Local Plan in 2020, where there is found to be a conflict between policies, the London Plan would take precedence in decision making.
- 05.1.3** The Development Plan for the Borough comprises the following:
- / London Plan (2021)
 - / Local Plan Part 1 (Strategic Policies) (2012)
 - / Local Plan Part 2 (Development Management Policies) (2020)
- 05.1.4** There is no neighbourhood plan covering the application area.
- 05.1.5** The National Planning Policy Framework (December 2024) (NPPF) is an important material planning consideration in the determination of all applications and provides the policy framework for development plan documents.
- 05.1.6** As identified in paragraph 6 of the adopted NPPF other statements of government policy may be material when deciding applications such as relevant Written Ministerial Statements.
- 05.1.7** It is important to observe that not all planning policies may align with each other, and there can be competing priorities within and between policies. In this situation, a judgement must be made according to their weight in meeting the overall aspirations and objectives that the adopted plans are trying to achieve.
- 05.1.8** The subsequent sections list the policies of considerations to this development proposal.

05.2 NATIONAL PLANNING POLICY FRAMEWORK

- / Chapter 2 - Achieving sustainable development;
- / Chapter 4 - Decision Making
- / Chapter 5 - Delivering a sufficient supply of homes;
- / Chapter 8 - Promoting healthy and safe communities;
- / Chapter 9 - Promoting sustainable transport;
- / Chapter 11 - Making efficient use of land;

- / Chapter 12 - Achieving well-designed and beautiful places;
- / Chapter 13 – Protecting Green Belt land;
- / Chapter 15 – Conserving and enhancing the natural environment;

05.3 LONDON PLAN 2021

- / GG1 - Building Strong and Inclusive Communities
- / GG2 - Making the best use of land
- / GG3 - Creating a healthy city
- / GG4 - Delivering the Homes Londoners need
- / GG6 - Increasing Efficiency and Resilience
- / D1 - London's form, character and capacity for growth
- / D2 - Infrastructure Requirements for Sustainable Densities
- / D3 - Optimising Site Capacity Through the Design-led Approach
- / D4 - Delivering Good Design
- / D5 - Inclusive Design
- / D6 – Housing Quality and Standards
- / D7 – Accessible Housing
- / D8 – Public realm
- / D11 - Safety, Security and Resilience to Emergency
- / D12 - Fire Safety
- / H1 - Increasing Housing Supply
- / H4 - Delivering Affordable Housing
- / H10 - Housing Size Mix
- / S4 - Play and Informal Recreation
- / HC1 - Heritage Conservation and Growth
- / G1 - Green Infrastructure
- / G3 - Metropolitan Open Land
- / G4 - Open Space
- / G5 - Urban Greening
- / G6 - Biodiversity and Access to Nature
- / G7 - Trees and Woodlands
- / SI1 - Improving Air Quality
- / SI2 - Minimising Greenhouse Gas Emissions
- / SI3 - Energy Infrastructure
- / SI5 - Water Infrastructure

- / SI6 - Digital Connectivity Infrastructure
- / SI8 - Waste Capacity and Net Waste Self-sufficiency
- / SI12 - Flood Risk Management
- / SI13 - Sustainable Drainage
- / T1 - Strategic approach to transport
- / T2 - Healthy Streets
- / T3 - Transport Capacity, Connectivity and Safeguarding
- / T4 - Assessing and Mitigating Transport Impacts
- / T5 – Cycling
- / T6.1-5 – Car Parking
- / T7 – Deliveries, Servicing and construction
- / DF1 – Delivery of the Plan and Planning Obligations

05.4 LOCAL PLAN PART 1 (STRATEGIC POLICIES) (2012)

- / NPPF1: National Planning Policy Framework – Presumption in Favour of Sustainable Development
- / H1: Housing Growth
- / H2: Affordable Housing
- / HE1: Heritage
- / BE1: Built Environment
- / EM1: Climate Change Adaptation and Mitigation
- / EM2: Green Belt, Metropolitan Open Land and Green Chains
- / EM4: Open Space and Information Recreation
- / EM6: Flood Risk Management
- / EM8: Land, Water, Air and Noise
- / T1: Accessible Local Destinations

05.5 LOCAL PLAN PART 2 (DEVELOPMENT MANAGEMENT POLICIES) (2020)

- / DMH 1: Safeguarding Existing Housing
- / DMH 2: Housing Mix
- / DMH 6: Garden and Backland Development
- / DMH 7: Provision of Affordable Housing
- / DMHB 1: Heritage Assets
- / DMHB 2: Listed Buildings
- / DMHB 7: Archaeological Priority Areas and Archaeological Priority Zones

- / DMHB 11: Design of New Development
- / DMHB 12: Street and Public Realm
- / DMHB 14: Trees and Landscaping
- / DMHB 15: Planning for Safer Places
- / DMHB 16: Housing Standards
- / DMHB 17: Residential Density
- / DMHB 18: Private Outdoor Amenity Space
- / DMHB 19: Play Space
- / DMEI 1: Living Walls and Roofs and on-site Vegetation
- / DMEI 2: Reducing Carbon Emissions
- / DMEI 4: Development in the Green Belt or on Metropolitan Open Land
- / DMEI 7: Biodiversity Protection and Enhancement
- / DMEI10: Water Management, Efficiency, and Quality
- / DMEI14: Air Quality
- / DMCI4: Open Spaces in New Development
- / DMCI5: Children's Play Areas
- / DMCI 7: Planning Obligations and Community Infrastructure Levy
- / DMT 1: Managing Transport Impacts
- / DMT 2: Highway Impacts
- / DMT4: Public Transport
- / DMT 5: Pedestrians and Cyclists
- / DMT 6: Vehicle Parking

05.6 SUPPLEMENTARY PLANNING DOCUMENTS

- / Mayor of London Accessible London - Achieving an Inclusive Environment SPG
- / Mayor of London Affordable Housing and Viability SPG
- / Mayor of London Characterisation and Growth Strategy LPG
- / Mayor of London Optimising Site Capacity: A Design-led Approach LPG
- / Mayor of London Housing Design Standards LPG
- / Mayor of London All London Green Grid SPG
- / Mayor of London Urban Greening Factor LPG
- / Mayor of London Air Quality Positive LPG
- / Mayor of London Air Quality Neutral LPG
- / Mayor of London "Be Seen" Energy Monitoring LPG
- / Mayor of London Control of Dust and Emissions During Construction and Demolition SPG

