



**The Barn Hotel, West End Road, Ruislip**

**LPA REFERENCE 7969/APP/2023/1473**

**RESPONSE TO LB HILLINGDON FEEDBACK**

**'URBAN DESIGN AND CONSERVATION' COMMENTS**

**04.08.23**

Please accept this response in relation to the *Consultation responses internal and external the barn hotel* document provided by Christopher Brady on 18<sup>th</sup> July 2023.

This response is to be read in conjunction with the Iceni *Lettered Response to LB Hillingdon* and specifically deals with the Urban Design and Conservation response.

Please note that Chase New Homes is not in receipt of the original consultee comments and prior to any determination of the application we formally request that the original comments are provided and we are also given access to the Planning Register to consider the neighbour comments and provide feedback if necessary.

It is noted that the urban design comments are interwoven with the conservation response. Conservation and townscape matters are dealt with in the Iceni report, and this response deals with the more general matters of design, planning policy and precedent.

The numbering below follows that within the response from Urban Design and Conservation.

1. Context

The description refers to the listed buildings and some other buildings but does not reference the topography of the site nor the significant vegetation about it, namely the significant difference in levels with West End Road, which is embellished with tall trees and evergreen hedging on this boundary, almost entirely obscuring the site.

There is also no reference to the site being adjacent to the Town Centre designation nor the significant apartment blocks on the other side of the railway line – Kings Lodge.

The above must be recognised within the consideration of any planning application.

## 2. Listed Buildings Context

Please refer to the Iceni response.

## 3. Development Context

The urban design response does not identify the residential care home opposite the site which is more exposed and at a higher level to the application site, thereby appearing taller despite its four-storey pitched roof form.

Please refer to the Iceni response with regard to the listed buildings element of this section.

## 4. Proposed new buildings

No comment.

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

Please refer to the Iceni response.

Please also note that Chase New Homes disagrees with the statement that the proposals would create large development blocks when viewed from West End Road.

This cannot be construed as a true statement due to the difference in levels with West End Road being elevated to The Site with trees and dense evergreen hedging several metres in height. The site is almost entirely obscured in views from West End Road and this is a significant material consideration in any such assessment.

The proposed apartment buildings will appear as a maximum of three-storeys in views from West End Road, which is entirely commensurate with the neighbouring Sherley Court retirement scheme on the other side of West End Road. There also must be acknowledgement that The Site abuts the Town Centre boundary, which is where London Plan policy directs significant development.

Comparison is also made to the existing apartments within Garden Close, viewing this as setting a limit on the scale and massing of new development at the entrance to the site. To follow this would represent a significant under-utilisation of The Site, where planning policy expressly supports densification with the following:

*NPPF Paragraph 105: 'Significant development should be focused on locations which are or can be made sustainable....This can help to reduce congestion and emissions and improve air quality and public health.'*

London Plan Policy T1 seeks to make 80% of all trips in London by foot, cycle or public transport by 2041, and for all development to make the most effective use of land, reflecting its connectivity and accessibility by existing and future public transport, walking and cycling routes.

Hillingdon's own Local Plan seeks for sustainable forms of transport and reducing dependency on the private car. Naturally this is directing growth to locations that are near public transport interchanges, encouraging walking and cycling.

The Site clearly meets or rather exceeds the criteria in the above policies and must, as such, be considered in this context.

This Council must also be mindful of the Master Brewer site in Hillingdon, which proposed substantial tall buildings in a low-rise suburban setting near to the green belt.

It was resisted by the Council who stated that the scheme would '*completely overwhelm its smaller-scale suburban surroundings*'.

The Council sought a judicial review against the mayor's approval of a scheme in towers up to 11 storeys in height. The challenge was however lost and the towers approved.

The towers had acknowledged impacts upon the Grade I Ickenham Farm House, Scheduled Ancient Monument and Ickenham Conservation Area.

The Site is also located in a low density area, bordering the Green Belt and bounded by two-storey dwellings.

The scheme was well-supported and permitted by the Mayor.

The Council should be very mindful of similarities with our (far less) dense scheme and the direction of travel with planning policies and the need for gentle densification.

It is therefore simply not appropriate to consider a scheme unacceptable by pointing at development nearby given the above, particularly in this instance where this site's topography allows for taller buildings (and yet is not referred to in the consultee response).

