



BROWN BOOTS TOWN PLANNING

Prepared by Matt Brown
Brownbootsgt@gmail.com
07508 305 766

Planning Statement.
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Introduction

This statement has been prepared by Matt Brown (PGDIP) of Brown Boots Town Planning to accompany an application for full planning permission for the demolition of the existing dwelling and the erection of a two storey 5 bedroom dwelling at 25 Warren Road, Ickenham UB10 8AA.

Ultimately the statement is designed to extrapolate the pertinent issues regarding the redevelopment of this site and clearly demonstrate how the proposal is in direct accordance with adopted policies and guidance contained within National Planning Policy Framework (2021), London Plan (2021), the Hillingdon Local Plan: Part One - Strategic Policies (2012), Hillingdon Local Plan: Part 2 - Development Management Policies (2020).

The report is set out in a manner that the appointed case officer will find helpful and is written with them in mind.

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1. Site and Surrounds and proposal

1.1 The dwelling in question is located on the north side of Warren Road, Ickenham and is located in between two, two storey extended dwellings and is set back a substantial distance from the public highway. The property nestles in between two dwellings and is of a similar scale and design. One prominent feature of the site is the fact that the land descends from west to east.

1.2 In general the area can be described as residential, characterised by two storey dwellings set within quite uniform but large plots. The area is suburban in nature but the built form has very little character by way of architectural design or age of building.

1.3 The area informed by a mixture of established trees which are set within the public highway and private land and are covered by an area wide Preservation order



2. Planning History and Pre application

2.1 The applicant has sought planning permission for the knockdown and rebuild of a dwelling on this site. Planning permission was refused under planning ref: 77289/APP/1646 for the following reasons,

"1. The proposed development, by virtue of the size, scale, massing, height and design (including the uncharacteristic crown roof form and excessively sized rear dormer with solar panels and single storey rear element) would fail to harmonise with the character and architectural composition of the surrounding properties, appearing as a visually dominant, incongruous and bulky form of development which would be detrimental to the visual amenity of the street scene and harmful to the character and appearance of the surrounding area. The proposal therefore conflicts with Policy BE1 of the Hillingdon Local Plan: Part One- Strategic Policies (2012) and Policies DMHB 11 and DMHB 12 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020), Policies D3 and D4 of the London Plan (2021) and the National Planning Policy Framework (2021)."

"2. In the absence of a preliminary ecology report, there is insufficient information to demonstrate that the proposed development, which would involve the demolition of the existing dwelling, would not cause any harm to protected species (which includes bats). The proposal therefore fails to demonstrate that no harm would be caused to protected species and their habitats, contrary to Policy G6 of the London Plan (2021), Policy DMEI 7 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020) and the National Planning Policy Framework (2021). "

2.2 The applicant has undertaken a review of reason one and after consideration a redesign has been formulated. Further to this, the applicant, in line with paragraphs 39-46 of the National Planning Policy Framework (2021) a submission made seeking pre application advice in an attempt to generate clarity regarding perceived impact on neighbouring occupiers and the character of the area.

2.3 The proposal submitted as part of this application has been designed with the comments made at pre application stage in mind. From a design perspective the proposal now provides a far greater degree of symmetry, the reduction in overall depth, alterations in roof, reduction in the size of the area of solar panel and further detail regarding the patio area proposed.

2.4 Refusal reason 2 referred to the fact that insufficient information was submitted regarding the potential of protected species. The applicant commissioned Arbtech to produce a Preliminary Ecological Appraisal. The survey provides recommendations on how the proposed development can mitigate any negative impact on protected species.

3. The principle of the proposed development.

- 3.1 The proposal seeks the demolition of the existing two storey residential building and replace it with the erection of a replacement two storey building comprising of a 5 bedroom dwelling.
- 3.2 Policy S1 of the London Plan (2021) states that development proposals that provide high quality, inclusive social infrastructure that addresses a local or strategic need and supports service delivery strategies should be supported. It also states that new facilities should be easily accessible by public transport, cycling and walking and should be encouraged in high streets and town centres.
- 3.3 The principle of residential development on site is established through the existing residential unit and a residential use on site in general is considered to be policy compliant. The London Borough of Hillingdon Local Plan Part 1 Policy BE1 of the Hillingdon Local Plan: Part One - Strategic Policies (2012) states that all new developments should achieve a high quality of design in all new buildings and the public realm contributes to community cohesion and a sense of place. Policy HE1 of the Hillingdon Local Plan: Part One - Strategic Policies (2012) states that the Council will conserve and enhance Hillingdon's distinct and varied environment, its settings and the wider historic landscape. Policy DMHB 11 of the Hillingdon Local Plan: Part Two (January 2020) resist any development which would fail to harmonise with the existing street scene or would fail to safeguard the design of existing and adjoining sites.
- 3.4 The Council's current information on housing need indicates a substantial borough-wide requirement for larger affordable and private market units, particularly three bedroom properties.
- 3.5 The applicants proposes a replacement dwelling so the principle of the development is already set and as such affordable housing is not required and given that the area is characterised by multi bedoomed properties on large plots the established character is not in anyway compromised by the proposal. It is also important to note that there is no principle objection to the principle of demolishing the existing dwelling.
- 3.6 Given the site's location, the size of the dwelling and the fact that sufficient parking and private amenity space can be provided, it cannot be questioned that the principle of a replacement dwelling on this site is acceptable in principle and indeed practice.

