

APCAR SMITH PLANNING

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PLANNING STATEMENT

**54 and 56 PEMBROKE ROAD
RUISLIP
HA4 8NF**

MAY 2021
Our Ref: CA/3046

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APPENDICES

- A.** Arden House Animal Hospital Statement (9 February 2021)
- B.** RSPCA letter of support.

1.00 INTRODUCTION

- 1.01 This Statement accompanies a planning application by Ms C Siddle (of Arden House Animal Hospital of 56 Pembroke Road) in respect of proposals relating to both Nos.54 and 56 Pembroke Road (both properties being in Ms Siddle's freehold ownership).
- 1.02 As far as No.56 is concerned the proposals involve the change of use of the existing veterinary practice back to the original use of the property as a single family dwelling together with the demolition of the extensions which have previously been constructed to facilitate the veterinary practice use.
- 1.03 At No.54 the proposals involve change of use to veterinary clinic together with single storey side and rear extensions and a loft conversion.
- 1.04 The proposals therefore effectively swap the residential and veterinary practice uses between Nos. 54 and 56.
- 1.05 As discussed further in Section 3 (in which we comment on relevant planning history) No.56 Pembroke Road benefits from an extant planning permission for substantial further extension and alterations to enable improvements to the veterinary practice's facilities. Since permission was granted it has become apparent that the approved extensions and alterations could not be undertaken whilst the veterinary practice remained operational in the premises; it has proven impossible to temporarily relocate whilst remaining in the vicinity of the site to serve the practice's client base; hence the decision was made to effectively move the residential use from No.54 to No.56 and the veterinary practice use to No.54.
- 1.06 If planning permission is granted for the proposals as now sought the practice could continue to operate from No.56 whilst the building works to No.54 are undertaken. When those building works are complete the practice would be able to relocate to No.54. The works to No.56 would then take place enabling that property to return to residential use. It is acknowledged that the Local Authority are likely to require the Applicant to enter into a Legal Agreement to ensure that No.56 does revert back to residential use following the implementation of that part of the planning permission relating to No.54.

1.07 Attached at Appendix A is a letter dated 9 February 2021 from Arden House Animal Hospital (the veterinary practice at 56 Pembroke Road providing further information in respect of the reasoning behind the application and the proposals.

1.08 It is not intended that there will be any increase in intensity of the veterinary practice use as a result of the works and move to No.54 Pembroke Road. There will be no increase to the number of consulting rooms or increase in veterinary staff or clients on the premises. The proposals are solely to bring the facilities up to date and fit for purpose. As the RSPCA confirm in their letter at Appendix B, Arden House Animal Hospital is important to the local community in terms of the function it provides. They support the proposals to which this application relates.

1.09 The application is submitted following pre-application advice – as also discussed in Section 3.

1.10 The application is submitted on the basis of the following plans:

➤ Site Location Plan	Drwg No 100
➤ No.54 – Existing Site Plan	Drwg No 101
➤ No.54 – Existing Ground Floor Plan	Drwg No 102
➤ No.54 – Existing First Floor Plan	Drwg No 103
➤ No.54 – Existing Roof Plan	Drwg No 104
➤ No.54 – Existing Elevations	Drwg No 105
➤ No.54 – Proposed Ground Floor Plan	Drwg No 106 Rev K
➤ No.54 – Proposed First Floor Plan	Drwg No 107 Rev K
➤ No.54 – Proposed Loft Plan	Drwg No 108 Rev K
➤ No.54 – Proposed Roof Plan	Drwg No 109 Rev K
➤ No.54 – Proposed Elevations	Drwg No 110 Rev K
➤ No.54 - Proposed Street Scene Elevation	Drwg No 111 Rev K
➤ No.54 - Proposed Site Plan	Drwg No 112 Rev K
➤ No.54 - Proposed Rear Elevations	Drwg No 113 Rev K
➤ No.54 - Proposed Storm Water Management	Drwg No 114 Rev K
➤ No.56 – Existing Ground Floor Plan	Drwg No 201
➤ No.56 – Existing First Floor Plan	Drwg No 202
➤ No.56 – Existing Roof Plan	Drwg No 203
➤ No.56 – Existing Elevations	Drwg No 204
➤ No.56 – Existing Elevations	Drwg No 205
➤ No.56 – Proposed Ground Floor Plan	Drwg No 206
➤ No.56 – Proposed First Floor Plan	Drwg No 207
➤ No.56 – Proposed Roof Plan	Drwg No 208

➤ No.56 – Proposed Elevations	Drwg No 209
➤ No.56 – Proposed Elevations	Drwg No 210
➤ Topographical Survey	Drwg No MB-SURV-PR- TS-001 Rev 1

1.11 The application is also accompanied by the following supporting documents:

- Design and Access Statement (produced by KVB Architects Ltd)
- Daylight and Sunlight Assessment (produced by T16 Design)
- Arboricultural Impact Assessment incorporating Tree Constraints Plan, Tree Protection Plan and Arboricultural Method Statement (produced by E Sense-Arbicultural Consultants)
- Completed London Sustainability Drainage Proforma
- WAVIN Stormwater Management System

