



**DEMOLITION OF EXISTING DETACHED
SINGLE DWELLING AND THE ERECTION OF A
BUILDING CONSISTING OF 9 NO. FLATS
WITH ASSOCIATED PARKING
AND AMENITIES (RESUBMISSION)**

**90 LONG LANE
ICKENHAM UB10 8SX**

**PLANNING STATEMENT
PREPARED FOR
ORACLE GLOBAL INVESTMENTS LTD**

JUNE 2026

1.0 INTRODUCTION

1.1 This Statement has been prepared in support of a full planning application for redevelopment comprising a building consisting of 9 no. flats following demolition of the existing dwelling at 90 Long Lane, Ickenham UB10 8SX. The application is submitted on behalf of Oracle Global Investments Ltd, the landowner.

1.2 The Statement demonstrates how the proposal meets NPPF policy and relevant London Plan 2021 and Hillingdon Local Plan policies. It includes a heritage assessment of the impact of the proposals on the character and appearance of the Ickenham Village Conservation Area.

1.3 The application drawings are:

PL7/SM/2964-00 – Proposed Location Plan and Block Plan (1:1250 & 1:500@A3)

PL7/SM/2964-01 – Proposed Site Plan (1:500@A3)

PL7/SM/2964-02 – Proposed Ground Floor Plan (1:100@A3)

PL7/SM/2964-03 – Proposed First Floor Plan (1:100@A3)

PL7/SM/2964-04 – Proposed Second Floor Plan (1:100@A3)

PL7/SM/2964-05 – Proposed Elevations 1 (1:100@A3)

PL7/SM/2964-06 – Proposed Elevations 2 (1:100@A3)

PL7/SM/2964-07 – Existing and Proposed Street Scenes (1:500@A3)

PL7/SM/2964-08 – Proposed Section (1:100@A3)

PL7/SM/2964-09 – Proposed Front and Rear Elevations - Coloured (1:100@A3)

PL7/SM/2964-10 – Proposed Roof Plan (1:100@A3)

PL7/SM/2964-11 – Existing Block Plan (1:500@A3)

PL7/SM/2964-12 – Existing and Proposed Block Plan Overlay (1:500@A3)

3D FRONT ELEVATION (NTS)

3D FRONT ELEVATION 45 LHS (NTS)

3D REAR ELEVATION 45 RHS (NTS)

1.4 This Statement should be read in conjunction with the following technical reports submitted in support of the application:

- (1) Transport Note ref. 26/923/B prepared by Magna Transport Planning Ltd, April 2026
- (2) Arboricultural Impact Assessment, Method Statement TH/3988D and Tree Protection Plan prepared by Trevor Heaps Arboricultural Consultancy Ltd, 7 April 2026
- (3) Daylight, Sunlight and Overshadowing Assessment prepared by Hawkins Environmental, 1 April 2026
- (4) BNG Assessment prepared by Ecology & Land Management, April 2026
- (5) Statutory Biodiversity Metric prepared by Ecology & Land Management, 23 April 2026 (Excel spreadsheet submitted separately)
- (6) Fire Safety Strategy prepared by Bancil Property Consultants, May 2026

1.5 This application follows a previous planning application 8905/APP/2024/2478 for a development of 9 no. flats which was refused by the Council on 8 May 2025 for three reasons:

- (1) Scale, massing and overall design resulting in an incongruous visually prominent form of development that would be detrimental to the character, appearance and visual amenity of the street scene and the setting of Ickenham Village Conservation Area contrary to Policies BE1 and HE1 of the Hillingdon Local Plan: Part One - Strategic Policies (2012), Policies DMHB 1, DMHB 4, DMHB 11 and DMHB 12 of the Hillingdon Local Plan: Part Two – Development Management Policies

(2020), Policies HC1, D1, D3 and D4 of the London Plan (2021) and Chapters 12 and 16 of the National Planning Policy Framework (2024).

- (2) Overbearing impact on the adjoining residents leading to a harmful sense of enclosure and loss of outlook to the residents of Nos 88 and 92 Long Lane contrary to Policy BE1 of the Hillingdon Local Plan: Part One - Strategic Policies (2012), Policy DMHB 11 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020) and the National Planning Policy Framework (2024).
- (3) Lack of a comprehensive fire statement demonstrating how the development would meet the requirements of Policies D5 and D12 of the London Plan (2021) in relation to reducing fire risk, construction methods, means of escape, strategy of evacuation and suitable access and equipment for firefighting.

1.6 This resubmission application addresses these objections. The project team has carefully worked through the issues previously raised by the Council and have fully revised the proposals. The main changes are:

- (1) Scale, massing and design: The proposed building has been reduced in height, depth and width. These reductions result in a building which is appropriate in its scale to its plot and neighbours and would not result in harm to the character of the area. The depth of the main element (excluding the small single storey rear extension) has been reduced from 22.4m to 19m. The rear elevation is only 2.5m beyond the rear elevation of the flats at No. 88 Long Lane and at a distance of 6.5m at this point, compared to the previous refused scheme which extended 6m beyond the rear No. 88 Long Lane. The proposed building has a T shaped footprint. The width of the front element has been reduced from 19.7m to 18.7m. The width of the remainder of the building has been reduced from 17m to 15m and the shape of this element has been revised by incorporating more angled side elevations (to reflect the design of the flats at No. 88 Long Lane). This further reduces the

perceived scale and massing from the neighbouring properties. The building height (9.9m) is the same as the flats at No. 88 Long Lane. The proposed eaves height to the side elevations (2.7m) is lower than No. 88 (3.5m).

- (2) Neighbour amenity: The combined effect of the reductions in the height, width and depth improve the relationship with neighbouring properties and address the previous amenity concerns. In particular, the reduced building depth means that the two-storey element extends beyond its neighbours by only 2.5m and 3.5m respectively (noting that these plots are at an angle to Long Lane and therefore rear elevations do not align and are staggered anyway). The angled shape of the side elevations with the eaves effectively at ground floor (2.7m eaves height) and the remainder of the elevation within the roof sloping away from each side boundary further reduces scale and massing viewed from the neighbouring properties. The daylight, sunlight and overshadowing assessment submitted with the application demonstrates how the proposal complies with normal BRE standards and would not impact neighbouring properties. The revised proposals significantly reduce the number of windows in the side elevations so there are no habitable room windows overlooking the neighbouring properties. The layout and accompanying tree report and plans demonstrate how the proposal will retain existing mature trees and hedging to the side boundaries which will further protect neighbour amenity. The proposals incorporate private amenity space in the form of balconies or garden terraces for each flat to comply with Hillingdon and London Plan standards. There is also communal amenity space so overall the proposal significantly exceeds standards.
- (3) Fire safety: The previous application was refused because of the failure to provide a satisfactory fire statement. A Fire Safety Strategy prepared by Bancil Property Consultants Ltd is submitted with this application to

demonstrate how the revised proposals comply with London Plan Policies D5 and D12.

- 1.7 All other matters were considered acceptable in relation to the previous planning application 8905/APP/2024/2478. I refer to the Officer's Report on the previous application to the Council's Planning Committee on 7 May 2025 throughout this Statement. To assist the officers in considering the current proposals I have used the same headings and ordering in my assessment in Section 4 as the Committee Report to the previous application.
- 1.8 This Statement and the drawings and reports accompanying the application demonstrate that the proposal would represent an efficient use of land and make an important contribution to the Council's housing land supply on previously developed land in a sustainable urban location. It would not result in any harm to the character of the area or to residential amenity of occupiers of neighbouring properties and would comply with all other relevant policies including those dealing with housing mix, quality of residential accommodation (internal and external), highways and parking, accessibility, trees and landscaping, ecology, BNG, flooding and drainage, sustainability, waste management and fire safety.

