

Item No.	Report of the Head of Development Management and Building Control
Address:	THE BARN HOTEL WEST END ROAD RUISLIP
Development:	Redevelopment of the site for residential use involving the partial demolition of the existing Grade II Listed Building and conversion to 2 new residential units, demolition of surrounding buildings and erection of 2 new residential blocks with associated amenity space, landscaping and parking
LBH Ref Nos:	7969/APP/2023/1473

**Drawing Nos:**

Affordable Housing Statement 01.05.23  
 Preliminary Ecological Appraisal B22138  
 Calculation of Biodiversity Net Gain using Defra Metric 3.1B22138  
 Landscaping Details 101A  
 CG/39435 Desk Study, Geotechnical and Geoenvironmental Interpretative Report  
 Groundshare Site Plan 14 November 2022  
 GS-9196487 Geotechnical Information  
 22-10869 Ground Testing Summary Report  
 FE1523 Rev 2  
 IDL/1143/DS/001  
 01.05.23 Material Details  
 01.05.23 Refuse Management Plan  
 REF: MG/GI/ROL01027 REV: - 10 March 2023  
 RP01-22530-R1 Noise Impact Assessment  
 Planning Statement 01.05.23  
 Statement of Community Involvement  
 Telecoms Statement 01.05.23  
 Sustainability Statement May 2023  
 Urban Greening Factor Score 21.02.2023  
 Air Quality Assessment RP02-22530-R1  
 22 0063-3 A  
 22 0063-50 A  
 22 0063-2 B  
 22 0063-102 H  
 22 0063-401  
 22 0063-501  
 22 0063-502  
 22 0063-107 A  
 22 0063-204 C  
 22 0063-20 A  
 22 0063-21 A  
 22 0063-22 A  
 22 0063-201 H  
 22 0063-202 F  
 22 0063-203 F  
 22 0063-1 R  
 Covering letter from flooding consultant in response to LPA flood comments  
 11.09.23

UFG Rating and Plan May 2023  
22 0063-503 D  
Transport Statement February 2023  
Travel plan February 2023  
Hotel Valuation and Viability Report 20230313  
2091-KC-XX-YTREE-TCP01Rev0  
2091-KC-XX-YTREE-TreeSurvey-Rev0 The  
Archaeological Desk-Based Assessment March 2023  
Heritage & Townscape Visual Impact Assessment May 2023  
The Barn Hotel Energy Statement 04.04.23  
The Barn Hotel Overheating 11.04.2023  
Financial Viability Assessment  
Water Cycle Strategy  
22 0063-51 A  
22 0063-100 G  
22 0063-101 F  
22 0063-103 F  
22 0063-104 F  
22 0063-105 F  
22 0063-106 F  
22 0063-108 B  
22 0063-200 H  
22 0063-205 D  
22 0063-301 C  
22 0063-302 C  
22 0063-402 A  
22 0063-12  
22 0063-13  
Design and Access Statement Revised  
Agent letter of rebuttal in response to feedback from the LBH heritage and urban design officer  
The Barn Hotel, West End Road, Ruislip - Highways Response Letter  
Letter of Response to Feedback from Historic England  
Agent Covering Letter in Response to Internal Consultee Comments 11.09.23

**Date Plans Received:** 02-06-23

**Date Application Valid:** 02-06-23

## **1. RECOMMENDATION**

### **REFUSAL for the following reasons:**

#### **1. NON2 Heritage**

The proposed development by reason of its size, scale, bulk, massing, siting and design would be an inappropriate, over-development of the site that would be detrimental to the setting of these Grade II listed buildings, thus resulting in less than substantial harm to these heritage assets. Furthermore, the proposal lacks necessary detail in respect to the physical impact on and treatment of the historic fabric of the listed buildings. Thus, the level of harm to the fabric of the listed buildings, whilst less than substantial, cannot be fully determined. Consequently,

the applicant has failed to demonstrate that the benefits of the proposal would outweigh the identified and potential harms. The application is therefore contrary to Policies HE1 of the Hillingdon Local Plan: Part 1 (2012), Policies DMHB 1, DMHB 2 and DMHB 11 of the Hillingdon Local Plan Part 2 (2020), Policy HC1 of the London Plan (2021) and Chapter 16 of the National Planning Policy Framework (2021).

## 2. NON2 Street scene / townscape

The proposed development by reason of its size, scale, bulk, massing, design, appearance, layout and visual prominence would result in a visually dominant, overdevelopment of the site, that would be at odds with the distinctive suburban character of the surrounding area, harming the visual amenity and character of the area. As such the proposal fails to accord with Policy BE1 of the Hillingdon Local Plan: Part One (November 2012), Policies DMHB 11 and DMHB 12 of the Hillingdon Local Plan: Part Two Development Management Polices (2020), Policies D3 and D8 of the London Plan (2021) and Chapter 12 of the National Planning Policy Framework (2021) including paragraphs 130 and 134.

## 3. NON2 Unit mix

The proposed unit mix fails to provide sufficient family sized units, as required by the latest information on housing need in the Borough. The proposed development fails to contribute towards mixed and balanced communities and the range of housing types required within the Borough contrary to Policy DMH 2 of the Hillingdon Local Plan: Part 2 (2020) and Policy H10 of the London Plan (2021).

## 4. NON2 Cycle parking

The proposed cycle parking design does not conform to the London Cycling Design Standards which would result in the impractical design of cycle parking, thus reducing the level of cycle use. The application submission is therefore contrary to Policy DMT 5 of the Hillingdon Local Plan Part 2 - Development Management Policies (2020) and Policy T5 of the London Plan (2021).

## 5. NON2 Overheating

The application fails to demonstrate that the scheme provides the necessary level of overheating mitigation to prevent the unnecessary overheating of the proposed residential units, thus resulting in poor quality and unsustainable living conditions for prospective residents. The application submission is therefore contrary to Policy SI4 of the London Plan (2021) .

## 6. NON2 Daylight and sunlight

The application fails to demonstrate that the proposed development would be provided with adequate levels of daylight and sunlight amenity, thus resulting in poor quality living conditions for prospective residents. The application submission is therefore contrary to Policy BE1 of the Hillingdon Local Plan: Part One (2012) and Policy DMHB 11 of the Hillingdon Local Plan: Part Two - Development Management Policies (2020), Policy D6 of the London Plan (2021), and the BRE Guidelines: Site layout planning for daylight and sunlight (2022).

## 7. NON2 SUDS

The application fails to demonstrate that suitable and appropriate sustainable drainage systems have been incorporated into the design. The application submission is therefore

contrary to Policy DME1 9 and DME1 10 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020), Policy EM6 of the Hillingdon Local Plan: Part 1 - Strategic Policies (2012), London Plan Policies SI 5, SI 12 and SI 13 (2021) and paragraph 169 of the National Planning Policy Framework (2021).

#### 8. NON2 Ecology

The submitted ecology report fails to provide adequate information to demonstrate that the proposed development would not result in detrimental harm to bat roosts. The application submission therefore fails to demonstrate the protection of bats and is contrary to Policy G6 of the London Plan (2021) and Policy EM7 and DME1 7 of the Hillingdon Local Plan Parts 1 (2012) and 2 (2020) respectively.

#### 9. NON2 Accessibility

The proposal fails to provide adequate provision of disabled units designed to accessible standards and therefore fails to adhere to the requirements of inclusive design. As such, the proposed development fails to accord with Policies D5 and D7 of the London Plan (2021) and Chapters 8 and 12 of the National Planning Policy Framework.

#### 10. NON2 Amenity Space

The application fails to provide adequate levels of amenity space to serve the occupants of the development, resulting in poor quality living conditions for prospective residents, contrary to Policy DMHB 18 of the Hillingdon Local Plan: Part 2 (2020).

#### 11. NON2 Obligations

In the absence of a completed section 106 agreement, the applicant has failed to provide contributions towards the improvement of services and facilities as a consequence of demands created by the proposed development (air quality mitigation, employment and construction training, carbon offset, health, travel plan and monitoring, public open space, highway improvement works, affordable housing and the prevention of future occupiers from joining the local parking management scheme). The scheme therefore conflicts with Policy DMCI 7 of the Hillingdon Local Plan Part 2 Development Management Policies (2020), the London Borough of Hillingdon Supplementary Planning Document on Planning Obligations (2014) and Policy DF1 of the London Plan 2021).

## 2. INFORMATIVES

#### 1. I99 Non Standard Informative

With regards to reasons for refusal 5, 6 and 7, the LPA has requested further information related to the associated technical reports. In the event of an appeal, the LPA would welcome early discussion on these matters to streamline the appeals process and prevent any abortive work for any party. In respect of reason for refusal number 7, it is noted that the applicant failed to submit the revised FRA and Drainage Strategy within the time frame (07.09.23) set by the LPA, which would have allowed time for the document to be reviewed. As such it could not be considered during the assessment of the application.

#### 2. I52 Compulsory Informative (1)

The decision to REFUSE planning permission has been taken having regard to all relevant

planning legislation, regulations, guidance, circulars and Council policies, including The Human Rights Act (1998) (HRA 1998) which makes it unlawful for the Council to act incompatibly with Convention rights, specifically Article 6 (right to a fair hearing); Article 8 (right to respect for private and family life); Article 1 of the First Protocol (protection of property) and Article 14 (prohibition of discrimination).

3. I71 LBH worked applicant in a positive & proactive (Refusing)

In dealing with the application the Council has implemented the requirement in the National Planning Policy Framework to work with the applicant in a positive and proactive way. We have made available detailed advice in the form of our statutory policies from the Local Plan Part 1, Local Plan Part 2, Supplementary Planning Documents, Planning Briefs and other informal written guidance, as well as offering a full pre-application advice service.

4. I53 Compulsory Informative (2)

The decision to REFUSE planning permission has been taken having regard to the policies and proposals in the Hillingdon Local Plan Part 1 (2012) and Part 2 (2020) set out below, including Supplementary Planning Guidance, and to all relevant material considerations, including The London Plan (2021) and national guidance.

DMHB 1 Heritage Assets  
DMAV 1 Safe Operation of Airports  
DMAV 3 RAF Northolt  
DMCI 3 Public Open Space Provision  
DMCI 7 Planning Obligations and Community Infrastructure Levy  
DME 5 Hotels and Visitor Accommodation  
DMEI 10 Water Management, Efficiency and Quality  
DMEI 14 Air Quality  
DMEI 9 Management of Flood Risk  
DMH 2 Housing Mix  
DMH 7 Provision of Affordable Housing  
DMHB 16 Housing Standards  
DMHB 17 Residential Density  
DMHB 18 Private Outdoor Amenity Space  
DMHB 19 Play Space  
DMT 1 Managing Transport Impacts  
DMHB 2 Listed Buildings  
DMHB 3 Locally Listed Buildings  
DMHB 7 Archaeological Priority Areas and archaeological Priority Zones  
DMHB 11 Design of New Development  
DMHB 12 Streets and Public Realm  
DMHB 14 Trees and Landscaping  
DMT 2 Highways Impacts  
DMT 5 Pedestrians and Cyclists  
DMT 6 Vehicle Parking  
DMEI 2 Reducing Carbon Emissions  
DMEI 7 Biodiversity Protection and Enhancement  
LPP D4 (2021) Delivering good design  
LPP G5 (2021) Urban greening  
LPP G6 (2021) Biodiversity and access to nature  
LPP G7 (2021) Trees and woodlands  
LPP GG2 (2021) Making the best use of land  
LPP GG4 (2021) Delivering the homes Londoners needs

LPP H1 (2021) Increasing housing supply  
LPP H10 (2021) Housing size mix  
LPP H4 (2021) Delivering affordable housing  
LPP SI1 (2021) Improving air quality  
LPP SI12 (2021) Flood risk management  
LPP SI13 (2021) Sustainable drainage  
LPP SI4 (2021) Managing heat risk  
LPP T2 (2021) Healthy Streets  
LPP T4 (2021) Assessing and mitigating transport impacts  
LPP D5 (2021) Inclusive design  
LPP D7 (2021) Accessible housing  
LPP D8 (2021) Public realm  
LPP D12 (2021) Fire safety  
LPP D14 (2021) Noise  
LPP H12 (2021) Supported and specialised accommodation  
LPP H13 (2021) Specialist older persons housing  
LPP HC1 (2021) Heritage conservation and growth  
LPP T5 (2021) Cycling  
LPP T6 (2021) Car parking  
LPP T6.1 (2021) Residential parking  
NPPF12 NPPF 2021 - Achieving well-designed places  
NPPF16 NPPF 2021 - Conserving & enhancing the historic environment  
NPPF11 NPPF 2021 - Making effective use of land  
NPPF15 NPPF 2021 - Conserving and enhancing the natural environment  
NPPF4 NPPF 2021 - Decision-Making  
NPPF5 NPPF 2021 - Delivering a sufficient supply of homes  
NPPF9 NPPF 2021 - Promoting sustainable transport

### **3. CONSIDERATIONS**

#### **3.1 Site and Locality**

- 3.1.1 The site measures 0.96 hectares and is located to the south of Ruislip Station. The application site comprises a varied collection of buildings at the centre of which are the Grade II Listed Buildings consisting of Sherley's Farm House, the Leaning Barn and the Oak Room.
- 3.1.2 The northern section of the site adjacent to the Metropolitan Underground line is occupied by two buildings that are reasonably sympathetic in style and materials but arranged in long blocks ("I" and "T" blocks). These provide the main accommodation for the hotel. The farmhouse is also used for accommodation purposes. The main dining and reception area occupy the Leaning Barn and Oak Room and the extensions to them. To the south lay 1-38 Gardens Close, residential apartment blocks, and to the east lays the rear gardens of the properties in Eversley Crescent. The existing hotel accommodation on site comprises 73 bedrooms.
- 3.1.3 The site is not within a Conservation Area; however the Ruislip Village Conservation Area and the Midcroft Area of Special Local Character are situated approximately 100m to the north and to the south of Pond Green is an area designated as Green Belt. The general character of the area to the south of the Metropolitan Underground line is distinctly different to the town centre typography to the north. It is generally made up of

2-storey arts and crafts styled suburban family dwellinghouses with generous front and rear gardens. It is also to be noted that Ruislip Station and the Signal Box is Grade II Listed.

### **3.2 Proposed Scheme**

3.2.1 The proposal seeks planning permission for the redevelopment of the site for residential use involving the partial demolition of the existing Grade II Listed Buildings and conversion to 2 new residential units, demolition of surrounding buildings, erection of 2 new residential blocks, erection of 7 dwellings arranged in 2no. terraced blocks and associated amenity space, landscaping, and parking.

#### Proposed Unit Mix

3.2.2 The drawings showing the proposed residential conversion of the Leaning Barn and Oak Room were amended during the course of the planning application process, altering the unit mix. The resultant application proposes 38 x 1-Bedroom Units, 50 x 2-Bedroom Units and 8 x 3-Bedroom Units. This would result in a housing mix of:  
1-Bedroom units - 39.6%  
2-Bedroom units - 52%  
3-Bedroom units – 8.3%

#### Affordable Housing

3.2.3 The application proposes an 18% by habitable room affordable housing offer at a tenure mix of 35/65 split tenure mix. This equates to 7 shared ownership units (5 x 1 bed, 2 x 2 bed) and 13 affordable rent units (6 x 1 bed and 7 x 2 bed).

#### Amenity Space

3.2.4 The submitted plans provide the following:  
Building 1: 410 sqm via balconies  
Building 2: 345 sqm via balconies  
Sherleys Farm House: 100 sqm private garden  
Oak Room and Leaning Barn: 90 sqm private garden  
7 New Dwellings: 494 sqm private gardens

3.2.5 The site plan also indicates that an area of informal recreation and play would be provided to the west of Sherleys Farm House measuring 347 sqm.

3.2.6 A drafting error is noted on drawing ref 22 0063-203 F where the fifth floor plan does not illustrate access to the roof terrace presented on the corresponding elevations. Notwithstanding this drafting error, the applicant has confirmed that the space would be accessible to the upper floor units and if minded to approve the application, a condition could be used to secure a revised floor plan. As such, the area has been included within the amenity space calculation.  
Total: 1786 sqm

#### Public Open Space and Child Play space

3.2.7 The proposed development does not incorporate an on-site provision of open space. Informal play space is provided.

#### Access Vehicle and Cycle Parking

3.2.8 A new access off Garden Close is proposed to serve the terraced dwellings which abut Garden Close. 66 car parking spaces are to be provided and a total of 175 long stay cycle parking spaces plus 4 visitor spaces are to be provided.

### **3.3 Relevant Planning History**

7969/APP/2023/1833            THE BARN HOTEL WEST END ROAD RUISLIP  
Listed Building Application for the partial demolition and conversion of existing Grade II Listed Buildings for residential use with associated landscaping and parking (In connection with Full Planning Application reference 7969/APP/2023/1473)

7969/APP/2010/2459            THE BARN HOTEL WEST END ROAD RUISLIP  
Demolition of 3 garages and existing lodge in connection with the new entrance way and parking layout scheme (Application for Listed Building Consent.)  
**Decision:** 13-01-2011            Approval

7969/APP/2010/2458            THE BARN HOTEL WEST END ROAD RUISLIP  
Creation of new roadway entrance, new arrangement of parking layout, erection of 1 x 3 space detached garage, maintenance shed, condenser unit and bin store compounds, erection of timber fencing and brick walls, creation of 3 staff parking spaces and re-arrangement of service yard area (involving demolition of existing entrance lodge).  
**Decision:** 13-01-2011            Approval

7969/APP/2009/996            THE BARN HOTEL WEST END ROAD RUISLIP  
Erection of new 2m high fence and gates on Garden Close frontage  
**Decision:** 03-08-2009            Approval

7969/APP/2007/2781            THE BARN HOTEL WEST END ROAD RUISLIP  
ERECTION OF A GLASS CONSERVATORY TO THE OAK ROOM AND A GLAZED PORCH TO THE REAR ACCESS OF THE EXISTING BAR AREA WITH NEW RAISED EXTERNAL DECKING TO THE FRONT (APPLICATION FOR LISTED BUILDING CONSENT).  
**Decision:** 15-11-2007            Refusal

7969/APP/2007/2780            THE BARN HOTEL WEST END ROAD RUISLIP  
ERECTION OF A GLASS CONSERVATORY TO THE OAK ROOM AND A GLAZED PORCH TO THE REAR ACCESS OF THE EXISTING BAR AREA WITH NEW RAISED EXTERNAL DECKING TO THE FRONT.  
**Decision:** 15-11-2007            Refusal

7969/APP/2006/1792            THE BARN HOTEL WEST END ROAD RUISLIP  
ERECTION OF A SINGLE-STOREY EXTENSION TO THE OAK ROOM TO PROVIDE A GARDEN ROOM (APPLICATION FOR LISTED BUILDING CONSENT)  
**Decision:** 06-10-2006            Refusal                    **Appeal:** 21-02-07            Dismissed

7969/APP/2006/1793            THE BARN HOTEL WEST END ROAD RUISLIP

ERECTION OF A SINGLE-STOREY EXTENSION TO THE OAK ROOM TO PROVIDE A GARDEN ROOM

**Decision:** 06-10-2006      Refusal      **Appeal:** 21-02-07      Dismissed

7969/APP/2006/1234      THE BARN HOTEL WEST END ROAD RUISLIP  
DETAILS OF GLAZED LINKS / GLAZED LIFT SHAFT IN COMPLIANCE WITH CONDITION 11 OF PLANNING PERMISSION REF: 7969/APP/2004/603 DATED 07-12-2004: ERECTION OF A TWO-STOREY ACCOMMODATION BLOCK CONTAINING 10 BEDROOMS AND THREE SUITES

**Decision:** 03-02-2012      No Further Action(P)

7969/APP/2006/374      THE BARN HOTEL WEST END ROAD RUISLIP

DETAILS OF STAIRCASE.

**Decision:** 17-02-2006      No Further Action(P)

7969/APP/2006/94      THE BARN HOTEL WEST END ROAD RUISLIP  
CREATION OF NEW ROADWAY ENTRANCE, NEW ARRANGEMENT OF PARKING LAYOUT, RELOCATION OF 3 DEMOLISHED RESIDENTIAL GARAGES, CREATION OF 3 STAFF PARKING SPACES, RE-ARRANGEMENT OF SERVICE YARD AREA (INVOLVING DEMOLITION OF EXISTING ENTRANCE LODGE).

**Decision:** 05-09-2007      **Non Determination Appeal:** 05-09-07      Allowed

7969/APP/2006/95      THE BARN HOTEL WEST END ROAD RUISLIP  
DEMOLITION OF BLOCK OF 3 GARAGES AND EXISTING LODGE IN CONNECTION WITH NEW ROAD WAY ENTRANCE AND PARKING LAYOUT SCHEME (APPLICATION FOR LISTED BUILDING CONSENT).

**Decision:** 26-03-2007      Withdrawn (P)

7969/APP/2005/1749      THE BARN HOTEL WEST END ROAD RUISLIP ERECTION OF AIR-CONDITION PLANT AND ENCLOSURE BUILDING

**Decision:** 02-03-2012      No Further Action(P)

7969/APP/2005/1462      THE BARN HOTEL WEST END ROAD RUISLIP  
CONSTRUCTION OF UNDERGROUND WINE CELLAR WITH ACCESS STAIRS, AND STEEL RAILING AROUND ENTRANCE

**Decision:** 09-09-2005      Approval

7969/APP/2005/1380      THE BARN HOTEL WEST END ROAD RUISLIP  
CONSTRUCTION OF UNDERGROUND WINE CELLAR WITH ACCESS STAIRS, AND STEEL RAILINGS AROUND ENTRANCE (APPLICATION FOR LISTED BUILDING CONSENT)

**Decision:** 09-09-2005      No Further Action(P)

7969/APP/2005/517      THE BARN HOTEL WEST END ROAD RUISLIP  
DETAILS IN COMPLIANCE WITH CONDITIONS 2 (MATERIALS), 3 (BUILDING ACCESS ARRANGEMENTS), 5 (LANDSCAPING SCHEME), 6 (SCREEN PLANTING ON EASTERN BOUNDARY), 8 (TREE PROTECTION MEASURES), 10 (FENESTRATION AND WINDOW

SURROUNDS), AND 12 (BOUNDARY TREATMENT) IN COMPLIANCE WITH PLANNING  
PERMISSION REF: 7969/APP/2004/603 DATED 7.12.2004 : ERECTION OF A TWO  
STOREY ACCOMMODATION BLOCK CONTAINING 10 BEDROOMS AND 3 SUITES

**Decision:** 03-02-2012      **No Further Action(P)**

7969/APP/2004/1836 THE BARN HOTEL WEST END ROAD RUISLIP  
THE CREATION OF NEW ROADWAY ENTRANCE, NEW ARRANGEMENT OF PARKING  
LAYOUT, RE-LOCATION 3 DEMOLISHED RESIDENTIAL GARAGES; CREATION OF 4  
STAFF PARKING SPACES, RE-ARRANGEMENT OF SERVICE YARD AREA (INVOLVING  
DEMOLITION OF EXISTING ENTRANCE LODGE)

Decision: 26-10-2005 Withdrawn (P)

7969/APP/2004/1837 THE BARN HOTEL WEST END ROAD RUISLIP  
DEMOLITION OF BLOCK OF 3 GARAGES AND EXISTING ENTRANCE LODGE IN  
CONNECTION WITH NEW ROAD WAY ENTRANCE AND PARKING LAYOUT SCHEME  
(APPLICATION FOR LISTED BUILDING CONSENT)

Decision: 26-10-2005 Withdrawn (P)

7969/APP/2004/602 THE BARN HOTEL WEST END ROAD RUISLIP  
ERCTION OF A SINGLE STOREY RESTAURANT EXTENSION AND SINGLE STOREY  
CONSERVATORY (APPLICATION FOR LISTED BUILDING CONSENT)

**Decision:** 14-05-2004      **Withdrawn (P)**

7969/APP/2004/603 THE BARN HOTEL WEST END ROAD RUISLIP  
ERCTION OF A TWO STOREY ACCOMMODATION BLOCK CONTAINING 10  
BEDROOMS AND 3 SUITES

Decision: 23-11-2004 Approval:

7969/APP/2003/501 THE BARN HOTEL WEST END ROAD RUISLIP  
ERECTION OF A SINGLE STOREY EXTENSION FOR USE AS A GARDEN ROOM  
**Decision:** 30-05-2003 **Withdrawn (P)**

7969/APP/2003/327 THE BARN HOTEL WEST END ROAD RUISLIP  
ERECTION OF A SINGLE STOREY EXTENSION FOR USE AS A GARDEN ROOM  
(APPLICATION FOR LISTED BUILDING CONSENT)