2.00 SITE AND SURROUNDINGS

- 2.01 The application site comprises the plots of both Nos. 54 and 56 Pembroke Road, having a combined width of 30m, depth of 54m adjacent to No.58 and 58m adjacent to No.52, and an overall area of 1,683sqm.
- 2.02 The plot of No.56 Pembroke Road is slightly narrower than that of No.54 with a past side/rear extension to No.56 having resulted in the plot of No.56 increasing in width in the past.
- 2.03 Properties in the vicinity comprise a mix of detached houses, semi-detached houses and purpose built flats. No.56 is the only non-residential use in the vicinity.
- 2.04 Properties immediately surrounding the joint application site are a mix of detached and semi-detached houses. Both Nos.54 and 56 are detached as are properties to the east. To the west Nos. 50 and 52 are a pair of semi-detached houses beyond which is a further detached house and purpose built part three/part four storey flats.
- 2.05 The scale of the houses in the vicinity and their design vary quite significantly. No.56 has a hipped end roof with a front gable to an original protruding front wing. It has a single storey front element beneath a pitched roof where the entrance door is positioned to the side. It is not clear whether this is an original part of the building or a subsequent extension. Apart from the signage advertising the veterinary practice use the premises remain of residential appearance. The extensions, constructed specifically for the existing veterinary practice use, incorporate a substantial flat roof single storey side/rear extension projecting 10m from the original rear elevation and projecting 3.9m beyond the original flank wall. To the rear, once this extension is beyond the rear elevation of No.54, its width increases to 5.5m. There is also a rear extension to a depth of 3.1m occupying most of the width of the building, set in from the flank elevation adjacent to No.56 by 0.65m. In addition to the extensions there are two detached single storey outbuildings at the rear of No.56 – a garage/storage building and a shed – both of which are utilised as part of the veterinary practice for storage purposes and similar.

2.06 No.54 has not previously been extended. It is a roughly square two storey building with its main entrance in the centre of the front elevation, being topped by a pyramidal roof form.

2.07 No 58 is of similar scale and form to No.56 but with its front wing having a hipped end roof rather than a gable end. Beyond this is a chalet bungalow.

2.08 On the opposite side of the site No.52 Pembroke Road is a semi-detached house. It, together with No.50, would have originally been a pair of symmetrical semi-detached properties with a hipped end roof. No.52 has had a hip to gable end roof extension together with a box dormer at the rear. It also has a single storey side extension up to the boundary with No.54 and a single storey rear extension up to the boundary with No.54.

2.09 The frontages of both Nos.54 and 56 are entirely hard surfaced and both used for car parking. No.54 has a dropped kerb adjacent to its boundary with No.52. It also shares a wide dropped kerb with No.56 covering approximately 50% of the width of the plot of No.56 and continuing to approximately in line with the flank elevation of No.54 adjacent to No.56. The only soft landscaping to the front of the properties is a hedgerow occupying approximately half of the front boundary of No.56.

2.10 No.56 is used for veterinary practice purposes in its entirety. The ground floor contains the main veterinary practice working rooms including three consulting rooms, the reception, wards, theatres etc. The first floor is used for ancillary residential purposes and staff areas. It can only be accessed via an internal staircase and is therefore unsuitable for use as an independent self-contained dwelling. No.54 is used entirely as staff accommodation arranged as 4 flats.

2.11 There are no parking restrictions in the vicinity of the site on the southern side of Pembroke Road. On the northern side are single yellow lines.

2.12 The site has a Public Transport Accessibility Level of 3. It is approximately 400m from Ruislip Underground Station. There are also bus stops to a number of routes within 400m of the site so providing good access to Central London and the surrounding suburban areas.

3.00 PLANNING HISTORY

3.01 The known planning history for No 56, for which there is documentation on the Council's website, dates back to 2002 when planning permission was granted for the erection of a detached rear storage unit (Permission Ref: 33485/APP/2002/395). The approved plans show the detached garage/store building which still exists. It is clear from the existing plans that at the time of the submission of this application in 2002 the existing extensions to the building were in place with it already being used as a Veterinary Hospital. We note that the approved plans show No 54 Pembroke Road as providing staff accommodation with staff car parking in front of that. This remains the case. It is also noted from the existing plans submitted with that application that the boundary between Nos 54 and 56 was flush with the flank elevation of No 54. We note that the Officer's report in respect of this application refers to there being no relevant past planning history with no history of permission having been granted for a vets practice but it appearing to be well established since the 1950s.

3.02 In 2015 an application was submitted for 54 Pembroke Road involving a change of use of the ground floor to create a veterinary clinic with part two storey, part single storey rear extension with flats above (Ref: 10793/APP/2015/476). However this application was withdrawn prior to determination. We note from the supporting documentation that reference was made to reverting 56 Pembroke Road back to residential use following the completion of the proposed development but with no legal mechanism available to ensure this we suspect that the Council were concerned about the principle of the proposed change of use resulting in two neighbouring veterinary practices. We also note from the submitted plans that that application involved a very substantial single storey rear extension, extending some 20m beyond the existing rear elevation together with a first floor extension 4m in depth.

3.03 In 2016 planning permission was refused for an application involving both Nos 54 and 56 Pembroke Road (Ref: 10793/APP/2016/2624). The proposals primarily involved No 54 with the change of use of the ground floor again to a Veterinary Practice with the same substantial rear extension as the withdrawn application (20m deep and with a large pitched roof having a ridge height of 6.7m), a first floor rear extension and 3 self-contained flats on the first floor. Part of the existing side/rear extension to No 56 was to be demolished to provide

access to a car park which would have been to the rear of both Nos 54 and 56. The proposals incorporated a total of four consulting rooms so increasing the intensity of the veterinary practice use (as one additional consulting room). The proposals incorporated a 17 space car park at the rear which would have been entered alongside the boundary with No.52 and exited between Nos.54 and 56 as well as 3 parking spaces to the front of No.54. The rear garden of No.56, which was proposed to revert to residential use, was to be reduced in depth to enable the car parking for the veterinary practice to extend across the width of both plots. The submitted plans did not show the demolition of the past extensions to No.56.