- / Mayor of London Sustainable Transport, Walking and Cycling Guidance LPG
- / Mayor of London Energy Planning Guidance
- / Mayor of London Housing SPG
- / Mayor of London Planning for Equality and Diversity in London SPG
- / Mayor of London Play and Informal Recreation SPG
- / Mayor of London Use of Planning Obligations in the Funding of Crossrail and the Mayoral Community Infrastructure Levy SPG
- / London Borough of Hillingdon: Planning Obligations 2014

06. PLANNING CONSIDERATIONS

06.1 DEVELOPMENT IN GREEN BELT

06.1.1 A part of the application site falls under the Green Belt. The Green Belt designation falls towards the rear of the site but does not include The Dower House. The designation does fall on Plot 1-18. As such, the Green Belt designation does not align with the long-established and historical curtilage of The Dower House holding. Whilst this adds complexity to the assessment of the proposals, it is of course the case that these designations exist to achieve different purposes; and can co-exist together.

'GREY BELT' CONSIDERATIONS

06.1.2 The 2024 NPPF introduced 'grey belt'. Grey belt is defined:

'For the purposes of plan-making and decision-making, 'grey belt' is defined as land in the Green Belt comprising previously developed land and/or any other land that, in either case, does not strongly contribute to any of purposes (a), (b), or (d) in paragraph 143. 'Grey belt' excludes land where the application of the policies relating to the areas or assets in footnote 7 (other than Green Belt) would provide a strong reason for refusing or restricting development.' [our underlining].

06.1.3 The definition of "previously developed land" includes the curtilage of developed land (and it should not be assumed that the whole of the curtilage should be developed). There is a degree of ambiguity in the definition's reference to 'land in built-up areas such as residential gardens', given the characteristics of this site. However, it is not considered that the development proposal contributes to any of the three purposes detailed under paragraph 143 however, and the grey belt definition is on the basis of meeting 'and/or' (in other words, to be considered grey belt, the land only needs to be either previously developed land or adhere to paragraph 143(a),(b) or (d); not both).

06.1.4 However, footnote 7 in the framework includes "designated heritage assets". The rear of the site is, and has always been since (and before) the establishment of the planning system, part of the curtilage of The Dower House (confirmed in the submitted Heritage Statement). Curtilage should also be treated as a whole, rather than subdivided. It is for reason of footnote 7 alone, that it is not viewed the site cannot be considered grey belt despite being previously developed land, or land that is not strongly serving the Green Belt purpose.

06.1.5 An assessment of the development proposals against undeveloped Green Belt land will therefore be made.

GREEN BELT

06.1.6 Paragraph 142 of the NPPF states:

'The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.'

06.1.7 Paragraph 153 of the NPPF states:

'When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt, including harm to its openness. Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. 'Very special circumstances' will not exist unless the

potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.' [our underlining].

06.1.8 Paragraph 154 of the NPPF identifies types of development within the Green Belt that the government does not consider to be inappropriate. The application proposal does not fall under any of the development types listed. The proposal would have an impact on the openness and permanence of the Green Belt. Consequently, the part of the development proposals which are located within the Green Belt designation, are considered for the purposes of Green Belt to be inappropriate development and by definition harmful to the Green Belt. A 'Very Special Circumstances' (VSC) case therefore applies to this proposal.

06.1.9 In making a VSC case, the substantial weight to the harm of development on Green Belt needs to be clearly outweighed by other considerations. The other harms resulting from the proposal also need to be identified and assessed as part of this process.

06.1.10 The following sections will assess the other matters of the development proposal, before returning in Section 6.9 to weigh the applicant's VSC case.

06.2 HOUSING DELIVERY

MAINTAINING SUPPLY AND DELIVERY

06.2.1 Paragraph 78 of the NPPF identifies the need for local planning authorities to identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against their housing requirement set out in adopted strategic policies, or against their local housing need where the strategic policies are more than five years old. *

*Unless these strategic policies have been reviewed and found not to require updating. Where local housing need is used as the basis for assessing whether a five-year supply of specific deliverable sites exists, it should be calculated using the standard method set out in national planning practice guidance.

06.2.2 The strategic policies of the development plan (Local Plan Part 1) were adopted in 2012, and as such is over 5 years old. The Council produced in March 2023 however a '5-year supply of deliverable housing sites' document (covering 2022-2027). This is the latest available assessment. This concluded the council had a 6.5-year supply of deliverable housing sites. It is noted that the March 2022 publication identified a 7.2 year supply.

06.2.3 Appendix 1 of the document forecast the following housing deliveries in each financial year:

2022/23	2023/24	2024/25	2025/26	2026/27
749	1532	1976	1949	1120

06.2.4 The latest Housing Delivery Test (2023 measurement), covers up to the financial year 2022-23. For 2022/23 the HDT identifies 745 homes were delivered. [The Planning London Datahub | London City Hall](#) identifies 750 homes were completed. The projections therefore broadly align for this financial year.

06.2.5 The Planning London Datahub does however identify a substantial divergence in the years ahead. The hub identifies that in 2023/24 only 624 homes were completed, and in 2024/25 100 homes were

completed. This is 908 and 1,876 homes less (total 2784 homes) than the latest respective council forecast.

- 06.2.6** The Datahub also identifies a total of 2,523 homes commenced in the last 3 complete financial years (2022-2025) and a total of 1,408 homes were granted planning consent. This compares to an annualised London Plan target for Hillingdon of 1,083 homes.
- 06.2.7** The latest HDT identifies that Hillingdon is achieving a 91% housing delivery, and as per Paragraph 80 of the NPPF, it is the latest HDT that applies the consequences detailed under paragraph 79. This has placed the borough in 'Action Plan', meaning the authority should prepare a plan to assess the causes of under delivery and identify actions to increase delivery in future years. The Action Plan has yet to be issued by the council.
- 06.2.8** Whilst the presumption is not yet in place against the borough (sub 75% housing delivery), it appears evident that a significant slowdown in housing delivery will start to present in future HDT results (potentially around 45% between 2022-2025 based on Datahub data). Furthermore, the outcome of the new method for calculating housing need has increased Hillingdon's annual housing target from 1,083 homes to 2,292 homes. The housing target has therefore increased, whilst housing delivery is decreased. In this context, it appears all but inevitable that the authority will fall into the 20% buffer requirement, if not the presumption in favour of sustainable development. The development proposal will be providing a material number of homes, which can also be delivered relatively quickly (compared to a strategic site for example).
- 06.2.9** Housing delivery is a core aim of the NPPF, the London Plan and the adopted Local Plan. London is facing an acute housing shortage and housing proposals do as such carry very significant positive weight in development proposals in principle. The worsening supply and delivery of new homes in the borough, heightens this weight in decision making.
- 06.2.10** Local Plan Policy DMH 1(Safeguarding Existing Housing) is also of some consideration. The policy seeks to prevent the loss of existing self-contained housing. The policy was adopted in acknowledgement that in order to achieve the Council's housing target, existing homes would need to be protected from loss. In essence, the present situation facing The Dower House is the loss of a home in the borough given the building is not habitable. The proposals would reverse this.