2.0 SITE DESCRIPTION

- 2.1 The application site is located on the northwest side of Long Lane, about 80 metres to the north-east of its junction with Swakeleys Drive and 320 metres north of the Long Lane/A40 Western Avenue eastbound entry junction. The site has a PTAL of 3 (up from PTAL 2 at the time of the previous applications) and is within convenient walking distance less than 400 metres from Hillingdon station and bus stops.
- 2.2 The application site sits within an established residential area which includes both detached houses and flatted developments. To the north there is also the Cardinal Hume Campus of the Douay Martyrs School. Of particular relevance to the current application is the 3-storey block of 9 no. flats constructed on the adjacent site of No. 88 Long Lane immediately to the north under planning permission 29164/APP/2016/4622 dated 11 September 2017. This recent development is now an important component of the character and pattern of development to the surrounding area.
- 2.3 The site and surrounding area lie within the Ickenham Village Conservation Area. The application site and the neighbouring property to the rear (known as Dormy House) are also covered by Tree Preservation Orders (TPOs 438 and 482a).
- 2.4 The site is within flood zone 1 (lowest risk) and not within an identified critical drainage area.
- 2.5 The site is considered suitable, particularly given the scale and nature of the adjacent development, to accommodate a more intensive development which would contribute additional new homes in a sustainable location to meet the Borough's identified housing needs without harm to the built, natural or heritage environment or residential amenity.

3.0 DESCRIPTION OF THE DEVELOPMENT

- 3.1 The proposal is to demolish the existing detached dwellinghouse and erect a building comprising 9 flats (2 no. one bed flats, 5 no. two bed flats and 2 no. three bedroom flats) with associated parking and amenities.
- 3.2 The application is a resubmission following a previous planning application 8905/APP/2024/2478 which was refused by the Council on 8 May 2025. The application was refused on three grounds: (1) siting and scale of the development which would be out of keeping with the character of the Conservation Area and the area generally; (2) impact on neighbouring amenity; and (3) inadequate fire safety information.
- 3.3 Each of these reasons for refusal have been addressed in the current proposals. The scale and design of the development have been substantially revised to ensure that they are appropriate for the plot and its surrounds and would not result in unacceptable impacts on neighbouring amenity. A full fire strategy statement is submitted with the application.
- 3.4 The current scheme proposes the same number of flats as previously but the scale and design have been revised and strongly reflect the development of 9 no. flats on the adjacent site at No. 88 Long Lane (which is a smaller site than the application site). This scheme was supported and approved by the Council. It was considered acceptable within the Conservation Area. It now contributes itself to the character of this area. The proposal would reflect this established character.
- 3.5 The main features of the proposed layout remain similar to the previous application. The development would be served via the existing vehicular access from Long Lane. The existing separate pedestrian access is also retained. The forecourt would provide parking for 9 cars (including a space for disabled persons). There would be 20 cycle parking spaces and a bin store area on the south side of the forecourt easily accessible from Long Lane. The proposed layout retains the same individual trees and boundary trees that were

retained in the previous application. The Council did not raise any objection in relation to vehicle and cycle parking, refuse storage and trees with the previous application.

4.0 NATIONAL AND LOCAL PLAN POLICIES

National Planning Policy Framework

- 4.1 The National Planning Policy Framework December 2024 (NPPF) reaffirms the pro-growth agenda for the planning system. At its heart is a presumption in favour of sustainable development which means that proposals which accord with an up-to-date development plan should be approved without delay.
- 4.2 The NPPF seeks to significantly boost the supply of housing land and to support growth by making sufficient provision for housing and other development in line with the presumption in favour of sustainable development at paras. 11(a) and (b) of the Framework; see also NPPF paras. 8 and 20 and footnote 11. The Framework underpins the Government's ambitious plans to deliver 1.5 million new homes during the current parliamentary term or 370,000 new homes each year through the re-introduction of mandatory standard method for identifying local housing needs and five-year housing supply targets.
- 4.3 The proposals offer the following benefits pursuant to the main NPPF sustainable development principles at paragraph 8:
- Economic objectives – Provides land for housing to support economic growth on a previously developed site which is owned by a small-scale SME developer of the type that Government is keen to support (NPPF para. 73) and which is immediately available for housing development to support economic growth. Benefits to the local community and local economy including creation of jobs and supply chain investment associated with the construction stage and increased demand for local goods and services over the long-term occupation of the dwellings.
 - Social objectives – Widens the choice of high-quality residential accommodation in a sustainable urban location and contributes to meeting objectively assessed housing needs in the Borough.

Specifically, the proposal would contribute to the Borough's identified housing needs in a sustainable location near to shops and services.

- Environmental objectives – Protects and enhances the environment including the historic and natural environment. Encourages non-car modes of travel due to its good sustainable location with restrained on-site parking provision and full cycle provision and immediate access to bus services outside the site. Provides an acceptable standard of amenity for existing and future occupiers in accordance with nationally described space standards and London Plan standards.

4.4 Other national policy relevant to the current application includes:

- **Government policy seeks to boost significantly the supply of housing (Section 5)**
- **To support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and land with permission is developed without unnecessary delay (paragraph. 61)**
- **Small and medium sized sites can make an important contribution to meeting the housing requirement of an area, are essential for Small and Medium Enterprise housebuilders to deliver new homes, and are often built out relatively quickly (paragraph 73)**
- **Planning policies and decisions should support development that makes efficient use of land taking into account factors such as the availability of land suitable for accommodating different types of housing (paragraph 129)**
- **Planning policies and decisions should ensure that developments:**
(a) will function well and add to the overall quality of the area; (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; (e) optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development; and (f) create places that are safe, inclusive and accessible (paragraph 135)

The Development Plan

4.5 The development plan for the purposes of S38(6) of the PCPA 2004 and S70(2) of the TCPA 1990 is the London Plan – The Spatial Development Strategy for London March 2021, the Hillingdon Local Plan: Part 1 Strategic Policies (November 2012) and the Hillingdon Local Plan: Part 2 Development Management Policies (2020).

4.6 Plan policies most relevant to this application include:

London Plan 2021

GG2 – Making the best use of land

GG4 – Delivering the homes Londoners need

D1 – London’s form, character and capacity for growth

D2 – Infrastructure requirements for sustainable densities

D3 – Optimising site capacity through the design-led approach

D4 – Delivering good design

D6 – Housing quality and standards

D12 – Fire safety

H1 – Increasing housing supply

H2 – Small sites

H10 – Housing size mix

HC1 – Heritage conservation and growth

SI13 – Sustainable drainage

T5 – Cycling

T6 – Car parking

Hillingdon Local Plan Part 1 (2012) and Part 2 (2020)

LPP D4 – Delivering good design

LPP D6 – Housing quality and standards

LPP D8 – Public realm

HE1 – Heritage

BE1 – Built environment

DMHB4 – Conservation areas

DMHB11 – Design of new development

DMHB12 – Streets and public realm

DMHB14 – Trees and landscaping

DMHB16 – Housing standards

DMHB17 – Residential density

DMBH18 – Private outdoor amenity space

5.0 ASSESSMENT OF THE PROPOSALS

The principle of development

- 5.1 The Committee Report to the previous application 8905/APP/2024/2478 noted that the site is within the settlement limits within an established residential area and the provision of new housing on the site is acceptable in principle, subject to consideration of other factors. The report acknowledged that the provision of 9 dwellings would represent a net increase of eight units that would provide a valuable contribution towards meeting local housing need.
- 5.2 LP Policy DMH 1 states that the net loss of existing self-contained housing will be resisted unless the housing is replaced with at least equivalent residential floorspace. The proposal results in a net increase in the number of self-contained dwellings and in the amount of residential floorspace.
- 5.3 Local Plan Part 2 acknowledges that the redevelopment of dwellings into new blocks of flats can enable more effective uses of sites to be achieved providing this is in keeping with the character of the area. LP Policy DMH4 allows redevelopment of dwellings into new blocks of flats where it is on a residential street and the proposal will not result in more than 10% of properties being redeveloped flats (to avoid overconcentration). The Committee Report to the previous application confirmed that the proposed development would not result in more than ten percent of properties within the area redeveloped into flats and therefore it would not lead to an overconcentration of flat developments within the area. (Policy DMH4 also states that redevelopment for flats will only be permitted where the existing property is greater than 120m² floorspace and allows only one flat per floor. It appears this part of the policy is more relevant to conversions of existing buildings. As the previous Committee Report noted, although there would be more than one flat per floor, these would provide a high-quality of internal accommodation in accordance with London Plan Policy D6 and therefore it was considered the proposals complied with LP Policy DMH4).