3.04 Planning permission was refused for reasons relating to the following matters:

- Loss of a single family dwelling.
- Scale, excessive depth etc being visually intrusive and harmful to the character and appearance of the dwelling and the surrounding area.
- The proposals (with particular reference to the parking) resulting in disturbance harming the amenities of the residential area.
- Failure to provide appropriate external amenity space for the occupiers of the proposed flats.
- Internal floor areas of the flats being substandard.
- Impact of the proposed extension as a result of its height and depth harming amenities of occupiers of Nos 52 and 56.
- Intensification of the use of the site and the footprint harming the character of the area.
- The application failing to demonstrate that the proposals would not harm existing trees.
- Failure to demonstrate sufficient parking or cycle storage or appropriate arrangements for collection of refuse/recycling.

3.05 Following on from this refusal of planning permission this practice were instructed in mid-2017 and asked to advise with regard to the Veterinary Practice's desperate need to improve the quality of their existing facilities as the ongoing search for alternative premises in the area was proving fruitless. Subsequently a request for Pre-Application Advice was submitted in April 2018 (Ref: 33485/PRC/2018/69) for proposals involving the demolition of the existing extensions and larger extensions to No.56.

3.06 The pre-application advice confirmed there to be no objection in principle to the extensions with detailed comments in respect of the extension.

3.07 Following on from this pre-application advice Application Ref: 33485/APP/2019/3433 was submitted. This reduced the width of the two storey side extension pulling it away from No 54 and the two storey rear extension was set in from the flank elevation adjacent to No 58. The single storey front extension was reduced so that it was no longer the full width of the property. The single storey rear extension was reduced in height. The first floor ancillary flat was revised so as to be a studio flat. However planning permission was refused on the basis of concerns relating to character, appearance and visual amenities, in particular as a result of the proposed roof form including flat roof element.

3.08 A further application was then submitted (Ref: 3485/APP/2020/733 with a redesigned roof for, eliminating the flat roof element and instead involving a raised height to the overall roof with a small area of crown roof. Planning permission was granted on 27 April 2020 and therefore remains extant. Of relevance to the current proposals is that the extant permission involved an increased depth to the single storey side/rear extension and also increased its width coming closer to No.58 Pembroke Road. The approved plans show, at ground floor level, the main veterinary practice working spaces (consulting rooms, reception area, wards etc) with offices and a staff room at first floor level and a staff bedsitting room also at first floor level. This extant permission was not required to provide additional car parking, it being acknowledged that the proposals did not involve any intensification of the existing use; simply the provision of improved facilities.

3.09 Prior to the submission of this planning application the Local Authority's pre-application advice has been sought with a virtual pre-application meeting taking place on 27 October 2020. Revised plans were submitted following this meeting to address comments raised by the Planning Officer which primarily related to the detailing/scale of the extension and number of parking space. The pre-application advice was issued by way of an e-mail on 21 December 2020 (Ref: 10793/PRC/2020/199). Concern was raised that the scheme submitted for pre-application advice did not incorporate No.56 and therefore there could be no way of ensuring that the use of No.56 would revert

back to its original residential use. Parking at the front of No.54, with no parking at the rear, was confirmed as acceptable. It is acknowledged that the pre-application advice raised some concern with regard to the proposed alterations to the roof. However we are aware that the Officer did not visit the site (as a result of all site visits being abandoned due to COVID concerns at the time). On line aerial imagery does not show a number of extensions including the hip to gable extension at No.52 Pembroke Road with its large box dormer window and roof alterations and extensions to many other properties along this stretch of Pembroke Road involving more steeply sloping roofs with large crown elements and the 4 storey blocks of flats only 3 properties to the west. The proposals have, however, been amended by pulling the dormer cheeks in, away from both side elevations, so ensuring that the dormer will not impact the street scene.

4.00 PROPOSED DEVELOPMENT

4.01 As far as No.56 Pembroke Road is concerned the proposals involve the demolition of the single storey extensions at both the side and rear, taking the property back to its original shell to provide a 3 bedroom single family house. Two parking spaces for the single family house are provided on the existing hard surfaced area to the front. Unlike the previous application for Nos.54 and 56 (as referred to at Paras 3.03 to 3.04) the entire rear garden would be retained for the single family dwelling at No.56 with neither the proposed veterinary practice use of No.54, nor its car park, extending into or utilising any part of the plot of No.56.

4.02 As regards No.54 the proposals involve a single storey rear extension to a depth of 7.9m (less than half of the depth of that previously proposed and less than the depth of the extension to No.56). Furthermore this extension utilises the change in natural ground levels being set at a lower level than the main building with there being stairs leading down into the rear extension. It is proposed that this extension have a green/sedum roof. As can be seen from Drwg No 110 Rev K its roof height will be below the existing 2m high close boarded fence along the boundary with No.52 Pembroke Road and similar fencing that would separate the plots of Nos.54 and 56 (shown on the proposed site plan – Drwg No 112 Rev K).

