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Date: 6th January 2022  
Our Ref: 924/PRC/2021/187

Dear Dr Bob Newell

**RE: Extensions to care home facility**  
**SITE: Denville Hall Ducks Hill Road Northwood**

I refer to your request for pre-application advice dated 8th of August 2021 and our subsequent call on 31st August 2021 relating to the above development. The advice provided is based on the following drawings and documents issued to the Local Planning Authority for consideration:

Plan Numbers: GA (-5) 204.3 Proposed Building C - received 10 Aug 2021  
GA (-2) 201.2 Proposed Building C Plans - received 10 Aug 2021  
DH-01 Site Master Plan 1 - received 10 Aug 2021  
GA (-2) 201.1 Proposed Master Plan - received 10 Aug 2021  
GA (-3) 201.1 Proposed Long Section A - received 10 Aug 2021  
GA (-5) 202.1 Preview 1 Building A - Front View - received 10 Aug 2021  
GA (-4) 202.1 Proposed Building A Elevations - received 10 Aug 2021  
GA (-4) 203.1 Proposed Building B Elevations - received 10 Aug 2021  
GA (-4) 204.1 Proposed Building C Elevations - received 10 Aug 2021  
DH-01a Site Master Plan with existing site overlay - received 10 Aug 2021  
Reptile Survey September 2021 - received 11 Nov 2021  
Nocturnal Emergence / Dawn re-entry Bat Surveys - received 11 Nov 2021  
GHA/DS/122660:21 Arboricultural Report - received 10 Aug 2021  
Pre-Application Transport Statement - received 10 Aug 2021  
DH-02 Site Master Plan 2 - Rear Site - received 10 Aug 2021  
DH-04 Staff Flow/Access - received 10 Aug 2021  
DH-05 Trees to be Removed - received 10 Aug 2021  
GA (-2) 101.2 Master Plan Showing Demolition - received 10 Aug 2021  
Design and Access Statement July 2021 - received 10 Aug 2021  
Planning Statement V1 - 08/08/2021 - received 10 Aug 2021  
Landscape Cover 14th July 2021 - received 10 Aug 2021  
Trees Refs 1 - Small and Medium sized Trees - received 10 Aug 2021  
Preliminary Ecological Appraisal - received 10 Aug 2021  
Existing Buildings Statement - received 10 Aug 2021  
GA (-2) 101.3 OS Plan (Location Plan) - received 10 Aug 2021

DH -00 Survey Plan 1 - received 10 Aug 2021  
GA (-2) 101.1 Master Plan Existing - received 10 Aug 2021  
GA (-5) 202.2 Proposed View Building A Rear View - received 10 Aug 2021  
GA (-2) 201.2 Proposed Building A Plans - received 10 Aug 2021  
GA (-5) 203.1 Proposed Building B - received 10 Aug 2021  
GA (-5) 203.2 Proposed Building B - received 10 Aug 2021  
GA (-2) 201.2 Proposed Building B Plans - received 10 Aug 2021  
GA (-5) 204.1 Proposed Building C - received 10 Aug 2021  
GA (-5) 204.2 Proposed Building C - received 10 Aug 2021

**Outlined below is a preliminary assessment of the proposal, including an indication of the main issues that should be addressed should you choose to submit a formal planning application. Please note that the views expressed in this letter represent officer opinion only and cannot be taken to prejudice the formal decision of the Council in respect of any subsequent planning application, on which consultation would be carried out which may raise additional issues. In addition, the depth of analysis provided corresponds with the scope of information made available to Council officers.**

### **The Site and Surrounds**

The site to which this pre-application advice request relates is Denville Hall, which is located on the west side of Ducks Hill Road approximately 30m north of its junction with Northgate. The site encompasses approximately 3.2 acres and is located within about 1.2km of Northwood Underground Station and Northwood Town Centre. The site is close to the Copsewood Estate Area of Special Local Character (on the east side of Ducks Hill Road), and its tree-lined western boundary forms the boundary with the Metropolitan Green Belt. Its northern boundary is formed by modern residential properties on Muscovy Place and Cygnet Close. On the eastern side lies Ducks Hill Road, with residential properties to the south and parkland associated with the Riverside Club to the west.

The northern part of the site lies within Tree Preservation Order (TPO) no. 424 and the site has a Public Transport Access Level (PTAL) of 1a (poor).

Denville Hall is a retirement home (care home with nursing) with a maximum capacity of 40 residents and 50 staff. Residents are all housed in single rooms with en-suite facilities. It includes a dementia ward (15 residents) and a resident age range of 75-100+. Average age of residents is 85 years old. The original building was built in 1880's and has been a retirement home for approximately 50 years.