**Decision:** 30-05-2003      **Withdrawn (P)**

7969/APP/2002/2414 THE BARN HOTEL WEST END ROAD RUISLIP  
REPAIR WORK TO EXTERNAL TIMBERS AND FENESTRATION (APPLICATION FOR  
LISTED BUILDING CONSENT)

7969/APP/2002/2313 THE BARN HOTEL WEST END ROAD RUISLIP  
NEW GABLE TO RECEPTION ENTRANCE WITH OAK POSTS, NEW DOUBLE ESCAPE  
DOORS FROM RECEPTION AND WINDOW ALTERATIONS

**Decision: 02-03-2012** No Further Action(P)

7969/APP/2002/2267            THE BARN HOTEL WEST END ROAD RUISLIP  
NEW GABLE TO RECEPTION ENTRANCE WITH OAK POSTS, NEW DOUBLE ESCAPE  
DOORS FROM RECEPTION AND WINDOW ALTERATIONS (APPLICATION FOR LISTED  
BUILDING CONSENT)

**Decision:** 02-03-2012            No Further Action(P)

7969/APP/2002/1571            THE BARN HOTEL WEST END ROAD RUISLIP  
DEMOLITION OF EXISTING OFFICE BUILDING (APPLICATION FOR LISTED BUILDING  
CONSENT)

**Decision:** 08-11-2002            Withdrawn (P)

7969/APP/2002/1570            THE BARN HOTEL WEST END ROAD RUISLIP  
ERECTION OF REPLACEMENT OFFICES WITH 8 BEDROOMS ABOVE AND NEW  
CONFERENCE FACILITIES OVER EXISTING STAFF AREA OF MAIN BUILDING  
(INVOLVING DEMOLITION OF EXISTING OFFICES)

**Decision:** 08-11-2002            Withdrawn (P)

7969/APP/2002/383            THE BARN HOTEL WEST END ROAD RUISLIP  
ERECTION OF SINGLE STOREY FRONT AND SIDE EXTENSIONS, VARIED EXTERNAL  
AND INTERNAL ALTERATIONS AND REDECORATION TO THE BARN HOTEL AND  
ASSOCIATED GARDEN AREA (INVOLVING DEMOLITION OF EXISTING EXTENSIONS)  
(APPLICATION FOR LISTED BUILDING CONSENT)

**Decision:** 02-03-2012            No Further Action(P)

7969/APP/2002/380            THE BARN HOTEL WEST END ROAD RUISLIP  
ERECTION OF SINGLE STOREY FRONT AND SIDE EXTENSIONS, VARIED EXTERNAL  
AND INTERNAL ALTERATIONS AND REDECORATION TO THE BARN HOTEL AND  
ASSOCIATED GARDEN AREA (INVOLVING DEMOLITION OF EXISTING EXTENSIONS)

**Decision:** 02-03-2012            No Further Action(P)

7969/APP/2001/2489            THE BARN HOTEL WEST END ROAD RUISLIP  
DETAILS OF CONSERVATORY IN COMPLIANCE WITH CONDITION 6 OF LISTED  
BUILDING CONSENT REF.7969/APP/2000/2686 DATED 04/04/2001; ERECTION OF NEW  
RECEPTION AND STAFFROOMS TO REPLACE PARTIALLY DEMOLISHED RECEPTION  
AREA

**Decision:** 19-01-2005            Withdrawn (P)

### **Comment on Planning History**

Application reference 7969/APP/2023/1833 - *'Listed Building Application for the partial demolition and conversion of existing Grade II Listed Buildings for residential use with associated landscaping and parking (In connection with Full Planning Application reference 7969/APP/2023/1473)'* at The Barn Hotel, West End, Ruislip, relates to the application and is currently under consideration by the Council.

#### **4. Advertisement and Site Notice**

4.1 Advertisement Expiry Date: **7th July 2023**

4.2 Site Notice Expiry Date: **7th July 2023**

#### **5. Comments on Public Consultation**

5.1 A site notice was displayed to the front of the site, letters were sent to neighbouring properties and an advert was posted in the local paper. All forms of consultation expired on 19-07-23.

5.2 In response to the public consultation, the LPA received a total of 1073 responses comprising of 1066 objections, and 7 comments in support of the application. In addition, the Council has received a petition in objection to the proposal containing 40 valid signatures. A summary of the concerns raised is set out below:

- Traffic / Parking / Congestion
- Local infrastructure - strain on School Places / GP / Local services (including sewers/water)
- Impact upon the Grade II Listed Building
- Overpopulation / Overdevelopment (scale / height / bulk)
- Loss of residential amenity to neighbouring properties / Overbearing impact upon neighbouring properties
- Noise
- Disruption (including construction / lorries etc.)
- Other major works nearby (such as HS2)
- Loss of green space / nature / trees / environmental concerns (including animals)
- Pollution / Air quality / Dust / Environmental Damage
- Out of keeping
- Out of character
- Asbestos
- Loss of privacy / overlooking
- Safety concerns (especially regarding children)
- Visual amenities - impacts / concerns
- Loss of light / outlook / overshadowing
- Loss in value of homes
- Waste disposal / rats issues
- Glare concerns
- Poor quality design
- Flooding issues
- Loss of sense of community / community facilities
- Need for affordable housing
- Need hotel accommodation
- No need for more flats
- Other site would be less harmful
- Loss of jobs
- Sense of enclosure
- Reduced quality of life
- Antisocial behaviour

5.3 Representations were received from the following local groups:

Objection received from Ruislip Residents' Association

The Ruislip Residents' Association are opposed to this incongruous form of overdevelopment detrimental to the setting of the two Grade II listed buildings originally part of Sherley's Farm on the site (subject to Ref:7969/APP/2023/1833), and Ruislip Station to the North of the site. Fig 14 on "March 2023 Archaeological Desk-Based Assessment" displays an unacceptable street scene with the listed buildings hemmed in by two 6 storey buildings. Building 1 should be no higher than 4 storeys to complement the height of Masters and Sherleys Court to the west, building 2 should graduate down to a maximum of 3 storeys to complement the flats at Garden Close. Kings Lodge north of the site is an outlier with no similar types of structure within the immediate vicinity of the site close by. The original office building (Times House) was extended in height in late 1990s, 10 years before the Ruislip Village Conservation Area (RVCA) was extended to the SE corner of the High Street. The siting of buildings of this scale with white and pale colour bricks will not complement with the surrounding predominantly red bricks, and so will be uncharacteristic of the area and be very visible from the public realm having a detrimental impact on the area & will fail to harmonise with the historic context of the two Grade II listed buildings on the site. Windows and balconies on SE elevation of building 2 will overlook the private amenity space enjoyed by residents in Garden Close. Although the levels of building 1 graduate down towards Eversley Crescent the building will be an overwhelming mass. The proposed development by reason of its siting, size, scale, bulk, massing and height, would cause harm to the residential amenities of the neighbouring occupiers at Eversley Crescent, Garden Close, Masters and Sherleys Court. Policy H10 of the London Plan (2021) states that new development should consist of a range of unit sizes. Policy DMH 2 of the Hillingdon Local Plan: Part 2 - .indicates a substantial borough-wide requirement for larger affordable and private market units, particularly 3 bedroom properties, as identified in the Strategic Housing Market Assessment 2016. Out of 96 dwellings only 9 will have 3 or more bedrooms. No robust justification why the proposal fails to provide a larger proportion of three bedroom units is provided. Access to the 7 terraced houses will be at a bend in Garden Close where the residents of Garden Close park their cars. The remaining 89 dwellings will be accessed via the existing narrow access road from the mini roundabout. No traffic or local parking surveys have been submitted. The extra traffic generated by the proposed development at the dangerous mini roundabout would be unacceptable in terms of the local highway and junction capacity, traffic flows and conditions of general highway or pedestrian safety causing potential conflict with Policy T4 of the LP and Policy DMT 1. There are also concerns regarding extra traffic movements upon the highway and pedestrian safety in Garden Close & Eversley Crescent where overflow parking from the proposed development site is very likely to be located. If this planning proposal is accepted there should be robust arrangements for Waste Collection. It is difficult to assess if policies DMHB17 & 18 have been satisfied to provide suitable density in units per hectare or adequate size and quality of external amenity space. Similarly, no details of the sustainability credentials of the proposed development or the type of renewable technologies that would be utilised have been provided. The harm that would be caused by these proposals would not be outweighed by public benefits.

Objection received from The Ruislip, Northwood and Eastcote Local History Society

The Ruislip, Northwood and Eastcote Local History Society is totally opposed to this application. It represents a huge over development of the site and it will be very detrimental to the setting of the two listed buildings. These two buildings-the farmhouse and the lodge will be surrounded and swamped by modern unsympathetic housing. The developer could argue that they have been given a new lease of life by being converted to residential houses but that would be at great cost to their setting. The value of preserving listed buildings is severely compromised if they are left marooned in inappropriate surroundings. The buildings were originally part of Sherley's Farm, parts of which date from the 16th century. A building on this site was mentioned in the 1565 Terrier-a list produced by King's College Cambridge, who were the Lords of the Manor of Ruislip at the time. The buildings form an important link with Ruislip's rural history. It is worrying that there is very little information on the effects of the alterations to the listed buildings. We hope there will be a separate specialist report in the listed building application which is still to be submitted. No decision should be taken without everyone being able to view this information. Although the site is set below the road level the two blocks of six storey flats will be visible from the road. They will be very obtrusive and detrimental to the street scene. The choice of white and black bricks for the exterior walls will be out of keeping with the predominately red brick buildings to be found in the neighbouring High Street. If this application is approved it will set a dangerous precedent that even important historical sites with listed buildings are not protected from unsuitable and unsympathetic development. We request that the application is refused.

Objection received from Eastcote Residents' Association and the Eastcote Conservation Society

The Barn Hotel has long been a community asset and this together with its listed building status make it a site worthy of being sympathetically retained.

It is not in our Residents' Association and Conservation Panel area but it is for these reasons we want to state our complete support for the objections made by the Ruislip Residents' association, the Ruislip, Northwood and Eastcote Local History Society and the very many residents we know have also supported them.

In summary:-

- The proposals result in an over development of the site which takes away the setting of the two listed buildings.
- The size, bulk and massing of the two blocks of flats will dwarf these listed buildings and will not harmonise with the surrounding buildings and the Ruislip Conservation Area. Contrary to the applicant's view, the lower level of the land on the site does not mitigate these facts.
- The proposed alterations to the listed buildings do not suggest that they will be enhanced as a result, given the partial demolition detailed.
- The narrow entrance/exit to the hotel onto the small but very busy roundabout has always been a difficult one and the very substantially increased numbers of people using it far more regularly suggest real highway safety concerns, together with traffic congestion issues, given the directions of the main roads

that feed into the roundabout. These roads give access to and from a Doctors' Surgery and Waitrose, Ruislip High Street and the A.40.

- If parking on site proves insufficient, it is hard to see where any on street parking would be available in the vicinity and it would certainly cause considerable additional stress to the adjacent streets.

We ask that this application be refused.

Objection received from Hillingdon Friends of the Earth

Hillingdon Friends of the Earth would like the Planning Committee to action these comments please, because as much as possible needs to be done to reduce the impact of new developments on climate change: Please require that the fabric goes above and beyond current Building Regulations so the dwellings are well insulated, highly efficient and zero carbon (passivhaus or equivalent) to avoid being retrofitted later. Include heat recovery ventilation to avoid damp issues owing to being highly insulated. Please require one shared/community highly efficient heating system for the building (heat pump, ground source if possible). Sustainable materials should be used for the construction and the whole life cycle of carbon should be taken into consideration and accordingly measures should be taken to reduce the carbon emissions from the whole cycle. Please require that electrical appliances which are fitted must be certified energy saving products and all lighting is LED. Ensure all suitable roof space has photovoltaic or solar thermal installed and that all rainwater is harvester for grey water use. Explore battery storage for the property. Ask Transport for London to review the nearby bus routes to ensure they have capacity. Create segregated cycle lanes from the development to the nearest Tube station large developments. Ensure the property is easily accessible to good walking routes and not just a car park Ensure plentiful cycle storage Limit parking spaces to the minimum for less able bodied people and ensure all parking spaces have electric vehicle charging points Ensure as many trees are planted in the landscaping as possible and that no plastic fake lawn is allowed. All external paved surfaces should be porous to allow drainage and reduce flooding. Ensure it is very easy to recycle (easier than to dispose of general waste) including adequate storage in communal areas, Kitchen designs to include separate bins, etc Ensure there is onsite composting Ensure fixtures and fittings are durable, so replacements are not needed frequently. All paved areas to include space for vegetation Existing mature trees to be retained wherever possible and additional trees to be planted Provision for wildlife such as nesting boxes, bat boxes and wildlife tunnels

CASE OFFICER COMMENT:

- 5.4 The comments which are considered to be material to the assessment of the application are responded to within the main body of this report.
- 5.5 It should be noted that in relation to concerns raised about construction impacts, in the event of an approval, a condition would be recommended to require a demolition and construction management plan, in order to ensure construction impacts are minimised as far as practicable.
- 5.6 Asbestos is controlled separately under The Control of Asbestos Regulations (2012).
- 5.7 Impact on property values is not a material planning consideration.

## Statutory and Non-Statutory Consultee Comments

5.8 Comments received from statutory and non-statutory consultees are summarised below:

### HISTORIC ENGLAND

#### *Significance of the heritage assets:*

The application proposals are for extensive redevelopment of the site of the Barn Hotel in Ruislip, which occupies the former Sherley's Farm. The Farmhouse and a pair of agricultural outbuildings, known as the Oak Room and Leaning Barn, are timber-framed buildings with brick infill panels. The Farmhouse and Oak Room date to the 17th century, while the Leaning Barn might be of slightly earlier origin. The barns are each of two bays with open truss roofs, the former with a queen post truss, the latter with a queen strut truss. The Oak Room has been subdivided with a floor. All three buildings are listed at Grade II, the barns together as a single asset. The site is not within a conservation area, but stands near the Grade-II listed 'Metroland' Ruislip underground station, with the surroundings chiefly characterised by development contemporary with it.

#### *Impact of the proposals on significance:*

The proposals are for clearance of the hotel buildings with the exception of the three listed buildings, but including modern extensions to these, and conversion and redevelopment of the site for residential use. Two six-storey flat blocks would be built to the north and south of the site, with two smaller buildings close to the listed buildings in the centre, all with a loosely Art Deco character. To accommodate the additional residences, areas of hardstanding, access, fencing and other infrastructure would be created in the grounds. While the immediate setting of the barns in particular would be improved by the proposals, construction at considerable scale and density within the broader former farmyard surroundings of the group would create a harmfully unsympathetic setting for the listed buildings.

The Oak Room and the Leaning Barn would be joined by a modestly-scaled linking structure but internally subdivided to provide a house, while the Farmhouse would be converted from hotel use back to a single dwelling by removal of some internal subdivisions. The clearance of modern hotel buildings and structures of no significance would generally remove past sources of harm to the listed buildings. There are particular opportunities for enhancement by reversing the harm of subdivision in the former Farmhouse, and revealing the significant elevations of the listed outbuildings and better present their relationship to the Farmhouse.

The success of the proposals in realising these opportunities is not assured by the level of detail provided by the application drawings and documents. The removal of so many extensions to the listed barns would have considerable implications for their structure and fabric, which needs to be thoroughly understood. Proposed additional subdivision within the significant interior volumes and elevations of the barns could introduce new

harm, particularly where this would obscure appreciation of their exposed framed structures or necessitate alteration of the fabric.

*Relevant planning policy context:*

The Planning (Listed Buildings and Conservation Areas) Act 1990 contains a statutory duty for Local Planning Authorities to have special regard to the desirability of preserving listed building or their setting and of preserving or enhancing the character or appearance of conservation areas. Chapter 16 of the National Planning Policy Framework (NPPF) sets out how these duties should be applied in decision-making about the historic environment. Paragraphs 195 and 199 state that local authorities should seek to avoid or minimise any conflict between the conservation of designated heritage assets and any aspect of development proposals under consideration, and should give 'great weight' to preserving their significance regardless of the degree of any harm proposed. The more important the asset, the greater the weight should be. Paragraph 200 states that any harm or loss should require clear and convincing justification, and paragraph 202 that less than substantial harm will have to be weighed against the public benefits of the proposals.

The London Plan 2021 supports the statutory duties. Hillingdon's Local Plan development management policies were adopted in 2020. On new housing, policy DMH6 makes clear a presumption against 'garden and backland development' because of its impact on "local character, amenity space and biodiversity". Policy DMHB1 sets out expectations of development affecting listed buildings. It should: make a positive contribution to the local character and distinctiveness of the area; relate appropriately in terms of siting, style, scale, massing, height, design and materials; not compromise its setting; and take opportunities to conserve or enhance the setting.

*Historic England's position on the proposals:*

The proposed conversion of the three listed farm buildings promises to enhance their significance, subject to minimising additional subdivision and the satisfactory provision of considerably more detail on the treatment of their fabric; yet the opportunity this presents to enhance the listed group by provision of a setting which better supports their appreciation as a significant historic farm complex appears to be missed. Indeed, the proposed new buildings are likely to cause harm through the unsympathetic imposition of their novel scale, bulk and density in the listed buildings' significant setting.

In general the proposed works to the listed buildings are inadequately detailed. Considerable additional detail on the significance of the fabric and the physical impact and proposed detailing of the proposals would be required to give confidence that harm is minimised and significance safeguarded through the proposed conversions.

In judging whether the balance of heritage harm and benefit presented by the proposals resolves in favour of the application, and whether harm is outweighed by the public benefits it would secure, you should also be confident that harm has been minimised and any that would be caused in clearly and convincingly justified.

*Recommendation:*

Historic England has concerns regarding the applications on heritage grounds. We consider that the issues and safeguards outlined in our advice need to be addressed in order for the applications to meet the requirements of paragraphs 195-202 of the NPPF.

In determining these applications you should bear in mind the statutory duty contained in: sections 16(2) and 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to have special regard to the desirability of preserving listed buildings or their setting or any features of special architectural or historic interest which they possess; and section 38(6) of the Planning and Compulsory Purchase Act 2004 to determine planning applications in accordance with the development plan unless material considerations indicate otherwise.

Your Authority should take these representations in account and determine the application in accordance with national and local planning policy and in consultation with your specialist conservation advice. We have drafted the necessary letter of authorisation for your Authority to determine the application as you see fit and have referred this to the Planning Casework Unit (PCU) (copy attached). You will be able to issue a formal decision once the PCU have returned the letter of authorisation to you, unless the Secretary of State directs the application to be referred to them.

This response relates to designated heritage assets only. If the proposals meet the Greater London Archaeological Advisory Service's published consultation criteria we recommend that you seek their view as specialist archaeological adviser to the local planning authority. The full GLAAS consultation criteria are on our webpage at the following link:

<https://www.historicengland.org.uk/services-skills/our-planning-services/greater-london-archaeology-advisory-service/our-advice/>

**RAF NORTHOLT**

The application site occupies the statutory safeguarding zones surrounding RAF Northolt. In particular, the height and birdstrike safeguarding zones surrounding the aerodrome and is approximately 1.35km from the aerodrome boundary.

*Aerodrome height:*

The proposed development site occupies the statutory height safeguarding zone that ensure air traffic approaches, and the line of sight of navigational aids and transmitters/receivers are not impeded.

The MOD have reviewed the documents and has no aerodrome height safeguarding objections to the proposals. However, the MOD recognises that cranes may be used during the construction of tall buildings at this site. These may affect the performance of the Precision Approach Radar (PAR) and air traffic safety. If the proposal at this site does progress, it will be necessary for the developer to liaise with the MOD at RAF Northolt prior to the erection of cranes or temporary tall structures.

The MOD would request that a condition be included in any planning permission granted to ensure that the MOD is notified of when and where cranes will be erected.

A suggested condition wording is provided below:

**Submission of a Construction Management Strategy**

Development shall not commence until a construction management strategy has been submitted to and approved in writing by the Local Planning Authority covering the application site and any adjoining land which will be used during the construction period. Such a strategy shall include the details of cranes and other tall construction equipment (including the details of obstacle lighting). The approved strategy (or any variation approved in writing by the Local Planning Authority) shall be implemented for the duration of the construction period.

**Reason:**

To ensure that construction work and construction equipment on the site and adjoining land does not obstruct air traffic movements or otherwise impede the effective operation of air traffic navigation transmitter/receiver systems.

***Birdstrike:***

Within this zone, the principal concern of the MOD is the creation of new habitats that may attract and support populations of large and/or flocking birds close to an aerodrome.

After reviewing the plans and documentation provided in the application, given the location of the development relative to RAF Northolt, it is identified that the landscaping plans have the potential to form an attractant environment to those large and/or flocking bird species that may be hazardous to aviation safety.

The proposed landscaping utilises much of the existing trees and greenspace supplemented with a small number of native and ornamental hedgerows and shrubs. It is recognized that these are likely to result in the presence of, for example, small numbers of non-hazardous species in addition to the potential for nesting Wood Pigeons, Carrion Crows, Magpies and potentially winter foraging Thrushes. There is insufficient detail provided in the landscaping and planting scheme for the MOD to make an informed decision, so to prevent developing a significant additional attractant in the environment and habitat to large and/or flocking birds it is recommended that the proportion of berry bearing plants within the planting palette is retained below 30% of the total planting palette of trees, shrubs and hedgerows. Hedging that consists of, for example, native beech, hornbeam, field maple and hazel would be acceptable.

**Planting schedule**

No development shall take place until such time as a detailed planting schedule has been submitted to and approved in writing by the Local Planning Authority in consultation with Ministry of Defence. All planting shall be carried out strictly in accordance with the details approved unless otherwise agreed in writing with the Local Planning Authority in consultation with the Ministry of Defence.

#### Reason

To ensure that the planting/landscaping implemented at the site does not attract or provide a habitat for those large and/or flocking bird species hazardous to aviation safety.

In conclusion, the MOD has, subject to the conditions set out above, no objections to this proposal. I would be grateful if you could confirm receipt of this letter and confirm that a relevant condition covering the MOD's requirements is included in any consent granted.

The MOD must emphasise that the advice provided within this letter is in response to the data and information detailed in the developer's documents titled "Landscape Proposals", "Site Layout Plan" and "Application Form" dated February 2023, March 2023 and May 2023 respectively. Any variation of the parameters (which include the location, dimensions, form, and finishing materials) detailed may significantly alter how the development relates to MOD safeguarding requirements and cause adverse impacts to safeguarded defence assets or capabilities. In the event that any amendment, whether considered material or not by the determining authority, is submitted for approval, the MOD should be consulted and provided with adequate time to carry out assessments and provide a formal response.

It is important that the conditions requested in this response are included in any planning permission granted. As per Planning Circular 01/03: Safeguarding Aerodromes, Technical Sites and Military Explosives Storage Areas, if London Borough of Hillingdon Council decides to grant planning permission contrary to our advice, then we must be notified 28 days prior to a decision being made.

#### GLAAS

##### Recommend Archaeological Condition(s)

Thank you for your consultation received on 2023-06-13.

The Greater London Archaeological Advisory Service (GLAAS) gives advice on archaeology and planning. Our advice follows the National Planning Policy Framework (NPPF) and the GLAAS Charter.

##### *Assessment of Significance and Impact:*

The planning application is not in an Archaeological Priority Area but Sherley's Farm was part of Field End, a small hamlet which formed part of a cluster of dispersed rural settlements around the manorial centre at Ruislip. For Greater London, Ruislip has a remarkable concentration of surviving medieval and early post-medieval buildings, historic landscape and archaeology. The presence of three listed farm buildings - two of which are now believed to have 16th century origins - indicates that the site has archaeological interest. The listed buildings are themselves of archaeological interest as demonstrated by a level 3 historic building survey carried out in 2017 and there is potential for further discoveries from the built fabric during conversion, including for example from the use of dendrochronology to date the timber frames.

There may also be associated buried archaeological remains of post-medieval date or earlier (medieval) occupation. Whilst the footprints of the existing post-war buildings are likely to be heavily disturbed, the surrounding open ground may have better survival. New development or landscaping groundworks outside the post-war building footprints would likely damage or destroy buried archaeological features.

An archaeological perspective can also help with considering the setting of the listed building and new design. The site access is actually the route of 'West End Road' prior its realignment for the construction of Ruislip Station in 1907. West End Road is likely to be of medieval origin explaining the position of Sherley's Farm beside the road and next to (perhaps encroaching on) the parish's medieval open fields. Restoring some sense of the road's formerly rural character would be desirable and complement the proposed landscaping adjacent to the farmhouse. Whilst the removal of the post-war accretions around the listed buildings is positive, the substantial scale of the proposed new residential blocks appear over-bearing to the listed buildings.