4. Impact on the character & appearance of the area

4.1 The proposed development (demolition and erection) will be assessed against policies contained with the London Borough of Hillingdon Local Plan: Part 1 and more pertinently part 2 - Development Management Policies (2020). Particularly relevant to the determination of this proposal is Policy BE1 of the Hillingdon Local Plan: Part One - Strategic Policies (2012) states that all new developments should achieve a high quality of design in all new buildings and the public realm contributes to community cohesion and a sense of place. Policy HE1 of the Hillingdon Local Plan: Part One - Strategic Policies (2012) states that the Council will conserve and enhance Hillingdon's distinct and varied environment, its settings and the wider historic landscape.

4.2 Policy DMHB 11 of the Hillingdon Local Plan: Part Two (January 2020) resist any development which would fail to harmonise with the existing street scene or would fail to safeguard the design of existing and adjoining sites. DMHB 11 Design of New Development provides design considerations which the Council will take into account when determining all planning applications, from large scale new development to more modest extensions and alterations.

4.3 Policy DMHB 11 of The Local Plan: Part 2 - Development Management Policies (2020) states that:

A) All development, including extensions, alterations and new buildings will be required to be designed to the highest standards and, incorporate principles of good design including: i) harmonising with the local context by taking into account the surrounding:

- scale of development, considering the height, mass and bulk of adjacent structures;
- building plot sizes and widths, plot coverage and established street patterns;
- building lines and setbacks, rooflines, streetscape rhythm, for example, gaps between structures and other streetscape elements, such as degree of enclosure;
- architectural composition and quality of detailing;
- local topography, views both from and to the site; and
- impact on neighbouring open spaces and their environment.

- ii) ensuring the use of high quality building materials and finishes;
- ii) ensuring that the internal design and layout of development maximises sustainability and is adaptable to different activities;
- iv) protecting features of positive value within and adjacent to the site, including the safeguarding of heritage assets, designated and un-designated, and their settings; and
- v) landscaping and tree planting to protect and enhance amenity, biodiversity and green infrastructure.

B) Development proposals should not adversely impact on the amenity, daylight and sunlight of adjacent properties and open space.

C) Development will be required to ensure that the design safeguards the satisfactory re development of any adjoining sites which have development potential. In the case of proposals for major development sites, the Council will expect developers to prepare master plans and design codes and to agree these with the Council before developing detailed designs.

D) Development proposals should make sufficient provision for well designed internal and external storage space for general, recycling and organic waste, with suitable access for collection. External bins should be located and screened to avoid nuisance and adverse visual impacts to occupiers and neighbours.

4.4 The following section will demonstrate how the revised proposal is in accordance with sub sections A-D.

"A) All development, including extensions, alterations and new buildings will be required to be designed to the highest standards and, incorporate principles of good design including: i) harmonising with the local context by taking into account the surrounding: - scale of development, considering the height, mass and bulk of adjacent structures; - building plot sizes and widths, plot coverage and established street patterns; - building lines and setbacks, rooflines, streetscape rhythm, for example, gaps between structures and other streetscape elements, such as degree of enclosure; - architectural composition and quality of detailing;



- local topography, views both from and to the site; and - impact on neighbouring open spaces and their environment. "

Harmonising with Local Context. The proposed new dwelling has been designed to accord with the eclectic residential design features of Warren Road. Unlike many planned residential areas the streets built form character is formed not by conformity in design but by way the lack of harmony in house design, no two dwellings in area the same, therefore proposed new designs are not bound by the weight of conformity in design or materials, as there is no established design character on Warren Road.

There is however a degree of uniformity which is formed in a contextual sense by way of plot widths and plot with coverage. Most plots on Warren Road are of similar widths. The adjacent plan below demonstrates this.