HOUSING MIX

- 06.2.11** The unit mix for the 21-home development is comprised of 2x 4bed houses, 14x3bed houses, 2x2bed houses and 3x2bed apartments (within The Dower House). This mix is wholly for market sale.
- 06.2.12** Policy DMH 2 (Housing Mix), identifies that '*the Council will require the provision of a mix of housing units of different sizes in schemes of residential development to reflect the Council's latest information on housing need.*'
- 06.2.13** The Strategic Housing Market Assessment Update (October 2018) appears to be the latest published research into the market housing needs of the borough (the Hillingdon Housing Strategy 2021-2026 only concerns affordable tenures). The strategic assessment identifies a 'significant need' for family sized housing as part of any market housing mix. The study identifies the following assessed needs for market homes:

Unit Size	Hillingdon Market Housing Need
1 Bedroom	300
2 Bedroom	5,000
3 Bedroom	18,200
4 Bedroom	5,400
5 Bedroom	900

06.2.14 The proposed unit mix very clearly aligns with the strategically assessed housing needs for market tenure accommodation. The development proposal’s housing mix therefore adds to the weighting significance of the housing offer proposed.

AFFORDABLE HOUSING

06.2.15 Policy DMH 7 (Provision of Affordable Housing) seeks a minimum of 35% of new homes on sites of 10 or more units delivered as affordable housing; subject to viability. Where homes cannot be delivered onsite, a financial contribution for off-site affordable housing may be accepted.

06.2.16 The development proposal does not propose an affordable housing contribution (onsite or offsite). In accordance with policy DMH 7, the submitted Conservation Deficit Assessment has identified that it is not viable for the proposed development to provide a contribution (and that the applicant would still have to take a commercial decision to proceed with the development below an agreeable profit level).

06.2.17 Additionally, as per the applicant’s pre-application advice, ‘the amount of enabling development that can be justified will be the minimum amount necessary in order to address the conservation deficit and to secure the long-term future of the asset.’ Policy DMH 6 (Garden and Backland Development) also states that ‘development on backland sites must be more intimate in mass and scale and lower than frontage properties’. Both of these characteristics, specific to this development proposal, has a limiting affect on the volume of development which can be delivered and enable the provision of affordable housing. The application proposal has demonstrated that it is not viable to provide an affordable housing contribution, compliant with policy DMH 7. An early and late stage viability review will also be secured in the S106.

SUMMARY

06.2.18 There is an acute need for more housing, of all tenures, in the borough. The outlook for housing delivery in Hillingdon appears to be materially worsening in future years. The proposed housing mix aligns with the market tenure housing needs of the borough. The development proposal adheres to the adopted policy approach on affordable housing by demonstrating the affordable housing offer against the viability of the scheme. Given the weight afforded to housing delivery, the characteristics of the proposed development, and the adherence to the development plan, the proposed housing delivery is considered to be attributed very substantial weight in favour of the development.

06.3 HERITAGE CONSIDERATIONS

06.3.1 The National Planning Policy Framework (NPPF) and National Planning Policy Guidance (NPPG) collectively guide the approach to assessing and determining development proposals concerning heritage assets. These are set out below.

PLANNING STRATEGY TOWARDS HERITAGE ASSETS

06.3.2 Paragraph 202 of the NPPF identifies that plans should set out a positive strategy for the **conservation** and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. This strategy should take into account:

- / d) the desirability of sustaining and enhancing the significance of heritage assets, and putting them to viable uses consistent with their conservation;
- / e) the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring;
- / f) the desirability of new development making a positive contribution to local character and distinctiveness; and
- / g) opportunities to draw on the contribution made by the historic environment to the character of a place.

06.3.3 NPPG Paragraph 003 expands that in developing their strategy, plan-making bodies should identify specific opportunities within their area for the conservation and enhancement of heritage assets, including their **setting**. This could include, where appropriate, the delivery of development that will make a positive contribution to, or better reveal the significance of, the heritage asset, or reflect and enhance local character and distinctiveness with particular regard given to the prevailing styles of design and use of materials in a local area.

06.3.4 **Setting** of a heritage asset is defined as the surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral.

06.3.5 NPPG Paragraph 002 defines **conservation** to be an active process of maintenance and managing change. It requires a flexible and thoughtful approach to get the best out of assets. In the case of buildings, neglect and decay of heritage assets are best addressed through ensuring they remain in active use that is consistent with their conservation.

06.3.6 Part of the public value of heritage assets is the contribution that they can make to understanding and interpreting our past. Only where a heritage asset is to be lost should the aim be to capture and record evidence of the asset's significance and its contribution to the past.

UNDERSTANDING HERITAGE ASSETS

06.3.7 In determining applications, local planning authorities should require an applicant to describe the **significance** of any heritage assets affected, including any contribution made by their setting (NPPF, Paragraph 207).

- 06.3.8** Significance is defined in the NPPF as the value of a heritage asset to this and future generations because of its heritage interest. The interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting.
- 06.3.9** The NPPG defines archaeological, architectural, artistic or historic interest to mean:
- 06.3.10** Archaeological - if it holds, or potentially holds, evidence of past human activity worthy of expert investigation at some point.
- 06.3.11** Architectural and Artistic interest: These are interests in the design and general aesthetics of a place. They can arise from conscious design or fortuitously from the way the heritage asset has evolved. More specifically, architectural interest is an interest in the art or science of the design, construction, craftsmanship and decoration of buildings and structures of all types. Artistic interest is an interest in other human creative skill, like sculpture.
- 06.3.12** Historic interest: An interest in past lives and events (including pre-historic). Heritage assets can illustrate or be associated with them. Heritage assets with historic interest not only provide a material record of our nation's history, but can also provide meaning for communities derived from their collective experience of a place and can symbolise wider values such as faith and cultural identity.
- 06.3.13** Understanding what makes a heritage asset significant consequently helps to inform development proposals and how harm can be minimised or avoided.