The site also has potential for public engagement with local heritage - for example by on-site interpretation and engagement of local community groups such as a school, older people or an arts or historical society.

*Planning Policies:*

NPPF Section 16 and the London Plan (2021 Policy HC1) recognise the positive contribution of heritage assets of all kinds and make the conservation of archaeological interest a material planning consideration. NPPF paragraph 194 says applicants should provide an archaeological assessment if their development could affect a heritage asset of archaeological interest.

NPPF paragraphs 190 and 197 and London Plan Policy HC1 emphasise the positive contributions heritage assets can make to sustainable communities and places. Where appropriate, applicants should therefore also expect to identify enhancement opportunities.

If you grant planning consent, paragraph 205 of the NPPF says that applicants should record the significance of any heritage assets that the development harms. Applicants should also improve knowledge of assets and make this public.

*Recommendations:*

I advise that the development could cause harm to archaeological remains and field evaluation is needed to determine appropriate mitigation. However, although the NPPF envisages evaluation being undertaken prior to determination, in this case consideration of the nature of the development, the archaeological interest and/or practical constraints are such that I consider a two-stage archaeological condition could provide an acceptable safeguard. This would comprise firstly, evaluation to clarify the nature and extent of surviving remains, followed, if necessary, by a further investigation. A programme of public benefit activities would also be secured.

I therefore recommend attaching a condition as follows:

No demolition or development shall take place until a stage 1 written scheme of investigation (WSI) has been submitted to and approved by the local planning authority in writing. For land that is included within the WSI, no demolition or development shall take place other than in accordance with the agreed WSI, and the programme and methodology of site evaluation and the nomination of a competent person(s) or organisation to undertake the agreed works.

For those parts of the site which have archaeological interest a stage 2 WSI shall be submitted to and approved by the local planning authority in writing. For land that is included within the stage 2 WSI, no demolition/development shall take place other than in accordance with the agreed stage 2 WSI which shall include:

- A. The statement of significance and research objectives, the programme and methodology of site investigation and recording and the nomination of a competent person(s) or organisation to undertake the agreed works
- B. Details of a programme for delivering positive public benefits related to the site's heritage
- C. The programme for post-investigation assessment and subsequent analysis, publication & dissemination and deposition of resulting material. This part of the condition shall not be discharged until these elements have been fulfilled in accordance with the programme set out in the stage 2 WSI.

#### Informative

Written schemes of investigation will need to be prepared and implemented by a suitably professionally accredited archaeological practice in accordance with Historic England's Guidelines for Archaeological Projects in Greater London. This condition is exempt from deemed discharge under schedule 6 of The Town and Country Planning (Development Management Procedure) (England) Order 2015.

This pre-commencement condition is necessary to safeguard the archaeological interest on this site. Approval of the WSI before works begin on site provides clarity on what investigations are required, and their timing in relation to the development programme. If the applicant does not agree to this pre-commencement condition, please let us know their reasons and any alternatives suggested. Without this pre-commencement condition being imposed the application should be refused as it would not comply with NPPF paragraph 205.

I envisage that the archaeological fieldwork would comprise the following:

#### Evaluation

An archaeological field evaluation involves exploratory fieldwork to determine if significant remains are present on a site and if so to define their character, extent, quality and preservation. Field evaluation may involve one or more techniques depending on the nature of the site and its archaeological potential. It will normally include excavation of trial trenches. A field evaluation report will usually be used to inform a planning decision (pre-determination evaluation) but can also be required by condition to refine a mitigation strategy after permission has been granted.

In this case trial trenches should be positioned in areas affected by new development outside of existing building footprints.

### Historic Building Recording

Historic building recording is an investigation to establish the character, history, dating, form and development of a historic building or structure which normally takes place as a condition of planning permission before any alteration or demolition takes place. The outcome will be an archive and a report which may be published. Works to the listed buildings should be covered by a building recording watching brief to supplement the existing level 3 survey by recording hidden details and attempting dendrochronology dating. I therefore recommend attaching a condition as follows:

No demolition shall take place until a written scheme of historic building investigation (WSI) has been submitted to and approved by the local planning authority in writing. For buildings that are included within the WSI, no demolition or development shall take place other than in accordance with the agreed WSI, which shall include the statement of significance and research objectives, and

A. The programme and methodology of historic building investigation and recording and the nomination of a competent person(s) or organisation to undertake the agreed works

B. The programme for post-investigation assessment and subsequent analysis, publication & dissemination and deposition of resulting material. This part of the condition shall not be discharged until these elements have been fulfilled in accordance with the programme set out in the WSI

Informative: The written scheme of investigation will need to be prepared and implemented by a suitably professionally accredited heritage practice in accordance with Historic England's Guidelines for Archaeological Projects in Greater London.

### *Refer to Conservation Officer:*

As this proposal affects heritage assets other than undesignated archaeology, we recommend that you seek the advice of your local authority conservation officer. As no listed building consent application appears to have been submitted it is unclear what actual works are required to the buildings themselves. However, as noted above there would be a significant change to their setting.

You can find more information on archaeology and planning in Greater London on our website.

This response relates solely to archaeological considerations. If necessary, Historic England's Development Advice Team should be consulted separately regarding statutory matters.

### THAMES WATER

#### *Waste Comments:*

As you are redeveloping a site, there may be public sewers crossing or close to your development. If you discover a sewer, it's important that you minimize the risk of damage. We'll need to check that your development doesn't limit repair or maintenance activities, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes.

With regard to SURFACE WATER drainage, Thames Water would advise that if the developer follows the sequential approach to the disposal of surface water we would have no objection. Management of surface water from new developments should follow Policy SI 13 Sustainable drainage of the London Plan 2021. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required. Should you require further information please refer to our website.

We would expect the developer to demonstrate what measures will be undertaken to minimise groundwater discharges into the public sewer. Groundwater discharges typically result from construction site dewatering, deep excavations, basement infiltration, borehole installation, testing and site remediation. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. Should the Local Planning Authority be minded to approve the planning application, Thames Water would like the following informative attached to the planning permission: "A Groundwater Risk Management Permit from Thames Water will be required for discharging groundwater into a public sewer. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures he will undertake to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team.

Thames Water would advise that with regard to WASTE WATER NETWORK and SEWAGE TREATMENT WORKS infrastructure capacity, we would not have any objection to the above planning application, based on the information provided.

Thames Water would recommend that petrol / oil interceptors be fitted in all car parking/washing/repair facilities. Failure to enforce the effective use of petrol / oil interceptors could result in oil-polluted discharges entering local watercourses.

Thames Water would advise that with regard to FOUL WATER sewerage network infrastructure capacity, we would not have any objection to the above planning application, based on the information provided.

The proposed development is located within 15 metres of a strategic sewer. Thames Water requests the following condition to be added to any planning permission. "No piling shall take place until a PILING METHOD STATEMENT (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface sewerage infrastructure, and the programme for the works) has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement." Reason: The proposed works will be in close proximity to underground sewerage utility infrastructure. Piling has the potential to significantly impact / cause failure of local underground sewerage utility infrastructure. Please read our guide 'working near our assets' to ensure your workings will be in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures.

*Water Comments:*

With regard to water supply, this comes within the area covered by the Affinity Water Company. For your information the address to write to is - Affinity Water Company The Hub, Tamblin Way, Hatfield, Herts, AL10 9EZ - Tel - 0845 782 3333.

**HEATHROW SAFEGUARDING**

We have now assessed the above application against safeguarding criteria and can confirm that we have no safeguarding objections to the proposed development.

**NATS**

The proposed development has been examined from a technical safeguarding aspect and does not conflict with our safeguarding criteria. Accordingly, NATS (En Route) Public Limited Company ("NERL") has no safeguarding objection to the proposal.

However, please be aware that this response applies specifically to the above consultation and only reflects the position of NATS (that is responsible for the management of en route air traffic) based on the information supplied at the time of this application. This letter does not provide any indication of the position of any other party, whether they be an airport, airspace user or otherwise. It remains your responsibility to ensure that all the appropriate consultees are properly consulted.

If any changes are proposed to the information supplied to NATS in regard to this application which become the basis of a revised, amended or further application for approval, then as a statutory consultee NERL requires that it be further consulted on any such changes prior to any planning permission or any consent being granted.

**NETWORK RAIL**

Network Rail has no objections as this is LUL only.

**TFL INFRASTRUCTURE**

It has come to our attention that a planning application has been submitted for the above property.

Though we have no objection in principle to the above planning application, there are a number of potential constraints on the redevelopment of a site situated close to London Underground railway infrastructure. Therefore, it will need to be demonstrated to the satisfaction of TfL Infrastructure Protection engineers that:

- the development will not have any detrimental effect on our tunnels and structures either in the short or long term
- the design must be such that the loading imposed on our tunnels or structures is not increased or removed
- we offer no right of support to the development or land

Therefore, we request that the grant of planning permission be subject to the following separate numbered conditions to be discharged in a phased manner as and when they are completed.

1. Before the demolition stage begins, no works shall be carried out until the following, in consultation with TfL Infrastructure Protection, have been submitted to and approved in writing by the local planning authority.
  - a) provide an overview of the overall development including both design on temporary and permanent works.
  - b) provide detailed design and Risk Assessment and Method Statement (RAMS) for the demolition works
  - c) identify and accommodate the location of the existing London Underground structures
  - d) there should be no opening windows or balconies facing the London Underground elevation
  - e) demonstrate access to elevations of the building adjacent to the property boundary with London Underground can be undertaken without recourse to entering our land
  - f) allow clear access for London Underground to safely carryout inspections/maintenance of their boundary/retaining wall or fence
  - g) demonstrate that there will at no time be any potential security risk to our railway, property or structures
  - h) accommodate ground movement arising from the development construction thereof
  - i) mitigate the effects of noise and vibration arising from the adjoining railway operations.
  - j) provide details on the use of tall plant/scaffolding for the demolition phase
  - k) demonstrate that any EMC emissions from any plant or equipment to be used on the site or in the finished structure will not adversely affect LU equipment or signalling
2. Before the sub-structure construction stage begins, no works shall be carried out until the following, in consultation with TfL Infrastructure Protection, have been submitted to and approved in writing by the local planning authority.
  - a) provide detailed design for foundations, basement and ground floor structures, or for any other structures below ground level, including piling (temporary and permanent)
  - b) completion of a glare and glint study
3. Before the super-structure construction stage begins, no works shall be carried out until the following, in consultation with TfL Infrastructure Protection, have been submitted to and approved in writing by the local planning authority.
  - a) provide detailed design for all superstructure works (temporary and permanent)
  - b) site specific Risk Assessments and Method Statements (RAMS) for any activities (craneage, scaffolding, use of tall plant) which TfL may deem to be a risk to LU. Individual RAMS should be issued a minimum of 6 weeks prior to the individual activity commencing

**Reason:** To ensure that the development does not impact on existing London Underground transport infrastructure, in accordance with London Plan 2021, draft London Plan policy T3 and 'Land for Industry and Transport' Supplementary Planning Guidance 2012

*This response is made as Railway Infrastructure Manager under the "Town and Country Planning (Development Management Procedure) Order 2015". It therefore*

*relates only to railway engineering and safety matters. Other parts of TfL may have other comments in line with their own statutory responsibilities.*

PLANNING OFFICER COMMENT – The recommended conditions are noted. In the event of a positive recommendation, it is considered that part d of condition 1 would not meet the tests for conditions, having regard to the intervening distance and existence of buildings currently.

#### TfL

The site is not in close proximity to the Transport for London Road Network (TLRN) or Strategic Road Network (SRN). However, the site borders TfL land, and falls directly south of Ruislip Station.

The site is served by 7 bus routes (398, U10, 114, 331, H13, U1, and E7) within 380m of the site. In addition, the site is within 350m of the Ruislip London Underground Station which is served by the Piccadilly, and Metropolitan lines. Consequently, the site has a PTAL of 4 on a scale of 0 to 6b, where 6b is the highest.

TfL has the following comments on the application:

##### *Construction:*

A Construction Logistics Plan (CLP) has not been submitted in support of the application and in line with Policy T7 TfL request that a draft document is submitted prior to the determination of the application, with a full version secured by legal agreement. Once submitted TfL may provide additional commentary on the construction of the proposal.

##### *Healthy Streets and Active Travel Zone:*

As identified in Policy T2 of the London Plan, all developments should seek to deliver improvements that support the Mayor's Healthy Streets approach. The Healthy Streets approach seeks to improve air quality, reduce congestion and make attractive places to live and work. There are ten Healthy Streets indicators which put people and their health at the heart of decision making and aim to result in a more inclusive city where people choose to walk, cycle, and use public transport. An ATZ assessment has been completed, but TfL's position is that the ATZ conducted is extremely light touch, the routes should go to the medical practice, the nearest open space, and places of worship as a minimum. The conclusions that the ATZ on the 2 routes chosen have identified is poor. The ATZ claims that both routes have no possible improvement measures identified apart from cycle advance stop lines. TfL strongly disagree that the two routes chosen have little to no improvement needed, and request a more detailed ATZ assessment is undertaken, which highlights the worst sections of each routes and provides possible improvement measures. Once an updated ATZ assessment is conducted TfL will provide additional comments, and TfL will support the London Borough of Hillingdon in securing any appropriate improvements where necessary.

In addition to the above routing of the ATZ a route should be conducted from the secondary entrance where the 7x 3 bed terrace houses are to be located.

*Trip Generation:*

The TRICS assessment demonstrates that the proposed development is anticipated to generate 12 trips in the AM peak, 22 trips in the PM peak and 197 trips across the 12-hour period. The proposed development is expected to result in a net decrease in the AM peak (-1), and a net increase in the PM peak (+13).

*Car Parking:*

A total of 66 car parking spaces will be provided on site. This includes 14 spaces for the 7x 3 bed residential dwellings and 4 spaces for the retained buildings. 14 spaces for the 7x 3 bed residential dwellings equals 2 spaces per dwelling which far exceeds the recommended maximum level of parking. TfL consider the level of parking on site should be reduced, given the level of public transport access. The proposals indicate 0.69 spaces (excluding terraces and retained buildings) per dwelling which is at the higher end of the maximum amount. All developments should look to reduce the level of car share in accordance with the Mayors Transport Strategy and the London Plan, TfL expect a reduction in car parking space in order to ensure the development is not car dependent.

*Cycle Parking:*

Long stay Cycle parking is provided internally, 175 spaces throughout the site which is compliant with the quantum needed against the London Plan Standards for the overall site. The ground floor plans indicate that there is a variety of parking types which TfL welcomes. However, the cycle parking is not compliant against the London Cycle Design Standards (LCDS). A minimum spacing between Sheffield stands of 1m should be achieved with a recommended width of 1.2m, currently the plans are suggesting the spacing between stands is 0.4m. There is also a concern regarding the widths of some of the aisles and accesses with Building 1s access aisle width just 1.16m when the minimum requirement is for 1.8m. TfL request that all cycle parking is LCDS and London Plan compliant.

In addition, it is not clear where the cycle parking is for the 7x 3 bed Terrace houses as this has not been provided on the plans. TfL suggest removing some of the car parking to provide the cycle stores needed for each dwelling. As, the 7x 3 bed house have no cycle parking they are not compliant with London Plan Policy T5.

Currently, due to no cycle parking being provided for the 7x 3bed terrace houses the proposal is not fully compliant with the London Plan Policy T5, in addition to the proposal not being compliant with the LCDS.

*Travel Plan:*

The Travel Plan targets are not ambitious enough, and need to meet with the Mayors Transport Strategy (MTS) target of towards 80% sustainable travel. The Travel Plan should be secured via legal obligation

*Deliveries and Servicing:*

The Delivery and servicing strategy appears appropriate. A full Delivery and Servicing Plan should be secured via condition.

*Conclusion:*

TfL request a reduction in car parking, cycle parking to be compliant with LCDS and the London Plan, a revised ATZ assessment, a revised Travel Plan, and a draft CLP submitted prior to the determination of this application. Once the above is received TfL will provide further comments. In addition London Underground Infrastructure Protection will respond separately.

**METROPOLITAN POLICE**

Recommend that a planning condition that SBD accreditation is achieved by the site. - It is also recommended that the lighting for all publicly accessible areas of the site emanates from above 3m (columns as opposed to bollards) - The rear areas of all the buildings in the site are secured with a minimum of a 2.1m fence and made private or semi private to for residents. If more detail or rationale is required please email [robert.palin@met.police.uk](mailto:robert.palin@met.police.uk)

**CAIDENT GAS**

Pipeline map provided for guidance.

**LBH CONSULTEES**

**URBAN DESIGN AND CONSERVATION**

The extent of the proposed development is considered to be far too great for this sensitive site in footprint, height, bulk and massing undermining the setting of the two existing Listed buildings. The harm to the setting is considered to be less than substantial and the NPPF 2021 public benefit test needs to be applied.

The site layout fails to follow good urban design principles with several instances of below standard separation distances that will affect the amenity of future residents. Lastly, the accommodation quality is sub-optimal and the appearance of the building is considered to be inappropriate to the context.

*1. Context:*

The application site is situated immediately south of Ruislip Station (grade II) and is currently operated as The Barn Hotel. The site consists of a varied collection of buildings at the centre of which are the Grade II Listed Buildings, Sherley's Farmhouse, the Leaning Barn and the Oak Room.

To the south east lies 1-33 Gardens Close, residential apartment blocks, and to the east lies newly constructed accommodation blocks and the rear gardens of the

properties in Eversley Crescent and to the west lies West End Road which leads onto Ruislip High Street.

### *2. Listed Buildings Context:*

The listed barns to the southeast of the farmhouse are believed to date from the late C16 or early C17. The 'leaning' barn formed of two-bays and constructed from traditional timber framing with queen strut roof truss and has been restored.

The other barn (the Oak Room) is also to a traditional timber-framed construction and has had a later floor installed. The external appearance to the barns is similar to the house with the timber-framing picked out in black and the masonry infill panels painted white. The roofs are also finished in old clay tiles. The barns have been extended and joined extensively with later single-storey extensions of little or no architectural interest to provide facilities and function rooms for the running of the hotel.

Sherley's Farmhouse dates from the C17 and is of a traditional timber-framed construction that is 2-storeys in height and L-shaped in plan with irregular fenestration. The external framing has been painted black with the masonry infill painted white. The building is finished with an old, tiled roof. Internally the building still retains much of its original timber framing and its bay configuration can still be clearly discerned along with other features of interest.

Collectively the listed buildings form an important surviving group of late medieval buildings. The application is accompanied by a Heritage and Townscape Visual Assessment by Iceni which lays out the historic development of the site and assesses the interest and significance of the listed buildings.

### *3. Development Context:*

It is important to acknowledge that the Barn Hotel complex is now situated in suburban 'Metroland' which has its own distinctive characteristics that are quite different to those in more central London locations. The site sits south of Ruislip Station in an area characterised by low residential development with detached and semi-detached houses of one and two-storeys such as those found in Willow Grove, Eversley Crescent, and Shenley Avenue. There are a limited number of larger blocks with a 3 and part 4 storey blocks of flats to the south in Garden Close. These developments were built in the 1930s with the expansion of the suburban area and define the local context. The houses and flats are situated in leafy green gardens with clear gaps between the houses that allow their compositions to be fully appreciated.

The existing development on site has grown slowly in a piecemeal fashion as the hotel has gradually expanded since the 1950s. The post war development now greatly outnumbers the original listed buildings and covers a larger area and volume. This has affected the remaining original open rural setting of the buildings that was left following the 1930s suburban expansion. Notwithstanding this, the new buildings / extensions in the farm's curtilage are relatively low key and have not been designed to make an architectural statement or compete with the listed buildings. In most instances the new additions sit quietly on the site being to a traditional form and construction and no more than two-storeys in height respecting the listed buildings to some degree as well as the suburban residential development adjacent to the site.

The landscaping around the listed farmhouse helps to soften its setting particularly from the hotel accommodation blocks to the north and the listed buildings still remain the main focus at the centre of the site.

#### *4. Proposed new buildings:*

The proposed new development for 94 dwellings, consists of;

- Building 1, an 'L' shaped building along the west and north boundary of the site. This building is serviced via a car park located between the proposed building and Grade II listed Sherley's Farmhouse. Building 1 is predominantly 6 storey with 4 and 2 storey elements tapering down to the 2 storey residential units along Eversley Crescent.
- Building 2, a broadly square block at predominantly 6 storey at the southern end of the site.
- 7 no 3 bed houses, are accessed from Garden Close with back garden fences directly to the rear of the much reduced built form attached to the Grade II listed Barn and Outbuildings to the south of Sherley's Farmhouse.

#### *5. Height Scale and Massing Buildings 1 and 2:*

The height scale and massing of Building 1 and 2 blocks of flats (at 6 storey) will be substantial and cause harm to the setting of the listed buildings. Although the demolition of some of the building elements attached to the listed barns would be of some benefit, this would not outweigh the harm caused by the new development which will dwarf the listed buildings enclosing it on the north and south sides. The new blocks will dominate the listed buildings and would be seen in the immediate backdrop of the listed buildings from within the site and from West End Road.

Revisions are needed to significantly reduce the amount of proposed development so that the setting and historic curtilage of the listed buildings is not further harmed.

The proposed development also harms the wider townscape. The six storey blocks would create large development blocks when viewed from West End Road that would be at odds with the distinctive suburban character of the area and would detract from many of the views in adjoining streets. It should be noted that this site is not considered appropriate for focal buildings as the site is topographically set down from West End Road.

The rectangular adjacent block of flats along Garden Close create a scale and massing that could continue for any proposed building at the entrance of the site and appearing to almost complete the perimeter block.

The scale and massing of the two storey houses are more respectful of the Listed Buildings, however, the location and juxtaposition needed is addressed in the next section of the comments.

#### *6. Layout:*

The site lacks a public street frontage with only a single access point via a narrow private road off West End Road. To overcome this constraint the layout proposes two

cul-de-sacs, one accessed from Garden Close and the other from the access road. This locates the proposed houses in a backland area between the backs of the houses along Eversely Crescent and the listed buildings. While Building 1 is located in a backland area between the railway/road embankment and side elevation of Grade II listed Sherley's Farmhouse. This arrangement creates ill-defined fronts and backs with a public realm dominated by car parking and hardscape. This approach fails to accord with good urban design principles and is detrimental to the setting of the two listed buildings.

#### *6.1 Separation Distances:*

Many of the separation distances within the site fail to comply with the nationally accepted window to window distance of 21m for two storey dwellings. These include;

- the separation distance between the windowed elevation of The Barn and the houses to the rear of approximately 12m.
- the separation distance between the windowed elevation of The Barn and Building 2 of approximately 9m.
- the separation distance between the windowed elevation of Building 2 to the proposed unit 89 of approximately 16m.

The layout will need to be revised to ensure all separation distances comply with the standard in order to retain sufficient privacy, daylight/sunlight and outlook amenity. It should be noted that where buildings are larger than 2 storey the separation distance should be increased.

Lastly, the back garden fences of house unit 91 and 90 are located directly to the rear of the Grade II listed Barn causing harm to its setting.

#### *7. Appearance:*

The material palette of the surrounding buildings is predominantly red brick. Accordingly, the light coloured brick is not considered to be appropriate to the context.

The elevational fenestration introduces horizontal banding which picks up on details from other surrounding buildings and is supported. However, the balconies dominate many of the elevations particularly for the Building 2 top floor set back.

More information is required on the tint of the window glazing. It looks too dark in the elevational drawings.

#### *8. Accommodation Quality:*

##### *8.1. Building 1:*

The internal double stacked configuration of Building 1 delivers a high proportion of single aspect units, (approximately 50%). More serious, 25% of Building 1 units are single aspect north facing, some of which suffer below BRE guidance levels of daylight/sunlight. Section 4.1 of the London Design Standards states;

'New homes should be dual aspect unless exceptional circumstances make this impractical or undesirable; for example, when one side of the dwelling would be subjected to excessive noise or outside air pollution. Where single aspect dwellings are proposed, by exception, they should be restricted to homes with one or two bedspaces, should not face north and must demonstrate that the units will have adequate passive ventilation, daylight and privacy, and not overheat (particularly relevant for south or west facing single aspect units'

The lower floors of Building 1 western elevation directly face the embankment of the West End Road, creating poor outlook.