Another feature of the area is the front building line which is fairly regimented throughout the road. The proposed scheme respects the building line and the plot width and adjacent properties have been taken into account.

Scale of development, considering the height, mass and bulk of adjacent structures - The proposed dwelling is indeed larger in terms of scale and height than the existing dwelling but is significantly reduced from the originally submitted scheme (77289/APP/1646) and now respect the views of the Council officer, the revised scheme ultimately respectful of location within the plot and the neighbouring properties.

Despite proposing a significant increase in floorspace this does not come at the expense of the established built form, quite the opposite in fact the new dwelling has been designed to increase the gap between the flank walls of the dwelling and the established side boundary.

The proposed development provides a significant gap from the side boundary with number 23 Warren Road and a gap greater than 1m from the boundary with the property at 27 Warren Road. The comparison massing diagram below clearly demonstrates that the proposed scheme is not substantially different to the in situ dwelling.



Fig 28: Site Plan Massing Comparison



Fig 29: Elevation Massing Comparison

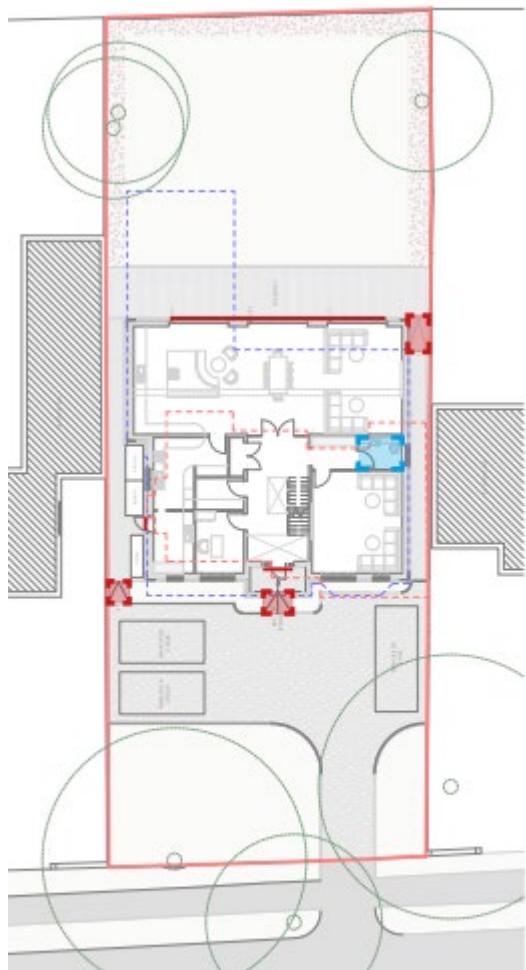
It is imperative to note that both neighbouring properties, 23 and 25 have been extended significantly and the extent of the two storey element of the proposal is comparable to the extended property at number 27.

It is significant that the property at number 23 Warren Road is set on significantly higher ground than the proposed dwelling and the significant gap between the side boundary and the property at 23 is considered a design feature overcome any chance of coalescing brought about by the increased ridge height, further to this the applicant proposes an eaves height which is still significantly lower than that of the dwelling at 23 Warren Road. Another design consideration is the inclusion of hipped roofs which again reduce in general the bulk and massing of the proposal providing that much desired gap at first floor level.

The proposal is respectful and comparable to the bulk and scale of neighbouring dwellings and the inclusion of design features such as hipped roofs and the provision of an increased gap between both side boundaries negates any negative impact on the character of the area. Therefore the proposal is compliant with Policy DMHB 11 of The Local Plan: Part 2 - Development Management Policies (2020).

Building plot sizes and widths, plot coverage and established street patterns – The building plot size remains unaltered by the proposed development but the plot coverage is reduced in terms of two storey width and in general the proposed dwelling is comparable with other nearby dwellings which have either been extended exponentially or by way of larger newer build dwellings.

The two storey element of the new dwelling is now far more comparable in terms of scale with the property at 27 Warren Road which has been extended on many occasions over a period. It is acknowledged that officers have previously held concerns regarding the previous scheme with particular regard to the amount of single storey flat roof located to rear of the property. This has been significantly reduced as part of the revised scheme and therefore overcomes any perceived impact on the occupiers on number 23. The proposed site layout plan below demonstrates that there is a large rear garden retained as part of the proposal and also includes in blue, an outline, of the previously submitted scheme. The retained garden is of a similar size and scale to surrounding gardens and would not result in an overdevelopment of the plot. The plan below shows this.