UNDERSTANDING IMPACT ON HERITAGE ASSETS FROM DEVELOPMENT PROPOSALS

- 06.3.14** Proposed development affecting a heritage asset may have no impact on its significance or may enhance its significance and therefore cause no harm to the heritage asset. Where potential harm to designated heritage assets is identified, it needs to be categorised as either less than substantial harm or substantial harm (which includes total loss) NPPG Paragraph 018.
- 06.3.15** When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance (NPPF, Paragraph 212).
- 06.3.16** NPPF Paragraph 214 identifies that proposals which lead to substantial harm should be refused unless it is demonstrated that it is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:
- / a) the nature of the heritage asset prevents all reasonable uses of the site; and
 - / b) no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and
 - / c) conservation by grant-funding or some form of not for profit, charitable or public ownership is demonstrably not possible; and d) the harm or loss is outweighed by the benefit of bringing the site back into use.
- 06.3.17** NPPF Paragraph 215 identifies where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the **public benefits** of the proposal including, where appropriate, securing its **optimum viable use**.

- 06.3.18** Whether a proposal causes substantial harm will be a judgement for the decision maker, but in general terms 'substantial harm' is a high test so it may not arise in many cases. For example, in determining whether works to a listed building constitute substantial harm, an important consideration would be whether the adverse impact seriously affects a key element of its special architectural or historic interest. It is the degree of harm to the asset's significance rather than the scale of the development that is to be assessed. The harm may arise from works to the asset or from development within its setting.
- 06.3.19** NPPG Paragraph 020 states that **public benefits** may follow from many developments and could be anything that delivers economic, social or environmental objectives as described in the NPPF. Public benefits should flow from the proposed development. They should be of a nature or scale to be of benefit to the public at large and not just be a private benefit. However, benefits do not always have to be visible or accessible to the public in order to be genuine public benefits, for example, works to a listed private dwelling which secure its future as a designated heritage asset could be a public benefit.
- 06.3.20** Examples of heritage benefits may include:
- / sustaining or enhancing the significance of a heritage asset and the contribution of its setting
 - / reducing or removing risks to a heritage asset
 - / securing the optimum viable use of a heritage asset in support of its long term conservation
- 06.3.21** NPPG Paragraph 015 states that it is important that any use [of a heritage asset] is viable, not just for the owner, but also for the future conservation of the asset: a series of failed ventures could result in a number of unnecessary harmful changes being made to the asset.
- 06.3.22** If there is only one viable use, that use is the optimum viable use. If there is a range of alternative economically viable uses, the optimum viable use is the one likely to cause the least harm to the significance of the asset, not just through necessary initial changes, but also as a result of subsequent wear and tear and likely future changes. The optimum viable use may not necessarily be the most economically viable one. Nor need it be the original use. However, if from a conservation point of view there is no real difference between alternative economically viable uses, then the choice of use is a decision for the owner, subject of course to obtaining any necessary consents.
- 06.3.23** Harmful development may sometimes be justified in the interests of realising the optimum viable use of an asset, notwithstanding the loss of significance caused, and provided the harm is minimised.
- 06.3.24** Paragraph 221 of the NPPF identifies that local planning authorities should assess whether the benefits of a proposal for **enabling development**, which would otherwise conflict with planning policies but which would secure the future conservation of a heritage asset, outweigh the disbenefits of departing from those policies.

SUMMARY

- 06.3.25** To summarise, the NPPF and NPPG collectively identify:
- / The need for continued proactive management of heritage assets,
 - / The need to understand the significance (be it archaeological, architectural, artistic and or in combination historic) of heritage assets,
 - / The need to understand the setting of a heritage asset and how this contributes to the assets value,

- / The recognition that the use of heritage assets can evolve over time and that maintaining use is likely a core part of heritage conservation and enjoyment,
- / The need to identify if a development proposal causes total loss, substantial harm or less than substantial harm to the heritage asset, or if it enhances the significance of the asset and therefore causes no harm.
- / That public benefit (meaning an economic, social or environmental benefit) may not necessarily be visible and could include securing the heritage asset's conservation.
- / The recognition that a viable use of the heritage asset is needed in decision-making,
- / A flexible approach to each heritage asset is required and desirable as the case maybe,
- / That development either physically to the heritage asset itself or other enabling works maybe required, even desirable, to ensure the heritage asset is positively conserved and its significance revealed.
- / Retention of a heritage asset is desirable but how the past is best recorded and interpreted is a part of the heritage considerations.

ASSESSMENT OF PROPOSALS IN HERITAGE TERMS

06.3.26 The significance to The Dower House has been identified:

- / Moderate significance in the historic regional and local context of Harlington's development and a rare remnant of the few historic buildings to survive in Harlington,
- / Mixed architectural interest on account of the significant changes which have occurred to the fabric of the building over time (including a complete refacing of external elevations in the sixteenth and eighteenth century as well as the substantial recent fire damage), but retaining important structural elements dating back to at least the early sixteenth century,
- / Social historical interest from its original function as a dowager house, portraying the social process of the upper classes.
- / Low setting interest, particularly in the wider setting, given the changing context in which the asset was established, but with some setting interest towards the rear of the site which continues to face towards undeveloped/agricultural land.

06.3.27 The Forecourt Wall to The Dower House has:

- / Architectural design interest complimenting The Dower House, but notably featuring modern and poorly executed repair work to its fabric.

06.3.28 The significance of the property as a heritage asset first and foremost demands that the property's physical presence is retained. Retention means a rare historic building survives and the historical development of the area continues to be reflected in the townscape. Key architectural fabric elements of the heritage asset would also be retained, and that the physical presence of the building is the best communication of the social attitudes/customs at the time of construction. It is not seen how these factors can be adequately recorded and understood if the heritage asset is not physically retained. With

the condition of the property, Priority A on the 'Heritage at Risk' register, the potential to lose the heritage asset is a very real consideration and the proposals to restore the physical fabric of the building represent very significant public benefit carrying substantial weight in decision making.