#### *8.2. Building 2:*

The internal configuration of building 2 around a central core delivers approximately 30% single aspect units. This percentage is unacceptably too great for a new building. Additionally, the ground floor frontage is dominated by bins and bike stores, these should be located to the rear of the building to create an active building frontage.

In conclusion, the accommodation quality is not considered to meet the GLA Housing Design Standards, particularly as the accommodation quality is further reduced with only 68% of the 148 rooms meeting the BRE sunlight guidance values. These cumulative liveability compromises are considered unacceptable.

#### *9. The Listed Building proposals:*

It is proposed to convert all of the listed buildings to residential use.

##### **The Farmhouse**

The building will be returned to use as a single dwelling which is in line with its original function as a rural farmhouse. Only minor alterations are proposed, namely the removal of later partitions inserted due to the building's use as hotel accommodation. There is no detail on the impact of new pipework/electricity runs or how building regulations might affect the listed building.

In terms of the immediate setting, the link building between the Oak Room and Leaning Barn and The Farmhouse is to be demolished which would potentially open up the setting to the south of the farmhouse. However, the landscaping plans show a loss of green and soft planting on the north, east and west sides and a garden fence built in close proximity to the south elevation. Any gains with the removal of the link are diminished by the loss of green in other areas, increase in hardstanding and cramped proposed garden.

##### **The Oak Room and Leaning Barn**

Conversion to residential is more of a challenge than with the farmhouse as the original purpose of the buildings is thought to be ancillary farm buildings although there is some evidence that The Oak Room may have been domestic due to the quality of its frame. As with the farmhouse there is no detail on the impact of building regulations or installing pipework/utilities.

The later extensions that surround and buttress these two listed buildings are of little architectural significance and detract from the earlier phases of development. There is therefore no objection to their removal in principle. There would however need to be a prior commencement conditions if the application were to be approved which should include:

- a detailed survey covering the building fabric to understand what is historic and what is more recent.
- a schedule of demolition
- a structural report on how to ensure the structural integrity of both listed buildings given the level of structural support these extensions may currently be providing to the listed buildings.
- a clear set of proposals on how the exposed elevation would be presented/made good

In place of the demolished extensions will be a new lightweight single storey link extension between the two structures. This will house the kitchen and additional bedroom. The concept is acceptable as is the scale.

The ground floor of The Oak Room is not as well preserved as the first floor and some alterations to the layout are suggested to better preserve what is of interest. On the ground floor, the layout might be improved with the dining room in the new extension along with the kitchen and the study/bedroom in the Oak Room. Both small windows on the north elevation should be retained, these are 19th century/possibly early 20th century. The window on the west elevation should also be preserved, although not early it allows for light to pass into the Oak Room particularly if the new extension is kept light and open plan.

The introduction of multiple partitions into the first floor of the Oak Room cannot be supported. The room is open to the roof, the Queen post structure is visible and the framing is far better preserved than on the ground floor. Creating one bedroom possibly with a small ensuite would be lower impact and allow the historic structure to be better appreciated.

There is no objection to the closing up of the door on the south elevation of the Leaning Barn, this is a modern insertion and closing if off would be acceptable. Nor is there an objection to the creation of a window into the opening at the south end of The Oak Room.

The proposed garden is oddly shaped curving round from west to north with the boundary running close to the south and east elevation. Heritage gains accrued from the removal of the extensions is diminished by the odd siting within the plot with boundaries limiting views of the newly revealed elevations.

#### *10. Impact on setting of Listed Buildings:*

The impact on the near setting of the listed buildings is discussed above. In general the proposed landscaping is detrimental and does not preserve the existing soft green areas around the listed buildings in particular the farmhouse. Large new areas of hardstanding are introduced, particularly to the north of the farmhouse which do not offset the reduction in hardstanding on the west of the site. There will be parked cars on both side of the farmhouse which would not be an enhancement.

The boundaries are too close to the listed buildings and although detail is not provided it is assumed these are tall and will limit views towards and out of the listed buildings. The effect will be suburban rather than trying to create something softer and possibly closer to the rural roots of these buildings.

In terms of the impact of the wider proposals for the site on the listed buildings it is considered that these are harmful. The major concern is the scale of the two proposed six storey buildings (Building 1 & 2) at either end of the site with the listed buildings sandwiched between them. These are overwhelming and disproportionate in scale to the group of late medieval buildings. While attempts have been made to ensure the development in the centre of the site is lower with the two storey blocks on the east side these do not offset the impact of the two tall buildings.

The harm to the listed buildings due to the impact on their setting is less than substantial but would be regarded above the middle level and the planning exercise (NPPF 2021) regarding public benefit would need to be applied.

#### *11. Landscape:*

The landscape is limited to narrow areas around the proposed blocks of flats limiting amenity value, gardens to the proposed houses, gardens to the Listed buildings, small area of communal space and large areas of hardscape for access road/car parking. The dividing up and sub-division of the landscape with boundaries treatments between the plots detrimentally affects the setting of the listed buildings especially as this requires the removal of tree planting.

#### PLANNING OFFICER COMMENT:

The applicant has submitted a rebuttal to the Urban Design Officers comments which includes a letter from Iceni, the Heritage and Townscape consultant employed by the applicant. The content of this letter has been reviewed by the Councils Heritage Officer and the objection is maintained.

It is noted that the applicant raised concerns regarding the accuracy of reference to windows in paragraph 6.1 above. The points raised have been noted and taken into consideration in the assessment of the application.

#### HIGHWAYS

##### *Site Characteristics & Background:*

In 2020, a pre-application enquiry was submitted (7969/APP/2020/167) based on a proposed redevelopment of the site consisting of 130 residential dwellings with a total 69 on-plot parking spaces. A general objection was raised on the premise of overdevelopment including a reference to parking under-provision by the Highway Authority with a recommendation for further justification of a lower quantum if the proposal is to be replicated at a future application stage.

The proposed design has now been reduced in terms of density and would consist of 2 new residential blocks incorporating a mix of 87 one & two-bedroom flatted units plus

the conversion of an existing listed building to 2 further dwellings together with 7 three-bedroom houses that are to be physically segregated from the main area dedicated to the flatted component. In summary, 96 new residential units are proposed. A total of 66 on-plot parking spaces are to be provided with 48 communal spaces serving the flatted component (87 units) plus 4 allocated to the 2 units located within the converted build together with 14 serving the 7 houses.

An established vehicular/pedestrian access on West End Road (designated as 'classified') with its junction with Wood Lane, is positioned directly onto the immediately adjacent mini-roundabout junction connecting the above two roads and currently serves the hotel use. This would continue as an access provision for the 89 flatted component whilst a second pedestrian/vehicular access located to the east i.e. via the publicly adopted Garden Close is proposed and would be dedicated solely to the 7 three-bedroom terraced houses.

In the main, the surrounding roadways do not exhibit parking controls and the address is located just south of Ruislip town centre & LU station with a good 'real world' public transport accessibility (PTAL) reflected by a rating of 4.

*Parking Provision:*

Hillingdon Local Plan: Part 2 Policy - DMT 6 requires that new development will only be permitted where it accords with the council's adopted parking standards unless it can be demonstrated that a deviation from the standard would not result in a deleterious impact on the surrounding road network.

London Plan (2021): Policy T6.1 (Residential Parking) requires that new residential development should not exceed the maximum parking standards as set out in table 10.3.

**Flatted component (89 mixed units)**

The overriding regional standard demands up to 44-66 spaces and 52 are to be provided hence as this quantum falls within this banding, there is compliance to the standard.

**Terraced Houses (7x3 bedrooms)**

The maximum requirement for a 3 bedroom 'plus' dwelling is for up to 2 spaces to be provided on-site to comply with the local parking standard whilst the overriding regional standard would demand up to 3-5 spaces given the PTAL rating and unit quantum proposed.

Hence, there appears to be conformity with the local standard, but an over-provision is evident when applying the regional. However, in this case such parking excess is considered acceptable as it reduces the potential for untoward injudicious internal site and/or on-street parking displacement given the mainly unrestricted residential roadways in adjacent Garden Close and Eversley Crescent.

*Parking Allocation:*

For each of the above components, the allocation of spaces would benefit from a parking allocation plan to secure adequate provision for each unit hence a suitable planning condition should be applied. There are no further observations.

*Electric Vehicle Charging Points (EVCP's):*

In line with the London Plan (2021), within the final parking quantum there is a requirement for a minimum 20% 'active' EVCP provision with all remaining spaces being designated as 'passive' provisions. The applicant confirms that all 66 spaces are to be designated as 'active' provisions which is fully compliant and therefore welcomed.

*Disabled Parking:*

10% of parking spaces out of the 52 spaces affiliated to the flatted element should be disabled compliant. 5 are depicted distributed across the site which falls in-line with the standard.

*Motorcycle/Scooter Parking:*

The council's Local Plan: Part 2 standard requires that 1 motorcycle/scooter parking space per 20 parking spaces is to be provided within new development and hence this should be inclusive to this proposal. 3 spaces are therefore required and although this has not been confirmed or indicated by the applicant, this aspect can be secured by way of planning condition.

*Cycle Parking:*

In terms of cycle parking there should be provision in line with the regional standard. Flatted component (89 mixed units) & Terraced Houses (7x3 bedrooms) In the region of a minimum of 172 secure and accessible 'long stay' spaces are required and the applicant proposes a total of 175 located within a convenient secure communal storage area for the flatted component with 2 spaces allocated within the curtilage of each of the 7 houses. 4 generic 'short stay' provisions are also proposed. The proposed quantum therefore conforms with the relevant standard but as full detail of positioning and allocation per unit has not been supplied, a suitable planning condition is recommended.

*Vehicular Trip Generation:*

Local Plan: Part 2 Policies DMT 1 and DMT 2 require the council to consider whether the traffic generated by proposed developments is acceptable in terms of the local highway and junction capacity, traffic flows and conditions of general highway or pedestrian safety.

It is accepted that the anticipated vehicular trip generation impact on the highway at the established West End Road access during the most crucial and sensitive morning and late afternoon/early evening peak traffic periods is likely to vary and increase as compared to the current Hotel related use. However, in reality the anticipated level of activity generated by the dominant flatted element of the proposal would be expected to not exceed 20 to 25 two-way movements during these peak traffic periods which is also likely to change dynamically from day to day due to personal modal choice related to use of sustainable travel alternatives, home working etc which inherently gives rise to the potential for a reduction in predicted movements.

Nevertheless, such a predicted level of activity would be considered relatively inconsequential in terms of overall base-line traffic imposition terms hence the proposal's likely activity is therefore considered relatively absorbable in generation terms and can be accommodated within the local road network without notable detriment to traffic congestion and road safety.

Secondly, the same logic would also apply to the creation of a new access from Garden Close serving the 7 new houses despite the fact that it would clearly alter the use profile at this currently dormant location. In conclusion, the anticipated level of activity during peak at this location would, in statistical terms, be expected to be relatively negligible and therefore does not raise concern or specific issue.

*Vehicular / Pedestrian Access Arrangements:*

An established vehicular/pedestrian access on West End Road is positioned directly onto the mini-roundabout junction and currently serves the hotel use. This would continue as an access provision for the 89 flatted component whilst a secondary pedestrian/vehicular access located to the east i.e. via the publicly adopted section of Garden Close is proposed and would be dedicated solely to the 7 three-bedroom terraced houses.

*West End Road Access / Egress:*

The opening is to remain unaltered but with a realigned internal roadway arrangement which will allow for improved turning 'into & out' of the envelope which is welcomed as this will improve ease of access/egress and reduce hindrance for vehicles using the site. In terms of achieving satisfactory sight-lines, it is recommended that a front boundary height condition is applied to maintain a low boundary treatment north of the access on West End Road not exceeding 0.6m in height for a distance of at least 2-3 meters. Amended detail or a suitable planning condition should satisfy this requirement.

*Garden Close - New Aperture:*

There is no objection in principle relating to this new opening. Any physical works would be facilitated at the applicant's/developer's expense and should conform to council standards in terms of build quality and dimension, and this would be arranged post-permission via a formal/legal agreement i.e. s278/184 of The Highways Act 1980.

*Internal Site Layout / Servicing:*

The proposed internal parking and road layout arrangement should conform to the Department for Transport's (DfT) - Manual for Streets (MfS) (circa 2007) best practice for road and parking layouts as there is an operational and safety benefit derived from a site arrangement which allows all vehicles using the site to enter and leave in a forward gear without hindrance resulting from an inadequate road layout design (or other obstructions such as parked vehicles etc). This is the recommended best practice on operational and highway safety grounds which is also applicable to servicing/delivery, emergency and refuse collection vehicles.

With reference to the above, a vehicle 'swept path' analysis had been submitted and it has been demonstrated that the internal roadway served by the established and new site aperture allows acceptable access to all of the parking spaces and can

satisfactorily cater for service, refuse collection and emergency vehicles (fire tenders) without hindrance by allowing such vehicles to enter and leave the site in a forward gear thereby conforming to established best practice. There are no further observations.

*Active Travel Zone (ATZ):*

The applicant has appraised the locality under TfL's 'Healthy Streets (HS) and Active Travel Zone (ATZ)' inventory directives which seek to audit the public realm in line with the set 'Healthy Streets' criteria parameters which include the examination of existing characteristics of the public realm and are headed as follows:

Easy to cross,  
Shade and shelter,  
Places to stop and rest,  
Not too Noisy,  
People choose to walk/cycle and use public transport,  
People feel safe,  
Things to see and do,  
People feel relaxed,  
Pedestrians from all walks of life,  
Clean Air.

The above process aims to identify whether a key destination route from the site is fit for purpose or requires necessary enhancement where deficiencies are identified. The most relevant pedestrian route from the site to Ruislip Underground station has been appraised and the audit has found that the surrounding public realm exhibits a reasonably high degree of accessibility to this key destination along the said route indicating broad adherence to the HS criteria. The Highway Authority accepts this position, and no further action is therefore recommended.

*Travel Plan (TP):*

In line with established guidance afforded by Transport for London (TfL), an overarching framework Travel Plan (TP) has been submitted. It will be a key tool in moving toward sustainable travel and mitigating impacts on the local public realm and represents a long-term strategy for managing travel modes for all users of the site. The submitted TP is considered broadly fit for purpose and will need to be secured under planning condition as this is considered to be a 'live' document. This will allow for a review mechanism in years 1, 3 and 5 following site occupation which will help ensure compliance to the sustainable travel mode 'SMART' targets as set within the submitted action plan.

*Construction Management Plan (CMP):*

A full and detailed CMP will be a requirement given the constraints and sensitivities of the local road network. The plan will need to be secured under planning condition to optimise construction related routing and frequency thereby avoiding/minimising potential detriment to the surrounding public realm.

*Conclusion:*

The application has been reviewed by the Highway Authority who are satisfied that the proposal would not discernibly exacerbate congestion or parking stress, and would not raise any measurable highway safety concerns, in accordance with Local Plan: Part 2 Development Plan (2020) Policies DMT 1, DMT 2 & DMT 6 and Policies T4, T5 and T6 of the London Plan (2021).

ADDENDUM TO HIGHWAYS COMMENT

Planning law requires that applications for planning permission be determined in accordance with the development plan unless material considerations indicate otherwise. The published London Plan 2021 Policy T6.1 Residential Parking requires that development proposals must comply with the relevant parking standards.

As mentioned above the application site is situated adjacent to Ruislip Station and has a PTAL ranking of 4. The London Plan standard for residential developments in Outer London with a PTAL ranking of 4 is between 0.5 and 0.75, this standard applies to one-bed, two-bed and three-bed proposals.

For this development comprising 96no. units the London Plan would allow a maximum of between 72no. and 48no. car parking spaces, the 66no. proposed are midway in this range and comply with this standard.

In accordance with Transport for London guidance the applicant has provided a Healthy Street Transport Statement containing an Active Travel Zone assessment. This assessed the pedestrian route to Ruislip Underground Station and the pedestrian route to Ruislip High Street. The Highway Authority consider that the route to the Wood Lane Medical Centre/Waitrose supermarket should also have been included in this assessment.

The authors of the ATZ describe the route to Ruislip Station as being excellent and the route to Ruislip High Street as being of a similar 'good' standard, the only interventions the ATZ identified were cycle advanced stop lines but it is not specified where these would be provided. Transport for London as a consultee upon this application describe this ATZ as being "light touch" and they "strongly disagree that the two routes chosen have little or no improvement needed", the Highway Authority shares this view.

In 2019 LB Hillingdon submitted a Liveable Neighbourhoods bid to Transport for London that sought funding to deliver a series of measure to encourage and enable travel by walking, cycling and public transport. This bid had the support of the then Cabinet Member for Planning, Transportation and Recycling.

The Council appointed consultants to assist with the bid making progress which included a thorough analysis of the existing situation and a Healthy Street check. However, just as the bidding process was underway the Covid pandemic struck and as a result Transport for London funding was suspended and the bid went no further. Because the applicants Active Travel Zone assessment is unsatisfactory the Highway Authority has referred to this Liveable Neighbourhoods bid to identify Healthy Streets measures that the proposal should deliver to make it self-sufficient in transport terms.

A developer contribution to deliver the interventions shown in the table below is required.

- Provide tactile paving and dropped kerbs that the side road junctions of Wood Lane j/w Sherleys Court and Wood Lane entrance to Waitrose/Wood Lane Medical Centre £13,200
- Advanced stop line for cyclists on all arms of the junction £2,400
- Corner of Pembroke Road/High Street: Remove guard rails and resurface footway £8,798
- Eight street trees western side of West End Road £3,072

Total £27,470

The developer contribution required to deliver these works would be £27,470 including fees. This budget has been calculated using the Council's term contractor schedule of rates.

### ACCESS

This proposal is for the redevelopment of The Barn Hotel has been revisited following the previous accessibility comments provided on 01/07/2023 and subsequent submission of additional plans and commentary. London Plan policy D7 requires the application of Approved Document M4(3) to all new developments comprising 10 units or more. As per the policy wording, wheelchair user dwellings apply to all tenures, and should be distributed to provide a range of aspects, floor level locations, views, and unit sizes. Whilst these latest plans and additional information satisfy overcome part of the previous accessibility objection, the following matters remain a concern:

1. An accessible parking bay should be allocated to every M4(3) wheelchair accessible/adaptable unit.
2. The M4(3) units should be interspersed throughout the development, applied to all tenures and unit sizes. A minimum of one 3 bed house, and a mix of 1 and 2 bed flats should be built to an M4(3) standard. These should be available as affordable and private for sale units as per the ratios/number of units agreed by the Council.
3. The affordable M4(3) units should be constructed to a wheelchair accessible standard, with all such design provisions shown on a separate plan for every dwelling type. Particular attention should be given to the bathroom position relative to the principal bedroom, and to sufficient kitchen worktop space required according to the number of bed spaces.
4. Buildings 1 and 2 should both incorporate at least one lift per stair core capable of being used as an evacuation lift in compliance with BS EN 81-20 and BS EN 81-70.
5. The Design and Access Statement should be updated accordingly. CONCLUSION: unacceptable. Revised plans and documents are requested prior to any approval.

### CONTAMINATED LAND

I have reviewed a copy of the geo-environmental information within the following report submitted in support of the application:

Title: Desk Study, Geotechnical and Geoenvironmental Interpretive Report; Ref: CG/39435; Date: January 2023; Prepared by: Card Geotechnics Ltd

The report provides details of phase 1 desk study and Phase 2 site investigation works conducted at the location.

The updated conceptual site model and quantitative risk assessment categorises the contamination risk ratings at the site as low to moderate for three identified contaminant linkages and low for eight further identified contaminant linkages.

Notwithstanding the submission of acceptable geo-environmental recommendations outlined within the abovementioned report, I further recommend the LPA should impose the following condition/s if planning permission is awarded:

- (i) The development hereby permitted (excluding demolition, site clearance and initial ground investigation works) shall not commence until a fully detailed scheme to address unacceptable contamination, (including identified concentrations of a single heavy metal and PAH's), has been submitted to and approved by the Local Planning Authority (LPA). All works which form part of the required remediation scheme shall be completed before any part of the development is occupied or brought into use unless the Local Planning Authority dispenses with any such requirement specifically and in writing. The scheme shall include the following measures unless the LPA dispenses with any such requirement specifically and in writing:
  - (a) A written remediation method statement, providing confirmed details of the proposed remediation scheme, including how completion of such works and their precise whereabouts will be verified, shall be agreed with the LPA prior to implementation. No deviation shall be made from this scheme without the express agreement of the LPA.
  - (ii) If during remedial or development works contamination not addressed in the submitted remediation scheme is identified, an addendum to the remediation scheme shall be agreed with the LPA prior to implementation; and
  - (iii) Upon completion of the approved remedial works, this condition will not be discharged until the final verification report has been submitted to and approved by the LPA, to confirm the works have been carried out in full and in accordance with the approved methodology.
  - (iv) No contaminated soils or other materials shall be imported to the site. All imported soils for landscaping and/or engineering purposes shall be clean and free of contamination. Before any part of the development is occupied, all imported soils shall be independently tested for chemical contamination, and the factual results and interpretive reports of this testing shall be submitted to and approved in writing by the Local Planning Authority.

REASON To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems and the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors in accordance with Hillingdon Local Plan: Part 2 (January 2020) Policies - DMEI 11: Protection of

Ground Water Resources and DMEI 12: Development of Land Affected by Contamination.

2 Reason for Refusal (if objecting):

N/A

3 Observations:

Risks to human health were identified as unacceptable concentrations of 7No. contaminative substances present in made ground materials at the site.

The detected 1No. heavy metal, and 6No. polycyclic aromatic hydrocarbons (PAHs) were recorded as:

- Lead
- Benzo(a)Anthracene
- Chrysene
- Benzo(b)fluoranthene
- Benzo(a)Pyrene,
- Indeno (1,2,3,-cd) pyrene
- Dibenzo (a,h) anthracene.

POLICY

*Existing Use:*

The proposal would result in the loss of an existing 73-bedroom hotel. The hotel is located outside of Ruislip Town Centre, but within the 300-metre definition for an 'edge of centre' location. Policy E10 of the London Plan (2021) outlines that in outer London, serviced accommodation should be promoted in town centres and within Opportunity Areas. The Local Plan: Part 2 (2020) outlines in Policy DME 5 that visitor accommodation is supported in accessible sustainable locations as defined in the Site Allocations and Designations document. This document identifies Hotel Growth locations in both Hayes and Uxbridge. Paragraph 2.24 also notes that, in accordance with national planning policy, hotel development of an appropriate scale will also be acceptable in other town centres. Furthermore, paragraph 6.10.2 of the London Plan sets out that the tourism industry is important to London's economy and that it is estimated that London will need to build an additional 58,000 bedrooms of serviced accommodation by 2041 according to the London Plan.

The proposal could be considered to be at odds with the strategic objective to deliver more hotel rooms within the borough. However, it should be noted that there is no policy that would explicitly prevent the loss of hotel accommodation in this location. This needs to be viewed in the context of the greater contribution the site could make to other strategic objectives, as the proposal would result in the gain of 96 self-contained residential units (C3) on a sustainable brownfield site with good public transport access, in line with strategic policies within the Development Plan. As such,

there is no in principle objection to the loss and gain of hotel accommodation and residential units respectively.

Please note it is currently unclear how the applicant views the other uses on site. There is a restaurant on site called the 'Hawtrey's'. It is not clear whether this primarily serves the hotel or members of the public, with the assumption being the latter and therefore making it Use Class E. There are also conference/meeting rooms on site which again could either be ancillary to the hotel or a primary use in themselves. The applicant should distinguish these existing uses as soon as possible.

*Housing Mix:*

Policy DMH 2 of the Local Plan: Part 2 - Development Management Policies (2020) requires the provision of a mix of housing units of different sizes in schemes of residential development to reflect the Council's latest information on housing need. Paragraph 4.6 outlines that there is a substantial borough-wide requirement for larger affordable and private market units, particularly three-bedroom properties. Furthermore, Policy H10 of the London Plan (2021) sets out that schemes should generally consist of a range of unit sizes. The London Plan defines family housing as "A dwelling that by virtue of its size, layout and design is suitable for a family to live in and generally has three, four, five, or more bedrooms."

In addition, paragraph A.6 of Policy H10 of the London Plan recognises that:

"the nature and location of the site, with a higher proportion of one and two bed units generally more appropriate in locations which are closer to a town centre or station or with higher public transport access and connectivity".

Policy H10 sets out that the nature and location of the site is also a consideration in determining the proposed mix.

In this regard, the application site has a PTAL rating of mainly 3, with the north parts of the site having a rating of 4. The site is also located in walking distance from Ruislip Underground Station and Ruislip Town Centre, including the primary shopping area.