- 5.4 The Council previously confirmed there is no objection in principle to redevelopment for flats to create additional residential units in this location in land use terms, subject to the proposal being in accordance with all relevant development plan policies and guidance.
- 5.5 I consider the principle of additional residential development in this location is acceptable and accords with national and local planning policies:
- (1) The proposal accords with national policy, the London Plan and Local Plan policies which seek to direct new housing development to sustainable urban locations and particularly to previously developed land (PDL). New homes should be delivered through a wide range of development options as possible by reusing small brownfield sites that can be developed more quickly and in well-connected places.
 - (2) The site lies within an established urban area where there is a general presumption in favour of new residential development subject to normal development control considerations as confirmed above.
 - (3) The site has good public transport accessibility (PTAL rating 3). There are bus stops immediately outside the site served by route 278 (Heathrow Central, Harlington, Hayes & Harlington Station, Uxbridge, Hillingdon Station, Ickenham Station, West Ruislip Station, Ruislip Station) with 4 buses/hour in each direction, and also school bus services 695, 697 and 698. Hillingdon station and further bus stops are within a convenient walking distance (within 400 metres) south of the site. Hillingdon (Long Lane) local centre is 400 metres to the south and Ickenham district centre is 800 metres to the north of the site so well within the CIHT recommended walking distances.
 - (4) The proposal accords with London Plan 2021 policies which reaffirm the need to optimise the use of land particularly in sustainable locations; see GG1 – Making the best use of land, D3 – Optimising site capacity through the design-led approach, and H1 – Increasing housing supply.

Housing mix

- 5.6 London Plan Policy H10 notes a need for additional family housing (defined as three or more bedrooms). HLP Policy DMH 2 states that new developments should provide a mix of housing sizes that reflect the Council's latest evidence of need, including meeting a requirement for larger homes (particularly three-bedroom units) as identified in the Strategic Housing Market Assessment 2016.
- 5.7 The Council, in assessing the previous proposal, concluded that because it provided a net increase in the number of family sized units it accorded with the Council's housing strategy and complied with HLP Policy DMH 2 and London Plan H10.
- 5.8 As noted above there is established policy in favour of making effective use of sites and optimising the density of development. The proposed development would deliver 2 x three-bedroom units which comply with the London Plan space standards and nationally described space standards. The existing detached dwelling on the site is a family-sized unit. The inclusion of 2 family units provides a net gain of family sized units and makes a contribution to the identified need.
- 5.9 London Plan Policy H10 states that schemes should generally consist of a range of unit sizes having regard to local evidence of need and the range of housing need and demand in the 2017 London SHMA. The policy states that one and two bed units are generally more appropriate in locations with higher public transport access and connectivity. The current proposal now offers a wider range of 1, 2 and 3 bed unit sizes. Given the various policy objectives, the overall housing mix is considered acceptable. It would provide a balanced mix of properties suitable for both families and individuals whilst providing an uplift of an additional 8 homes on PDL in a sustainable urban location where there are genuine choices available for non-car modes of travel.
- 5.10 Overall, the proposal is consistent with both London Plan and HLP policies aimed at increasing the supply of family-sized homes but also encouraging a

range of unit sizes. The proposal is supported in principle, subject to compliance with other planning considerations, including design, amenity space, and parking standards.

Design and character and appearance of the area (including Ickenham Village Conservation Area)

- 5.11 Local Plan policies seek to ensure that all new development complements and, where possible, improves the character and appearance of the area in which it is proposed. Policy DMHB11 requires all development to be designed to the highest standards and incorporate principles of good design and harmonise with the local context by taking into account the surrounding scale of development and considering the height, mass and bulk of adjacent structures, building lines and set backs and protecting features of positive value. Policy DMHB12 requires developments to improve legibility and ensure public realm design takes account of the established townscape character and quality of the surrounding area. London Plan Policies D1, D3 and D4 require proposals to respond positively to local context and to deliver high-quality, context-sensitive design.
- 5.12 Additionally, S72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 places a statutory duty on LPAs to pay special attention to the desirability of preserving or enhancing the character or appearance of conservation areas. This requirement is reflected in London Plan Policy HC1, which requires developments to conserve the significance of these assets and their settings, and HLP Policy DMHB4 (Conservation areas) which seeks states that new development within a Conservation Area or on its fringes, will be expected to preserve or enhance the character or appearance of the area.
- 5.13 The Committee Report to the previous refused application acknowledged that the flatted development at the adjoining site (No. 88 Long Lane) has recently been completed (Ref: 29164/APP/2016/4622). While elements of the previous proposals drew some inspiration from this neighbouring development, the proposed building would be significantly wider and bulkier than No. 88 such that

the proposal would result in a building of substantial massing owing to its increased height, width, built form and bulk. The applicants sought to demonstrate that because the current application site is markedly larger than No. 88, in terms of percentage of built area proportionately the proposals were appropriate and acceptable. The report concluded that the development would continue to appear quite imposing due to its size, massing and scale which appears significantly greater than any of the existing buildings within the immediate area. Officers commented that the proposed bulk and massing should respond to the surrounding context, rather than plot size.

- 5.14 The Committee Report also noted that a key concern was the overall scale and bulk of the projecting Dutch-style rear return which would appear disproportionate within the building and would fail to appear as a subservient addition to the main building. Notably the rear projection would extend approximately 12 metres, which is larger than the depth of the main front building section. Combined with its substantial width, even with a modest set-in of 1.2m on each side, this exacerbates the overall scale and bulk, causing harm to the building's overall design and to the wider Conservation Area. Visually the combination of both the main frontage building and the rear projecting element would be imposing. Whilst, the projecting element would be more visible from flank, and rear viewpoints, given its overall height and width in proximity to the main roof, there would be some visibility also from public vantage points. The resultant form would appear cramped and overdeveloped compared to the prevailing looser urban grain and development pattern along Long Lane. Although the staggered building line reflects some aspects of the street's character, this would not mitigate the excessive massing, which would be readily visible from both public and private viewpoints. The proposed development would therefore represent a cramped and overly intensive form of development, and a more significant reduction in the size and scale of the building would be necessary to achieve an acceptable form.
- 5.15 The current proposals have been substantially revised by the project team, with advice from myself, to address the previous objections:

- (1) The form and pattern of the proposals are inspired by the approved flatted development at No. 88 which is considered an appropriate design approach for the current site.
- (2) The main element of the proposed building is two storey and faces Long Lane broadly following the established building line (whilst noting that this is staggered because plots/buildings are not perpendicular to the street). It incorporates a steeply pitched roof with a projecting central which follows a similar form to No. 88 (although the current proposal is hipped).
- (3) There is a smaller projecting rear wing which has a similar Dutch barn shape to No. 88. This arrangement ensures the bulk and massing of the building is reduced particularly when viewed from neighbouring properties.
- (4) The Committee Report to the previous refused scheme set out some key dimensions. For comparison purposes:
 - The proposed building would measure approximately 19m wide along the front elevation. *Current proposal: 18.8m wide across a plot width of 28.1m or a building/plot width ratio of 67%. By comparison the building/plot width ratio at No. 88 is 86% (15.4 building width but plot width of only 18m).*
 - Height of approximately 10m. *Current proposal: 9.8m height. Same height as flats at No. 88. The front gable and rear wing have a lower height of 9.5m. to provide subservience (in combination with set in width and shape, see below)*
 - Building depth of 23.5m at ground floor. *Current proposal: Building depth of 21.3m building depth at ground floor, reducing to 19m for upper floors. Building depth for No. 88 flats is 23.5m.*