4.03 The proposals also involve a small side extension adjacent to No.52, to a lower height than No.52s single storey side extension, recessed 1m from the front building line.

4.04 There would be no extension to the first floor, unlike the previous proposals. The roof would be extended changing it from a pyramidal roof to a gable end roof with gables to the side elevations, and with a rear dormer recessed significantly from both sides, ridge and eaves lines.

4.05 The main veterinary facilities would occupy the ground floor, with two consulting rooms. The first floor would accommodate staff facilities including an office, staff room, staff kitchen and WCs and a conference/meeting room. Within the roof space would be a 1 bedroom staff flat.

- 4.06 Clients would enter from the existing front door. The existing side door would be used as the staff entrance. A total of 4 car parking spaces are proposed in front of the building – 2 for visitors and 2 for staff. The 2 existing dropped kerbs in front of No.54 would be reinstated to pavement and a new centrally positioned dropped kerb created.
- 4.07 The entire rear garden would be retained as such. 4 cycle parking spaces are proposed to be provided at the side of the building (adjacent to the staff entrance). The refuse area is proposed to be in front of the single storey side extension set back from the main front building line.

5.00 CONSIDERATION OF PROPOSED DEVELOPMENT IN THE CONTEXT OF RELEVANT PLANNING POLICIES AND SUPPLEMENTARY GUIDANCE

5.01 We consider relevant aspects of the National Planning Policy Framework, The London Plan, the London Borough of Hillingdon's Local Plan Part 1 – Strategic Policies and Part 2 – Development Management Policies.

NATIONAL PLANNING POLICY FRAMEWORK (2019)

5.02 The application is submitted following pre-application advice so following the guidance in Section 4. The proposals have been amended to respond to the advice given.

5.03 The use is clearly one which is of service to the local community. The letter from the Royal Society for the Prevention of Cruelty to Animals as attached at Appendix B confirms this. The existing use is clearly a valued community resource. The Statement produced by the Veterinary Practice itself (Appendix A) explains the need for the proposals. Para 92 of the NPPF requires planning decisions to guard against the unnecessary loss of valued services and facilities. It is clear that the existing use cannot continue to operate from their existing accommodation at No.56 as they fail to meet current standards as referred to in the Statement at Appendix A. Whilst alternative locations have been sought (again discussed in the Statement at Appendix A) no suitable sites have been found. Furthermore extending in accordance with the extant permission for No.56 is not feasible as the veterinary practice would have to close for a significant period of time whilst building works were undertaken. Since the proposals have been designed to ensure no harm to the street scene or amenities of neighbouring occupiers, and given that the proposals do not result in any intensification of the existing use, it is therefore hoped that the Local Authority will follow the guidance in Para 92 with a positive decision on this application.

LONDON PLAN (2021)

5.04 A veterinary practice is an important element of the social infrastructure required to support the area's population. Policy S1 requires development proposals to provide high quality social

infrastructure and to make the best use of land. Part F of the policy resists the loss of existing social infrastructure unless forming part of planned improvements (whether or on site or elsewhere) to provide fit for purpose facilities. The proposals are for precisely that – replacing the outdated facilities at No.56 with fit for purpose facilities at No.54.

- 5.05 Of particular relevance to the proposals moving the veterinary use from No.56 to 54 Pembroke Road is the reference at Para 5.1.5 (which is part of the supporting text to Policy S1) that, where there is a loss of a social infrastructure facility a replacement “that continues to meet the needs of the neighbourhood it serves” should be provided. This demonstrates acknowledgement of the need for the veterinary practice to remain local for the benefit of the local community and existing clients.
- 5.06 The existing use is clearly important to the local community. This is clear from the RSPCA letter at Appendix B. The enhanced facilities are clearly necessary to comply with current standards as is clear from the Applicant’s Statement at Appendix A. The proposals should therefore be encouraged in principle.
- 5.07 Policy H1 seeks to increase housing supply. The proposals will provide for a single family house at No.56 where the only residential accommodation at present is the staff flat. At No.54 the four small flats – each laid out as 1 bedroom but being undersized as discuss further below – will be replaced with a fit for purpose veterinary practice with an appropriately sized staff flat within the roof space.
- 5.08 Policy H8 resists loss of existing housing. It is considered that the proposals should be considered on balance. They replace an ancillary flat at No.56 with a good sized family house. At No.54 it is acknowledged that 4 flats (occupied by staff) will be replaced with 1 ancillary staff flat. However, as referred to below in the context of policy D6, the existing 4 flats are all significantly below standard. Furthermore the proposals should be considered in the context of Policy S1 which, as referred to above, supports the principle of the proposals.
- 5.09 Policy D6 relates to housing quality and standards with cross reference to Table 3.1 which refers to minimum unit sizes dependent upon numbers of bedrooms/bed spaces. The 3 bedroom single family house

proposed for No.56 (ie; going back to its original use) is 104sqm, so being of an appropriate size for a 3 bedroom/6 person house. The staff flat within the roof space of No.54 will have a floor area of 50sqm so being appropriate for a 1 bedroom/2 person unit. All 4 existing flats within No.54 are substandard. They are all arranged as 1 bedroom/2 person units which should be a minimum of 50sqm, yet all have floor areas significantly below this being less than 40sqm each. The requirements of the policy in respect of external amenity space will be very generously complied with given the very large rear gardens to both plots.