The proposal relates to a 100% residential scheme with opportunity to deliver family housing at ground and upper floors with terraces. In addition, the application site is also located in close proximity to public open space / recreation grounds, as well as Sacred Heart Roman Catholic Primary school as well as less than a mile to Ruislip High School and White House Nursery and east of the site there is a residential area which a large number of family sized units. Furthermore, the applicant has not provided any clear justification for why supplying more family units would not be possible do to within the site and as such the benchmark for the scheme would be to supply a minimum of 20% family units. Given this, it is considered that the proposed housing mix would not comply with Policy DMH 2 of the Local Plan: Part 2 and PolicyH10 of the London Plan.

*Affordable Housing:*

The Local Plan Part 2 policy DMH7 and London Plan policy H5, sets out that subject to viability and if appropriate in all circumstances, a minimum of 35% of all new homes on sites of 10 or more units should be delivered as affordable housing, with the tenure

split 70% Social/Affordable Rent and 30% Intermediate, as set out in Policy H2: Affordable Housing of the Local Plan Part 1. The applicant has submitted a viability assessment stating that they are unable to provide any affordable housing but are willing to provide a maximum of 15% affordable housing. Given this it is considered necessary that the viability assessment is tested by a third-party consultant. Please also note that none of the units proposed to be affordable are family units, which would not conform with the council's affordable housing need

*Public Open Space:*

Policy DMCI 4 of the Local Plan: Part 2 (2020) sets out that proposals for major new residential development must make provision for new or enhanced public open space. The proposals appear to identify space for communal private outdoor amenity for residents, which is identified as counting against the proposals of Policy DMHB 18. However, only a limited amount of community open space has been proposed and the applicant has not provided any clear justification as to why the proposal cannot provide onsite public open space in line with Policy DMCI 4.

**NOISE**

Sufficient information has been provided by the Applicant to make a recommendation with respect to noise. It is recommended that no objection is made on noise grounds subject to the inclusion of a suitable condition which should be achievable based on the information provided and considering measurement and prediction uncertainty. Hence: 'For the lifetime of the development hereby permitted the noise level shall not exceed 35 dB LAeq 16 hrs between 0700 and 2300 and 30 dB LAeq 8 hrs, between 2300 and 0700, measured inside any room whilst achieving acceptable internal living conditions with respect to ventilation and temperature. This has regard to the guidance set out in British Standard 8233: 2014.'

**AIR QUALITY**

The proposed development is located outside the LBH Air Quality Management Area and within Ruislip Town Centre Focus Area bringing additional traffic emissions which will add to current poor air quality. As per the London Plan, developments need to be air quality neutral as minimum and LBH requires development proposals located within Focus Areas to be air quality positive (LBH Air Quality Local Action Plan 2019-2024), contributing to the reduction of emissions in these sensitive areas.

LBH requires new developments to incorporate air quality positive design measures from the outset and suitable mitigation measures to reduce pollution, especially in areas where the air quality is already poor (LBH Air Quality Local Action Plan 2019-2024), namely Focus Areas. Furthermore, policy DMEI 14 of the emerging London Borough of Hillingdon Local Plan (part 2), requires active contribution towards the continued improvement of air quality, especially within the Air Quality Management Area. Finally, the London Plan (March 2021) requires development to be air quality positive specially within focus areas, actively contributing to reduce pollutant emissions to the atmosphere.

According to LBH Local Action Plan, proposed development within Focus Areas (or with impacts on FAs) needs to be Air Quality positive and further action is required to

reduce total emissions produced by its operation. Therefore, the total emissions associated with these activities need to be mitigated. Further, the proposed development is not air quality neutral and therefore contradictory to the London Plan.

Mitigation measures to reduce emissions can be applied on-site or off-site. Where this is not practical or desirable, pollutant off-setting will be applied. The level of mitigation required associated with the operation phase of the proposed development is calculated using Defra's Damage Cost Approach.

Any mitigation measures proposed were evaluated in terms of likely emission reductions onto local air quality. Wherever quantifiable, these are calculated and subtracted from the overall value due. When no quantification is possible, a flat rate discount is applied.

The undiscounted level of mitigation required to the proposed development for traffic emissions is £247,882. Once all deductions were applied, the remaining value of mitigation due is £223,094. Flat rate deductions applied are as follow: Travel Plan (10%), Green Sustainable Measures (0%), contribution to long term LBH strategic long-term strategies (e.g. multimodal shift) (0%), totalling a reduction of £24,788.

Therefore, a section 106 agreement with the LAP of £223,094 is to be paid for Hillingdon to deliver its air quality local action plan and or implement specific measures on/along the road network affected by the proposal that reduce vehicle emissions and or reduce human exposure to pollution levels.

In addition, conditions are recommended to secure:

- Air Quality - Low Emission Strategy;
- Measures to reduce emissions from demolition and construction.

## ENERGY

The energy statement (Hodkinson, April 2023) sets out an acceptable approach to carbon savings within the development. It shows broadly a 70% saving in carbon emissions with a shortfall of 27.8tCO2/annum. Therefore;

- 1 - A condition is necessary to ensure the development is carried out in accordance with the approved energy statement.
- 2 - A section 106 contribution of £79,230 is secured for the shortfall. This is to be paid into the Council's Carbon Offset Fund.
- 3 - The standard 'be seen' condition is required to ensure monitoring and recording is reported to the Council.

Finally, it is important to note that the proposed energy solution includes PVs on the new structure. The implications of this in relation to the listed building needs to be properly understood by the design and conservation team.

No PVs can be seen on the elevation drawing (east elevation). The submitted roof plan cannot therefore part of the approved plans list as well as the energy statement.

## VIABILITY

We have reflected our updated position in our modelling which is shown in the table below. Based on our inputs, we consider the 100% private scheme to generate a residual land value of £5,507,594, which reflects a surplus of £1,987,594 against our BLV. The 15% affordable housing scheme put forward by the Applicant reflects a residual land value of £3,984,302, which reflects a surplus of £464,302 against the BLV.

In order to determine what level of affordable housing would be viable, we have reviewed the maximum amount of affordable housing that would generate a surplus against the BLV. We have modelled a mix of 7 shared ownership units (5 x 1bf, 2 x 2bf) and 13 affordable rent units (6 x 1bf, 7 x 2bf). This is a total of 20 units, amounting to circa 21% affordable provision. Based on our inputs, this produces a residual land value of £3,531,092, producing a small surplus of £11,092. We consider this the maximum amount of affordable housing the development could reasonably support.

## ECOLOGY

I object to the proposed development due to insufficient information on bats. The submission is supported by a preliminary ecological assessment but no further species specific surveys have been provided.

All bat species are designated and protected as European protected species (EPS). EPS are protected under the Conservation of Habitats and Species Regulations 2017.

Prior to making a positive determination on a planning application, the Local Planning Authority must

- make sure any mitigation or compensation conditions you impose do not conflict with the requirements of a bat mitigation licence
- be confident that Natural England will issue a licence

Part of the requirements for a Natural England licence is to apply three derogation tests to ensure that impacts to bat populations are unavoidable. The LPA does not need to strictly apply these tests at decision making stage but must have confidence that if applied, a positive determination would be made by Natural England.

Unfortunately for this application, it is not possible to have any confidence due to the insufficiency of information. The PEA identified high bat potential in 3 buildings and moderate in a fourth. 3 of these buildings will be subject to demolition or major refurbishment thus potentially harming bats if they are present. As the PEA indicates bats are likely to be present then further information is necessary to allow the LPA to make an informed decision and to enable a satisfactory application of the requirements set out above (taken from the national government guidance).

The LPA would expect surveys to inform the planning proposal so it can avoid harming bats as much as possible, surveys must:

- be carried out in the most recent, appropriate season

- identify the bat species and size of population
- identify the type of roost and its importance, and any access points used by bats to enter the roost
- identify important flight routes and foraging areas used by bats close to proposed developments

The applicant must provide the suitable survey information to allow an informed decision. Based on the information provided, the development has high potential for supporting bat populations which would be significantly adversely impacted by the development.

The application cannot be approved until the information is provided.

Should the submission of information overcome the above objection, together with the correct consideration of the Licensing requirements (if necessary) then any subsequent approval should be subject to the standard ecological enhancement condition with plans submitted prior to commencement and any site clearance. The PEA has identified minimal further impacts on ecology although the site is likely to have general ecological benefits if not supporting other protected species. The landscape plans are not yet clear about all the biodiversity features that will be included within the proposal.

## FLOODING

I write to you with regards to planning application 7969/APP/2023/1473 - THE BARN HOTEL WEST END ROAD RUISLIP. Please see a summary of the application below with further information in the attached review form.

### a) Review Summary

This application has not sufficiently demonstrated the use of the London Plan's drainage hierarchy and is proposing the following key items:

- Type of development: Re-development of The Barn Hotel to provide 96 new residential homes comprising demolition of existing unsympathetic structures, retention and conversion of Grade II listed buildings into two new residential homes, seven new-build three-bedroom houses and two new buildings containing 87 apartments.
- Flood risk: The site is located in Flood Zone 1 and therefore at low risk of fluvial flooding. The site is at low to medium risk of flooding surface water, and low risk of groundwater flooding.
- Types of conveyance / attenuation features: The applicant proposes a green roof, permeable paving and attenuation storage crates.
- Runoff rate restriction (l/s): The applicant proposed to discharge the site at 3.5 l/s. The site has been split into two areas, Area 1 is a larger area and proposed to discharge to the surface water sewer on West End Road at 2 l/s, while Area 2 is a smaller area which proposes to discharge to the surface water sewer on Garden Close at 1.5 l/s.
- Runoff attenuation volume (m3): The applicant proposed a total attenuation volume of 442m3.
- Maintenance plan: The applicant has detailed the maintenance tasks for the Permeable Paving and Crate attenuation, however there are no maintenance

tasks stated for the green roof or hydrobrakes. The maintenance owner has been stated as Chase New Homes until the site is handed over to the management company.

b) Recommendation and Requests

We object to the application for the following reasons:

- The applicant has not sufficiently justified the exclusion of rainwater harvesting / re-use within the design.
- The applicant has not considered implementing blue roofs or water butts.
- Infiltration has been discounted due to clay geology, however infiltration testing should be carried out to demonstrate this.
- The full development area has not been used to calculate the greenfield runoff rates.
- The applicant has not provided the greenfield or existing runoff volumes for the site for a 1 in 100-year 6 hr storm event. The applicant should also provide the proposed runoff volumes for the site for a 1 in 100-year 6 hr event.
- The attenuation volumes differ between the report and the calculations.
- The applicant has not completed the attenuation volume section of the SuDS proforma.
- It is not clear what area has been included within the calculations.
- The applicant has not stated the maintenance tasks for the proposed green roof or hydrobrakes.
- The applicant has not demonstrated that Thames Water have been consulted over the proposed connection to their surface water sewers on West End Road and Garden Close.

To address the above, please can the applicant submit information which:

- Elaborates on the spatial constraints discussed when justifying the exclusion of rainwater harvesting.
- Demonstrates that the applicant has considered the implementation of blue roofs or water butts within the design, giving sufficient justification if they are deemed unfeasible.
- Infiltration testing should be carried out to determine whether this is a suitable method of discharge.
- An area of 0.466ha has been used to calculate the greenfield runoff rates, which is not the full development area. These should be revised to include the development area of 0.804ha.
- Demonstrates the greenfield, existing and proposed runoff volumes for a 1 in 100-year 6hr storm event.
- Updates the values for attenuation volume in the report to align with those in the calculations.
- Complete the attenuation volume section of the SuDS proforma.
- It should be clarified whether the full development area has been included within the calculations.
- States the maintenance tasks for the proposed green roof and hydrobrakes.
- Demonstrates that Thames Water have been consulted about the proposed connection to their surface water sewers.

## WASTE

Insufficient details for refuse storage & management Bin capacity calculation required based on 120L waste per bedroom, per week: Number of bedrooms x 120litres =capacity required. Divide by 1100L bulk bins for total number of bins required per block, 50/50 split general waste & recycling containers.

Communal food waste bins should also be placed in each individual bin store:140L or 240L. Residents should not carry waste more than 30m in a horizontal distance from their front door to bin store.

All bulk bins & food waste units should be in one storage area per block for ease of access for residents. Enclosure should be large enough to allow clearance of 150mm between each bin & walls, with min of 2m in height. There should be space in front of bins to allow residents easy access when depositing waste and allow collectors space to pull bins out of the enclosure.

Floors & walls of bin stores must be constructed & finished in materials that are resistant & easy to clean. Walls should be made from impervious, non-combustible material that has fire resistance of 1 hour when tested to BS 476-21. Walls & doors should have rubber buffers to prevent wall damage from moving bins. There should be adequate ventilation to reduce complaints of odours. If gates/doors added to enclosures they should be metal, hardwood or softwood clad with metal. They should have a fire resistance of 30 mins when tested to BS 476-22. Door frames should allow a clearance of 150mm either side of bins when being pulled out for collection. Door frames should be rebated into reveals of openings. A latch/clasp to hold the gate/door open for safety & damage prevention during collection is required. The floor of enclosures should have a suitable fall (no greater than 1:20) towards drainage points. If bins are inside buildings, they should have a light which should be a sealed bulkhead fitting (housings rated to IP65 in BE EN 60529:1992) It should be ensured that there are no steep inclines, door lips or flights of stairs between location of external bin store & collection point.

The gradient of any path that bins must be moved on should be smooth & no more than 1:20, with a width of at least 2 metres without obstruction. Roads providing access to buildings should have foundations & a hard-wearing surface capable of withstanding a fully laden refuse vehicle of 32 tonnes Gross Vehicle Weight. Roads should have a minimum width of 5m & be designed so that collection vehicles can continue mainly in a forward direction. For safety reasons, it's encouraged that developers make use of turning circles or separate entrances/exits to minimise the need for vehicles to reverse. Dropped kerbs are needed outside each bin store for safe manoeuvre of bins by collection crews. These should be 2 kerb lengths minimum (a kerb length is 900 mm). A dropped kerb should be sited within 10m of the facilities & pulling area should be free from obstructions with a sound surface. A swept path analysis must be provided to demonstrate that collection vehicles will not reverse more than 12m, with entrance & exit in a forward motion being considered. The driver's line of sight to the storage must not be obstructed. Barriers to be in place where bins will closely pass parked cars. Bins should not cross parking bays, whether designated or otherwise. Waste storage areas should be accessible from the street via key pad/digital lock, electronic fob or keys. Codes will be shared with the Council's collection crews. Waste collection crews &

caretakers should not have to carry refuse or recycling sacks more than 15m, move bulk bins more than 10m, nor pass through the building internally for collections.

## **APPLICANT REPRESENTATIONS**

The applicant has submitted rebuttals to some of the consultee objections during the application process. These have been taken into consideration in the assessment of the application. It should also be noted that the applicant submitted a revised FRA and drainage strategy in response to the Flood Officer objection. This was received outside of the LPAs timeframe and therefore could not be assessed. An informative is recommended on the decision notice to indicate that the LPA would welcome early discussion on this item, in order to streamline the appeals process and prevent any abortive work for any party.

## **6. Local Plan Designation and London Plan**

6.1 The following Local Plan Policies are considered relevant to the application:-

Part 1 Policies:

- PT1.BE1 (2012) Built Environment
- PT1.EM8 (2012) Land, Water, Air and Noise
- PT1.HE1 (2012) Heritage

Part 2 Policies:

- DMHB 1 Heritage Assets
- DMAV 1 Safe Operation of Airports
- DMAV 3 RAF Northolt
- DMCI 3 Public Open Space Provision
- DMCI 7 Planning Obligations and Community Infrastructure Levy
- DME 5 Hotels and Visitor Accommodation
- DMEI 10 Water Management, Efficiency and Quality
- DMEI 14 Air Quality
- DMEI 9 Management of Flood Risk
- DMH 2 Housing Mix
- DMH 7 Provision of Affordable Housing
- DMHB 16 Housing Standards
- DMHB 17 Residential Density
- DMHB 18 Private Outdoor Amenity Space
- DMHB 19 Play Space
- DMT 1 Managing Transport Impacts
- DMHB 2 Listed Buildings
- DMHB 3 Locally Listed Buildings
- DMHB 7 Archaeological Priority Areas and archaeological Priority Zones
- DMHB 11 Design of New Development
- DMHB 12 Streets and Public Realm
- DMHB 14 Trees and Landscaping
- DMT 2 Highways Impacts
- DMT 5 Pedestrians and Cyclists
- DMT 6 Vehicle Parking
- DMEI 2 Reducing Carbon Emissions
- DMEI 7 Biodiversity Protection and Enhancement
- LPP D4 (2021) Delivering good design
- LPP G5 (2021) Urban greening
- LPP G6 (2021) Biodiversity and access to nature

LPP G7 (2021) Trees and woodlands  
LPP GG2 (2021) Making the best use of land  
LPP GG4 (2021) Delivering the homes Londoners needs  
LPP H1 (2021) Increasing housing supply  
LPP H10 (2021) Housing size mix  
LPP H4 (2021) Delivering affordable housing  
LPP SI1 (2021) Improving air quality  
LPP SI12 (2021) Flood risk management  
LPP SI13 (2021) Sustainable drainage  
LPP SI4 (2021) Managing heat risk  
LPP T2 (2021) Healthy Streets  
LPP T4 (2021) Assessing and mitigating transport impacts  
LPP D5 (2021) Inclusive design  
LPP D7 (2021) Accessible housing  
LPP D8 (2021) Public realm  
LPP D12 (2021) Fire safety  
LPP D14 (2021) Noise  
LPP H12 (2021) Supported and specialised accommodation  
LPP H13 (2021) Specialist older persons housing  
LPP HC1 (2021) Heritage conservation and growth  
LPP T5 (2021) Cycling  
LPP T6 (2021) Car parking  
LPP T6.1 (2021) Residential parking  
NPPF12 NPPF 2021 - Achieving well-designed places  
NPPF16 NPPF 2021 - Conserving & enhancing the historic environment  
NPPF11 NPPF 2021 - Making effective use of land  
NPPF15 NPPF 2021 - Conserving and enhancing the natural environment  
NPPF4 NPPF 2021 - Decision-Making  
NPPF5 NPPF 2021 - Delivering a sufficient supply of homes  
NPPF9 NPPF 2021 - Promoting sustainable transport

In addition:

Development Plan

6.2 Planning law requires that applications for planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise.

6.3 The Development Plan for the London Borough of Hillingdon currently consists of the following documents:

The Local Plan: Part 1 - Strategic Policies (2012)  
The Local Plan: Part 2 - Development Management Policies (2020)  
The Local Plan: Part 2 - Site Allocations and Designations (2020)  
The West London Waste Plan (2015)  
The London Plan (2021)

Material Considerations

6.4 The National Planning Policy Framework (NPPF) (2021) is also a material consideration in planning decisions, as well as relevant supplementary planning documents and guidance.

## 7. MAIN PLANNING ISSUES

### 7.1 Principle of Development

#### Loss of Hotel:

7.1.1 Policy E10 of the London Plan (2021) outlines that in outer London, serviced accommodation should be promoted in town centres and within Opportunity Areas. The Local Plan: Part 2 (2020) outlines in Policy DME 5 that visitor accommodation is supported in accessible sustainable locations as defined in the Site Allocations and Designations document. This document identifies Hotel Growth locations in both Hayes and Uxbridge. Paragraph 2.24 also notes that, in accordance with national planning policy, hotel development of an appropriate scale will also be acceptable in other town centres. Furthermore, paragraph 6.10.2 of the London Plan sets out that the tourism industry is important to London's economy and that it is estimated that London will need to build an additional 58,000 bedrooms of serviced accommodation by 2041 according to the London Plan.

7.1.2 The proposal seeks to change the use of the site from Hotel (Use Class C1) to residential (Use Class C3), as such, the proposal would result in a loss of the hotel and its ancillary uses, such as the on-site restaurant and bar. Although the proposal is not in accordance with the wider strategic objective to increase hotel accommodation across the borough, it is noted that the application site does not fall within a Town Centre or dedicated area identified for hotel growth within the Local Plan. As such, no objection is raised to the principle of the change of use from hotel to residential accommodation. The Policy Officer's comments regarding the loss of the restaurant and bar are noted, however these are considered to be ancillary spaces to the main use of the site and are common within most hotels.

#### Principle of Residential Development:

7.1.3 Additional residential development is supported in principle, subject to the detailed considerations set out within this report.

7.1.4 It should be noted that the Council can demonstrate a 5-year supply of deliverable housing sites, therefore the tilted balance (NPPF paragraph 11) is not engaged.

### 7.2 Density and Housing Mix

#### Density:

7.2.1 Policy DMHB 17 of the Hillingdon Local Plan: Part 2 (2020) states that all new residential development should take account of the Residential Density Matrix contained in Table 5.2.

7.2.2 Paragraph 5.67 of the Hillingdon Local Plan: Part 2 (2020) states that Hillingdon will apply the density standards set out in the London Plan in a flexible manner, according to local circumstances. Large parts of the borough, including many areas near town centres, are suburban in character and will lean heavily towards the application of lower to mid-range density scales. Table 5.2 represents a starting point for discussions on

the issue of residential density, which should ultimately be determined by a design led approach.

- 7.2.3 Policy D3 (Optimising Site Capacity through the Design-led Approach) of the London Plan (March 2021) further requires all development to make the best use of land following a design-led approach that optimises the capacity of sites, including site allocations and offers no density matrix figures. The policy further states that higher density developments should generally be promoted in locations that are well connected to jobs, services, infrastructure, and amenities by public transport, walking and cycling.
- 7.2.4 The PTAL score for the site is 4, which identifies the area as having a good level of public transport accessibility. Table 5.2 indicates that sites within 4-6 rating should provide between 495 - 1,100 habitable rooms per hectare and between 165 - 405 units per hectare if the scheme proposes a housing type of flat accommodation.
- 7.2.5 The immediate area around the site comprises predominantly of two storey traditional residential dwellings, a residential building to the west which is 4 stories in height and a train station and high street to the north. The proposed development would provide 272 habitable rooms across 96 residential units. As such, the scheme results in a density of approximately 98 units and 272 habitable rooms per hectare. Whilst the development provides a density which is lower than the guidance set out within Table 5.2, the site accommodates Grade II listed buildings which makes this a very sensitive location. Significant weight is afforded to protecting the setting of the heritage assets, thus a design led approach is required, rather than a scheme which achieves the density guidelines. As set out in subsequent sections of this report, there are significant concerns regarding the scale, bulk and massing of the proposed development (amongst other matters) and it is concluded that the proposal represents a harmful over-development of the site.

Housing Mix:

- 7.2.6 Policy H10 of the London Plan (2021) states that schemes should generally consist of a range of unit sizes and sets out a number of factors which should be considered when determining the appropriate housing mix on a particular scheme. This includes local evidence of need.
- 7.2.7 Policy DMH 2 of Hillingdon Local Plan: Part 2 (2020) requires the provision of a mix of housing units of different sizes in schemes of residential development to reflect the Council's latest information on housing need. Paragraph 4.6 outlines that there is a substantial borough-wide requirement for larger affordable and private market units, particularly three-bedroom properties.
- 7.2.8 Policy H10 of the London Plan (2021) outlines that the nature and location of the site can be a justification for an alternative housing size mix, with a higher proportion of one and two bed units generally more appropriate in locations which are closer to a town centre or station or with higher public transport access and connectivity.
- 7.2.9 The site has a PTAL rating of 4 meaning it benefits from a higher than moderate level of access to public transport, thus reducing the reliance upon the motor vehicle to travel to and from the site. The site is located within walking distance to Ruislip Train Station, which accommodates a number of bus routes, therefore the site is considered to be

within a reasonably sustainable location. Notwithstanding the relatively sustainable nature of the site, the Local Plan requires residential developments to deliver homes in accordance with the identified need unless within highly sustainable or town centre locations. Major developments should deliver a minimum of 20% 3-bed or more units in accordance with the needs identified with the Councils Strategic Housing Market Assessment.

7.2.10 The application (following amendment during its course) proposes the following mix:

1-Bedroom units (38) - 39.6%
2-Bedroom units (50) - 52%
3-Bedroom units (8) – 8.3%
Total (96 units) 100%

7.2.11 As indicated above, the application proposes a mix of mainly 1 and 2 bedroom units, with less than 10% family sized units to be provided. The application would therefore fail to provide an adequate contribution towards meeting the borough's identified need for 3 bed or larger units, and would result in an over-concentration of smaller sized units, outside of a highly sustainable and / or town centre location. It is further noted that the proposed affordable housing provision does not include any family sized units.