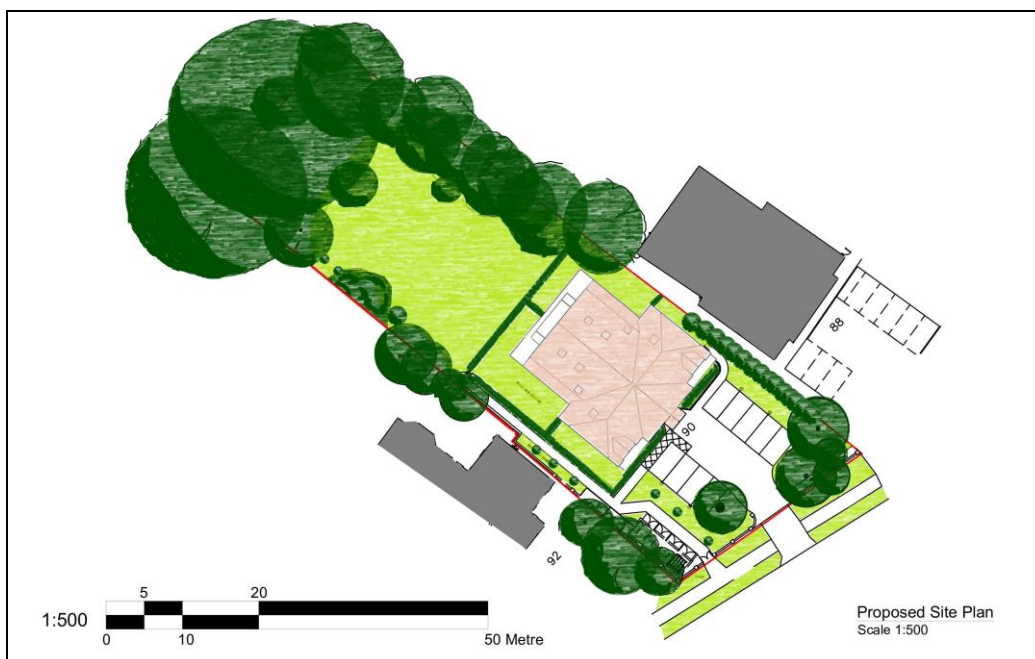
- Rear wing steps in by 1.2m on each side. *Current proposal: Rear wing steps in by 2.4m on each side. The increased set-in distance and reduced ridge height helps ensure a subservient rear wing and also reduces views of the rear wing from the street (which in any event is largely screened by mature trees and shrubs).*

(5) The following are additional relevant comparisons (not used in the previous Committee report):

- The site area for this proposal (0.22ha) is 29% larger than the site area for No. 88 (0.17ha) yet the building footprint is only 3% larger (or smaller than No. 88 footprint if the single storey rear element is discounted).
- The overall building/plot ratio is 16% (building footprint of 352m² and site area of 2198m²) compared to 19% building/plot ratio for the No. 88 flats (building footprint of 327m² and site area of 1730m²).
- The rear wing in the current proposal is proportionally much smaller than the rear wing to No. 88 flats. The volume of the rear wing is about 780m³ compared to about 1005m³ for the rear wing to No. 88 (22%). The proposed rear wing is only 8m deep above ground floor compared to 10.2m depth for the rear wing at No. 88.
- The bulk and mass of the rear wing on the current proposal is also significantly less (and materially reduced compared to the previous refused scheme). The rear wing has a Dutch barn shape (or Gambrel form) with a low eaves height (about 2.7m) and two sloping roofs to the side, a low and shallow upper slope (about 30°) and a steeper lower slope (about 65°). This reduces the bulk and mass when viewed from neighbouring properties. For example, the roof at the point where the lower slope meets the upper slope (top of the first floor) is 5.8m above ground level and

set in more than 12m from the boundary with No. 92 and 8m from the boundary with No. 88. The rear wing to No. 88 is bulkier so both the first and second floor accommodation is set within the steeper lower slope, hence the equivalent point at the top of the lower slope is 8.5m above ground level and only 6.4m and 5.5m from the side boundaries respectively. For comparison, the ratio of the outline to the rear wing to the overall rear elevation is 58% for the current proposal and 70% for the flats at No. 88.

- 5.16 All of these quantitative comparisons demonstrate that the current proposal has incorporated significant reductions compared to the previous refused scheme. It now provides a suitably scaled development which is proportionate to its site and in keeping with its surroundings, and particularly when compared to the flatted development approved for No. 88.
- 5.17 The Committee Report to the previous application notes that the wider Ickenham Village Conservation Area is characterised by spacious, maturely landscaped residential plots and properties occupying large plots with extensive rear gardens.
- 5.18 The proposal is set back in the site about 19m from the front boundary (26m from Long Lane carriageway) in line with the staggered building line created by its neighbours. The forecourt layout retains important trees at the front of the site T2, T3, T4 and T5 and T38 (the latter was required to be retained by the Council's Tree Officer in the previous application; the layout has been amended so it is situated within a soft landscape area rather than within the parking area). Boundary trees are also retained on both sides as with the previous scheme. Thus, the proposal retains a large front and rear garden and continues to be well-landscaped with mature trees and shrubs. In particular, the development will continue to be well-screened from views from the road and provide a soft, natural screen from the street scene, as acknowledged in the previous Committee Report. The proposal therefore would maintain the sylvan character of the local street scene within this part of the Conservation Area.



- 5.19 In terms of design detailing, the Council raised concerns that whilst the previous proposal attempted to draw on the neighbouring development by incorporating mock Tudor features to the front elevation, this has been poorly executed. The detailing was basic and lacked the high-quality design expected within the Conservation Area. The excessive amount of fenestration and inconsistent window proportions resulted in an unduly prominent and visually discordant appearance, failing to respect the local character and therefore resulting in harm to the character and appearance of the Conservation Area.
- 5.20 The current proposals have been substantially redesigned. They incorporate mock Tudor features to reflect the existing dwelling and the neighbouring flats at No. 88. This also reflects the majority of other dwellings in the area including two-storey detached houses on the opposite side of Long Lane.
- 5.21 The proposed materials are brick to the ground floor, timber with render to the first floor and horizontal timber banding to the front gable and dormers with red plain clay tiles to match neighbouring buildings. Other design details have been introduced including contrasting lintels and cills, brick plinth and horizontal timber boarding to the first-floor gable and dormer faces.

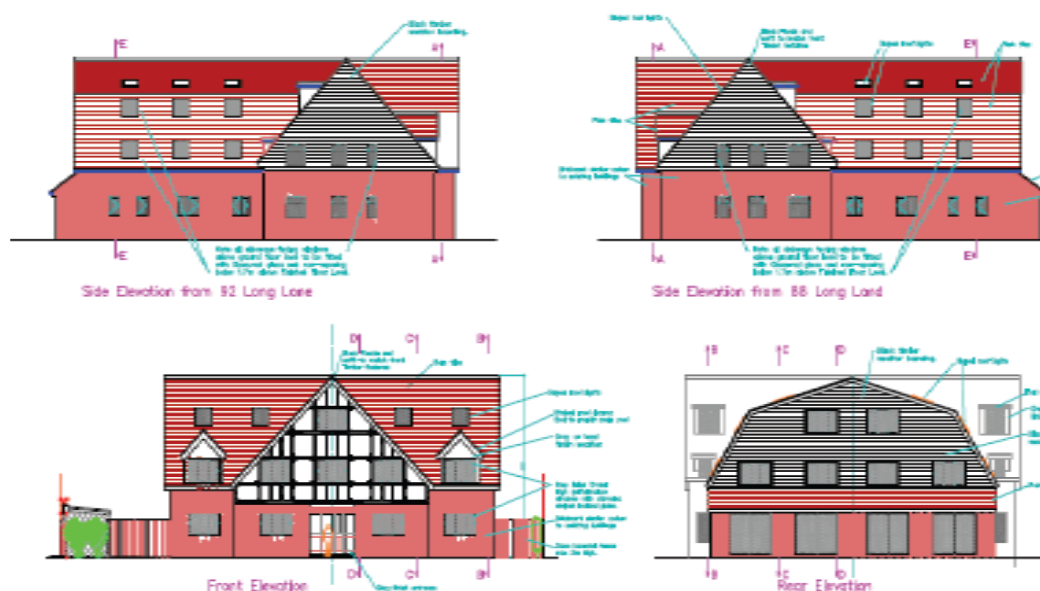


No 88 Long Lane – 9 flats



Established residential development opposite the application site

- 5.22 Windows are all triple casement except the 2 no. full length doors serving balconies. The fenestration on the rear elevation has been simplified with a handful of triple casement windows and full-length doors to the balcony and garden terrace areas. (windows could be leaded on the front elevation as shown below if required). As described above, the number of openings in the flank elevation has been significantly reduced compared to the refused scheme (from 9 to 3 openings).
- 5.23 The revised scale and design of the development will ensure that it would not have an unacceptable detrimental impact on the character, appearance and visual amenity of the area. The development would preserve the setting of the Ickenham Village Conservation Area. On this basis the proposal would accord with HLP Policies BE1, HE1, DMHB 1, DMHB 4, DMHB 11 and DMHB 12 and London Plan Policies HC1, D3 and D4, the National Planning Policy Framework (2024). The development would also meet the statutory duty in S72 to the LB&CCA 1990.