06.3.29 Against this very significant public benefit are other minor heritage harms identified to be:

- / The opening up of the Forecourt Wall causing a degree of architectural harm, but limited in impact by the fact this is not original historical fabric and a forecourt to the site can still be discerned,
- / Reduction of the immediate rear garden area to facilitate two of the homes required to enable the development, but with the impact limited by retaining a reference to a landscaped rear garden by the introduction of the proposed communal garden area, which also reveals a heritage aspect of the site to a wider audience,
- / Minor setting harm by developing at the far rear of the site which historically was set onto either woodland or agricultural fields – but a harm which is limited by the presence of rear development from other neighbouring sites which front High Street and that agricultural fields do still remain beyond the site area with the suburban context retained.
- / Minor harm from subdividing a heritage property into multiple homes instead of a single dwelling, but this not being evidently the case from the external appearance of the property.

06.3.30 Cumulatively these identified other harms are still considered to amount to less than substantial harm to the heritage asset, clearly outweighed by the public benefits of securing the long-term conservation of the asset which is its value. A less than substantial harm was also concluded by Historic England in pre-application discussions. Additional public benefits are also found in securing the asset's optimum viable use for continued residential occupation, provision of housing to address wider local area need, improving the local environment by restoring a decaying structure and bringing ownership back to the site to counter anti-social behaviour, and making the site accessible to more than a single owner, thus further revealing its heritage significance to a wider audience.

06.3.31 The proposed additional homes as well as the subdivision of The Dower House are a requirement to enable the development and realise the substantial heritage benefits on offer. As detailed in the Conservation Deficit Assessment, the development quantum is the minimum required to achieve a viable development, a key matter in assessment of the development impacts. The proposed arrangement keeps a low-density scheme, spatially separated from The Dower House and the architectural approach for the residential homes to appear akin to agricultural or ancillary buildings means they do not challenge or compete with the heritage asset itself and reflect structures which may have historically been present in the curtilage of The Dower House.

06.3.32 In establishing that an enabling development is required to support the restoration of the heritage asset, the applicant has followed the processes contained within Historic England's 'Enabling Development and Heritage Assets' 2020 guidance, engaging in pre-application enquiries with Historic England and the Local Planning Authority. The optimum viable use has been followed, and no other forms of funding have been identified or considered to be required to enable the restoration of the heritage asset. The Conservation Deficit Assessment has identified the minimum level of development necessary as described.

06.3.33 The submitted Archaeological Desk-Based Assessment has also identified that whilst the presence, location and significance of any buried heritage assets within the site cannot currently be confirmed, any findings that maybe uncovered are unlikely to be anything more than a non-designated heritage asset.

There is therefore no particular archaeological heritage impact identified for the development at the rear of the site.

06.3.34 The development proposal therefore clearly represents very substantial heritage benefit of substantial weight when taken as a whole. The proposal has rare and unique characteristics; the only viable approach to securing the long-term of a finite heritage asset.

06.3.35 The 2026 vision for Hillingdon in Local Plan Part 1 identifies that the plan will achieve the aim of protecting and enhancing the borough's built heritage assets, with fewer heritage assets at risk. Policy HE1 (Heritage) 'actively encourages the regeneration of heritage assets, particularly those which has been included in English Heritage's 'Heritage at Risk' register'. Policy DMHB 1 aligns with the strategic policy. This development proposal therefore meets a core aim of the adopted development plan.

06.4 DESIGN QUALITY AND NEIGHBOURING IMPACT

DESIGN

06.4.1 The architectural approach of the development proposals continues to follow that presented during pre-application discussions which was supported. The primary reservations as to the design concerned the height of the proposed buildings, the setting impact and the implications of backland development. As described above under the heritage assessment, the new homes are designed to appear akin to agricultural or ancillary buildings, an architectural style which does not challenge or compete with the heritage asset itself and reflect structures which may have historically been present in the curtilage of The Dower House, albeit not to the same extent. The materiality also reflects this design approach.

06.4.2 The main roof-ridgeline of Plot 1 is akin to the ridgeline of the main roof of the Dower House so there will be no conflict with the rooflines from High Road Harlington. Whilst the other new build homes are marginally above The Dower House's ridgeline, they are significantly further back in the plot and therefore would also not compete with the setting of The Dower House's roof. The roof heights are also an implication of following an agricultural style approach to the architecture, which commonly will have high-vaulted roofs. An appropriate balance is considered to have been reached. Furthermore, the existing context to the site is material, with the apartment block to the south of the site on Little Elms taller (at 3 storeys) than The Dower House which it neighbours. The existing residential properties immediately north and south of the site are also in closer proximity to The Dower House than Plot 1; the closest of the proposed dwellings. In this context, the proximity of the proposed development at the rear of The Dower House, and its impact on the property is limited in its harm when considered against Policy DMH 6 (Garden and Backland Development). This is best exemplified by viewing plan E-051 Rev PL01, extract below:



06.4.3 Policy DMH 6 should also be considered against the latterly adopted London Plan Policy H2 (Small Sites). Whilst the site exceeds the 0.25 hectares limit of a defined 'small site', the principle and aim of this policy and how it differs from London Plan 2016 is of note. The policy recognises that a significant contribution to London's housing delivery can come from new build or infill development from sites in sustainable locations, and acknowledges an implication to green space/biodiversity provision as a result of this approach (paragraph 4.2.10). This is a shift from London Plan 2016 Policy 3.5 which enabled boroughs to introduce a presumption against development on back gardens or other private residential gardens where this can be locally justified. There is a link between this policy, and Policy DMH 6 as identified in paragraph 4.17 which makes reference to this. The weighting of Policy DMH 6 is therefore considered to have been effected by the latter adoption of London Plan Policy H2 and the extinction of London Plan 2016 Policy 3.5.

QUALITY OF ACCOMODATION

06.4.4 The development proposal achieves a high standard of accommodation for its future occupiers against objective measures.

06.4.5 All homes adhere to the national technical standards and exceed the minimum space standards. All homes also have functional and efficient layouts, optimising the useability of space.

06.4.6 All homes are at least dual aspect, enabling passive ventilation and adequate sunlight and daylight.

06.4.7 All homes have private outdoor amenity spaces, which exceed the minimum amenity space provision under Policy DMHB 18. For all new-builds this is in the form of a private rear garden. For The Dower House properties, there is immediate space around the property as well as 585sqm of communal space provided at the rear of the Dower House and the rear of the site.

06.4.8 The GLA playspace calculator generates a total playspace requirement of 130sqm. The play area measures 138sqm. For this type of development, led by houses rather than flatted apartments, children playspaces can also typically be within the private rear gardens. Amble playspace provision is therefore provided for.