7.2.12 Given the above considerations, it is considered that the proposed unit mix fails to provide sufficient family sized units, as required by the latest information on housing need in the Borough. The proposed development fails to contribute towards mixed and balanced communities and the range of housing types required within the Borough contrary to Policy DMH 2 of the Hillingdon Local Plan: Part 2 (2020) and Policy H10 of the London Plan (2021). This forms reason for refusal number 3.

### **7.3 Urban Design and Impact on the Character and Appearance of the Area**

#### Policy Context:

7.3.1 The NPPF (Chapter 12) emphasises the importance of good design, which is a '*key aspect of sustainable development (paragraph 126)*'. Paragraph 130 goes on to advise that planning policies and decisions should ensure that developments:

- 'a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;*
- b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;*
- c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);*
- d) establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;*

- e) optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and
- f) create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users<sup>49</sup>; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.'

7.3.2 At the regional level, Policy D3 of the London Plan (2021) sets out that developments should follow a design-led approach. Amongst other criteria, this policy requires that developments: '*enhance local context by delivering buildings and spaces that positively respond to local distinctiveness through their layout, orientation, scale, appearance and shape, with due regard to existing and emerging street hierarchy, building types, forms and proportions (D3 (1))*' and that they: '*respond to the existing character of a place by identifying the special and valued features and characteristics that are unique to the locality and respect, enhance and utilise the heritage assets and architectural features that contribute towards the local character (D3(1))*'.

7.3.3 At the local level, Policy BE1 of the Hillingdon Local Plan: Part One (November 2012) seeks to ensure a high quality of design in all new development. In addition, Policy DMHB 11 of the Hillingdon Local Plan: Part 2 (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;
- iii) 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.

7.3.4 Policy DMHB 12 (Streets and Public Realm), also from the Local Plan Part 2, is also relevant in that it seeks to ensure developments are well integrated with the surrounding area and accessible.

7.3.5 Heritage matters are assessed in a subsequent section of this report, therefore it should be noted that the assessment which follows focusses on urban design, townscape and character impact.

Site Context:

7.3.6 The site sits south of Ruislip Station in an area characterised by low-rise residential development, with detached and semi-detached houses of one and two-storeys such as those found in Willow Grove, Eversley Crescent, and Shenley Avenue. There are a limited number of larger blocks with a 3 and part 4 storey block of flats to the south in Garden Close. These developments were built in the 1930s with the expansion of the suburban area and define the local context. The houses and flats are situated in leafy green gardens with clear gaps between the houses that allow their compositions to be fully appreciated.

7.3.7 The existing development on site has grown slowly in a piecemeal fashion, as the hotel has gradually expanded since the 1950s. The post war development now greatly outnumbers the original listed buildings and covers a larger area and volume. This has caused harm to what was the remaining original open rural setting of the buildings that was left following the 1930s suburban expansion. Notwithstanding this, the new buildings / extensions in the farm's curtilage are relatively low key and have not been designed to make an architectural statement. In most instances the new additions sit quietly on the site, owing to a traditional form and construction and no more than two-storeys in height respecting the listed buildings to some degree, as well as the suburban residential development adjacent to the site.

7.3.8 The landscaping around the listed farmhouse helps to soften its setting, particularly from the blocks of development to the north and it remains the main focus at the centre of the site.

Assessment of Proposed Development:

7.3.9 The proposed new development would introduce 2 new residential blocks referred to as Building 1 and Building 2, and 7 new two storey dwellings across 2 terraced blocks. Buildings 1 and 2 would extend up to 6 stories in height which is clearly much taller than the existing two storey buildings. The application is supported by a Townscape Visual Impact Assessment which illustrates the level of change resultant of the development from key viewpoints.

7.3.10 Viewpoint 1 is taken from the roundabout on West End Rd, which abuts the site access. At present, those interacting with this section of West End Rd are able to see directly through the site entrance and beyond with limited obstruction. Proposed Block 2 would engulf the entire view of the entrance, giving the impression of there being nothing beyond the building.

7.3.11 Viewpoint 2 is taken from within the site entrance itself. As with viewpoint 1, viewpoint 2 illustrates the suburban nature of the site's location, as whilst there are clearly buildings located within the site, there are established views across the entire site including views of the Grade II Listed Building which would be unduly harmed by the proposed new development, thus diminishing the spacious open views which are enjoyed at present.

7.3.12 Viewpoints 3 and 4 are taken from the edge of the bridge which sails over the railway line next to the site and show limited sections of the site. However, view 5 which is also taken from on the bridge and is angled towards the site from a pedestrian viewpoint, demonstrates the overbearing height of the building and the extent of the elevations which can be seen from the road. The bulk, scale and massing, and the lack of

architectural detailing of the elevations, creates the view of an over-dominant and incongruous form of development.

- 7.3.13 View 6 is taken from Kings Lodge which is in excess of 150 metres from the site, the 6-storey building can be viewed readily from this distance which demonstrates the vast scale of development which is being proposed.
- 7.3.14 Viewpoint 7 is taken from within the Ruislip Station Car Park and illustrates a limited change to this view.
- 7.3.15 Viewpoints 8 and 9 are taken from within Eversley Crescent. Both six storey buildings can be readily seen from these viewpoints. The side elevation of building 1 is particularly prominent looking west with very little articulation, creating a visually oppressive view.
- 7.3.16 In terms of the scale of development, the tallest buildings within the immediate context would be the 3 and 4 storey buildings at Sherley and Masters Court, which are located to the west of the site (on the opposite side of West End Road). These buildings feature a mix of hip and gable ended roof forms and are designed with more traditional materials, such as a red London stock brick and tiled roofs. When viewed within the context of the two storey dwellings which immediately bound the site and those which are proposed as part of the application itself, the proposed new blocks would appear over-dominant and would fail to respect the adjacent buildings (in what is a sensitive location), or the wider townscape context. The new blocks would dominate the listed buildings and would be seen in the immediate backdrop of the listed buildings from within the site and from West End Road. The two, six storey blocks would create a large and dominating wall of development when viewed from West End Road that would be at odds with the distinctive suburban character of the area, causing harm to the visual character and appearance of the area. The proposal would also detract from many of the views in adjoining streets (as highlighted above with reference to the views within the Heritage and TVIA), causing harm to the wider townscape.
- 7.3.17 Whilst it is noted that the staggered height of building 1 would appear to have been incorporated to provide some transition between the one / two storey dwellings within Eversley Crescent, it does not detract from the overall scale, bulk, and massing of the proposed buildings, which tower above the existing and surrounding buildings within the immediate context.
- 7.3.18 It is noted that the applicant refers to the scale of Sherleys Court and the larger block located north of the site adjacent to Ruislip Station in an attempt to justify the scale of development proposed. Sherleys Court (as described previously) is a 4-storey building featuring a pitched roof and a more traditional material palette. Importantly, it is set on the other side of West End Road, away from the low-rise development immediately adjoining the application site. Whilst the building at Sherleys Court does sit on a higher ground level, it is clear from the applicants TVIA that the proposed 6 storey building (building 2) would still appear taller. Moreover, Sherleys Court does not accommodate a set of Grade II Listed Buildings, thus is considered a less sensitive site than the application site.
- 7.3.19 Due regard has been given to the scale, bulk, and massing of the building adjacent to the train station to the north. This is a 7-storey building with the uppermost floor being

set back from the floors beneath it to reduce the potential impact of the building perceived at both street level and longer distances. Whilst slightly taller, the building - importantly, and in contrast with the application site - is located within the Town Centre boundary, a location where both the Local Plan and London Plan provide support for taller buildings.

7.3.20 To conclude, due regard has been given to the existing buildings highlighted by the applicant, however these do not provide a justification for allowing the proposed development.

7.3.21 In addition to the concerns about visual prominence and over-dominance, there are concerns regarding the more detailed layout and design of the proposed development also. The layout proposes two cul-de-sacs, one accessed from Garden Close and the other from the access road. This locates the proposed houses in a backland area between the backs of the houses along Eversley Crescent and the listed buildings. While Building 1 is located in a backland area between the railway/road embankment and side elevation of Grade II listed Sherley's Farmhouse. This arrangement creates ill-defined fronts and backs with a public realm dominated by car parking and hardscape. This approach fails to accord with good urban design principles.

7.3.22 Turning to appearance, the material palette of the surrounding buildings is predominantly red brick. Accordingly, the proposed light coloured brick is not considered to be appropriate to the site context. The balconies dominate many of the elevations, particularly for the Building 2 top floor set back and the proposed terraced housing blocks appear bland and uninspiring.

7.3.23 Taking all of the aforementioned issues into account, it is concluded that the proposed development by reason of its size, scale, bulk, massing, design, appearance, layout and visual prominence would result in a visually dominant, overdevelopment of the site, that would be at odds with the distinctive suburban character of the surrounding area, harming the visual amenity and character of the area. As such, the proposal fails to accord with Policy BE1 of the Hillingdon Local Plan: Part One (November 2012), Policies DMHB 11 and DMHB 12 of the Hillingdon Local Plan: Part Two Development Management Policies (2020), Policies D3 and D8 of the London Plan (2021) and Chapter 12 of the National Planning Policy Framework (2021) including paragraphs 130 and 134.

## 7.4 Heritage and Conservation

### Statutory and Policy Context:

7.4.1 Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990, imposes a statutory duty on Local Planning Authorities requiring that in considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.

7.4.2 The NPPF at Chapter 16, places great importance on the protection of heritage assets. Of particular relevance to this development proposal are the following paragraphs:

*'199. When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to*

*the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.'*

*'202. Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.'*

*'206. Local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites, and within the setting of heritage assets, to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably.'*

- 7.4.3 In regard to the consideration of impact on setting, the NPPG advises that: *'Significance' in terms of heritage-related planning policy is defined in the Glossary of the National Planning Policy Framework as the value of a heritage asset to this and future generations because of its heritage interest. Significance derives not only from a heritage asset's physical presence, but also from its setting (NPPG Paragraph: 006 Reference ID: 18a-006-20190723)'*
- 7.4.4 At the regional level, Policy HC1 of the London Plan (March 2021) states that development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings. The cumulative impacts of incremental change from development on heritage assets and their settings should also be actively managed. Development proposals should avoid harm and identify enhancement opportunities by integrating heritage considerations early on in the design process.
- 7.4.5 Policies DMHB 1 and DMHB 2 of the Hillingdon Local Plan: Part 2 (2020) both require development proposals to avoid harm to the historic environment and retain the significance of the designated heritage assets.
- 7.4.6 The above policies are also supported by Policy HE 1 of the Hillingdon Local Plan: Part 1 (2012).

Assessment of Heritage Impact:

- 7.4.7 The site accommodates Sherley's Farmhouse, which dates back to the early 17th Century and is of a traditional timber-framed construction that is 2-storeys in height and L-shaped in plan with irregular fenestration. The external framing has been painted black with the masonry infill painted white. The building is finished with an old, tiled roof. Internally, the building still retains much of its original timber framing and its bay configuration can still be clearly discerned along with other features of interest.
- 7.4.8 There are two Grade II Listed barns to the southeast of the farmhouse which are believed to date back to the late 16th or early 17th Century. The 'Leaning' Barn formed of two-bays and constructed from traditional timber framing with queen strut roof truss has been restored.
- 7.4.9 The other barn (the Oak Room) is also a traditional timber-framed construction and has had a later floor installed. The external appearance to the barns is similar to the house

with the timber-framing picked out in black and the masonry infill panels painted white. The roofs are also finished in old clay tiles. The barns have been extended and joined extensively with later single-storey extensions of little or no architectural interest to provide facilities and function rooms for the running of the hotel.

7.4.10 Collectively, the listed buildings form an important surviving group of late medieval buildings. The immediate context has been described previously at paragraphs 7.3.6 – 7.3.8 of this report (above).

7.4.11 There are two elements to the heritage assessment of this proposal, (1) the impact the proposal would have on the Grade II Listed Buildings and (2) the impact the proposal would have on the setting of the Grade II Listed Buildings.

(1) Impact the Proposal Would Have on the Grade II Listed Buildings:

7.4.12 It is proposed to convert the farmhouse and barns to form 2no. residential dwellings. Beginning with the proposals for the Leaning Barn and Oak room, a new lightweight single storey link extension between the two structures is proposed. The Council's Heritage Officer is satisfied that this concept is acceptable, as is the scale. There is also no objection to the closing up of the door on the south elevation of the Leaning Barn, as this is a modern insertion. Nor is there an objection to the creation of a window in the opening at the south end of The Oak Room.

7.4.13 The proposals for the Leaning Barn and Oak Room have been amended during the course of the application process, in response to comments from the Council's Heritage Officer. The amendments reinstate a window and limit the subdivision of the first floor, addressing those particular concerns.

7.4.14 Turning to the Farmhouse, the building will be returned to use as a single dwelling which is in line with its original function as a rural farmhouse. Only minor alterations are proposed, namely the removal of later partitions inserted due to the building's use as hotel accommodation. However, it is noted that there is no detail provided on the impact of new pipework / electricity runs or how The Building Regulations might affect the listed building.

7.4.15 As noted, within both the comments from the Council's Heritage Officer and Historic England, the proposal features the removal of some of the latter additions / extensions to the listed buildings. The removal of the extensions is considered to be acceptable in principle, as they are of little architectural significance and detract from the earlier phases of development. It is recognised that the removal of the latter additions has the potential to better reveal the historic significance of the buildings and would be considered as a heritage benefit. Nevertheless, the benefits must be weighed against the harms which are overriding in this case as explained further below.

7.4.16 It is considered that the proposals lack necessary detail. In particular, the following documents would have been expected with a proposal such as this:

- a detailed survey covering the building fabric to understand what is historic and what is more recent;
- a schedule of demolition;
- a structural report on how to ensure the structural integrity of both listed buildings given the level of structural support the extensions may currently be providing to the listed buildings;

- a clear set of proposals on how the exposed elevations would be presented / made good.

7.4.17 Whilst the above matters could arguably be addressed through conditions, it is considered that would not be appropriate in this case, as in the absence of the information, the level of harm to the listed buildings (whilst less than substantial) cannot be fully determined.

(2) Impact the proposal would have on the setting of the Grade II Listed Buildings.

7.4.18 It is considered that the proposal results in significant harmful impacts upon the setting of the designated heritage assets.

7.4.19 Building 2 would be constructed approximately 10m from The Leaning Barn and Oak Room and Building 1 would be constructed a similar distance from Sherleys Farm House. At predominantly 6 stories in height, these buildings would cause significant harm through the unsympathetic imposition of their novel scale, bulk and massing on the listed buildings' significant setting. The proposed buildings are overwhelming and disproportionate in scale to the group of late medieval buildings. Whilst attempts have been made to ensure the development in the centre of the site is lower with the two storey blocks on the east side, these do not offset the impact of the two tall buildings on the listed buildings' setting.

7.4.20 Although only partially, currently the listed buildings can be viewed from the site entrance along West End Road and when travelling north over the railway bridge. The height, scale and massing of both proposed apartment blocks would enclose views of the heritage assets to within the site only.

7.4.21 The views from within the site would be dominated by the presence of the 2 much taller buildings, which would be completely at odds with the listed buildings and adjacent low-rise development. The scale of the buildings fails to respect the sensitive nature of the site.

7.4.22 In addition to the impact of the proposed apartment blocks, the setting would be adversely impacted upon by the proposed landscaping arrangements. Large new areas of hardstanding are introduced, particularly to the north of the farmhouse which does not offset the reduction in hardstanding on the west of the site. Further, there will be parked cars on both sides of the farmhouse which would not be an enhancement.

7.4.23 The boundaries are too close to the listed buildings and although detail is not provided, it is assumed these are tall and will limit views towards and out of the listed buildings. The effect will be suburban rather than trying to create something softer and possibly closer to the rural roots of these buildings. Moreover, the dividing up and sub-division of the landscape with boundary treatments between the plots detrimentally affects the setting of the listed buildings.

7.4.24 It is concluded that the harm to the listed buildings due to the impact on their setting is less than substantial. The level of harm is considered to be above the middle level.

Consideration of Harm vs Public Benefits:

7.4.25 As noted previously, where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use (NPPF paragraph 202).

7.4.26 The planning submission cites public benefits including the provision of new housing and affordable housing, the removal of the latter extensions to the listed buildings and the conversion of the hotel which is becoming unviable to retain. The proposal would also reinstate a residential use of the farmhouse (in line with its original use). The proposal would generate construction jobs, albeit temporarily, and would bring new residents to the area who could potentially support nearby businesses and services through their custom. Whilst all of these are laudable, it should be noted that provision of affordable housing is a policy requirement for all developments proposing 10 or more units and there are concerns that the proposed housing mix is unacceptable (as previously stated). The Council also has an established and tested 5 year land supply, therefore the development of this site is not essential in order to meet housing targets. Giving due regard to all public benefits arising from the scheme, it is considered that these do not outweigh the harm to the designated heritage assets.

7.4.27 Accordingly, the proposed development by reason of its size, scale, bulk, massing, siting and design would be an inappropriate, over-development of the site that would be detrimental to the setting of these Grade II listed buildings, thus resulting in less than substantial harm to these heritage assets. Furthermore, the proposal lacks necessary detail in respect to the physical impact on and treatment of the historic fabric of the listed buildings. Thus, the level of harm to the fabric of the listed buildings, whilst less than substantial, cannot be fully determined. Consequently, the applicant has failed to demonstrate that the benefits of the proposal would outweigh the identified and potential harms. The application is therefore contrary to Policies HE1 of the Hillingdon Local Plan: Part 1 (2012), Policies DMHB 1, DMHB 2 and DMHB 11 of the Hillingdon Local Plan Part 2 (2020), Policy HC1 of the London Plan (2021) and Chapter 16 of the National Planning Policy Framework (2021).

7.4.28 Notwithstanding the harm identified above, the proposal is not considered to result in harm to the significance of the nearby Grade-II listed 'Metroland' Ruislip underground station or Ruislip Conservation Area.

## 7.5 Impact on Neighbouring Residential Amenity

7.5.1 Policy DMHB 11 of the Hillingdon Local Plan: Part 2 (2020) states that:  
 B) Development proposals should not adversely impact on the amenity, daylight and sunlight of adjacent properties and open space.

7.5.2 Specifically, paragraph 5.38 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020) states: *'The Council will aim to ensure that there is sufficient privacy for residents, and it will resist proposals where there is an unreasonable level of overlooking between habitable rooms of adjacent residential properties, schools or onto private open spaces. A minimum of 21 metres separation distance between windows of habitable rooms will be required to maintain levels of privacy and to prevent the possibility of overlooking. In some locations where there is a significant difference in ground levels between dwellings, a greater separation distance may be necessary.'*

7.5.3 Paragraph 5.40 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020) states: 'For the purposes of this policy, outlook is defined as

the visual amenity enjoyed by occupants when looking out of their windows or from their garden. The Council will expect new development proposals to carefully consider layout and massing in order to ensure development does not result in an increased sense of enclosure and loss of outlook.'

7.5.4 The application site is surrounded by residential properties in all directions. To the immediate east lie the bungalows / dormer bungalows on Eversley Crescent, to the south are the residential flats on Garden Close. Number 3 West End Road bounds the application site access to the south-west, and the flats at Sherleys and Masters Court sit to the west (on the opposite side of West End Road).

Overlooking and Privacy:

7.5.5 With regards to the residential properties to the east and southeast, Building 1 as referred to on the proposed site plan, would be located approximately 22 metres from the nearest property located within Eversley Crescent. The new building would extend from 2 stories to 6 stories in height and would feature a stepped height, falling lower towards the boundary shared with the properties in Eversley Crescent. It is considered that Proposed Building 1 would be sited sufficiently far from neighbouring properties to prevent any undue loss of privacy or overlooking, having regard to the recommended separation distance prescribed in the Local Plan (detailed above), and noting that windows in the east elevation could also be conditioned to be obscurely glazed.

7.5.6 The proposal would introduce 7 x 3-bedroom two storey dwellings within the middle to southeastern section of the site. The proposed terraced block containing units 92 to 94 would have its east facing side elevation situated approximately 14 metres from the rear elevation of number 39 Eversley Crescent. Given that the side elevation of the proposed terrace contains only secondary windows which could be conditioned to be obscurely glazed, this relationship is acceptable. The front and rear facing windows in the terrace would be positioned at an angle to the neighbouring properties, providing an acceptable relationship.

7.5.7 The other proposed terraced block (containing 4 no. dwellings) would sit further into the site, ensuring adequate separation to neighbouring properties on Eversley Crescent, preventing any undue overlooking. Similar to the 3-unit terrace, the south facing side elevation window facing towards the Garden Close flats could be obscurely glazed to prevent overlooking.

7.5.8 Building 2 would also be sited so as to accord with recommended separation distances in respect of the Garden Close flats, and it is noted that east elevation windows (which are secondary windows) are proposed to be obscurely glazed. This relationship is acceptable in respect of privacy.

7.5.9 The properties situated on West End Road, Masters and Sherley Court would be sufficiently far from the proposed built development so as not to suffer from harmful overlooking.

7.5.10 Having regard to the above, the proposal would have an acceptable impact on the privacy of neighbouring properties.

#### Daylight, Sunlight and Overshadowing:

7.5.11 The applicant has submitted a Daylight and Sunlight Report which assesses the potential impacts in terms of loss of daylight and sunlight caused by overshadowing from the proposed development. The report confirms that the assessment has been undertaken in line with the 2022/23 changes to the BRE guidance. The document states that the proposed development would not result in a reduction of daylight or sunlight to neighbouring windows and confirms there to be no windows which fail the BRE guidance tests.

7.5.12 In addition, having regard to the separation distances involved, it is considered that the proposed new buildings would be sited sufficiently far from existing neighbouring properties, such that existing dwellings would not experience undue loss of outlook / overbearing in respect of residential amenity considerations. However, this is notwithstanding the significant concerns highlighted previously that the proposed apartment blocks would be visually prominent and over dominant in design terms.

7.5.13 Taking the above points into consideration, the proposed development would not result in an undue reduction of outlook, daylight or sunlight to neighbouring properties and in respect of neighbouring residential amenity impacts, the proposal is considered to comply with Policy DMHB 11 of the Hillingdon Local Plan: Part Two - Development Management Policies (2020).

## **7.6 Standard of Accommodation – Proposed Residential Units**

#### Internal Space Standards:

7.6.1 Policy DMHB 16 of the Hillingdon Local Plan: Part 2 (2020) states that all housing development should have an adequate provision of internal space, in order to provide an appropriate living environment. To achieve this all residential development or conversions should:

- i) meet or exceed the most up to date internal space standards, as set out in Table 5.1; and
- ii) in the case of major developments, provide at least 10% of new housing to be accessible or easily adaptable for wheelchair users.

7.6.2 Policy D6 of the London Plan (2021) (Table 3.1) requires the following:

- One storey 1-bed 2 person unit should provide a minimum of 50 square metres Gross Internal Area (GIA);
- One storey 2-bed 3 person unit should provide a minimum of 61 square metres GIA;
- One storey 2 bed 4 person unit should provide a minimum of 70 square metres GIA;
- Two storey 2-bed 3 person unit should provide a minimum of 70 square metres GIA;
- Two storey 3-bed 5 person unit should provide a minimum of 84 square metres GIA;
- Two storey 4-bed 6 person unit should provide a minimum of 106 square metres GIA.

7.6.3 The proposed floor plans have been reviewed and demonstrate compliance with the internal space standards set out above.

#### Privacy and Outlook

7.6.4 The separation distances between the proposed new dwellings within the development are considered acceptable to enable a suitable level of privacy for prospective residents. A drafting error is noted on the 5th floor of building 2, a privacy screen is

included to segregate the amenity space for units 34 and 35 but no privacy screen is shown to segregate the amenity space between 36 and 35. Notwithstanding this error, a condition could have resolved this concern in the event of a grant of planning permission.

#### **Daylight and Sunlight**

7.6.5 Daylight and sunlight matters with regard to the development's potential impact upon existing properties is assessed in section 7.5 of this report (above). With regards to the daylight and sunlight levels for the proposed new residential units and amenity areas, the applicant has submitted a report which sets out compliance against the 2022 updated BRE Guidance.

7.6.6 In respect of daylight, the report confirms that 148 rooms were assessed and 140 (95%) achieve or exceed the BRE guidelines. In respect of sunlight, the report states that 100 (68%) of the 148 rooms assessed would meet the guideline values. Of these rooms, 15 are shown to meet the BRE's medium criteria and 54 meet the BREs high criteria. The report states that considering the south facing rooms in isolation, of the 52 rooms served by at least one window which faces within 90 degrees of due south, all 52 (100%) achieve the BRE's high criteria for sunlight availability.