Refused scheme



Current scheme



Proposed front elevation

Residential Amenity

- 5.24 HLP Policy DMHB 11 requires development proposals to not adversely impact the amenity, daylight, or sunlight of adjoining properties and open spaces. Local Plan para. 5.38 refers to a minimum separation distance of 21 metres between windows of habitable rooms to maintain levels of privacy and to prevent the possibility of overlooking.

Privacy

- 5.25 The principal habitable room windows for the proposed development are on the front elevation facing Long Lane (more than 50 metres from properties on the

opposite side of the road) and on the rear elevation looking down the long communal garden (46 metres length). Given these distances there would be no unacceptable overlooking or loss of privacy.

5.26 The only upper floor habitable room windows in the flank elevation of the building serve a bedroom (secondary window) and a bathroom to each of the front first floor flats. At this point the bedroom window does not overlook any windows in the flank elevation of the main part to No. 88 (because of the stagger in the road and plots, the neighbouring flank elevation is further forward). There are first floor openings in the roof to the rear wing of No. 88 but these all have raised cills to avoid any overlooking. The proposed bathroom window would be fixed shut and obscure glazed (secured by a condition). On the opposite side, there are no habitable room windows in the flank elevation of No. 92 facing towards the application site. The proposed bedroom window in the flank elevation on this side would overlook the roof of the single-storey side extension to No. 92. Again the proposed bathroom window would be fixed shut and obscure glazed (secured by a condition).

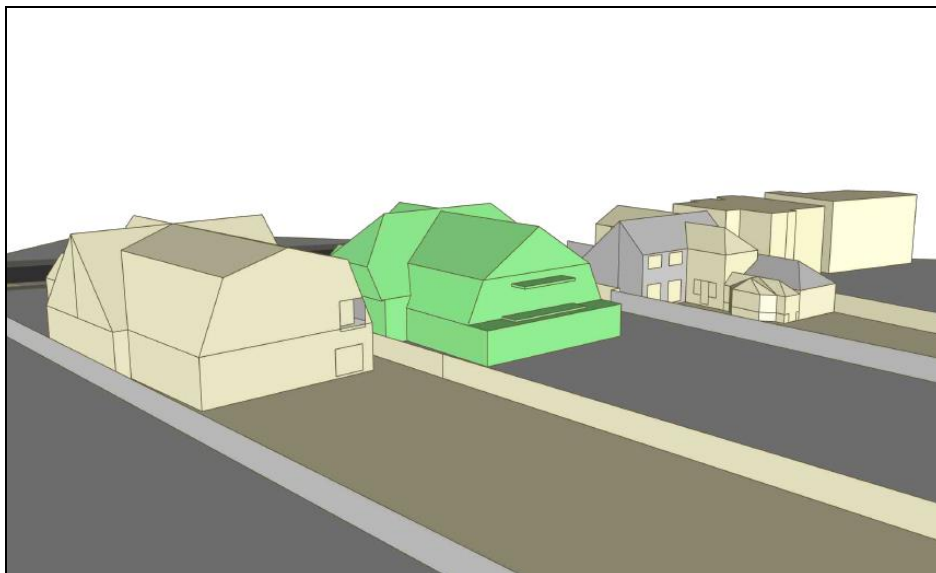
5.27 There are no habitable room windows to upper floors in the flank roof slope to the rear wing. The only openings are 3 no. rooflights on each side. One of these serves a bathroom. The others serve the kitchen, bathroom and living areas (secondary openings) to the second floor flat. These would all be at least 1.8m cill height above the relevant floor level (as with the similar openings in the roof to the rear wing of No. 88), and in the case of the bathrooms would also be obscure glazed and secured by a planning condition, to ensure no loss of privacy or overlooking.

Light and Outlook

5.28 An updated Daylight, Sunlight and Overshadowing Assessment undertaken by Hawkins Environmental (1 April 2026) is submitted with the application. This provides an assessment of the effect of the proposal on levels of daylight and sunlight falling on the windows of adjacent properties as well as gardens and outdoor amenity space using the standard BRE guidelines (2022).

- 5.29 Two types of daylight assessments were carried out in accordance with the BRE guidelines. The Vertical Sky Component (VSC) test identified a small reduction in daylight to some neighbouring windows but in all cases the proposed level of daylight will either exceed 27% VSC or the proposed level of daylight will be at least 0.8 times the existing. Therefore, all windows pass the BRE guidelines. The reduction in daylight is unlikely to be noticeable and in accordance with Appendix H to the 2022 BRE guidelines the impact of the proposed development on levels of daylight is assessed as 'negligible'.
- 5.30 A 'No Skyline' (NSL) assessment has also been undertaken to calculate the 'daylight factor' which gives an indication of how well daylight is distributed in a room in neighbouring properties. The NSL assessment shows that in all of the rooms assessed, whilst there is some reduction in the amount of working place that received direct light from the sky, in all cases those areas receiving direct light from the sky would be greater than 0.8 times the existing area and would therefore pass the BRE guidelines such that any reduction is not considered significant.
- 5.31 The Hawkins Environmental report also assesses the overshadowing impacts of the proposed development on gardens and outdoor amenity space. The BRE guidelines requires at least 50% of the garden should be capable of receiving at least two full hours of direct sunlight on 21 March and, if this is not achieved, providing the area overshadowing is greater than 0.8 times its former value then no material impact is likely to occur. The series of shadow diagrams appended to the report (0900 to 1700) show that at least 50% of the garden should be capable of receiving at least two full hours of direct sunlight on 21 March. At no time does the proposed building result in any additional overshadowing to the gardens of neighbouring properties at Nos. 88 and 92 Long Lane. In fact, there will be some minor improvements to the garden of No. 92 at 0900 and 1000 and to the garden of No. 88 from 1100 onwards compared to the existing situation (because of the removal of existing buildings situated on the boundaries).

- 5.32 The assessment therefore demonstrates that the proposed development would not result in an unacceptable loss of daylight or sunlight to neighbouring flats and overall light levels would remain satisfactory, and the proposal would not result in unacceptable overshadowing of neighbouring gardens and would offer some betterment.
- 5.33 The Council previously had concerns about the effect of the scale, depth and massing of the refused scheme on outlook and sense of enclosure. This was mainly due to the proposed building projecting significantly beyond the rear elevations of both neighbouring properties at Nos. 88 and 92 Long Lane and the overall height and bulk of the rear wing together with the number of windows in the side elevations. The current proposal has addressed these concerns through the following changes:
- (1) The depth of the two-storey element of the rear wing has been reduced from 10.2m to 8m. The overall building depth has also been reduced so that now the wing projects only 2.3m beyond the rear line of No. 88 (compared to an extended depth of nearly 7m beyond the rear line in the refused scheme). Similarly, the two-storey element projects only 3m beyond the rear of the front building at No. 92 and is set back about 9m from the back building at No. 92 (compared to 7.2m and 4.6m respectively for the refused scheme).
 - (2) The proposed rear wing easily complied with the BRE 45 degree rule of thumb for all habitable room windows.
 - (3) As described above, the shape of the rear wing has been revised to significantly reduce its bulk when viewed from neighbouring properties on each side. The rear wing has a low eaves height (only 2.7m) and two sloping roofs to the side, a low and shallow upper slope (about 30°) and a steeper lower slope (about 65°). The point where the lower slope meets the upper slope (top of the first floor) is 5.8m above ground level and set in more than 12m from the boundary with No. 92 and 8m from the boundary with No. 88.



3D Model of Revised Proposals. Source: Hawkins Environmental



3D Front elevation Source: Bancil Property Consultants

- (4) The resultant volume of the revised wing is about 22% less than the refused scheme (780m³ compared to 1005m³). The reduced form of the rear wing can be appreciated in the 3D image included in the Hawkins Environmental report (see also below).