Building lines and setbacks, rooflines, streetscape rhythm, for example, gaps between structures and other streetscape elements- The dwelling proposed is respectful of the front building line which is one of the very few consistent and established design characteristics and does not project beyond the in situ garage elevation. The plan above demonstrates how the proposal respects the existing bracket of development and the dotted red line shows the outline of the existing dwelling.

The proposed dwelling will have a ridge height which is greater than the existing dwelling and would have a marginally greater overall ridge height than the property at 23 which is set on slightly higher land. The appointed architect has acknowledged that this could be seen as being out of keeping with established rooflines so has mitigated its impact by electing to set the dwelling off the boundary and using a hipped roof design thereby reducing the impact of the proposal on the streetscape rhythm. The gaps to the boundary and the hipped roof design significantly reduce the new larger dwellings impact on the street.

The appointed architect has produced an overlay diagram which shows the roofline of the in situ dwelling transposed onto the proposed front elevation. This clearly demonstrates that the difference in height between existing and proposed is marginal and is designed to assure officers that the proposed dwelling is, in real terms not significantly different in terms of height than that of the dwelling already on the ground.

These mitigation methods combined with the retention of two very large and well established protected trees in the front garden significantly mitigate any negative impact that the proposed larger dwelling would have on the street scene. In short the proposal would be very difficult to read from any significant vantage point in the street. An officers site visit will clearly demonstrate this.

Architectural composition and quality of detailing- The existing dwelling utilises the brick and tile aesthetic which will be transferred into the proposal to ensure that the materiality of the house is still visibly similar to the existing and surrounding dwellings. The new material additions will include stone cills below window openings and stone key stones to the head of window openings. Furthermore, the existing white finish windows will be replaced with black finish windows to match the guttering, downpipes, fascias and soffits.

As stated earlier each dwelling on this side of Warren Road are very different in their design, composition and materials for example no.23 has a flat roof two storey front overhang which is tile hung and the other neighbouring property is a very simple red brick and tile construction. It is quite clear that there is not established architectural character in the area and the new development although introducing new façade features such as a front flat roof bay window, a flat roof dormer window, a first floor atrium window and brick and stone finish, it cannot be considered out of keeping with the surrounding area as there are very consistent design features.

Local topography, views both from and to the site- As stated previously the land drops across the site from west to east which results in a slight stagger in ridge and eaves heights, to mitigate the increase in ridge height the appointed architect has increased the gap between the new build and side boundaries therefore the staggered descent of built form will not be readily noticeable from any specific vantage point.

The new dwelling will be visible from Warren Road but its impact is tempered by the existence of two large protected trees which are to be retained. To the rear of the site the properties on Walnut Tree Close will not be detrimentally impacted upon by the proposed development.

Impact on neighbouring open spaces and their environment – This element of the policy is not applicable to the case before us.

ii) ensuring the use of high quality building materials and finishes; The proposal will retain the existing construction typology of brick and tile but incorporate further detailing to emphasise and increase the aesthetic appeal of the proposal.

The supporting design and access statement provides an overview of the materials that are proposed and should be read in combination with the proposed elevational details but the following sections provides a description of the following materials that are proposed,

Facing brick. The brick of choice will be Kassandra Multi or similar using a stand stretcher bond with the incorporation of brick detailing such as, a plinth, coining to the corners of the building, soldier courses to the head of the window and a brick arch to the surround of the covered main entrance.

Windows The glazing of choice will be black finish aluminium windows to provide a contrasting colour to ensure that the openings in the building are easily identifiable and help to break the massing of proposal to minimise overbearing.

Rainwater Goods To match the windows all of the fenestration on the proposal will be black finish in colour to provide uniformity to the design and help to tie everything together.

Stone Work -The inclusion of stone into the material palette offers a contrasting colour and texture to accent the brickwork and help to frame/ outline the windows. The sill offers a solid base which aesthetically supports the window whilst the key-stone above the window creates a focal point. The other stone accents such as the banding and parapet coping helps to provide a visual divide between the ground and first floor to break the massing and minimise long runs of vertical brickwork.

Tiles -The tiles of choice will be Redland Clay Classic, Medium Mixed Brindle or similar, these will compliment the brickwork in colour and the smaller size provides a more traditional & classy finish.

ii) ensuring that the internal design and layout of development maximises sustainability and is adaptable to different activities;

- Covered in section 4.

iv) protecting features of positive value within and adjacent to the site, including the safeguarding of heritage assets, designated and un-designated, and their settings; and - N/A

v) landscaping and tree planting to protect and enhance amenity, biodiversity and green infrastructure.