- 5.10 It is considered that the proposals comply with requirements of Policy D3 with the design led approach optimising the potential of the site and responding appropriately to the character, scale, building types and form of the locality.
- 5.11 As regards cycle parking the proposals provide 4 cycle parking spaces adjacent to the staff entrance at No.54. This number of cycle spaces was confirmed as appropriate through the pre-application advice. As regards cycle parking for the single family dwelling at No.56, there is ample space within the grounds for secure covered cycle storage. It is assumed that this could be conditioned. The proposals therefore comply with Policy T5.
- 5.12 As regards car parking Policy T6 cross refers to maximum standards. There are no car parking standards for uses such as veterinary practices specifically referred to. For the proposed 3 bedroom family dwelling, and given the PTAL rating of 3, Policy T6.1 and Table 10.3 to which it cross refers would permit up to 1 space. It is acknowledged that the submitted plans show 2 parking spaces. If the Local Authority were to be concerned in respect of overprovision of car parking for the family house at No.56 a condition could be imposed requiring revised details of front garden treatment and car parking to be submitted prior to first occupation of the dwelling. However it is noted that the pre-application advice indicates that the retention of the frontage of No.56 for car parking would be appropriate.

LOCAL PLAN: PART 1 – STRATEGIC POLICIES (2012)

- 5.13 Policy BE1 – Built Environment. The proposals comply with relevant requirements, maintaining the quality of the built environment,

providing a high quality of design and with the extensions to No.54 being in keeping with the local area. The fact that the proposed single storey extension to No.54 will be lower than boundary treatment along both neighbouring properties means that all that would be visible of the rear extension would be its roof when looking down from neighbouring upper floor windows. It will not be visible from the ground floor or from within neighbouring gardens. The proposed green (sedum) roof would minimise the appearance when viewed from upper floor windows. The small single storey side extension to No.54 is generally in keeping with the street scene with many properties having single storey side extensions. With regard to Criteria 9 of the policy, which refers to new developments not resulting in inappropriate development of gardens and green spaces, the proposals replace the large side and rear extension at No.56 (and the even larger approved extension in the extant planning permission) with a comparable extension to No.54. Whilst the footprint of No.54 is increased there will be no harm to biodiversity or increased risk of flooding.

- 5.14 Policy EM7 – Biodiversity and Geological Conservation. The only aspect of this policy relevant to the proposals is Point 7 which requires the use of sustainable drainage systems. The proposals incorporate this as can be seen from a submitted documentation.
- 5.15 Policy T1 – Accessible Local Destinations. This policy requires development to be accessible by sustainable modes including good cycling and walking provision. However the proposals do not involve a new or intensified use but simply enhanced facilities at the neighbouring property. The location is suitable for the existing client base. Given that there will be no intensification of use (no increased number of consulting rooms or staff and therefore no additional clients visiting the premises) the proposals will have no impact on the transport network.

HILLINGDON LOCAL PLAN PART 2: DEVELOPMENT MANAGEMENT POLICIES (2020)

- 5.16 Policy DMCI1 - Whilst the proposals result in the loss of the existing community facility at 56 Pembroke Road the same facility, but to improved standards to meet current requirements, will be provided at No.54. As required by the policy the level of accessibility and standard of provision at No.54 will be an improvement on that at No.56. It is

clear that the policy would not support the change of use of No.56 back to residential use without replacement facilities being provided within the local catchment area. The reference at Part A(i) to the local “catchment area” demonstrates the importance of the replacement facilities being within the local area. As referred to in Appendix A despite extensive searching for alternative premises nothing has become available that would be suitable for the use within the local catchment area and hence the proposals to effectively swap the uses between Nos 54 and 56.

5.17 Policy DMCI2 – Whilst the proposals are for a new community facility within No.54 they replace that at No.56 and are therefore clearly located within the community or catchment that they are intended to serve, in accordance with Part B(i) of the policy. The ground floor extension meets the needs of the intended occupier in accordance with Part B(ii).

5.18 Policy DMHB11 – The policy requires all development including extensions and alterations to be of the highest standard and incorporate the principles of good design with specific reference to the need to harmonise with the local context, use of high quality building materials and finishes, ensuring that the entire design and layout maximises sustainability and is adaptable to different activities and protecting features of value. With regard to the need to harmonise with the local context there is specific reference to scale of development including a consideration of height, mass and bulk of adjacent structures; plot coverage and street patterns; and building lines, roof lines, streetscape rhythm including gaps between properties. The proposals are considered to comply with all aspects of this policy, enhancing the street scene and the overall appearance of the sites by removing the inappropriate substantial side extension to No.56 and instead incorporating a sensitive, lower level green roofed extension to the rear of No.54 and small side extension. The roof extension, incorporating a subservient rear dormer (that could be constructed as permitted development to a single family house) does not increase the height of the roof from that currently existing and relates well to the existing hip to gable extension and rear dormer at No.52. With the gap between the roofs of No.54 and No.56 it is not considered that the hip to gable extension will over-dominate No.56.

5.19 Policy DMHB16 – This relates to housing standards and is relevant to the proposed staff flat. This complies with internal space standards as the policy requires. Likewise the single family house at No.56 complies with internal space standards. It is also relevant to take account of the fact that none of the existing 4 flats at No.54 comply with these standards and therefore, whilst there are less residential units overall as a result of the proposals, the fact that they now incorporate a family unit instead of 4 substandard 1 bedroom flats, should be considered to be a positive element of the proposals.