- (5) For comparison, the ratio of the outline to the rear wing to the outline of the overall rear elevation is about 58% for the current proposal compared to about 70% for both the refused scheme and the flats approved at No. 88.
- (6) There are no habitable room windows to the upper floors in the flank elevations on each side. There are only 3 no. rooflights in each side and these are positioned so that cill levels will be at least 1.8m above the relevant floor level (and bathrooms will be obscure glazed). This addresses the concerns in relation to overlooking in the refused scheme.
- (7) The Committee Report to the refused scheme noted that the neighbouring property at No. 92 Long Lane is L shaped and has a dining room and conservatory in a rear wing facing towards the proposed development. These are shown on the proposed layout drawing PL7/BP/3964-00. The dining room windows are almost in line with the rear line of the two-storey rear wing so there are open and unobstructed views to the left. From this position the roof to the rear wing is progressively sloping away from the viewer. The point where the lower slope meets the upper slope of the side roof (top of the first floor) to the rear wing is about 19 metres from these windows. Given the reduced depth, bulk and volume of the rear wing and the significant separation distances (and noting that none of these windows 5 to 12 in the Hawkins Environmental assessment show more than a 94% reduction in daylight) I consider the proposal would not result in an unacceptable sense of enclosure or loss of outlook to these rooms.
- (8) The northern flank of the proposed building would be near to flank windows in the adjacent flats at No. 88 Long Lane. See the proposed layout drawing PL7/BP/3964-00. The neighbouring windows are a secondary window to a kitchen area (which is also served by large full length glazed doors in the rear elevation) and a bathroom (which has obscure glazed windows) to the rear flat, and a second bedroom and a

secondary window to the kitchen (which is again also served by a large front facing window) to the front flat. The outlook from these windows is already affected by the boundary fence and hedging, the gable end to the existing dwelling to be replaced and an existing outbuilding on the boundary which is to be removed. The proposed building is set slightly further away from the boundary compared to the existing building. The flank to the proposed building has a lowered eaves height (about 3.7m) and a hip to this end of roof to reduce massing. Overall, given these circumstances it is considered the proposal would not result in significant additional loss of visual amenity for these occupiers.

Noise, Activity and Disturbance

- 5.34 The Committee Report to the previous refused scheme for 9 no. flats concluded that although the proposal resulted in an intensification of residential use, this would not be out of character or of a scale that would generate unacceptable levels of noise or disturbance.
- 5.35 Officers previously noted that the internal arrangement would place kitchen/living/dining areas to the first floor flats above bedrooms of ground floor flats. This has been addressed in the revised proposals. In any event, officers concluded that the development will be required to comply with Approved Document E of the Building Regulations in due course which would be sufficient to address potential noise transmission between units.

Conclusion on neighbouring amenity

- 5.36 The revised proposals address the Council's previous concerns in relation to the residential amenity of neighbouring occupiers, specifically through ensuring there would now be no unacceptable loss of privacy, overlooking, loss of outlook or overbearing impact. The development therefore accords with HLP Policy DMHB 11.

Quality of Residential Accommodation (Internal and External)

Internal Amenity Space

- 5.37 HLP Policy DMHB 16 states that all housing development should have an adequate provision of internal space in order to provide an appropriate living environment. London Plan Policy D6 of the London Plan (2021) states that housing development should be of high-quality design and provide adequately sized rooms. The London Plan sets out its own version of nationally described space standards to be met by new residential developments.
- 5.38 All of the 9 no. proposed flats would comply with the nationally described space standards and London Plan space standards and accord with Policy D6 (housing quality and standards):

	Standard	Proposed
Flat 1 (2B4P flat)	70 sq m	70.0 sq m
Flat 2 (2B4P flat)	70 sq m	70.0 sq m
Flat 3 (3B4P flat)	74 sq m	74.4 sq m
Flat 4 (3B4P flat)	74 sq m	74.4 sq m
Flat 5 (2B4P flat)	70 sq m	70.0 sq m
Flat 6 (2B4P flat)	70 sq m	70.0 sq m
Flat 7 (1B2P flat)	50 sq m	54.5 sq m
Flat 8 (1B2P flat)	50 sq m	54.5 sq m
Flat 9 (2B4P flat)	70 sq m	120.0 sq m

- 5.39 The proposed internal layouts would provide a satisfactory standard of accommodation for future occupiers. They meet space standards in relation to individual bedrooms and storage cupboard provision. The sections on drawing PL7/SM/2964-08 demonstrate the proposal achieves the minimum 2.5m floor-to-ceiling heights. Each flat would benefit from a primary outlook to either the

front or rear of the building, with additional secondary windows to the flanks providing improved cross-ventilation and access to natural light.

- 5.40 First floor and second floor accommodation in the rear wing is incorporated in the barn-style roof. This results in some limited headroom at the sides. However, this is mainly at second floor where the overall room sizes including the living/dining area are all generous and incorporate higher floor-to-ceiling heights than the minimum requirement.
- 5.41 Overall, the amount and quality of accommodation would ensure good living conditions for future occupants and would provide adequate outlook and natural light.
- 5.42 The layout shows a substantial communal garden retained at the rear of the building accessed via a pathway running along the southern side the building. There is a generous gap between the building and the boundary on this side which allows for the provision of private amenity space for the ground floor flats with substantial hedging around these areas and defensible planting between window and the access routes to ensure no loss of privacy to ground floor occupiers from other residents accessing the communal gardens.
- 5.43 The proposal would provide an acceptable standard of residential accommodation for future occupiers, with adequate internal space, natural light and outlook. The development therefore complies with HLP Policy DMHB 16 and London Plan Policy D6.

External Amenity Space

- 5.44 HLP Policy DMHB 18 (Private outdoor amenity space) states that new residential developments should provide adequate levels of private, well designed and located amenity space. Table 5.2 to the Local Plan specifies that 1 bed, 2 bed and 3 bed flats should provide a minimum of 20m², 25m² and 30m² of private amenity space respectively. Dwellings on upper floors should all have access to a private balcony or terrace where this is consistent with the

overall design of the building. Ground floor flats should have private gardens with a minimum 3 metres depth unless they are street facing.

- 5.45 In this case the architects have sought to provide each flat with some private amenity space. The ground floor flats have private garden terraces to the sides and rear with minimum depths of at least 3 metres (except for the north side garden). All upper floor flats have private balconies. The balconies to the front flats 5 and 6 are restricted for design reasons (which is an exception allowed by the policy).
- 5.46 The development also offers a substantial communal garden to the rear of the building of more than 1,000m² (more than 110m² per flat). Detailed landscaping of this area can be secured by a condition. The Council in assessing the previous application considered that the communal garden of about 600m² was sufficient to offset the lack of balconies in that scheme. As indicated above, there is sufficient space to provide defensible landscaped buffers around the private garden terrace areas to ensure their usability and protect the privacy of ground floor occupants.
- 5.47 The quantity and quality of proposed external amenity space is considerably improved compared to the previous scheme (which the Council considered was acceptable in amenity terms). The proposal would therefore comply with HLP Policy DMHB 18 and London Plan Policy D6.

Highways and parking

- 5.48 An updated Transport Note (April 2026) prepared by Magna Transport Planning Ltd is submitted with the application.
- 5.49 The Council (and the Council's Highway Officer) raised no objections to the access and parking arrangements for the previous refused scheme for 9 no. flats. The same arrangements have therefore been retained for the current proposals.

Access

- 5.50 The application site is accessed directly from B466 Long Lane. Long Lane is a single carriageway street with multiple driveways serving residential properties on both sides. It is subject to a 30 mph speed limit with and benefits from street lighting and wide footways on both sides. There are single yellow line parking restrictions along both sides of the street (Monday – Saturday between 8am and 6.30pm). An advisory cycle lane runs along both sides of the street in the vicinity of the site. A search on the Crashmap website has revealed that there have been no collisions reported on Long Lane at or in the proximity to the site access over the latest available five-year period.
- 5.51 The existing site access will be retained. This access is approximately 4.3 metres wide at its entrance adjacent to Long Lane. The existing gate will be removed thus ensuring that vehicles entering the site do not have to wait/obstruct the highway (as previously requested by the Highways Officer).
- 5.52 The site access achieves the vehicular visibility splays of 2.4 metres x 43 metres in both directions, and pedestrian visibility splays of 2.0 metres x 2.0 metres. As with the previous application, the access meets the required highway safety standards and is therefore considered to be safe and suitable for the proposed development.
- 5.53 A separate pedestrian and cycle access is proposed about 8 metres south of the vehicular access. This access will be 1.5 metres wide minimum. This provision enhances accessibility into the site for pedestrians and cyclists, as they do not need to walk through the car park thereby avoiding potential conflicts.