7.6.7 Having regard to the above, there are some concerns about the quality of the proposed units. The internal double stacked configuration of Building 1 delivers a high proportion of single aspect units, (approximately 50%). More serious, 25% of Building 1 units are single aspect north facing, some of which suffer below BRE guidance levels of daylight/sunlight. Section 4.1 of the London Design Standards states;

*'New homes should be dual aspect unless exceptional circumstances make this impractical or undesirable; for example, when one side of the dwelling would be subjected to excessive noise or outside air pollution. Where single aspect dwellings are proposed, by exception, they should be restricted to homes with one or two bedspaces, should not face north and must demonstrate that the units will have adequate passive ventilation, daylight and privacy, and not overheat (particularly relevant for south or west facing single aspect units')*

7.6.8 The internal configuration of building 2 around a central core also delivers approximately 30% single aspect units.

7.6.9 The LPA notes that the applicant's Daylight and Sunlight report refers to having tested a 'sample' of units; however, it is unclear how this sample was selected and whether it is robust and demonstrates the worst case scenario. This is particularly important in light of the concerns raised about poor sunlight levels and high proportion of north facing single aspect units. The LPA did seek clarification of this point during the application process, however a response was not received prior to the determination of the application. As such, an informative has been recommended to be included on the decision notice to indicate that the LPA welcomes early discussion on the matter in order to streamline any appeal and avoid any abortive work for any party.

7.6.10 The applicant's report also indicates that 3 of the amenity spaces tested fail the BRE guidelines with respect to sunlight received. These are gardens to two of the three bedoomed terraced properties and a relatively large amenity area to the north of Building 1. The latter is of particular concern given that the adjacent units are the single

aspect, north facing units referred to previously, albeit it is acknowledged that residents would have access to a shared amenity space in the centre of the site which would receive good levels of sunlight.

7.6.11 Cumulatively, it is considered that the application fails to demonstrate that the proposed development would be provided with adequate levels of daylight and sunlight amenity, thus resulting in poor quality living conditions for prospective residents. The application submission is therefore contrary to Policy BE1 of the Hillingdon Local Plan: Part One (2012) and Policy DMHB 11 of the Hillingdon Local Plan: Part Two - Development Management Policies (2020), Policy D6 of the London Plan (2021), and the BRE Guidelines: Site layout planning for daylight and sunlight (2022).

Overheating Assessment:

7.6.12 Policy SI 4 of the London Plan (2021) states:

- A) Development proposals should minimise adverse impacts on the urban heat island through design, layout, orientation, materials and the incorporation of green infrastructure.
- B) Major development proposals should demonstrate through an energy strategy how they will reduce the potential for internal overheating and reliance on air conditioning systems in accordance with the following cooling hierarchy:
  - 1) reduce the amount of heat entering a building through orientation, shading, high albedo materials, fenestration, insulation and the provision of green infrastructure;
  - 2) minimise internal heat generation through energy efficient design;
  - 3) manage the heat within the building through exposed internal thermal mass and high ceilings;
  - 4) provide passive ventilation;
  - 5) provide mechanical ventilation; and
  - 6) provide active cooling systems.

The energy assessment contains details relating to overheating.

7.6.13 The application is supported by an Overheating Assessment. The document refers to the modelling of selected units based in a variety of locations across the development. The report indicates that not all of the sampled units would comply with the industry standards if served by natural ventilation only. 12 of the 50 rooms tested are shown to fail which is in excess of 20%. The report goes on to provide solutions to increase compliance but fails to provide a conclusive mitigation strategy and it is unclear which of the mitigation measures have been adopted within the design. Additionally, the applicant's report refers to having tested a 'sample' of units, however it is unclear how this sample was selected and whether it is robust and demonstrates the worst case scenario. The LPA did seek clarification of this point during the application process, however a response was not received prior to the determination of the application. As such an informative has been recommended to be included on the decision notice to indicate that the LPA welcomes early discussion on the matter in order to streamline any appeal and avoid any abortive work for any party.

7.6.14 Taking the above matters into account, it is considered that the application fails to demonstrate that the scheme provides the necessary level of overheating mitigation to prevent the unnecessary overheating of the proposed residential units, thus resulting in poor quality and unsustainable living conditions for prospective residents. The application submission is therefore contrary to Policy SI4 of the London Plan (2021).

External Amenity Space:

7.6.15 Policy DMHB 18 of the Hillingdon Local Plan: Part 2 (2020) states:

- A) All new residential development and conversions will be required to provide good quality and useable private outdoor amenity space. Amenity space should be provided in accordance with the standards set out in Table 5.2.
- B) Balconies should have a depth of not less than 1.5 metres and a width of not less than 2 metres.
- C) Any ground floor and/or basement floor unit that is non-street facing should have a defensible space of not less than 3 metres in depth in front of any window to a bedroom or habitable room. However, for new developments in Conservation Areas, Areas of Special Local Character or for developments, which include Listed Buildings, the provision of private open space will be required to enhance the streetscene and the character of the buildings on the site.
- D) The design, materials and height of any front boundary must be in keeping with the character of the area to ensure harmonisation with the existing street scene.

7.6.16 Table 5.2 of the Local Plan Part Two states that the minimum amount of private outdoor amenity space which should be provided is as follows:

- 2 and 3 bedroom house: 60 sqm
- 4 bedroom house: 100 sqm
- Studio and 1 bedroom flats: 20 sqm
- 2 bedroom flats: 25 sqm
- 3 bedroom flats: 30 sqm

7.6.17 Based on the floor plans, the proposal should provide:

$$\begin{aligned}38 \times 1 \text{ bedroom flats} &= 760 \text{ sqm} \\49 \times 2 \text{ bedroom flats} &= 980 \text{ sqm} \\9 \times 2 \text{ or } 3 \text{ bedroom houses} &= 540 \text{ sqm}\end{aligned}$$

7.6.18 Based on the proposed plans the following amenity space is proposed:

Building 1: 410 sqm via balconies  
Building 2: 345 sqm via balconies  
Sherleys Farm House: 100 sqm private garden  
Oak Room and Leaning Barn: 90 sqm private garden  
7 New Dwellings: 494 sqm private gardens

7.6.19 The site plan also indicates an area of informal recreation and play would be provided to the west of Sherleys Farm House measuring 347 sqm.

Total : 1786 sqm

7.6.20 The proposed development would require approximately 2280 square metres of private amenity space. Based on the floor and site plans submitted, the proposal would provide 1786 sqm of private usable amenity space for future occupiers of the development. This results in a shortfall of 494 sqm. It should be noted that the building 2 elevations appear to indicate a balcony or terrace at 5th floor level. However, the floor plans do not correlate with this, as no access to the space from the units is demonstrated. It is also presumed that the area on the fifth floor to the rear of the building is not proposed

as amenity space given that there are habitable room windows overlooking this area and it is accessed internally only via a room with door off the main stair core. Notwithstanding the drafting error, the fifth-floor amenity space has been included within the amenity space calculation as a revised plan which could indicate a privacy screen and access to the terraces could be secured by condition.

7.6.21 As can be seen above, the application fails to provide adequate levels of amenity space to serve the occupants of the development in accordance with Policy DMHB 18 of the Hillingdon Local Plan: Part 2 (2020). It is considered that this is exacerbated by the failure to provide public open space on site and also by the poor quality of some of the amenity spaces within the development in respect of access to sunlight. In particular, the balconies serving the single aspect north facing units in Building 1 and the amenity space to the north of that building. It is concluded that the application fails to provide adequate levels of amenity space to serve the occupants of the development, resulting in poor quality living conditions for prospective residents, contrary to Policy DMHB 18 of the Hillingdon Local Plan: Part 2 (2020). This forms reason for refusal number 10.

Play Space:

7.6.22 Policy S4 of the London Plan (2021) states that residential development proposals should incorporate good-quality, accessible play provision for all ages. At least 10 square metres of play space should be provided per child that:

- a) provides a stimulating environment
- b) can be accessed safely from the street by children and young people independently
- c) forms an integral part of the surrounding neighbourhood
- d) incorporates trees and/or other forms of greenery
- e) is overlooked to enable passive surveillance
- f) is not segregated by tenure

7.6.23 This is supported by the mayor's supplementary planning guidance (SPG) 'Shaping Neighbourhoods: Play and Informal Recreation', which sets a benchmark of 10m<sup>2</sup> of usable child play space to be provided per child, with under-fives play space provided on-site as a minimum, and makes clear that play space should not be segregated by tenure.

7.6.24 Policies DMCI 5 and DMHB 19 of the Hillingdon Local Plan: Part 2 (2020) state:

- A) For all major development proposals, the Council will apply Hillingdon's child yields and the London Plan SPG; 'Providing for Children and Young Peoples Play and Informal Recreation', which specifies that 10sqm of play space should be provided for each child and an accessibility standard of 400 metres to equipped playgrounds.
- B) In areas of deficiency, there will be a requirement for new provision to be made to meet the benchmark standards for accessibility to play provision.
- C) The Council will resist the loss of existing play spaces unless:
  - i) a replacement play space of equivalent size and functionality is provided to meet the needs of the local population. Where this is not possible, development will only be permitted in exceptional circumstances where there are over-riding planning merits to the proposal; and
  - ii) it can be demonstrated robustly that they are no longer required and that their loss would not lead to a shortfall in overall play provision in the local area.

7.6.25 Paragraph 5.79 of the Hillingdon Local Plan: Part 2 (2020) states that the Council's Open Space Strategy proposes an accessibility standard for children's playgrounds based on a 400 metre travel distance.

7.6.26 Based on the Mayor's supplementary planning guidance (SPG) 'Shaping Neighbourhoods: Play and Informal Recreation', play space requirements is divided into 3 categories;

- age 0-4; door step play/within 100m;
- age 5-11 years; play within 400m of site;
- age 12+ years; play within 800m of site.

7.6.27 Based on the GLA Population Yield Calculator (v3.2), it is anticipated that the following numbers would be yielded from the proposed development:

- 19.1 no. children under the age of 5 years old;
- 13.2 no. children aged 5 to 11 years old; and
- 6.3 no. children aged 12 to 17 years old.

7.6.28 Child play space is calculated based on the unit mix and tenure. According to the GLA Population Yield Calculator the development should provide 242.8 sqm of child play space. The development proposes an informal play space of up to 347 sqm, which would be considered sufficient for a development of this size. In order to demonstrate compliance with DMCI 5 and DMHB 19, the applicant would need to provide details of play equipment and a more formalised play space strategy if the Local Planning Authority were minded to approve the application.

#### Public Open Space Provision:

7.6.29 Policy G4 of the London Plan (2021) states that development proposals should create areas of publicly accessible open space, particularly in areas of deficiency, where possible.

7.6.30 Policy EM4 of the Hillingdon Local Plan: Part 1 (2012) states that the Council will safeguard, enhance and extend the network of open spaces, informal recreational and environmental opportunities that operate as carbon sinks and that meet local community needs and facilitate active lifestyles by providing spaces within walking distance of homes. Provision should be made as close as possible to the community it will serve. There will be a presumption against any net loss of open space in the Borough. The Council will identify new opportunities for open space through an Open Space Strategy. Major developments will be expected to make appropriate contributions to the delivery of new opportunities, or to the improvement and enhancements of existing facilities.

7.6.31 Policy DMCI 4 of the Hillingdon Local Plan: Part 2 (2020) states:

A) Proposals for major new residential development will be supported where they make provision for new open space, or enhancements to existing open space, which meets the needs of the occupiers of the development and contributes to the mitigation of identified deficiencies in the quantity, quality and accessibility of open space. Regard will be had to Hillingdon's local recommended standards of provision for all relevant typologies of open space.

B) The provision of major new pieces of open space should contribute positively to Hillingdon's existing networks of green spaces. In major town centre developments, new civic space may be required as an alternative to green open space.

C) Proposals for major new residential development that fail to make provision for new or enhanced open space, or which would result in open space that is inappropriate in type, quality, or location, will be resisted.

7.6.32 The development should provide a minimum of 5,126 sqm of public open space. As stated above, the application lacks a detailed landscaping plan which distinguishes between the different types of landscaping required by policy to be provided. The applicant's rebuttal dated 18.08.23 does not satisfactorily address the requirement for public open space to be provided, it refers to pockets or linear sections of existing landscaping to be retained and provide a pleasant setting to the buildings. This cannot be considered a contribution towards public open space. In the absence of onsite provision, a financial contribution of £128,150 towards local park enhancements is required to offset what is not provided on site.

7.6.33 Subject to the agreement of the financial contribution, the proposal would be deemed to accord with Policy DMCI 4 of the Hillingdon Local Plan: Part 2 (2020), Policy EM4 of the Hillingdon Local Plan: Part 1 (2012) and Policy G4 of the London Plan (2021) in respect of public open space provision.

## **7.7 Highway and Parking Considerations**

7.7.1 In terms of planning policy, the following is considered particularly relevant:

7.7.2 The National Planning Policy Framework (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. This is supported by Policy T4 of the London Plan (2021).

7.7.3 Policy DMT 1 of the Hillingdon Local Plan: Part 2 (2020) states that development proposals will be required to meet the transport needs of the development and address its transport impacts in a sustainable manner.

7.7.4 Policy DMT 2 of the Hillingdon Local Plan: Part 2 (2020) states that proposals must ensure that safe and efficient vehicular access to the highway network is provided, schemes do not contribute to the deterioration of air quality, noise or local amenity or safety of all road users and residents. Also, that impacts on local amenity and congestion are minimised and there are suitable mitigation measures to address any traffic impacts in terms of capacity and functions of existing and committed roads.

7.7.5 Policy DMT 6 of the Hillingdon Local Plan: Part 2 (2020) requires that proposals comply with the Council's parking standards, in order to facilitate sustainable development and address issues relating to congestion and amenity.

7.7.6 The above policies are supported by Policies T4, T5, T6 and T6.1 of the London Plan (2021).

### Trip Generation:

7.7.7 The existing site accommodates a 72-bed hotel and is accessed via West End Road off the mini-roundabout. The site is located within 75 metres of Ruislip Train Station and within a PTAL 4 rated area, meaning the site is considered to have a good level of

public transport accessibility. The existing hotel generates 11 am and 9 pm peak trips resulting in a total of 20 during peak time. The proposed development would result in 34 peak time trips which is not a significant increase. As stated by the Council's Highways Officer, the proposed development would not give rise to an unacceptable increase in trip generation which would be detrimental to the highway network.

Access:

7.7.8 The proposal seeks to retain the existing access off West End Road as a main point of access and egress to serve the two new residential blocks and the converted listed buildings. In addition, a new access would be created in the south-east corner of the site, which would serve as access and egress for the 7 x 3 bedroom properties in this location. The new access is proposed on highway authority land and would lead out on to Garden Close. It is noted that no objection has been raised by the Council's Highways Officer regarding the provision of a new access in this location.

Car Parking / Motorcycle, Scooter Parking:

7.7.9 A total of 66 car parking spaces will be provided on site. This includes 14 spaces for the 7x 3 bed residential dwellings and 4 spaces for the retained buildings. 14 spaces for the 7x 3 bed residential dwellings equals 2 spaces per dwelling which exceeds the maximum level of parking set out within the London Plan. Whilst the parking provision exceeds the London Plan standards, it does sit between the Local Plan and London Plan maximum car parking standards and no objection has been raised by the Council's Highway Officer, therefore the car parking provision is considered to be acceptable. The applicant has failed to provide 3 motorcycle/scooter parking spaces required as per the Local Plan Part 2 standards. However, this could potentially be resolved by a planning condition in the event of an approval.

Accessible Parking:

7.7.10 Given that the application proposes a change of use and a wide scale redevelopment to provide 96 residential units, the applicant will be required to demonstrate that the development provides adequate accessible parking provision. In accordance with the London Plan, the applicant should demonstrate 3% provision from day 1 and a further 7% upon demand. As such, 3 spaces would need to be provided now and a further 7 based on demand. 5 spaces are shown on the proposed site plan which meets the day 1 requirement. It is noted that the development provides parking in excess of the London Plan standards, therefore it is likely that a further 7% could be provided if demand required it to be. If minded to approve the application, a condition pertaining to the submission of a parking allocation plan would be attached to the decision notice which would include the requirement to demonstrate on plan where the additional accessible spaces could be provided.

Cycle Parking:

7.7.11 The development would provide 175 long stay cycle spaces provided internally which accords with the London Plan Standards. Policy T5 of the London Plan (2021) states that "Cycle parking should be designed and laid out in accordance with the guidance contained in the London Cycling Design Standards". The proposal does not conform to these standards given that the spacing between the stands is 0.8 m and the London Cycling Design Standards requires a minimum of 1 m with a recommended width of 1.2 m. The concern raised by TFL regarding the location of the cycle parking for the terraced dwellings is noted however the applicant's site plan indicates cycle stores within the rear gardens which addresses that particular concern.

Electrical Vehicle Charging Points (EVCP):

7.7.12 In line with the London Plan (2021), within the final parking quantum there is a requirement for a minimum 20% 'active' EVCP provision with all remaining spaces being designated as 'passive' provisions. The applicant's Transport Assessment confirms that electrical charging provision is to be made for all 66 spaces, however no indication of which spaces are to be active and which ones are to be passive is shown on the proposed plans. Notwithstanding this lack of detail, the commitment to provide the EVCP is welcomed. In the event of an approval, the required provision could be secured by the imposition of a planning condition.

Active Travel Zone Assessment (ATZ):

7.7.13 The applicant has submitted an ATZ which has been reviewed by both the Council's Highway Officer and TfL. Although TfL raise concerns with the scope of the ATZ, the Council's Highways Officer considers the scope to be robust but there is a requirement for additional improvement works to the chosen routes in order to help improve pedestrian and cyclist activity which include:

- Provide tactile paving and dropped kerbs at the side road junctions of Wood Lane j/w Sherleys Court and Wood Lane entrance to Waitrose/Wood Lane Medical Centre - £13,200
- Advanced stop line for cyclists on all arms of the junction - £2,400
- Corner of Pembroke Road/High Street: Remove guard rails and resurface footway - £8,798
- Eight street trees western side of West End Road - £3,072

Total £27,470

7.7.14 These works are to be funded by the developer and should the LPA be minded to approve the application a financial contribution of £27,470 would be required to be secured within the heads of terms associated to the S106 Legal Agreement.

Summary / Conclusion of Highway Matters:

7.7.15 Whilst the development proposes a parking level above the London Plan standard, it is between the Local and London Plan standard. The additional parking required to fulfil the 7% accessible spaces based on demand would likely derive from the conversion of some existing spaces into larger spaces, which would naturally reduce the overall quantum. As such, on balance, the parking provision is acceptable.

7.7.16 The proposed accesses and anticipated trip generation levels are considered acceptable and no significant highway safety concerns are raised, subject to the imposition of conditions recommended by the Highway Officer.

7.7.17 Nevertheless, as highlighted above, the proposed cycle parking design does not conform to the London Cycling Design Standards which would result in the impractical design of cycle parking, thus reducing the level of cycle use. The applicant was provided with the opportunity to revise the cycle parking design and has submitted a rebuttal, however this does not satisfactorily address the concerns about inadequate stand spacing. The application submission is therefore contrary to Policy DMT 5 of the Hillingdon Local Plan Part 2 - Development Management Policies (2020) and Policy T5 of the London Plan (2021). There is not sufficient comfort that this matter could be addressed through the imposition of a planning condition, given that the cycle stands

are internal to the building and it is unclear whether there would be adequate space for alternative provision. Consequently, this matter forms reason for refusal number 4.

7.7.18 Finally, in the absence of agreed Heads of Terms and a completed S106 Legal Agreement, the Active Travel contributions are not secured. This forms one of the items listed within reason for refusal number 11.

## **7.8 Accessibility**

7.8.1 Policy D5 of the London Plan (2021) states that development proposal should achieve the highest standards of accessible and inclusive design.

7.8.2 Policy D7 of the London Plan (2021) also states that residential development must ensure that:

- 1) at least 10 per cent of dwellings (which are created via works to which Part M volume 1 of the Building Regulations applies) meet Building Regulation requirement M4(3) 'wheelchair user dwellings'
- 2) all other dwellings (which are created via works to which Part M volume 1 of the Building Regulations applies) meet Building Regulation requirement M4(2) 'accessible and adaptable dwellings'.

7.8.3 An initial objection was raised by the Council's Accessibility Officer, relating to the lack of information to demonstrate the residential scheme's compliance with accessible standards. London Plan policy D7 requires the application of Approved Document M4(3) to all new developments comprising 10 units or more. As per the policy wording, wheelchair user dwellings apply to all tenures, and should be distributed to provide a range of aspects, floor level locations, views, and unit sizes. Whilst these latest plans and additional information overcome part of the previous accessibility objection, they do not address the concerns in full. The application fails to demonstrate an acceptable mix and tenures of M4(3) units and buildings 1 and 2 fail to incorporate at least one lift per stair core in accordance with BS EN 81-20 and BS EN 81-70. 5. Both matters should be addressed prior to the determination of the application and the applicant has failed to do so. A further concern is identified but could be conditioned and this relates to all affordable M4(3) units being constructed to a wheelchair accessible standard. In addition, all of the M4(3) units should be provided with a designated accessible car parking space, this matter could also be conditioned.

7.8.4 Taking the above points into consideration, the proposal fails to provide adequate provision of disabled units designed to accessible standards and therefore fails to adhere to the requirements of inclusive design. As such, the proposed development fails to accord with Policies D5 and D7 of the London Plan (2021) and Chapters 8 and 12 of the National Planning Policy Framework.

## **7.9 Crime and Security Considerations**

7.9.1 Policy DMHB 15 of the Hillingdon Local Plan: Part 2 (2020) states that the Council will require all new development to ensure safe and attractive public and private spaces by referring to the Council's latest guidance on Secured by Design principles. Where relevant, these should be included in the Design and Access Statement. Development

will be required to comprise good design and create inclusive environments whilst improving safety and security by incorporating the following specific measures:

- i) providing entrances in visible, safe and accessible locations;
- ii) maximising natural surveillance;
- iii) ensuring adequate defensible space is provided;
- iv) providing clear delineations between public and private spaces; and
- v) providing appropriate lighting and CCTV.

7.9.2 The above is supported by Policy D11 of the London Plan (2021).

7.9.3 If this application had otherwise been recommended for approval, a secure by design condition would have been included in the recommendation, in order to achieve appropriate accreditation. Subject to such a condition, the proposal would accord with Policy DMHB 15 of the Hillingdon Local Plan: Part 2 (2020) and Policy D11 of the London Plan (2021).

## 7.10 Trees and Landscaping

7.10.1 Policy DMHB 14 of the Hillingdon Local Plan: Part 2 (2020) states:

- 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.

7.10.2 It is important for development applications to illustrate the relationship between the different types of landscaped areas and the buildings which they serve and provide a setting for. Notably, the application is not supported by a Landscape Design and Access Statement, nor is there much reference to landscaping within the submitted Design and Access Statement. No distinction is provided between the type of spaces proposed and their use within the submission other than the brief labelling on both the landscape strategy and proposed site plans. Whilst the soft landscaping comparison plans indicate that the proposal would result in an increase in soft landscaping overall, the lack of comprehensive landscaping details make the assessment of whether the spaces would be appropriate to serve the potential occupiers of the development difficult. For example, no reference to the provision of public open space is provided, reference to informal play is included within the submission and is shown within the area north of building 2 which also accommodates a natural pond, but no formal play space can be identified.

7.10.3 A significant amount of hard surfacing is to be required in order to facilitate access into the development and also the parking areas. The negative impact of this on the setting of the Listed Buildings has been discussed previously in this report.

7.10.4 With regards to trees, the application is supported by a tree survey which indicates all but 2 of the 46 on site trees would be retained. Whilst the tree loss is regrettable, the two trees to be felled are category U, therefore hold little value and would be replaced and an additional 34 trees planted. The landscaping plan lacks the detail to determine

whether the type of trees proposed and their location would be suitable as it only refers to "native tree" rather than a specific species.

7.10.5 In terms of Urban Greening, for residential developments a score of 0.40 is required in accordance with London Plan Policy G5. The submission is supported by an UGF Table which indicates how each of the areas within the site contributes to the overall score of 0.53. Furthermore page 3 indicates where these areas are located within the site in plan form. Given the score exceeds the London Plan requirements, a policy compliant level of Urban Greening is provided.

7.10.6 In the event of approval, a suite of planning conditions would be required to secure further detail and implementation of soft and hard landscaping, tree planting and tree protection measures.