5.20 Policy DMHB18 – The single family house at No.56 will benefit from a substantial rear garden. There will also be the substantial rear garden retained at the rear of No.54, usable for occupiers of the proposed staff flat within the roof space of that property.

5.21 Policy DMH1 – Whilst, as referred to above, the existing 4 self-contained flats within No.56 are lost from residential use, the proposals provide for a new residential use at No.56. Whilst the floor area of No.56, when restored to its original shell as is proposed, is slightly less than the existing floor space (including common parts) of No.54, given that the existing 4 flats at No.54 are sub-standard in terms of floor area and given also that the proposed staff flat at 54 is larger than the existing staff flat at 56, it is considered that, overall, the proposals are acceptable in the context of this policy. It is clear from Part B(iv) of the policy that the Council considers compliance with the space standards to be important and hence should not be overly concerned with regard to the proposals losing some sub-standard residential units given the overall benefits of the proposals,. Whilst the staff flat at No.54 is not provided with an individual entrance, given that this flat is intended solely to be ancillary to the veterinary practice (as is the existing flat at No.56) and would only be occupied by members of staff, it is not considered that the layout is unacceptable.

5.22 Policy DMEI1 – Although not a major development it is clear that the policy encourages living roofs such as that proposed for the single storey rear extension.

5.23 Policy DMT1 – The proposals meet the transport needs of the development with No.54 being accessible for staff and customers by public transport and providing an appropriate level of car parking (as the pre-application advice confirms). Given the nature of the proposed

use of No.54, as with the existing use of No.56 there are limited requirements for deliveries or servicing. The proposals therefore incorporate 2 staff and 2 visitor parking spaces, all independently accessible, enabling vehicles to enter and exit the site in forward gear. This is a distinct improvement on the parking layout at the front of No.56 where it would not be possible for 4 cars to be parked and each to be able to exit independently without another car having to be moved.

- 5.24 Policy DMT5 – Cycle parking provision is as has been agreed through the pre-application advice process.
- 5.25 Policy DMT6 – Car parking is as agreed through the pre-application process and is the appropriate level of car parking given that the proposals incorporate two consulting rooms. As required wheelchair accessible car parking is incorporated.
- 5.26 Policy DMHD1 – No extensions are proposed to No.56 and indeed the previous unsympathetic extensions are to be removed. Considering the proposals for No.54 on balance against the extensions to be removed at No.56 it is believed that a distinct improvement will be afforded to the area with the proposed subordinate and recessed single storey extension and the single storey rear extension to No.54 not being seen at all other than from upper floor windows of the neighbouring properties and, even then, only looking down onto a green roof. This is due to the sunken nature of the rear extension with its roof being below the height of boundary fences. Whilst No.54 would not be a dwelling it is acknowledged that it was originally and is in a residential area and therefore it is appropriate to consider the extensions in accordance with this policy. The rear extension and roof extension will appear subordinate to the main dwelling, will respect the design of the original property and be of matching materials. There will be no loss of outlook at all to neighbouring occupiers with ample garden space retained, not impacting on trees, hedgerow or other landscape features. Whilst the extension is more than 4m deep its careful design and height ensure that it will not give rise to any harm to residential or visual amenities. The roof extension maintains a pitched roof, as the policy requires, being to the same pitch as the existing and utilising the same materials. As the policy requires the dormer extension is solely on the rear elevation, located below the ridge tiles and retaining a substantial element of the original roof slope above the eaves line. It is not considered to be an overlay large roof extension.

6.00 CONCLUSIONS

6.01 Policies support the retention of community facilities. The existing veterinary practice does not meet current requirements and the owner has been looking, for over 6 years, at ways of improving on site at No.56 or, adjacent at 54, as there are no alternative sites or premises in the area that would fulfil the function.

6.02 The proposal is the only way of providing the enhanced veterinary practice for the benefit of the local community. Whilst planning permission was granted for the significant extensions and alterations to No.56 it has since been realised that these could not be undertaken with the veterinary practice continuing to operate from the premises and a way has had to be found to enable the practice to continue without interruption. With the current proposals the work would be undertaken at No.54 to provide the new practice there whilst the veterinary practice continues to operate from No.56. Once the works to No.54 are completed the veterinary practice could move in to its new accommodation and work would then commence to No.56, demolishing the extensions and with that property reverting back to residential use.

6.03 There will be no intensification of use. At present all of No.56 is utilised by the veterinary practice with the ancillary space and staff accommodation at first floor level. With the only access to the first floor being through part of the veterinary practice the residential accommodation within the first floor of No.56 has not been independently occupied since the veterinary practice use first commenced. It is clear from the Local Authority's records that this has been the case for at least 50 years.

6.04 The proposals involve the demolition of all extensions – side and rear – previously constructed at No.56 in connection with the veterinary practice use and the reversion of that property back to its original use as a single family, 3 bedroom, dwelling house.

6.05 As far as No.54 Pembroke Road is concerned that property is currently arranged as 4 self-contained flats occupied by veterinary practice staff – all 1 bedroom but all undersized having regard to national, strategic and local policies and guidance. It is proposed that the veterinary practice use moves from No.56 to 54. There will be no intensification of the use so no increase in activity associated with the use.