Vehicular Trip Generation

- 5.54 HLP Policies - DMT 1 and DMT 2 require proposed developments to demonstrate the traffic generated is acceptable in terms of the local highway and junction capacity, traffic flows and conditions of general highway or pedestrian safety. In assessing the previous application for 9 no. flats the

Council concluded that given the relatively moderate scale of development, any vehicular trip generation uplift is predicted to be minimal and therefore does not raise any specific highway concerns.

- 5.55 The updated Transport Note identifies that the application site has a PTAL ranking of 3 (PTAL 2 at the time of the previous application). Notwithstanding it notes that the site is in convenient walking distance of shops stations and other facilities. The Transport Note provides details of the availability of facilities within walking distance and local bus and train services all of which show that there are genuine opportunities and choices for non-car modes of travel by future residents.

Parking Provision

- 5.56 London Plan (2021) Table 10.3 - Maximum Residential Parking Standards requires all dwellings in Outer London PTAL 2 to have a maximum 0.75 no. spaces. The submitted layout plan shows 9 no. parking spaces. A swept path analysis is provided in the Transport Note. The Council previously considered this level of provision was acceptable subject to a condition requiring a car park design and management plan.
- 5.57 One of the car parking spaces will be designed as a disabled bay. This provision equates to 10% of the total number of dwellings and is therefore in accordance with the London Plan requirements. This provision ensures that the needs of people with disabilities and reduced mobility are appropriately addressed.

Electric Vehicle Charging Points (EVCPs)

- 5.58 The London Plan (2021) requires 20% of the parking spaces (i.e. 2 spaces in this case) to be provided with an active Electric Vehicle Charging Point (EVCP). The remaining 7 spaces will have passive provision, in accordance with the London Plan standards.

Cycle Parking and Safety

- 5.59 London Plan (2021) Table 10.2 - Minimum Cycle Parking Standards requires 1B2P flats to have at least 1.5 cycle parking spaces each and all larger flats to have at least 2 no. cycle parking spaces each. The proposed development would require at least 17 cycle parking spaces to meet the standard. The London Plan also requires developments of 5 - 40 dwellings to provide 2 visitor cycle parking space which should be provided with acceptable access between the dwelling, the cycle storage and the adopted highway.
- 5.60 A cycle store is proposed in the forecourt within approximately 18 metres from the main entrance to the building. The store will be able to accommodate 20 cycle spaces for residents. The entrance doors into the cycle store will be a minimum of 1.8 metres wide and will operate via key fob entry for ease of access for residents. This level of provision exceeds the London Plan, thus demonstrating the Applicant's commitment to encouraging sustainable travel. In addition to the above, there will be two external cycle parking spaces in the form of one Sheffield stand provided for the visitors to use to meet the London Plan standard for visitors.

Refuse Collection

- 5.61 A dedicated enclosure for the storage of refuse waste and recycling bins is shown on the proposed layout plan. This is positioned to the side of the forecourt area with easy access via the pedestrian gate to a collection point on the kerbside to Long Lane.

Accessibility

- 5.62 London Plan (2021) Policy D7 requires at least 10 per cent of dwellings in new residential developments to meet Building Regulation requirement M4(3) 'wheelchair user dwellings' and all other dwellings to meet Building Regulation requirement M4(2) 'accessible and adaptable dwellings'.

- 5.63 The submitted floor plans confirm that ground floor flats 1 and 2 comply with the M4(3) requirement. All other units comply with the M4(2) requirements. Full details to ensure step-free access and verification that the ground floor units meet M4(2) standards can be required by a condition. On this basis, the proposal is considered to accord with the inclusive design objectives of London Plan Policy D7.

Trees and Landscaping

- 5.64 London Plan Policy G1 of the London Plan (2021) requires development proposals to incorporate appropriate elements of green infrastructure that contribute to London's wider green infrastructure network. Policy G7 states that existing trees of value should be retained wherever possible, and that adequate replacement planting should be provided where tree loss is unavoidable. HLP Policies DMHB 11 and DMHB 14 state that proposals must include landscaping that enhances amenity, biodiversity, and green infrastructure, particularly in areas where such infrastructure is limited.
- 5.65 The Committee Report to the previous application noted the site benefits from a number of mature trees, particularly along the Long Lane frontage, which make a positive contribution to the character and appearance of the Ickenham Village Conservation Area.
- 5.66 The Council did not raise any tree related objections to the previous proposals and therefore the same approach to the protection and retention of trees is followed in the revised proposal.
- 5.67 An updated Arboricultural Report (7 April 2026) prepared by Trevor Heaps Arboricultural Consultancy Ltd is submitted with the application. The report identifies 33 individual trees and 5 groups of trees which are assessed using Bs5837:2012 guidelines. Three smaller trees T1, T8 and T9 (all Lawson or Leyland Cypress) and two dead trees T32 and T37 are proposed to be removed from the front garden to facilitate the development. This is the same as for the previous application which the Council's Tree Officer considered

acceptable. Retained tree T38 is now shown within proposed soft landscaping area rather than in the hard surfaced parking area which is considered an improvement compared to the previous proposals.

- 5.68 To provide mitigation new trees and shrubs will be planted post-construction as part of a comprehensive landscaping plan. The report also sets out tree protection measures and working methodology in accordance with BS5837:2012 recommendations to ensure the retaining trees are not harmed during the construction phase. Full details can be secured by a condition.
- 5.69 On this basis, the proposal is considered acceptable with respect to trees and landscaping and would comply with HLP Policies DMHB 4, DMHB 11, DMHB 12 and DMHB 14 and London Plan Policies G1 and G7.

Ecology

Impact on Protected Species

- 5.70 HLP Policy DMEI 7 states that if development is proposed on or near to a site considered to have features of ecological or geological value, applicants must submit appropriate surveys and assessments to demonstrate that the proposed development will not have unacceptable effects. The development must provide a positive contribution to the protection and enhancement of the site or feature of ecological value.
- 5.71 The Council in assessing the previous application noted that the site does not contain any ponds, open woodland or dense scrub and shrubbery. Ickenham Marsh and Park Wood (both of which are designated Nature Conservation Sites) are sufficient distance away from the site to impact on their protected species. Whilst the Council noted that there are trees to both the front and rear of the site, these are largely retained and there is no evidence that protected species use these landscaped areas as their habitat. Therefore, it is considered unlikely that protected species are present, making an ecology assessment unnecessary. There have been no changes in circumstances since this previous assessment.

Biodiversity Net Gain

- 5.72 An updated BNG Assessment (April 2026) and Statutory Biodiversity Metric (Excel spreadsheet) prepared by Ecology and Land Management is submitted with the application.
- 5.73 The baseline condition assessment shows there are 0.77 existing biodiversity units and 0.03 linear hedgerow units. The retention of the majority of trees and the creation of grassland, introduced shrub and planting of new trees will mitigate the loss of habitat features. The resulting biodiversity net change is 0.12 habitat units (+15.21%) and 0.02 hedgerow units (+68.30%). Thus there are no habitat or hedgerow biodiversity unit deficits and the trading rules have been satisfied so that the development complies with the BNG Regulations.

Air Quality

- 5.74 HLP Policy DMEI 14 states that proposals should demonstrate appropriate reductions in emissions. 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.
- 5.75 The Committee Report to the previous application noted that the site is within a designated Air Quality Management Area. It concluded that if planning permission was to be granted, a condition could be secured requiring the submission of an Air Quality Management Assessment detailing how the proposed development would achieve air quality neutral. A condition could also be secured requiring the submission of a Construction Management Plan to minimise air and other emissions caused during the construction phase. The applicants would accept such a condition.