06.4.9 All homes have defensible spaces in front of the properties. All homes are provided with secure cycle spaces and bin storage areas. As described in the section below, there is no harmful overlooking impact between properties, both within or external to the site.

06.4.10 The proposal is therefore in accordance with London Plan Policy D6 (Housing Quality and Standards) and Local Plan Policy DMHB 16 (Housing Standards).

IMPACT ON NEIGHBOURING PROPERTIES

06.4.11 Pre-application discussions noted the potential for overlooking between plots. The former Plot 1 at the rear of The Dower House has now been removed, replaced with the communal gardens.

06.4.12 The pre-application discussions also noted the potential overlooking between other dwellings within the development such as Plot 1 and 2 (as now labelled).

06.4.13 Plot 1 only has a small first floor bedroom window which faces towards Plot 2. This does not have a direct line into the proposed Plot 2 building. It is also to a room typically only occupied at night; being a bedroom. Ground floor windows at Plot 1 are screened by the plot's boundary fencing, including towards neighbouring properties.

- 06.4.14** The first-floor windows of Plots 2-17 face onto undeveloped land and therefore do not pose an overlooking risk. There are no first-floor elevational windows to Plot 18 facing north towards the neighbouring residential plots. Light is provided via rooflights, which both provide the floor with natural lighting whilst protecting against overlooking. The ground floor windows are similarly screened by the plot's boundary fencing.
- 06.4.15** Plot 16 to 18's principal windows are on an east-west axis. There are only small windows on the southern elevations, facing towards Plots 2-15. These windows do not align with the opposing properties. The arrangement therefore prevents harm from overlooking within the site.
- 06.4.16** The proposed site arrangement has therefore optimised the site layout to support the viability of the development, whilst being designed to mitigate overlooking between proposed properties as well as neighbouring properties and provide adequate daylight/sunlight levels to all rooms. The proposals therefore raise no harm to neighbouring or future residential properties.

06.5 SUSTAINABLE DEVELOPMENT

- 06.5.1** The new build elements will achieve onsite carbon reductions beyond Part L of 60% and the refurbishment of The Dower House will be an 81% improvement. A carbon offset contribution of £28,826 will be secured to achieve a net-zero carbon development.
- 06.5.2** All homes will be fitted with water-saving efficiency measures to meet the 105 litres of water per person per day target.
- 06.5.3** An Air Quality Assessment supports the application, which concludes that there is a medium risk from construction related activities, but that this can be adequately managed via appropriate construction management procedures. The applicant agrees to a condition(s) concerning the construction logistics and management during the construction process. The air quality assessment concludes no significant impact from the operational phase of the development. The impacts on air quality can as such be appropriately managed and there is no material from the development, adhering to London Plan Policy SI1 and DME114: Air Quality.

06.6 OPEN SPACE, TREES, URBAN GREENING AND BIODIVERSITY

- 06.6.1** The site is presently a private single residence only. The application will provide public access to the rear. This is a moderate benefit of the proposals, providing public open space and allowing additional views in which The Dower House can be appreciated from.
- 06.6.2** Tree removals are an unfortunate consequence of an enabling development, and upon land which was formerly an orchard. This would have been however a cultivated landscape and the significant trees are still retained, in particular adjoining Plot 1 which helps to obscure the new development from the High Street. The submitted Arboricultural Assessment identifies only 2 trees are Category B with the remaining 7 trees category C or U, which are of poor quality. This mitigates the level of harm to these tree removals.
- 06.6.3** The development Urban Greening Factor score is estimated to be 0.21. Whilst this is under the recommendation of 0.4 described under Policy G5 of the London Plan, the policy only targets, rather than requires an urban greening score of this level. Greening surrounds the development, which is the intention of the policy and the factor score is limited by the high number of private residential gardens, a characteristic of a development in this area. The approach is justifiable in policy terms.

06.6.4 The onsite biodiversity net-gain score of the development is (-)91.38% in terms of habitats due to the existing vegetation and trees. There is a gain in linear habitats however as these units are not present onsite as existing the mandate does not apply. Off sight credits will be purchased to achieve the 10% net-gain mandate.

06.7 DRAINAGE

06.7.1 The development achieves a 95% betterment from pre-developed peak runoff rates. This is supported by the inclusion of 137m³ attenuation tank which will be located under The Dower House communal amenity space. The development accords with London Plan Policy SI 13.

06.8 TRANSPORT, HIGHWAYS AND SERVICING

CAR PARKING

06.8.1 Local Plan Part 2 identifies that dwellings should provide 2 car parking spaces per dwelling. 2 bedroom flats should provide 1.5 spaces per unit. This generates 40.5 car parking spaces. The London Plan was adopted after the Local Plan however and takes precedence over the Local Plan as per Section 38(5) of the Planning and Compulsory Purchase Act 2004.

06.8.2 The London Plan 2021 altered the approach to car parking, imposing a maximum parking standard approach (rather than minimum). The Local Plan standard is not lower than the London Plan maximum standards, where the Local Plan could still take precedence over the London Plan. The site is in Outer London with a PTAL rating of 3 (as per TfL's WebCAT 3.0). The maximum standards under Policy T6.1 (Table 10.3) is 0.75 spaces per dwelling for 1-2beds and 1 space per dwelling for 3 beds. This equates to 22 car parking spaces as a maximum standard. The development provides 15 car parking spaces. All bays are accessible for disabled persons, exceeding the minimum 3% of bays requirement. All bays will be equipped with EV charging, exceeding the 20% active charging requirement under Policy T6.1.

CYCLE PARKING

06.8.3 Local Plan Part 2 identifies 1 cycle space per 2-bedroom house/flat, and 2 cycle spaces per 3 bedroom or more. This generates 38 spaces for the proposed development. London Plan Policy T5 imposes a minimum cycle standard however. Under table 10.2, the minimum requirements are 2-long stay spaces for all units within this development, meaning a total requirement of 42-long stay spaces, along with the provision of 2 short-term (visitor spaces). The development proposes this number of bays, with each unit provided with a dedicated, secure cycle storage area. The cycle parking provision therefore aligns with Policy T5.

SERVICING AND EMERGENCY VEICHL E ACCESS

06.8.4 Refuse collection for the apartments within The Dower House will take place from the existing set-back section of High Street Harlington, as is currently the case for the existing residential properties in this location.