- 6.06 The first floor of No.54 would form part of the working veterinary practice with all ancillary spaces. The roof space would provide a 1 bedroom staff flat of appropriate size complying with minimum size requirements.
- 6.07 Appropriate levels of cycle and car parking are provided commensurate with the number of consulting rooms at the veterinary practice and having regard to maximum standards in place.
- 6.08 With the proposals not involving an intensification of the existing use, simply moving it across from No.56 to 54, with improved facilities, there will be no impact in terms of staffing numbers or in terms of clients and their pets visiting the premises.
- 6.09 The proposed ground floor extensions will have minimal visual impact incorporating a small, recessed, single storey side extension (similar to many other properties in the street) and a significantly sunken single storey rear extension, which will have a green roof and will be lower in height than 2m high boundary treatment. As a result the rear extension will not impact on neighbours outlook, light or amenities in any way. Not only is it of reduced height but it is less than half the depth of that previously found unacceptable at the rear of No.54. The pre-application advice has raised no concern with the single storey extensions other than quoting from policy with its reference to single storey rear extensions not exceeding 4m. However this fails to have regard to the fact that the proposed extension is sunken and will have no impact at all on neighbours or visual amenities.
- 6.10 With regard to the roof extension the pitch of the roof will not be changed. The fact that it would not be a hipped end roof would not be unacceptable in the street scene. The rear dormer is subservient to the roof and similar to many other rear dormers as can be seen from on line aerial imagery. From the street the dormer would not be seen. Indeed in all respect No.54 would continue to look like a single family house.
- 6.11 The proposals incorporate parking entirely in the front garden areas as existing, overcoming the concerns in respect of the rear parking with the previous applications for the combined sites and responding to the pre-application advice.

APPENDIX

‘A’



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9th February 2021

We are currently in the process of submitting a planning application to move our current veterinary clinic from number 56 Pembroke Road to the neighbouring property (number 54) and convert number 56 back into a residential property.

In 2019 we applied for planning permission to renovate our current clinic to try and address the serious challenge we face in trying to work in an extremely dated and dilapidated building. The permission was granted in April 2020 – for which we were extremely grateful. Over the last 9 months we have explored our options in terms of implementing the renovation. The project will be complex and requires complete demolition of a sizeable portion of the property and total renovation of the remaining. The estimated time scale for the project is a minimum of six months, but most likely closer to nine months. Due to the current set up of the property it will not be possible for us to continue working in the building during the build. All of our clinical work areas (theatre, Xray, dental and hospital) are located in the wooden extension to the rear of the building – which will need demolishing first in order for the works to commence. This means we will not actually have a clinical area to work in, as well as a non-secure remaining building which will make it unsafe to even use the consult room areas due to the risk of a patient escaping. Having looked at various options for a work around, there just isn't enough available space to temporarily move some of the clinical areas into the front of the building, coupled with the fact we also need to take into account the health and safety aspect of any rooms we are re-purposing regarding ventilation of anaesthetic gases, Xray regulations – and of course social distancing of staff where possible. There is also the issue of the considerable noise and dust of the project which if in the same building really will have a detrimental impact on the patients.

We have looked into the option of temporarily relocating during the build – but the property needs to be in close vicinity of our current clinic in order to continue to be able to serve our client base - but as has always been the issue with us wishing to move – we have not been able to find a suitable property that would be appropriate to serve as a temporary veterinary hospital. After exhausting all options that we can think of between us (our architects and building firm) we have come to the conclusion that the only option available to us to make this project a reality would be for us to move the clinic to our property next door. This would mean we can continue working in our current building whilst the renovation is taking place, the new clinic would be in the same location as our current, and we would return number 56 back to a residential property once we have moved the clinic across upon completion of the project.

We are acutely aware of the importance of minimising all impact on the neighbours, and we do feel with the plans we are putting forward we have made every effort to ensure the enjoyment of their home will not be compromised in any way. The extension is comparable in size to what is already in place at no 56, and will have no impact on either neighbouring property (No 52 and No 56 when it reverts back to residential use) as a result of the extension being sunken.

2020 proved an extremely challenging year for us, but we have adapted our way of working so we can continue offering our vital services safely. The RSPCA in Hillingdon had to close completely during the first

lockdown, and so in addition to our own, we also supported all of their clients. Veterinary clinics are busier than ever currently, due to a combination of the closure of several charities that used to support this catchment area, as well as many new families acquiring pets. Coupled with juggling low staff numbers due to self-isolation and childcare commitments all clinics are under immense pressure, and the prospect of us closing completely for 6 months and hoping other local practices could absorb the work is just not reasonable or at all possible. In addition to this, the business could not survive a minimum 6 month closure and still be able to support all of our staff.

The fundamental reasoning behind the application is the fact that we have been established as a veterinary practice in the current premises since 1946, and so as you can imagine it is now very dated. We have attempted to change / improve what we can whilst still functioning as a business, but ultimately to undertake the scale of works necessary it is impossible with our current building. The building is a converted house and over 20 years ago the current extension was added. The extension is a predominately wooden construction, and over the years has deteriorated past the point of repair. There are rotten sections that leak and allow draughts through, as well as being very difficult to keep at hospital standard cleanliness. The layout also means that we only have one kennel area which means both cats and dogs are housed in the same room - which as you can imagine is stressful for the patients. The current design also makes it very difficult to keep at an ideal temperature. We have invested in various heating and air conditioning units, but in winter it is particularly difficult to keep all areas warm. We have replaced the roof on the extension completely as well as countless additional repairs to it, but in heavy rain it still leaks. The doors to the clinical areas are not wide enough to allow a moveable table through, meaning that staff have to carry heavy dogs from one room to another - which in itself carries health and safety concerns. Being a busy hospital means we do need to maintain a very high standard of hygiene - this building makes it very difficult to achieve that. On the market there are much more appropriate internal wall materials that facilitate keeping areas clean and allowing them to be hosed down. Unfortunately, due to the condition of our walls we cannot have them installed. We would welcome any council members to come and visit the surgery so we can show you the current working conditions and the problems we face daily.