- Covered in section 8.

B) Development proposals should not adversely impact on the amenity, daylight and sunlight of adjacent properties and open space.

-Covered in section 4.

5. Impact on neighbours

5.1 Policy DMHB 11 Part B of the Local Plan: Part Two (2020) notes development should not adversely impact upon the amenity, daylight and sunlight of adjacent properties and open space. This part of the policy read

“B. Development proposals should not adversely impact on the amenity, daylight and sunlight of adjacent properties and open space. “

5.2 The proposed building would be set in line with the front building line. The proposal would not significantly impact on the amenity of the neighbouring occupiers by virtue of visual amenity, overbearing or loss of light. The principal windows serving the proposed unit would face front and rear. The windows proposed in the rear elevation at first and roof level will not result in any additional overlooking of neighbouring dwellings.

5.3 None of the ground floor windows would result in overlooking of adjoining occupiers. The only window proposed at first floor level in the flank elevation serves an ensuite bathroom would be finished first floor window is obscure glazed non openable. This will not result in loss of privacy to the adjoining occupier or indeed future occupants of the dwelling proposed. The house has been designed with regard to the surrounding environment and the scheme acknowledges that the neighbour at 23 Warren Road has a window located in the flank elevation facing the application site at both ground and first floor.

5.4 It would be an anomaly to have a bedroom served exclusively by a flank window and despite that fact the neighbouring occupiers will not lose any privacy by way of the proposals layout or fenestration design. The applicant has diligently produced a daylight sunlight report to demonstrate how the proposed development will not be to the detriment of adjoining occupiers by way of light loss or overshadowing and demonstrates in more general terms demonstrates how little an impact the proposal would have by way of light loss and overshadowing as a whole.

5.5 The first floor flank window east elevation of no.23, it is approximately 2m from the shared boundary and approximately 4m from the flank wall of the new dwelling, This distance ensures that the two storey element of the proposed dwelling would in no way result in a development that could

be considered to have an overbearing impact on the neighbour at 23. Officers did not consider that the previous proposal to have a detrimental impact on this window (Please refer to the Officers report relating to application 77289/APP/2022/1646) and likewise due to the two storey element of the proposal not projecting beyond the two storey element on number 27 Warren Road, its impact is little. Further to this, the proposed dwelling would result in a greater gap between built form and the boundary than in situ. It is important to distinguish the difference between an overbearing development and one that result in overshadowing.

5.6 The applicant has commissioned a revised Daylight / Sunlight report produced by Daylight and Sunlight (UK) Limited on 9th December 2022. The Daylight Sunlight concluded that the proposed development is generally compliant with the guidance issued by Building Research Establishment.

"6.1.2 We noted transgressions to the ground floor living room of 23 Warren Road, which are unsurprising given that the living room windows are located so close to the common boundary.

6.1.3 The BRE cites special circumstances, where buildings located uncommonly close to the site boundary, they may be considered as "bad" neighbours, taking more than their fair share of light. Accordingly, a greater reduction in daylight or sunlight may be unavoidable and so the local authority may wish to apply different target values.

6.1.4 Nonetheless, with the application of the mirror-image principle, the proposed development is technically BRE compliant."

5.7 The Daylight Sunlight Report demonstrates that the design of the new dwelling accommodates for the amenity of neighbouring occupiers by way of its compliance with the BRE guidance and therefore as such the proposal complies with Policy DMHB 11 sub section B of the Local Plan: Part Two (2020).

5.8 The previously proposed single storey flat roofed rear projection runs along the boundary with number 23 has been reduced significantly and therefore overcomes any previous concern. The rear projection at 23 is large and set of higher land the image below demonstrates the extent of and height of this structure and as such the proposed single storey element of the new house has little if any impact on the neighbouring dwelling. The image below demonstrates the vastness of the in situ neighbouring rear projection.



5.9 The scale and depth of the neighbours large outshot (as shown above) serves to temper the impact of the proposed dwelling on the neighbouring dwelling. It is the neighbours development, its height from established ground floor level to eaves effectively enables the applicant to extend a considerably depth into the rear garden at ground floor level without having any negative impact on the occupiers at no.23 by way of light loss and or overshadowing. The large outshot and no.23 also nullifies any impact the new dwelling could have potentially have had on the residential amenity standards currently enjoyed by the neighbouring occupiers.