06.8.5 For the houses located to the rear of the site, two separate bin stores will be provided, one serving Plots 4-8 and the other serving Plots 11-15. Meanwhile, Plots 1-4, 8-10 and 16-18 will be provided with individual bins, with residents required to move these to the edge of the carriageway on collection day. The proposed site access in the southwestern corner has been designed to accommodate vehicles up to and including a refuse collection vehicle. The refuse vehicle can access all bin stores and dwellings required to place bins on the edge of the carriageway within a 25m drag distance, which is in accordance with The Building Regulation's 'Drainage and Waste Disposal' Approved Document 2010 (2015 Edition) and Manual for Streets.

06.8.6 Emergency vehicles will be able to access the site via the proposed vehicle access in the southwestern corner of the site from High Street Harlington.

06.8.7 Whilst the new access road through the site is single lane given the site constraints, the low level of activity through this route means that no material impact will arise. Servicing vehicles, such as refuse, have standard collection times which residents will be aware of, and the collections are swift operations. There is clear visibility on the access route with safe access for pedestrians to and from the site.

TRIP GENERATION IMPACT

06.8.8 The submitted Transport Statement identifies total trip generation of ten two-way vehicular movements during the AM peak hour (08:00-09:00), ten two-way vehicular movements during the PM peak hour (17:00-18:00) and a total daily flow of 105 two-way vehicle movements.

06.8.9 The total of ten vehicle movements in the peak hours equates to one vehicle trip every six minutes, which is considered to be negligible and is unlikely to have a significant impact on the local highway network.

06.8.10 The additional pedestrian and public transport movements are considered minimal and as such, they are unlikely to generate any material impact on the local highway or transport networks, given the available footway widths, the presence of formal pedestrian crossings, the provision of local cycle routes and the frequency of the local bus services.

06.8.11 The proposed development is anticipated to result in a maximum increase of 0.6% impact on High Street Harlington (north) and a maximum increase of 1.3% impact on High Street Harlington (south). The Transport Statement identifies no material impact on nearby junctions or road link infrastructure and no mitigation measures necessary from the development proposal.

06.8.12 In summary, the development proposal does not give rise to any transport harms and can be accommodated within the existing surrounding infrastructure. This also is an indicator of sustainable development, which can be accommodated within the existing urban settlement without interventions required. The proposal adheres to car, cycle and waste and refuse standards. The transport impact of the development is neutral.

06.9 VERY SPECIAL CIRCUMSTANCES (VSC)

06.9.1 Detailed in Section 6.1 of this statement, the development represents definitional harm to the Green Belt and therefore VSC must exist for the development to be supported.

06.9.2 In making a VSC case, the substantial weight to the harm of development on Green Belt needs to be clearly outweighed by other considerations. The other harms resulting from the proposal also need to be identified and assessed as part of this process.

06.9.3 As concluded in each part of this assessment, the development proposal's benefits and harms are judged as tabled below.

06.9.4 As part of this assessment, each matter is weighed against being of Very Substantial Harm, Significant Harm, Minor Harm, Neutral, Minor Benefit, Significant Benefit or Very Substantial Benefit.

06.9.5 This is then weighed as to how significant this matter is in the decision-making process. The weights we apply are Neutral Weight, Minor Weight, Moderate Weight, Substantial Weight and Very Substantial Weight.

06.9.6 Summary commentary is provided behind the judgement.

MATTER OF CONSIDERATION	WEIGHT
Green Belt	<p style="text-align: center;">Very Substantial Harm of Substantial Weight.</p> <p>The NPPF advises the decision maker to apply this level of harm and weight in decision making. It is noted that had this not been a proposal within a heritage curtilage then the land would indeed now be considered grey-belt.</p>
Housing Delivery	<p style="text-align: center;">Very Substantial Benefit of Substantial Weight</p> <p>The housing trajectory is rapidly declining, and this assessment has determined the ‘presumption’ is likely to formerly apply on release on the next Housing Delivery Test (presumed November 2025). Housing delivery has been mandated again, and 2024 NPPF applies substantial weight to housing delivery.</p>
Housing Mix	<p style="text-align: center;">Significant Benefit, of Significant Weight</p> <p>The housing mix aligns with the identified needs of the borough, an enhanced benefit to the delivery of housing. Whilst no affordable housing is provided, the applicant has demonstrated in accordance with policy that this would not be viable to do so. This is a justified planning position against the adopted plan and is of neutral matter – no benefit is derived from not providing affordable housing, yet equally no harm arises from not providing affordable housing.</p>
Heritage	<p style="text-align: center;">Very Substantial Benefit of Substantial Weight</p> <p>A heritage asset is by definition finite, and cannot be replaced once lost. There are few examples remaining of a dowager house in England, and the physical retention of the heritage asset is the only appropriate means of conveying the importance and understanding of the heritage asset. The asset is Category A on the ‘At Risk’ register and this is the only viable development proposal since the fire at the property in 2011. This prolonged timeframe, in an overall positive housing market environment, underlines the challenges to viability delivering the restoration. The Very Substantial Benefit is still concluded, weighing all other impacts on the heritage assets (such as setting harm to The Dower House, or partial loss of The Forecourt Walls to The Dower House).</p>
Trees, Ecology and Urban Greening	<p style="text-align: center;">Minor/Significant Harm of Moderate Weight</p> <p>To enable the development, 9 tree removals and loss of habitats are required, with an overall reduction on site. The harm is moderated however by both the new landscaping, which will develop and contribute over time, and the Biodiversity Net Gain mandate which ultimately, if not delivered in the locality of the site, still delivers</p>

	to the net-gain mandate. The site does not meet the recommended Urban Greening Factor target of 0.4, however this is not a requirement of development, only a target. The tree removals are mainly Category C and U trees which limits the level of harm that can be attributed to these removals.
Highways and Transport	<p style="text-align: center;">Neutral Impact. Neutral Weight</p> <p>The development proposal has not identified any material highway and transport harms. The development proposal can be accommodated without requiring any interventions to existing infrastructure.</p>
Public Access	<p style="text-align: center;">Moderate Benefit of Moderate Weight</p> <p>Public access and right of way is secured in the development proposal. As well as opening access, this also allows the heritage asset to be appreciated from settings hitherto restricted to the general public.</p>
Design	<p style="text-align: center;">Minor Benefit of Significant Weight</p> <p>The proposed accommodation is of a high practical standard and environmental design. The appearance of the dwellings positively responds to the setting of the site. The NPPF identifies that the creation of high quality, beautiful and sustainable buildings and places is</p> <p>fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.</p>
Townscape	<p style="text-align: center;">Significant Benefit of Moderate Weight</p> <p>The scaffolding to The Dower House has a detrimental impact to neighbours and the surrounding area. The vacant nature of the site, owing to its condition, is a magnet for anti-social behaviour (as well as adding to the risk to the heritage asset). The development proposal will address this.</p>

06.9.7 This assessment has identified the benefits and the harms of the development proposal, and there attributable weight. Such is the nature afforded to the restoration of the heritage asset that this matter alone is considered to, at least, neutralise the impact harm to the Green Belt. The other identified benefits, particularly around housing delivery, are clearly substantial. The other identified harms, and the weight to be given to these harms, does not diminish the very clear benefits from the proposal. Accordingly, the development proposal does demonstrate a VSC case for the application site. Accordingly, the development proposal should be supported.