In the past we did hold Royal College of Veterinary Surgeon Hospital Status, but as times and requirements changed we unfortunately lost this status as our building was unable to keep up. We had been very proud to be able to call ourselves an accredited veterinary hospital and if our application is successful we will endeavour to regain it. The current requirements that we cannot comply with currently, but which our proposal will address are:

- Reception area having separate dog and cat waiting areas.
- A dedicated dental area with appropriate ventilation
- A separate hospital ward to separate cats and dogs, predator and prey species and nervous animals.
- Washing and disinfectant facilities must be provided for staff in the kennels and cattery wards.
- A separate drainage system for Isolation wards must be in place.

In terms of the proposed extension size, we are only seeking to improve the failing facilities we already have for our established clients. Our aim is not to increase our client base, but to enhance our facilities so we can offer the best level of service and care to our existing patients. Our main aim is to achieve a separate cat and dog ward and a modern, hygienic and safe working environment for our staff.

We continually invest in the latest equipment and have passionate staff, but unless we are able to offer high quality care in a fit for purpose building, we will not be able to continue to offer this valuable service to the local community. The majority of our clients live within a 2 mile radius and the patients we treat include a large number of Guide dogs and RSPCA cases. We have partnered with the RSPCA Hillingdon

branch, and it is not an exaggeration to say that without our presence and support there is a high probability the charity would no longer be able to offer services in this area - which would further impact local residents. We also provide free of charge care to any wildlife residents have concerns about, and - where we can - often arrange transport to wildlife centres in cases where specialist treatment is needed. Clearly the service we provide is used and needed by the local community.

Over the last 10 years we have sought alternative properties, but due to the proximity of our client base we do need to be within a mile or so of our current premises, and nothing suitable has ever become available. We made extensive enquiries into the two properties on the end of Kingsend, but as they were considered in a conservation zone we were advised we would not be able to alter the layout from that of two separate houses which would have put us in no better position than we currently are. There was also no parking available for staff or clients. Another possible property was a commercial property on Victoria Road in Ruislip, but unfortunately also had no parking facilities. The possibility of buying a plot of land has also been explored and one did come up on Breakspear road in 2017. Upon investigation the plots came under green belt so we were advised it would not be possible to obtain planning permission for permanent structures by the council and so were more long term investment opportunities - so again were not suitable. Over the years we have been approached by many property developers offering substantial sums to sell our combined plots for housing development. We have had to turn them all down as we have not been able to find anywhere to move to. The company's themselves have also not been able to find us anywhere. We have had the financial motivation to look for alternative sites, but we have had to accept moving is just not a viable option. So we are in a position now where we are asking for your help in protecting a service that is highly valued by the local residents. We want to be able to provide the best service we can for our local pets and clients as we have for the past 75 years - and maintain job security for the local 20 employees who all rely on us remaining competitive. We really do feel that the loss of our clinic would be a serious loss to the whole community.

APPENDIX

'B'



Royal Society for the Prevention of Cruelty to Animals

Hillingdon, Slough, Windsor, Kingston & District Branch

Registered charity no. 263515

To whom it may concern

Support for Arden House Animal Hospital's Planning Application

The RSPCA Hillingdon branch has worked with Arden House Animal Hospital for over 40 years.

Arden House employ and provide a Veterinary surgeon to the RSPCA clinic, who then is in sole charge. As you can imagine, as a charity we do have limited resources compared to private practices, and so we also rely on their additional support for complex and emergency cases.

Animals that have had surgery at our clinic who need monitoring or after hours care are referred to Arden House for hospitalisation - as we do not have the necessary facilities to offer this. Without this service we would not be able to perform a vast majority of our surgeries if we could not guarantee continuity of care.

As a charity covering a huge area we do get extremely busy. Due to this Arden House will also see emergencies for us if the clinic is too busy. When Arden House see RSPCA clients they do so at a reduced rate compared to usual private fees. They do this for both emergencies and any surgeries that we cannot perform in our clinic due to various reasons - i.e. we may not have the required imaging equipment. This is a vital service and without it RSPCA patients would either have to find the funds to pay private fees, or sadly in many cases, the only options may be to put their pets to sleep, or have them signed over to us.

Arden House also provide a vet from their main hospital one morning a week to visit our Re-homing facility in Denham. This vet will health check and vaccinate animals that are looking for homes, which once again is a vital service that the Re-homing facility could not do without.

As well as the clinical support, they also assist in resolving our client complaints by giving an opinion on the cases and communicating with the client to resolve the issue if necessary.

The RSPCA Hillingdon is a charity that is widely used in the Hillingdon and surrounding areas. We very much value the relationship we have with Arden House and would struggle to continue to function without the services and support they provide. We do feel that modernising their facilities can only have a positive impact on both the patients and their owners.

Yours sincerely

Irene Hansford
Branch Chairman
24th September 2019