5.10 The design of the dwelling proposed has been informed by and is respectful to the constraints of the site and the layout of in situ buildings. Despite its increase in size the proposal would not dominate surrounding buildings by way of overbearing and the plot orientation means neighbouring occupiers will not suffer by way loss of light or overshadowing, this is confirmed by the Daylight / Sunlight study which has been produced voluntarily al cannot be considered overbearing to in a manner which respects the amenity standards currently enjoyed by all neighbouring occupiers. The proposal is therefore compliant with Policy DMHB 11 Part B of the Local Plan: Part Two (2020)

6. Impact on future occupiers (Internal and External amenity space)

- 6.1 INTERNAL AMENITY SPACE:
 - 6.2 Policy D6 of the London Plan (2021) sets out the minimum internal floor space standards required for residential developments in order to ensure that there is an adequate level of amenity for future occupants.
 - 6.3 Policy DMHB 16 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020) states that all housing development should have an adequate provision of internal space in order to provide an appropriate living environment.
 - 6.4 Policy D6 of the London Plan (2021). All of the proposed bedrooms would exceed the minimum floor area standards set out in the Technical housing standards - nationally described space standard (2015). It is therefore considered that this would result in a satisfactory form of living accommodation for future occupiers, in accordance with Policy DMHB 11 of the Hillingdon Local Plan: Part Two - Development Management Policies (2020) and Policies D6 and SI2 of the London Plan (2021).
- 6.5 EXTERNAL AMENITY SPACE PROVISION:
 - 6.6 Policy DMHB 18 of The Local Plan: Part 2 - Development Management Policies (2020) requires all new residential development to provide good quality and usable private outdoor amenity space.
 - 6.7 The proposed scheme would provide an ample amount of garden space for a dwelling of the size proposed. Table 5.3 associated with Policy DMHB 18 of the Local Plan: Part 2 requires dwellings greater than 4 bedrooms to provide a minimum of 100sqm. The proposed front and rear gardens combined provide an area far greater than 100sqm.

7. Parking Provision

- 7.2 Policy 111 of the NPPF (2021) states that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.
- 7.3 Policies DMT 1 and DMT 2 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020) requires the Council to consider whether the traffic generated by proposed developments is acceptable. The proposal would result in a 5 bedroom dwelling and the existing access would be utilised a total of 3 off street parking spaces would be provided. This accords with both the London Plan standards and the requirements of policies DMT1 and DMT2 of the Hillingdon Local Plan Part 2.
- 7.4 In line with the London Plan (2021), an electric charging point will be installed and provision for cycle parking can be made available within the site and details can be provided by way of pre commencement or restrictive conditions.

8. Trees, Landscaping and Ecology

8.1 Policy DMHB 14 of The Local Plan: Part 2 - Development Management Policies (2020) states that:

- A) All developments will be expected to retain or enhance existing landscaping, trees, biodiversity or other natural features of merit.
- B) Development proposals will be required to provide a landscape scheme that includes hard and soft landscaping appropriate to the character of the area, which supports and enhances biodiversity and amenity particularly in areas deficient in green infrastructure.
- C) Where space for ground level planting is limited, such as high rise buildings, the inclusion of living walls and roofs will be expected where feasible.
- D) Planning applications for proposals that would affect existing trees will be required to provide an accurate tree survey showing the location, height, spread and species of trees. Where the tree survey identifies trees of merit, tree root protection areas and an arboricultural method statement will be required to show how the trees will be protected. Where trees are to be removed, proposals for replanting of new trees on-site must be provided or include contributions to off site provision.

8.2 The local authority's web site shows that the trees within the site located within Tree Preservation Order Area No. TPO 793 as such a Arboricultural report has been undertaken and has concluded that the proposal before you accords with policy requirements DMHB 14 through sub sections A-D. It would retain all trees other than two and root protection areas would be required to ensure that the other protected trees are not materially impacted upon by way of the new development. Justification is provided for the trees to be removed and the Arboricultural Impact Assessment Statement and Method Statement produced by Abbots Arboricultural Advice 8th December 2022 is to be read in combination with the landscaping scheme produced on plan 22009-GAA-ZZ-00-DR-T-0102.dwg as submitted.

8.3 Part D of Policy DMHB 14 of The Local Plan: Part 2 states the following,

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

8.4 This development proposal is to demolish the existing dwelling house and construct a replacement. The new house will be essentially on the footprint of the former dwelling, though will be narrower and extend a little more northwards into the rear garden area. Warren Road has the benefit of some significantly-sized evergreen trees planted either side of the roadway. Some are growing on the roadside verges whilst others have been planted within the property curtilages.