Given the above, the scheme should be acceptable with regard to the height and massing proposed when the location, the policy endorsement, the topography and the Master Brewer Site are taken into consideration.

## 6. Layout

The response appears to take issue with the 'narrow private road' off West End Road. This is an existing access which has an existing narrow access road for the hotel use.

This is clearly material to the consideration of any planning application, but regardless, we propose small alterations to the entrance, improving its appearance. We also proposed to punctuate, re-align and improve the access road with new planting and areas of open space for residents to enjoy.

The response states that two cul-de-sacs are proposed to overcome the constraint of the access. This is not the case; it is a very sensible urban design approach to utilise

two *existing* accesses to the benefit of future occupants, and to create two distinct character areas within The Site.

The Response states that this is a 'backland area' but It is nothing of the sort. It is an existing brownfield site with existing buildings and an existing use. The proposed site layout clearly delineates the location of existing buildings. The lack of acknowledgment of this in combination with trying to shoe-horn it into a back land definition is concerning.

It is hard to see how the consultee response states that the layout 'creates ill-defined fronts and backs'.

There is clear active frontage along the entire new estate route from West End Road, with clearly defined public and private realm demarcated by hedging and planting to the front of the apartment buildings, with a centrally located landscaped green space, as is encouraged by sound urban design principles.

To state that Building 1 is in a back land area between road/railway embankment is puzzling, given that the outlook onto both is pleasant with significant trees and hedging, and more importantly Building 1 will be located where existing buildings are currently sited.

To imply that new buildings on the site of existing buildings on a brownfield site somehow creates a new back land environment just cannot be accepted, particularly when the setting and outlook for the new homes will be very pleasant, looking onto significant belts of trees and hedging. There can be no in principle objection for this reason.

All parking has been broken up with planting at regular intervals and further planting that book-ends the parking areas.

The houses accessed from Garden Close create a clearly appropriate street scene with houses fronting onto the access road, all with planting to the front and parking that is bounded by robust levels of planting to soften the setting. This creates a very pleasant environment for future residents and visitors.

Reference to harm to the setting of listed buildings is covered in the Iceni response, but it must be made clear that existing buildings' footprints are being re-utilised, the Oak Room is currently entirely consumed by recent additions and so its setting will be opened up and entirely improved by the proposal.

The existing poor setting for these buildings is a significant material consideration that must weigh in favour within the planning balance.

## 6.1 Separation Distances

The response states that the separation distances fail to comply with nationally accepted window to window distance of 21m for two-storey dwellings.

**This is incorrect.** Chase New Homes fully considered this at the design stage.

The response has not considered the internal arrangements of the buildings to properly assess this aspect.

We deal with each assertion below:

*'the separation distance between the windowed elevation of The Barn and the houses to the rear of approximately 12m.'*

Chase New Homes Response

**The only window on the eastern elevation of the Leaning Barn is at ground floor and obscured by a 1.8 metre boundary treatment. The main window to the Leaning Barn is on the opposing elevation. There is no mutual overlooking.**

*'the separation distance between the windowed elevation of The Barn and Building 2 of approximately 9m'*

Chase New Homes Response

**There is no window on the Leaning Barn elevation facing Building 2. As such there is no overlooking between the properties.**

*'the separation distance between the windowed elevation of Building 2 to the proposed unit 89 of approximately 16m.'*

Chase New Homes Response

**The windows on the Building 2 rear (east) elevation are ancillary slot windows and they will be obscure-glazed with limited opening. This can be controlled by condition.**

**The windows on the side (north-eastern) are clearly highly oblique and do not offer direct overlooking with the houses. If the perceived issue relates to the balcony, an obscure screen fixed to the eastern side of the balconies on the northern elevation can reasonably be secured by condition.**

*'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'*

Chase New Homes Response

**The submitted reports demonstrate very clearly that the proposed new homes and surrounding properties will receive sufficient privacy, daylight/sunlight and the outlook is clearly acceptable.**

*'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.'*

Chase New Homes Response

The rear of the listed Leaning Barn is currently consumed by recent dilapidated additions and cannot be perceived at all.

We are removing these structures and propose a wall, as shown on the landscaping plan, which is of far lesser scale and will be sympathetic to the listed building.

We are therefore proposing an improvement on the existing situation by removing the buildings and also providing a well-designed wall which will be entirely appropriate to the setting of the listed building. We invite the Council to impose a condition requiring final details of the wall.