Flooding and Drainage

- 5.76 HLP Policies DMEI 9 and DMEI 10 require any potential flood risk to be mitigated. Proposals that increase the risk of flooding or which fail to make adequate provision to control surface water runoff will be refused. London Plan Policy SI12 and SI13 of the London Plan (2021) requires new developments to ensure that flood risk is minimised and mitigated, and that surface water runoff is managed close to source.
- 5.77 The application site lies within Flood Zone 1 (lowest risk with a less than 1 in 1,000-year probability of fluvial and tidal flooding) on the EA Flood Map. National policy advises that more vulnerable uses such as residential development is acceptable in Flood Zone 1. No FRA is required.
- 5.78 The Committee Report to the previous application noted that parts of the site are identified as being in an area of surface water flood risk such that if planning permission were to be granted, a condition could be secured requiring the submission of a sustainable water management scheme incorporating sustainable urban drainage systems (SuDs). Subject to conditions, the proposed development would comply with HLP Policies DMEI 9 and DMEI 10 and London Plan Policy SI12 and SI13.

Sustainability

- 5.79 HLP Policy DMEI 2 requires all developments to make the fullest contribution to minimising carbon dioxide emissions in accordance with the London Plan targets.
- 5.80 The Committee Report to the previous application noted that the proposed development is a 'minor application' to provide a purpose-built flat building. Whilst the principle of London Plan Policy SI2 is relevant, the policy applies more specifically to major applications. The report also noted that whilst no energy statement is required to demonstrate a policy level of on-site carbon emission savings, the modern construction of the building would provide sufficient energy savings itself (including compliance with current Part L

(Conservation of fuel and power) Building Regulations standards) and therefore, the development would comply with the principles of the carbon saving development plan policies. The report concluded that a condition could be secured requiring the proposed development to achieve as a minimum, a water efficiency standard of no more than 110 litres per person per day maximum water consumption in accordance with London Plan Policy SI 5 of the London Plan.

Waste Management

- 5.81 HLP Policy DMHB 11(d) states that 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. To conform with the Council's 'waste-collection' distance parameter of 10 metres, refuse, recycling and food waste would need to be deposited kerbside on collection day.
- 5.82 The proposed layout plan shows a dedicated area for storage of refuse and recycling bins on the southern side of the forecourt area. The storage area measures 8m length x 1.3m depth minimum. This is sufficiently large to accommodate, say, 6 x 1100L Eurobins (based on the standard dimensions of 1260mm W x 990mm D in the Council's Waste Guidance 2021). The Guidance 2021 also provides a formula to calculate the total amount of waste capacity needed. Based on 2 x 1 bed, 5 x 2 bed and 2 x 3 bed flats the development would require capacity of at least 1530L. The size of the proposed storage area is more than adequate to meet this requirement. The bin store has easy access via the pedestrian gate for bins to be moved to a collection point on the kerbside of Long Lane on collection days.

Land Contamination

- 5.83 The previous Committee Report noted that the application site is not located within an area identified as being subject to potential land.

Fire Safety

- 5.84 London Plan Policy D12 requires all developments to achieve the highest standards of fire safety. Paragraph 3.12.1 to the Plan highlights that fire safety should be considered at the earliest stages of design, including how a building will function in the event of a fire, emergency evacuation procedures, and the safety of all buildings.
- 5.85 A detailed Fire Safety Strategy (May 2026) prepared by Bancil Property Consultants Ltd is submitted with the application. This provides construction details including assembly points, provision of sterile areas to all corridors and FR 60-minute floors and FR 60-minute walls separating each flat and separating flats from stairwells and corridors. The Strategy proposes the provision of fire detection and fire alarm equipment to comply with BS5839 Parts 1 and 6. Other active and passive measures include fire resistance doors (FD30 and FD60), emergency lighting and escape signage to comply with BS5266 Parts 1 and 4 and automatic opening vents with override facilities. Each flat will be provided with its own interlinked fire detection system comprising of smoke detection in the hall and bedrooms and heat detection in the living/kitchen/dining room areas. The internal layout plans for each flat have been designed with a fire resisting lobby approach and to comply with the maximum travel distance requirements. A fire pump appliance will be able to access the site from Long Lane and use the main forecourt area. The existing/proposed access is 4.3m wide and therefore exceeds the minimum 3.7m width required for a fire pump appliance.
- 5.86 The Fire Safety Strategy demonstrate how the development would achieve the highest standards of fire safety and emergency evacuation arrangements in accordance with London Plan Policies D5 and D12.

6.0 CONCLUSION

- 6.1 The proposal involves redevelopment to provide a building comprising 2 x 1 bed flats, 5 x 2 bed flats and 2 x 3 bed flats. The scale and design of the proposal have been influenced by the development of 9 no. flats approved by the Council on the adjacent site of No. 88 Long Lane.
- 6.2 The proposal represents good design which takes the opportunities available on this site to provide additional residential accommodation without harm to the character of the area or to the residential amenity of occupiers of neighbouring properties. Specifically, the reduced scale and design of the development is appropriate for its plot and in keeping with the neighbouring character. It would retain existing mature trees and hedging around the site boundaries. The proposal would not result in any harm to the character and appearance of the Ickenham Village Conservation Area.
- 6.3 The proposed flats accord with the minimum space standards. There is generous outdoor communal garden space as well as individual private balconies or garden terraces for each flat.
- 6.4 The proposal optimises the potential of the site to accommodate development in accordance with Government and local plan policies and the presumption in favour of sustainable development. The site location is accessible and within convenient walking distance (800m) of a range of shops, facilities and stations and bus stops. The development makes provision for active and passive EV charging points and a secure and covered store for cycles (including visitor spaces) which complies with and exceeds London Plan and Hillingdon standards. The development therefore provides realistic opportunities for a range of sustainable non-car travel options for future residents.
- 6.5 The application is accompanied by updated reports dealing with daylight and sunlight, transport, BNG, trees and fire safety which demonstrate how the proposal complies with relevant national policy, London Plan and Hillingdon policies.

- 6.6 The proposal would make an efficient use of brownfield (previously developed) land in an accessible urban location and would contribute to meeting the Borough's identified housing needs without any harm to the character of the area or residential amenity. It therefore represents sustainable development which complies with the development plan and other material considerations including national policy. Applying the normal planning balance, planning permission should be granted.

The Tilted Balance

- 6.7 The Council has published an updated assessment of housing land supply (Five Year Supply of Deliverable Housing Sites, April 2026). This takes into account the revised national policy requirements in the NPPF (December 2024) including the introduction of a revised standard method for calculating minimum housing need and the requirement for a five-year housing land supply for all local authorities. The latest calculations shows that there is only **2.5 years' supply** of housing sites or a shortfall of 5,421 homes for the five-year period 2025-2030.
- 6.8 The Council acknowledges that it cannot demonstrate a five-year supply of deliverable housing sites and the relevant Local Plan policies for the supply of housing are considered out-of-date and the presumption in favour of sustainable development contained in paragraph 11(d) of the NPPF is engaged when assessing proposals for new residential development. It notes that the Council must give substantial weight to the delivery of new housing in its planning decisions.
- 6.9 The relevant test for the proposals is that planning permission should be granted unless (1) the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for refusing the development proposed, or (2) any adverse impacts of doing so would significantly and demonstrably outweigh the benefits when assessed against the policies in the Framework taken as a whole, having particular regard to key policies for directing development of sustainable locations, making effective use

of land, securing well designed places, and providing affordable homes, individually or in combination.

- 6.10 Based on the revised proposals and the evidence contained in the technical reports submitted with the application, I do not consider the proposed development will conflict with national planning policy with respect to its impact upon any of the areas or assets of particular importance listed in footnote 7 to the NPPF to disapply the tilted balance. Therefore the 'tilted balance' in paragraph 11(d)(ii) of the NPPF applies when assessing the proposals.
- 6.11 Whilst I consider that applying the normal planning balance the proposal accords with policies and planning permission should be granted, the triggering of the tilted balance provides additional justification in support of the proposals. I have set out the economic, social and environmental benefits in paragraph 4.3 above which all weigh in favour of the proposals. Given the extent of the housing land supply shortfall, the contribution made by this development to the overall local housing needs should be afforded significant weight in favour of the grant of planning permission.
- 6.12 I conclude there would be no adverse impacts resulting from the proposals which would significantly and demonstrably outweigh these benefits when assessed against the policies in the Framework as a whole, having particularly regard to key policies for making effective use of land, securing well-designed places, improving accessibility and providing more new homes and therefore planning permission should be granted.

Paul Dickinson
BA (Hons) MRTPI MRICS MCMI
3 June 2026