- 8.5 Two of these trees are located close to the development area: one is growing in the front garden area of No. 25 whilst the second is located east of the property boundary within the curtilage of No. 27. These two trees will impose constraints on the construction ancillary activities, these can be addressed by means of ground protection and appropriate tree protection barriers. Other trees located nearby and in the rear garden are considerably smaller and development activity should not intrude into their calculated RPA's (Root Protection Areas)
- 8.6 It is concluded that the trees of merit on site will be retained and their roots remain unharmed as part of the new proposal provided that the methods of root protection as prescribed by the Root Protection Plan are adhered to. The two small trees to be removed are poor quality and provide no useful visual amenity. Their loss will not be apparent from outside the site and more than ample mitigation will be provided by new planting over much of the garden areas. As such the proposed new dwelling is designed in a manner that will have a limited impact on the landscape amenity of the area and will not result in any material harm to the protected trees of value within or adjacent to the site as such the proposal accords with Policy DMHB 14 of The Local Plan: Part 2 - Development Management Policies (2020).

9. Renewable Energy

- 9.1 Although not required by adopted planning policy the applicant has designed a scheme to utilise solar power. The area above the proposed rear dormer window will be used to facilitate an area for solar panels

10. Flooding and Drainage

- 10.1 The proposal site is located within Flood Zone 1 which is the lowest risk of flooding as such a full flood risk assessment is not required to support this application.

11. Air Quality

- 11.1 The following policy context is taken into consideration:
- 11.2 Paragraph 186 of the National Planning Policy Framework (2021) states that planning decisions should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and Clean Air Zones, and the cumulative impacts from individual sites in local areas. Opportunities to improve air quality or mitigate impacts should be identified, such as through traffic and travel management, and green infrastructure provision and enhancement. Planning decisions should ensure that any new development in Air Quality Management Areas and Clean Air Zones is consistent with the local air quality action plan. Policy 7.14 of the London Plan (March 2016) further supports this.
- 11.3 Policy EM8 of the Hillingdon Local Plan: Part 1 - Strategic Policies (November 2012) states that the Council will seek to safeguard and improve all land, water, air and noise quality. All development should not cause deterioration in the local air quality levels and should ensure the protection of both existing and new sensitive receptors.
- 11.4 Policy DMEI 14 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020) states:
 - A) Development proposals should demonstrate appropriate reductions in emissions to sustain compliance with and contribute towards meeting EU limit values and national air quality objectives for pollutants.
 - B) Development proposals should, as a minimum: i) be at least "air quality neutral"; ii) include sufficient mitigation to ensure there is no unacceptable risk from air pollution to sensitive receptors, both existing and new; and iii) actively contribute towards the improvement of air quality, especially within the Air Quality Management Area.
- 11.5 The application site is located on an existing residential plot and is not anyway more susceptible to air pollution than existing resident or by any means lead to a deterioration In local air quality levels. As such the proposal is compliant with policies included in the London Plan, Policy EM8 of the Hillingdon Local Plan Part 1 and DMEI 14 of the Hillingdon Local Plan:Part 2.

12. Noise

12.1 Policy D14 Noise of the London Plan (2021) states:

12.2 A In order to reduce, manage and mitigate noise to improve health and quality of life, residential and other non-aviation development proposals should manage noise by:

- 1) avoiding significant adverse noise impacts on health and quality of life
- 2) reflecting the Agent of Change principle as set out in Policy D13 Agent of Change
- 3) mitigating and minimising the existing and potential adverse impacts of noise on, from, within, as a result of, or in the vicinity of new development without placing unreasonable restrictions on existing noise-generating uses
- 4) improving and enhancing the acoustic environment and promoting appropriate soundscapes (including Quiet Areas and spaces of relative tranquillity)
- 5) separating new noise-sensitive development from major noise sources (such as road, rail, air transport and some types of industrial use) through the use of distance, screening, layout, orientation, uses and materials - in preference to sole reliance on sound insulation
- 6) where it is not possible to achieve separation of noise-sensitive development and noise sources without undue impact on other sustainable development objectives, then any potential adverse effects should be controlled and mitigated through applying good acoustic design principles
- 7) promoting new technologies and improved practices to reduce noise at source, and on the transmission path from source to receiver.

B Boroughs, and others with relevant responsibilities, should identify and nominate new Quiet Areas and protect existing Quiet Areas in line with the procedure in Defra's Noise Action Plan for Agglomerations.

12.3 Policy EM8 of the Hillingdon Local Plan: Part 1 - Strategic Policies (November 2012) states that the Council will seek to ensure that noise sensitive development and noise generating development are only permitted if noise impacts can be adequately controlled and mitigated.