## 7. Appearance

The Iceni response deals adequately with this matter.

## 8. Accommodation Quality

The response breaks the scheme down into component parts to try and emphasise an overstated position, that of:

- 1 single aspect units
2. daylight sunlight issues

The response also refers to the London Design Standards, which is supplementary guidance, to be read in conjunction with the London Plan.

No reference to relevant London Plan policies is given in the Urban Design response.

One cannot read the supplementary guidance in isolation of the policies, particularly when they carry far greater weight.

The response is therefore not fully considered and appears stunted, presenting an overly pessimistic view of the scheme.

We refer to the above points below:

### Single aspect units

Policy D6 states:

*A single aspect dwelling should only be provided where it is considered a more appropriate design solution to **meet the requirements of Part B in Policy D3 Optimising site capacity** through the design-led approach than a dual aspect dwelling, **and it can be demonstrated that it will have adequate passive ventilation, daylight and privacy, and avoid overheating.**\**

(\*my emphasis)

Part B of Policy D3 states:

**B 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,** in accordance with Policy D2 Infrastructure requirements for sustainable densities. Where these locations have existing areas of high density buildings, expansion of the areas should be positively considered by Boroughs where appropriate. This could also include expanding Opportunity Area boundaries where appropriate.

The Site is clearly in a location well connected to jobs, services, infrastructure and amenities by public transport, this is one of the most sustainable sites in the Borough.

As such it is entirely appropriate for an element of single aspect homes to ensure optimising site capacity and comply with Policies D3 & D6.

We commissioned consultant reports to clearly demonstrate that adequate ventilation and daylight are provided to the units and overheating is avoided, as is required by the above policies.

The submitted report by Anstey Horne states that 95% of the 148 rooms tested meet or exceed the guideline values **for daylight**, which have recently been made more stringent. This is an exemplary pass rate that demonstrates compliance with the above policies, **which specifically refer to daylight**. This is the policy test.

The Urban Design Response however refers to sunlight, which is a separate test against guidelines and **is not a policy requirement**.

Regardless, when tested against the most recent guidelines we have a pass rate of 68%, to which the Urban Design response implies unacceptability.

But they have failed to provide the full response from our consultant report, which states:

*'The guidelines acknowledge that 'if a room faces significantly north of due east or west (the sunlight criterion) is unlikely to be met'. Despite this tested all the rooms in our model regardless of orientation.'*

The report goes onto state:

*'When considering these results, it is worth bearing in mind that within a proposed scheme it is usually only possible to orientate circa half the rooms to face within 90 degrees of due south. **Therefore, a 68% adherence rate across the scheme is positive.**'*

The Urban Design response should have included the above which shows 68% adherence rate is a good result. We question why they have not given the planning department this information and created an impression of deficiency when the opposite is true.

The scheme is therefore clearly acceptable with regard to accommodation quality when a full reading of the policies, plans and associated reports is made.

Should the consultee continue to state otherwise we would request a meeting be held with Chase New Homes and our consultants.

#### 9. The Listed Building proposals

The Iceni response deals with the matters raised, but it must be added that an overly negative approach is clearly being made when a 'cramped proposed garden' is stated as diminishing 'Any gains' from the removal of the link building.

We fail to see how this conclusion has been formed.

The link building obscures all views to the rear whereas the proposed garden wall will be much lower and subordinate to the listed buildings.

There is also reference to an 'oddly shaped garden'.

These assertions fail to constitute adequate qualification to hold material weight.

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

This is dealt with in the Iceni response.

#### 11. Landscape

We do not agree that the landscaping proposed is limited. It is fully appropriate for this location, with robust Biodiversity Net Gains that demonstrate a clear betterment on the site as it currently exists.

The site also has a significant retained vegetation screen on the western boundary separating it from West End Road and a good level of separation and new planting on other boundaries.

The Council need only look to the immediate north and the recently permitted and built Corinthian Court, which is far tighter to its boundaries with minimal scope for landscaping or screening. Consistency of approach is required from the Council on this matter.

#### Conclusion

We trust that the response from Iceni and Chase New Homes provides a well-rounded and fuller picture of the proposals that will allow for a positive, creative and proactive discussion where the Council works with us as the applicant, as required by the Town & Country Development Management Procedure Order and Paragraph 38 of the National Planning Policy Framework 2021.