## 7.11 Ecology

7.11.1 Paragraph 174 of the NPPF (February 2021) states that planning decisions should contribute to and enhance the natural and local environment by: d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures. This is supported by Policy G6 of the London Plan (2021).

7.11.2 Policy DMEI 7 of the Hillingdon Local Plan: Part 2 (2020) also states that the design and layout of new development should retain and enhance any existing features of biodiversity within the site.

7.11.3 The applicant has submitted an ecology report which provides an assumption of the site's potential for wildlife habitat. The document confirms that the site is unlikely to accommodate Great Crested Newts based on an industry standard methodology and local knowledge. However, the report has drawn an objection from the Council's Ecology Officer, due to the likely presence of bats on site and the lack of survey information to address this. All bat species are designated and protected as European protected species (EPS). EPS are protected under the Conservation of Habitats and Species Regulations 2017.

7.11.4 The Council's Ecology Officer advises that prior to making a positive determination on a planning application, the Local Planning Authority must

- make sure any mitigation or compensation conditions you impose do not conflict with the requirements of a bat mitigation licence;
- be confident that Natural England will issue a licence.

7.11.5 Part of the requirements for a Natural England licence is to apply three derogation tests to ensure that impacts to bat populations are unavoidable. The LPA does not need to strictly apply these tests at decision making stage, but must have confidence that if applied, a positive determination would be made by Natural England.

7.11.6 Unfortunately for this application, it is not possible to have any confidence, due to the insufficiency of information. The submitted Ecology Report identified high bat potential in 3 buildings and moderate in a fourth. 3 of these buildings will be subject to demolition

or major refurbishment, thus potentially harming bats if they are present. As the Report indicates bats are likely to be present then further information is necessary to allow the LPA to make an informed decision and to enable a satisfactory application of the requirements set out above (taken from the national government guidance).

7.11.7 Based on the lack of information which has drawn objection from the Council's Ecology Officer, the proposal fails to provide adequate information to demonstrate that the proposed development would not result in detrimental harm to bat roosts. The application submission therefore fails to demonstrate the protection of bats and is contrary to NPPF paragraph 174, Policy G6 of the London Plan (2021) and Policy EM7 and DMEI 7 of the Hillingdon Local Plan Parts 1 (2012) and 2 (2020) respectively.

## **7.12 Waste**

7.12.1 Policy DMHB 11 of the Hillingdon Local Plan: Part 2 (2020) states that:  
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.

7.12.2 The application is supported by a Refuse Management Plan, which is unusually light and lacking in detail. It does however state that 'All refuse areas for apartments are within the maximum drag distance and maximum walking distance for residents. The houses will have a bin collection area.'

7.12.3 As the Refuse Management Plan fails to provide the expected level of detail, officers have had regard to the refuse bin provision identified on the drawings and the details within the Transport Statement to assist with the assessment of waste storage and management. A swept path analysis indicating adequate space for refuse vehicles to access the site and each of the residential properties has been provided, satisfying this requirement. The proposed plans indicate that buildings 1 and 2 would include a ground floor refuse and recycling storage room. Whilst the bins drawn appear to be of a different size to those indicated by the Council's Waste Officer, it is considered that there is enough comfort at this stage in order to resolve matters pertaining to waste storage via a planning condition in the event of approval. This also applies to the provision for the dwelling units within the terraces and the conversions.

## **7.13 Contaminated Land**

7.13.1 Policy DMEI 12 of the Hillingdon Local Plan: Part 2 (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.

7.13.2 The applicant's ground investigation report identified unacceptable concentrations of 7No. contaminative substances present in made ground materials at the site. The Council's Contamination Officer has reviewed the report and raises no objection, subject to conditions pertaining to the submission of further survey work details, a remediation strategy, and a verification report. It is therefore considered that subject to the imposition of the recommended conditions (in the event of approval), the proposal is acceptable with regard to contamination risks.

## 7.14 Energy

- 7.14.1 Policy SI 2 of the London Plan (2021) requires major developments to be net zero-carbon. Major development proposals are expected to include a detailed energy strategy to demonstrate how the zero-carbon target will be met within the framework of the energy hierarchy. A minimum on-site reduction of at least 35 per cent beyond Building Regulations is required for major development. Residential development should achieve 10 per cent, and non-residential development should achieve 15 per cent through energy efficiency measures. Where it is clearly demonstrated that the zero-carbon target cannot be fully achieved on-site, any shortfall should be provided through a cash in lieu contribution to the borough's carbon offset fund, or off-site provided that an alternative proposal is identified, and delivery is certain.
- 7.14.2 Policy EM1 of the Hillingdon Local Plan: Part 1 - Strategic Policies (November 2012) states that the Council will ensure that climate change mitigation is addressed at every stage of the development process. This includes the reduction of carbon emissions through low carbon strategies and encouraging the installation of renewable energy to meet the targets set by the London Plan (2021).
- 7.14.3 Policy DMEI 2 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020) requires that: A) All developments make the fullest contribution to minimising carbon dioxide emissions in accordance with London Plan targets; B) All major development proposals must be accompanied by an energy assessment showing how these reductions will be achieved; C) Proposals that fail to take reasonable steps to achieve the required savings will be resisted. However, if the Council is minded to approve the application despite not meeting the carbon reduction targets, then it will seek an off-site contribution to make up for the shortfall. The contribution will be sought at a flat rate of £/tonne over the lifetime of the development, in accordance with the current 'allowable solutions cost'.

7.14.4 The applicant has submitted an energy assessment which demonstrates that the proposed development does not meet the zero carbon energy requirements on site. The proposals only include an onsite saving of at least 70% which meets the London Plan requirements. This leaves a shortfall of 27.8t CO<sub>2</sub>. This equates to an offsite contribution requirement of £79,230 based on the carbon cost of £95/tCO<sub>2</sub> annualised over 30 years.

7.14.5 If minded to approve the application, the LPA would secure the contribution through a Section 106 Legal Agreement. In addition, further information relating to the submission of energy performance reporting and 'be seen' requirements would be required to be secured by condition.

7.14.6 It should be noted that there is a discrepancy between the proposed plans with regards to the PV provision. No PVs can be seen on the elevation drawing (east elevation) which contradicts the roof plan illustrated within the Energy Strategy. As such, if minded to approve the application, the roof plan would not be considered part of the approved plans condition. If the proposal had otherwise been considered acceptable, revised plans would have been sought.

## **7.15 Flood and Water Management**

7.15.1 Policy SI 12 of the London Plan (2021) requires that development proposals ensure that flood risk is minimised and mitigated. Policy SI 13 of the London Plan (2021) also requires that development proposals utilise sustainable urban drainage systems (SuDS), unless there are practical reasons for not doing so and should aim to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible. This is supported by Policy EM6 of the Hillingdon Local Plan: Part 1 (2012) and Policies DMEI 9 and DMEI 10 of the Hillingdon Local Plan: Part 2 (2020).

7.15.2 The site is located in Flood Zone 1 and therefore at low risk of fluvial flooding. The site is at low to medium risk of surface water flooding, and low risk of groundwater flooding. The applicant has submitted a Flood Risk Assessment which is considered to be acceptable in terms of its assessment of the site's potential flood risk. However, an objection has been raised by the Councils Flooding Officer on the basis that the drainage strategy does not provide adequate information to determine whether methods of sustainable urban drainage have been maximised across the site. Furthermore, the area used to calculate the greenfield run off rates is incorrect and the document fails to clarify whether the full development area has been included within the calculation.

7.15.3 The applicant was provided with the Flood Risk Officers comments on 17.08.23 and was given until 7.09.23 to provide a response. A response was submitted on 12.09.23 and given that the determination of the application was due to expire dated 15.09.23, the revised drainage strategy could not be accepted as an application document. Due to the concerns raised above and those within the Flooding Officers comments in section 5 of this report, it is concluded that the application fails to demonstrate that suitable and appropriate sustainable drainage systems have been incorporated into the design. The application submission is therefore contrary to Policy DMEI 9 and DMEI 10 of the Hillingdon Local Plan: Part 2 - Development Management Policies

(2020), Policy EM6 of the Hillingdon Local Plan: Part 1 - Strategic Policies (2012), London Plan Policies SI 5, SI 12 and SI 13 (2021) and paragraph 169 of the National Planning Policy Framework (2021). An informative is recommended to be added to the decision notice to advise that the LPA encourages early discussion regarding drainage matters to streamline any subsequent appeal and prevent abortive work by any party.

## **7.16 Air Quality**

7.16.1 Policy DME1 14 of the Hillingdon Local Plan: Part 2 (2020) is considered and states that:

- 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.

7.16.2 The proposed development is located outside the LBH Air Quality Management Area but within the Ruislip Town Centre Focus Area bringing additional traffic emissions which will add to current poor air quality. As per the London Plan, developments need to be air quality neutral as minimum and LBH requires development proposals located within Focus Areas to be air quality positive (LBH Air Quality Local Action Plan 2019-2024), contributing to the reduction of emissions in these sensitive areas.

7.16.3 According to LBH Local Action Plan, proposed development within Focus Areas (or with impacts on FAs) needs to be Air Quality positive and further action is required to reduce total emissions produced by its operation. Therefore, the total emissions associated with these activities need to be mitigated. Further, the proposed development is not air quality neutral and therefore contradictory to the London Plan.

7.16.4 As part of the assessment of Air Quality, the impact is balanced against the on site mitigation. In this case, there is very little mitigation proposed other than a Travel Plan. The proposed scheme is not air quality neutral therefore cannot be air quality positive. As such a damage cost of £223,094 would be required towards delivering the objectives of the AQ Action Plan. It is not clear whether this is accepted by the applicant and in the absence of an agreed Heads of Terms and completed S106 Legal Agreement, the air quality contribution is included as a matter listed in refusal reason number 11.

## **7.17 Archaeology**

7.17.1 NPPF Section 16 and the London Plan (2021 Policy HC1) recognise the positive contribution of heritage assets of all kinds, and make the conservation of archaeological interest a material planning consideration. NPPF paragraph 194 says applicants should provide an archaeological assessment if their development could affect a heritage asset of archaeological interest.

7.17.2 NPPF paragraphs 190 and 197 and London Plan Policy HC1 emphasise the positive contributions heritage assets can make to sustainable communities and places. Where appropriate, applicants should therefore also expect to identify enhancement opportunities.

7.17.3 Policy DMHB 7 of the Hillingdon Local Plan: Part 2 (2020) states that the Council, as advised by the Greater London Archaeological Advisory Service, will ensure that sites of archaeological interest within or, where appropriate, outside, designated areas are not disturbed. If that cannot be avoided, satisfactory measures must be taken to mitigate the impacts of the proposals through archaeological fieldwork to investigate and record remains in advance of development works. This should include proposals for the recording, archiving and reporting of any archaeological finds.

7.17.4 The planning application is not in an Archaeological Priority Area, however Sherley's Farm was part of Field End, a small hamlet which formed part of a cluster of dispersed rural settlements around the manorial centre at Ruislip.

7.17.5 The Greater London Archaeological Advisory Service (GLAAS) has been consulted and states that the development could cause harm to archaeological remains and field evaluation is needed to determine appropriate mitigation. As such, a two stage condition pertaining to a pre-demolition stage 1 written scheme of investigation is recommended, and if archaeological findings are discovered, a stage 2 written scheme of investigation would need to be submitted and approved in writing by the Local Planning Authority and GLAAS. Subject to these conditions GLAAS raise no objection and the impact on potential archaeological remains is considered to be satisfactory.

## 7.18 Noise

7.18.1 Policy D13 of the London Plan (2021) places the responsibility for mitigating impacts from existing noise and other nuisance-generating activities or uses on the proposed new noise-sensitive development. Development should be designed to ensure that established noise and other nuisance-generating uses remain viable and can continue or grow without unreasonable restrictions being placed on them.

7.18.2 The application is supported by a noise assessment which has been reviewed by the Council's Noise Officer. No objections are raised, but a condition pertaining to the restriction of noise levels with measurements taken within any room would be added to the decision notice should the LPA be minded to approve the application.

7.18.3 In terms of the impact of noise on neighbouring residents, in light of the proposed residential use which is generally compatible with surrounding uses, no significant issues are raised. As noted previously in this report, in the event of an approvable scheme, a Construction Management Plan condition would be included in the decision notice. This would ensure noise (amongst other environmental pollutants) are minimised as far as practicable during the demolition and construction phases.

## 7.19 Airport Safeguarding

7.19.1 The National Planning Policy Framework requires that planning decisions promote public safety and take into account wider security and defence requirements by:

- a) anticipating and addressing possible malicious threats and natural hazards, especially in locations where large numbers of people are expected to congregate. Policies for relevant areas (such as town centre and regeneration frameworks), and the layout and design of developments, should be informed by the most up-to-date information available from the police and other agencies about the nature of potential threats and their implications. This includes appropriate and proportionate steps that can be taken to reduce vulnerability, increase resilience and ensure public safety and security; and
- b) recognising and supporting development required for operational defence and security purposes, and ensuring that operational sites are not affected adversely by the impact of other development proposed in the area.

7.19.2 Policy DMAV 1 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020) states that:

- A) The Council will support the continued safe operation of Heathrow Airport and RAF Northolt and will consult with the airport operator on proposals in the safeguarded areas. Proposals that may be a hazard to aircraft safety will not be permitted.
- B) In consultation with the Airport Operator, the Council will ensure that:
  - i) areas included in Airport Public Safety zones are protected from development which may lead to an increase in people residing, working or congregating in these zones; and
  - ii) sensitive uses such as housing, education and hospitals are not located in areas significantly affected by aircraft noise without acceptable mitigation measures.

7.19.3 The site is located within the RAF Northolt safeguarding zone. The air safeguarding authorities have been consulted including RAF Northolt and the MOD, no objections have been raised. As such, no air safeguarding concerns are raised and the scheme complies with the requirements of Policy DMAV 1 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020).

## 7.20 Fire Safety

7.20.1 Policy D12 (Fire safety) of the London Plan (2021) says that in the interests of fire safety and to ensure the safety of all building users, development proposals must achieve the highest standards of fire safety.

7.20.2 The proposal is supported by a Fire Safety Statement which sets out details of an evacuation strategy, detection alarm and means of escape provision. It should be noted that the suitability of the structure and materials themselves would be considered in more depth at detailed design stage, whereby the applicant would need to demonstrate accordance with the fire safety related building regulations. As such, the Fire Safety Statement is considered to be robust, however further information is required following the comments relating to the need for one of the lifts to be amended in accordance with the Access Officers request. Furthermore, the applicant's Fire Safety Statement does not cover the building's construction: methods, products and materials used,

including manufacturers' details. A condition for a revised Fire Safety Strategy would therefore be required in the event of approval.

## **7.21 Affordable Housing**

7.21.1 Policy H5 of the London Plan (2021) states that the threshold level of affordable housing on gross residential development is initially set at:

- 1) a minimum of 35 per cent; or
- 2) 50 per cent for public sector land where there is no portfolio agreement with the Mayor; or
- 3) 50 per cent for Strategic Industrial Locations, Locally Significant Industrial Sites and Non-Designated Industrial Sites appropriate for residential uses in accordance with Policy E7 Industrial intensification, co-location and substitution where the scheme would result in a net loss of industrial capacity.

7.21.2 Policy H5 further states that to follow the Fast Track Route of the threshold approach, applications must meet all the following criteria:

- 1) meet or exceed the relevant threshold level of affordable housing on site without public subsidy
- 2) be consistent with the relevant tenure split (see Policy H6 Affordable housing tenure)
- 3) meet other relevant policy requirements and obligations to the satisfaction of the borough and the Mayor where relevant
- 4) demonstrate that they have taken account of the strategic 50 per cent target in Policy H4 - Delivering affordable housing and have sought grant to increase the level of affordable housing.

7.22.3 Policy H2 of the Local Plan: Part One (2012) requires sites with a capacity of 10 or more units, to provide an affordable housing mix to reflect the housing needs in the borough, particularly the need for larger family units.

7.22.4 Policy DMH 7 of the Local Plan: Part Two (2020) requires major residential developments to maximise the delivery of affordable housing on site. A minimum of 35% of all new homes should be delivered as affordable housing with a tenure split of 70% Social / Affordable Rent and 30% Intermediate.

7.22.5 The application as originally submitted proposed 15% affordable housing. The Financial Viability Appraisal submitted has been independently assessed by the Council's external consultant and following negotiations with the applicant, parameters have been agreed in order to allow the LPA to understand the viability of the proposed development and the associated number of affordable housing units which can be provided on-site.

7.22.6 Consequently, an affordable offer of 20 units (18% by habitable room) has been set out, with 64% being London Affordable Rent (LAR) and 36% Shared Ownership (approximately 65/35 split). The Council's consultant is satisfied that this provision is the maximum, viable, affordable housing provision that the scheme can deliver on-site with the tenure that best meets the needs of the Borough. An early and late-stage review mechanism would be an appropriate method for capturing any additional surplus post-determination of the application in the event of an approvable scheme.

7.22.7 The proposed affordable housing would be built to the same standards as private housing. The affordable housing would also share the same communal amenity spaces. Notwithstanding the above, and as noted in other sections of this report, no family sized affordable units are proposed to be included in the offer, therefore the development does not contribute to the need for affordable family homes.

7.22.8 If recommended for approval, the affordable housing provision proposed would be secured by a Section 106 legal agreement with an Early and Late Stage Viability Review mechanism imposed to secure further affordable housing units if the viability of the scheme improves. As such, the proposed development accords with Policy H5 of the London Plan (2021), Policy H2 of the Hillingdon Local Plan: Part 1 (2012) and Policy DMH 7 of the Hillingdon Local Plan: Part 2 (2020). Nevertheless, in the absence of an agreed heads of terms and completed S106 agreement, affordable housing forms one of the matters listed in refusal reason number 11.

## **7.22 Health Infrastructure**

7.22.1 The supporting text to Policy DF1 of the London Plan (Delivery of the Plan and Planning Obligations) explains that the demand for health services in London is increasing due to a growing and ageing population and an increase in complex and long-term health conditions, and as such, across London, developer contributions are used to fund the capital costs of new or expanded primary and community care facilities. This is needed to meet the increasing demand for services which arises from population growth in areas of intensification or growth. Using the London Healthy Urban Development Unit Planning Contributions Model (HUDU Model) allows local planning authorities, in conjunction with Clinical Commissioning Groups and NHS England, to calculate the capital cost of the additional health facilities required to meet the increased demand from developments.

7.22.2 Those units which are included within the affordable offer are exempt from CIL.

7.22.3 A HUDU model has been applied to this development, and a capital contribution of £21,439 towards healthcare facilities would be required to support the additional strain placed on local services as a result of the increase in population. This contribution would be secured as a planning obligation.

## **7.23 Planning Obligations**

7.23.1 Policy DMCI 7 of the Hillingdon Local Plan: Development Management Policies (Planning Obligations and Community Infrastructure Levy) sets out that planning permission will only be granted for development that clearly demonstrates there will be sufficient infrastructure of all types to support it, to ensure that development is sustainable in accordance with the NPPF (2021). Infrastructure requirements will be predominantly addressed through the Council's Community Infrastructure Levy (CIL) and through planning obligations.

7.23.2 Specifically, planning obligations are used to secure the provision of affordable housing in relation to residential development schemes, and where a development has infrastructure needs that are not addressed through CIL, to ensure that development

proposals provide or fund improvements to mitigate site specific impacts made necessary by the proposal. Applications which fail to include appropriate planning obligations to make the proposal acceptable will be refused. Planning obligations run with the land, are legally binding and enforceable.

7.23.3 The Community Infrastructure Levy Regulations, the NPPF and Planning Practice Guidance have put three tests on the use of planning obligations into law. In this regard, planning obligations must meet the following tests to be lawful:

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

7.23.4 In the event of an approvable scheme, the following Heads of Terms would be required to be secured through a section 106 legal agreement, to either ensure policy compliance (e.g. affordable housing) or to address deficiencies in the scheme which could not be addressed through amendments to the plans:

- 1) Air Quality Positive financial contribution of £223,094.
- 2) Employment Strategy and Construction Training: Details shall be in accordance with the Council's Planning Obligations SPD with the preference being for an in-kind scheme to be delivered. Securing an Employment / Training Strategy Agreement is the Council's priority. A financial contribution will only be accepted in exceptional circumstances.
- 3) A carbon offsetting contribution of £79,230 based on £95 per tonne over a period of 30 years, or a reduced figure if greater on-site carbon savings.
- 4) HUDU contribution of £21,439 towards healthcare facilities to support the additional population.
- 5) A full Travel Plan shall be submitted to and approved in writing by the Local Planning Authority. The Plan will include targets for sustainable travel arrangements, effective measures for the ongoing monitoring of the Travel Plan, and a commitment to delivering the Travel Plan objectives.
- 6) Open space contribution £128,150.
- 7) LBH highway improvement works comprising:
  - Provide tactile paving and dropped kerbs at the side road junctions of Wood Lane j/w Sherleys Court and Wood Lane entrance to Waitrose/Wood Lane Medical Centre £13,200
  - Advanced stop line for cyclists on all arms of the junction £2,400
  - Corner of Pembroke Road/High Street: Remove guard rails and resurface footway £8,798
  - Eight street trees western side of West End Road £3,072Total £27,470
- 8) Affordable Housing: Planning obligation for an on-site provision 7 shared ownership units (5 x 1 bed, 2 x 2 bed) and 13 affordable rent units (6 x 1 bed and 7 x 2 bed). This shall include an Early and Late-Stage Viability Review mechanism as defined by Policy H5 of the London Plan (2021).
- 9) To enter into a s278 agreement to secure highway works; and
- 10) A financial contribution equal to 5% of the total cash contributions, for Project Monitoring and Management.
- 11) Prevention of future occupiers from joining the local parking management scheme.

CIL : £775,817.30

Mayoral CIL : £351,901.82

7.23.5 In the absence of an agreed Heads of Terms and completed S106 Legal Agreement the above matters form reason for refusal number 11, as the applicant has failed to provide contributions towards the improvement of services and facilities as a consequence of demands created by the proposed development. The scheme therefore conflicts with Policy DMCI 7 of the Hillingdon Local Plan Part 2 Development Management Policies (2020), the London Borough of Hillingdon Supplementary Planning Document on Planning Obligations (2014) and Policy DF1 of the London Plan 2021).

## 8. Conclusion and Planning Balance

8.1 The application site accommodates two Grade II Listed Buildings, for which significant weight is afforded to the safeguarding of the historic fabric and setting.

8.2 It is acknowledged that the proposal would deliver some significant public benefits, including the provision of 96 residential units (including 20 affordable units), albeit this is tempered somewhat by concerns that the unit mix fails to provide sufficient family sized units. Other public benefits arising from the scheme include the removal of the latter extensions to the listed buildings and the conversion of the hotel which is becoming unviable to retain. The proposal would also reinstate a residential use of the farmhouse (in line with its original use). The proposal would generate construction jobs, albeit temporarily and would bring new residents to the area who could potentially support nearby businesses and services through their custom. In addition, the proposal would include landscaping and tree planting which has the potential to contribute positively to biodiversity.

8.3 Nevertheless, the proposal would cause less than substantial harm to the fabric and setting of the Listed Buildings within the site and by reason of its size, scale, bulk, massing, design, appearance, layout and visual prominence would result in a visually dominant, overdevelopment of the site, that would be at odds with the distinctive suburban character of the surrounding area, thereby harming the visual amenity and character of the area. There are also concerns that the accommodation provided would not be of great quality, with particular regard to the amount and quality of amenity space provision, daylight and sunlight levels, overheating and provision for disabled residents. Moreover, the application fails to demonstrate that it would not have a detrimental effect on protected species (bats) and that adequate provision has been made for drainage and cycle parking provision. Finally, in the absence of a completed S106 legal agreement, the development would not deliver the infrastructure necessary to support it.

8.4 Taking all matters into account, the proposal is considered to conflict with the development plan and the material benefits arising from the scheme do not outweigh the significant harms identified. Accordingly, the application is recommended for refusal for the reasons set out in section 1.

## **9. REFERENCE DOCUMENTS**

- National Planning Policy Framework (July 2021)
- The London Plan (March 2021)
- Hillingdon Local Plan: Part 1 - Strategic Policies (November 2012)
- Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020)
- Hillingdon Local Plan: Part 2 - Site Allocations and Designations (January 2020)
- Accessible Hillingdon Supplementary Planning Document (September 2017)
- Planning Obligations Supplementary Planning Document (July 2014)
- (BRE) guidelines (BRE209)