11.3 The proposal is residential in nature and surrounding uses are residential, the level of noise is considered created by the end use will be residential which is to be expected in a residential area.

13. Contaminated Land

13.1 Policy DMEI 12 of The Local Plan: Part 2 - Development Management Policies (2020) states:

A) Proposals for development on potentially contaminated sites will be expected to be accompanied by at least an initial study of the likely contaminants. The Council will support planning permission for any development of land which is affected by contamination where it can be demonstrated that contamination issues have been adequately assessed and the site can be safely remediated so that the development can be made suitable for the proposed use.

B) Conditions will be imposed where planning permission is given for development on land affected by contamination to ensure all the necessary remedial works are implemented, prior to commencement of development.

C) Where initial studies reveal potentially harmful levels of contamination, either to human health or controlled waters and other environmental features, full intrusive ground investigations and remediation proposals will be expected prior to any approvals.

D) In some instances, where remedial works relate to an agreed set of measures such as the management of ongoing remedial systems, or remediation of adjoining or other affected land, a S106 planning obligation will be sought.

13.2 The site is currently used for residential purposes and not considered susceptible to contamination. Other development projects on Warren Road have not be subjected to the requirement to provide studies or mitigation measures.

14. Community Infrastructure Levy

- 14.1 Policy DMCI 7 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020), requires that where developments generate the need for additional facilities, financial contributions will be sought. Infrastructure Levy (Amendment) Regulations 2011. The Council adopted its own Community Infrastructure Levy (CIL) on August 1st 2014 and the Hillingdon CIL charge for additional floor space for residential developments is £133.08 per square metre and office developments of £49.03 per square metre. This is in addition to the Mayoral CIL charge of £60 per sq metre.
- 14.2 The existing floor area to be demolished is 180 sqm.
- 14.3 The proposed total additional floor area as advised in the CIL application form is (residential)

15. Biodiversity / Ecology

- 15.1 Policy G6 of the London Plan (2021) states that development proposals should manage impacts on biodiversity and aim to secure net biodiversity gain. This should be informed by the best available ecological information and addressed from the start of the development process.
- 15.2 Policy DMEI 7 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020) states that if development is proposed on or near to a site considered to have Page 16 of 17 features of ecological or geological value, applicants must submit appropriate surveys and assessments to demonstrate that the proposed development will not have unacceptable effects. The development must provide a positive contribution to the protection and enhancement of the site or feature of ecological value. Circular 6/2005: Biodiversity and Geological Conservation- Statutory Obligations and Their Impact Within The Planning System states that where there is a reasonable likelihood of a protected species being present and affected, a survey should be carried out before planning permission is granted. These have now been completed by a suitably qualified person.
- 15.3 The application site is in proximity to two designated Nature Conservation Sites (i.e. Park Woods to the south and Fray Farm Meadows to the east). These are both considerable distances from the site and also the applicant could use permitted development rights to develop the loft space. Despite this a Preliminary Ecology Report and Bat Emergence Survey has been produced by Arbtech in October 2022.
- 15.4 The report, provides sufficient information to demonstrate that the proposed development, would not cause any harm to protected species and no further surveys are required. The proposal would comply with Policy G6 of the London Plan, Policy DMEI 7 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020) and the NPPF (2021).

16. Other matter Operational Refuse Requirements (Residential)

16.1 Sustainable waste management

Refuse collection would occur from Warren Road. In order to conform to the Council's 'waste collection' maximum distance collection parameter of 10m i.e. distance from a refuse vehicle to the point of collection or bin store, arrangements should ensure that waste is positioned at a collection point within this set distance.

16.2 Impact on archaeology/Conservation Areas /Listed Buildings or Areas of Special Character

Not applicable to this application.

16.3 Airport safeguarding

Not applicable to this application.

16.4 Impact on the green belt

Not applicable to this application.

17. CONCLUSION

- 17.1 As this statement simplistically demonstrates, the replacement dwelling, as proposed by this submission is acceptable in principle and practice and adequately overcomes the reasons for refusal as previously stated under 77289/APP/2022/1646. Its considered design not only ensures the development will accord with the design characteristics of the area, it will not result in a development that is to the detriment of the residential amenity currently afforded to neighbouring occupiers, it will not impact negatively upon the protected trees, provide sufficient off street parking and most importantly the proposal is directly in accordance with the adopted policy and criteria of the National Planning Policy Framework (2021), London Plan (2021), the Hillingdon Local Plan: Part One - Strategic Policies (2012), Hillingdon Local Plan: Part 2 - Development Management Policies (2020).
- 17.2 On this basis the planning application should be approved.