07. CIL AND S106 HEADS OF TERMS

07.1 COMMUNITY INFRASTRUCTURE LEVY

07.1.1 The Community Infrastructure Levy (CIL) is a levy (measured by £ per sqm) on development uplift. It is collected on implementation of a development or on phased schemes at the start of each phase. Different rates tend to be applied depending on the proposed land use. The levy in London is captured at both mayoral and local levels. The Mayor utilises the charge to pay for strategic infrastructure such as Crossrail (The Elizabeth Line).

07.1.2 Hillingdon captures the charge to provide local infrastructure that may need to be put in place to support new developments in the borough. This includes transport schemes, flood defences, schools, health and social care facilities, parks, open spaces and leisure centres. Hillingdon's rate is £95 per sqm (plus indexation from 2014). The purpose of the collection of CIL is to subsequently address any potential impact on the local infrastructure types identified, addressing any potential harms on such matters.

07.2 S106

07.2.1 A Section 106 (S106) agreement secures additional obligations from a developer deemed necessary to mitigate the impacts of a development proposal. These obligations run with the land, are legally binding and enforceable. CIL Regulation 122 identifies that these obligations must be:

- / necessary to make the development acceptable in planning terms;
- / directly related to the development; and
- / fairly and reasonably related in scale and kind to the development.

07.2.2 In consideration of the Council's Planning Obligations SPD (2014) and adopted policies, the applicant views the S106 Heads of Terms to be as follows:

- / Legal Fees and Monitoring
- / Early and Late-Stage Viability Review
- / Securing Public Access to Parts of the Site
- / Carbon Offset Payment / Net-Zero Development
- / Biodiversity Net-Gain Mandate
- / Car Free Development (preventing residents parking permit beyond the site)
- / Construction Training and Recruitment
- / Completion of The Dower House Restoration Prior to Final Occupancy of the Enabling Development

07.2.3 The applicant will engage with the Local Planning Authority as part of the application process over these Heads of Terms and any other the authority considers justified in consideration of the CIL Regulations.

08. CONCLUSION

08.1.1 The development proposal seeks planning and listed building consent for:

'Subdivision of The Dower House to provide 3 residential homes (Use Class C3) along with restorative works. Partial Demolition of the Forecourt Wall to The Dower House to enable rear site access. Erection of 18 residential homes (Use Class C3) at the rear of the site. Associated landscaping works.'

08.1.2 The development proposal is located within the Green Belt, and is classed as definitional harm to the Green Belt. The development proposal has therefore been required to demonstrate a Very Special Circumstances case, where the harm to the Green Belt, and any other identified harms, are clearly outweighed by the development proposal.

08.1.3 This planning statement has detailed that the application proposal does indeed provide substantial benefits which outweigh the harm to the Green Belt, and that a Very Special Circumstance case exists for this development proposal.

08.1.4 The Dower House is a listed building, by definition a finite resource that once lost cannot be replaced. There are few examples of dowager houses remaining in England, and this represents important physical historical evidence of the social norms of the time as well as the historical development of Harlington. The Dower House is Priority A on Historic England's Heritage At Register and there is a pressing need to urgently address the situation or else the asset will be lost. The fact the site has been in its present condition since 2011 in a positive housing market environment demonstrates the complex challenge in bringing forward a viable development to redress the matter.

08.1.5 The development proposal provides additional homes in a sustainable location which meets an identified need for the borough. The declining housing delivery rate, and the weight this is afforded in decision making with the re-mandated housing delivery test is also of significant material weight in decision making. The development proposal meets the overarching objective of the adopted development plan and amounts to sustainable development as defined by the National Planning Policy Framework. It is concluded the development proposal is supported.

Appendix 1: Public Consultation Responses

Petition of Support

Redevelopment of The Dower House, 393 High Street, Harlington, Hayes UB3 5DH

To: London Borough of Hillingdon Planning Team (Heathrow Villages Ward)

393 High Street, Harlington (known as The Dower House) is a Grade II listed building dating back to the 16th century. After suffering significant fire damage in 2011, it has remained in disrepair and has become a source of blight, negatively affecting residents and the wider Harlington community.

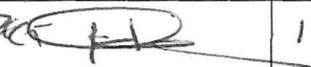
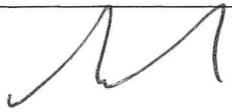
We, the undersigned, strongly support the proposed residential development of 2- and 3-bedroom market homes with parking to the rear of The Dower House. This scheme will enable the restoration and reuse of The Dower House while addressing pressing housing needs in our area.

This development will:

- Refurbish and restore The Dower House, removing a long-standing eyesore and preserving an important historic landmark.
- Deliver much-needed new family homes, helping to meet local housing demand.
- Boost the local economy, as new residents support existing shops, services, and small businesses.
- Promote efficient, sustainable land use, consistent with long-term community needs.

Market housing is essential to ensuring Harlington remains a welcoming, thriving place to live. We therefore urge the London Borough of Hillingdon planning team to approve this application.

Signatures of support from adjacent properties

Name	Address	Signature	Date
MR NUKAM SINGH	385 HIGH STREET HARLINGTON UB3 5DH		19 SEP 25
MR DARSHAN T SINGH	391 HIGH STREET HARLINGTON UB3 5DH		19 SEP 25

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Signatures of support from adjacent properties

Name	Address	Signature	Date
PETER FREWIN	387 HIGH ST UB3 5DH		19 9 25
ANDY STEVENS	389 HIGH ST UB3 5DH		19.9.25

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