Within the Denville Hall site are five buildings, dispersed across the curtilage. The focus is the 16th Century locally listed building (partially rebuilt in 1851) with a very large modern purpose-designed extension to the north, which houses the retirement home and specialist dementia wing. There are four further buildings on site and there is a Grade II Listed Building at 58 Ducks Hill Road.

### **The Proposal**

The submitted Planning Statement advises that the proposal has 'evolved around the concept of an organic inclusive master plan, creating a network of buildings that become part of a wider Denville Hall community.'

The proposal is for the creation of a central hub that brings the residents together whilst connecting them to the natural environment. A key observation of the Denville Hall community is that it lacks communal amenity space connected to the rich natural and spacious site environment. To enable the development, several buildings on the site will be demolished and new buildings will house the proposed new uses and activities. As part of this, the architectural proposal includes an extended soft and hard landscaping area.

In built environment terms, the creation of a single-storey Restaurant and Cafe (Building C) will

be the main artery connecting the existing main building to a new block of assisted living units to the north of the site (Building B). A smaller link, in the form of a see-through glazed bridge, would lead to the six assisted living units within a new building (Building A) towards the front of the site.

It is proposed to provide Denville Hall with a relocated entrance which provides a clear focus, and befits the architectural merit of the Heritage building. This is in order to create a sense of arrival and to focus upon the historic facade upon entry to the site, the approach being rather like that to a country house hotel.

The amended entrance road serves to provide a larger formal garden area to the heritage building than at present. The proposals also include amended car parking and access and works to the existing side entrance.

## **Planning Policy**

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

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

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

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

The proposed development would be assessed against the policies and proposals in the Development Plan set out below, including Supplementary Planning Guidance, and to all relevant material considerations, including The London Plan (2021) and national guidance:

### **Part 1 Policies:**

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

### **Other Policies:**

DMH 8 Sheltered Housing and Care Homes  
DMHB 1 Heritage Assets  
DMHB 2 Listed Buildings  
DMHB 3 Locally Listed Buildings  
DMHB 7 Archaeological Priority Areas and archaeological Priority Zones  
DMHB 11 Design of New Development  
DMHB 12 Streets and Public Realm  
DMHB 14 Trees and Landscaping  
DMT 2 Highways Impacts  
DMT 5 Pedestrians and Cyclists  
DMT 6 Vehicle Parking  
DMEI 2 Reducing Carbon Emissions  
DMEI 7 Biodiversity Protection and Enhancement

LPP D4	(2021) Delivering good design
LPP D5	(2021) Inclusive design
LPP D7	(2021) Accessible housing
LPP D8	(2021) Public realm
LPP D12	(2021) Fire safety
LPP D14	(2021) Noise
LPP H12	(2021) Supported and specialised accommodation
LPP H13	(2021) Specialist older persons housing
LPP HC1	(2021) Heritage conservation and growth
LPP T5	(2021) Cycling
LPP T6	(2021) Car parking
LPP T6.1	(2021) Residential parking
NPPF12	NPPF 2021 - Achieving well-designed places
NPPF16	NPPF 2021 - Conserving & enhancing the historic environment

## Main Planning Issues

### 1. Principle of development

#### Existing Buildings

The proposal involves the demolition of a number of buildings. This includes two buildings which are identified as being for residential use. Both buildings are described as disused, with one being a bungalow and another being a building that has been subdivided into flats. In order to determine the final application, it will be essential to know how long these buildings have been disused, so that the Local Planning Authority can determine whether they are short or long-term vacant. It is also necessary to know how many self-contained flats there are within the formerly converted building.

The proposal is ultimately for an increase in residential floorspace and therefore it is unlikely that there would be an objection to the loss of the existing residential accommodation. Nevertheless, full details of the existing position are required as part of the application and for monitoring purposes.

#### Specialist Older Persons Housing

The proposal includes 12 new self-contained units with washing and kitchen facilities. Therefore, there is the potential for independent living within the units. It is imperative that, in the final planning application, the Council can make a determination as to whether the proposal constitutes 'specialist older persons housing' or 'care home accommodation', in line with the definitions within the Development Plan. The applicant has indicated in the Planning Statement that the proposal would meet the definition within Paragraph 4.13.4 of the London Plan (2021) and therefore would be exempt from the requirements of Policy H13. This would mean the application is not required to deliver affordable housing. The Council will obviously scrutinise this assertion as part of the final application and the submission will be required to submit evidence to demonstrate compliance with the four-point criteria within Paragraph 4.13.4.

Policy DMH 8 of the Local Plan: Part 2 (2020) will be permissible for the application and requires that accommodation is located near to shops and community facilities and is easily accessible by public transport. The proposal is within walking and cycling distance from Northwood (Green Lane) Town Centre and Northwood Tube Station. This Journey can also be facilitated from buses stopping on Green Lane. It is also near to facilities outside of the town centre, including a leisure centre, golf course, pub and Mount Vernon Hospital. The proposal is for the extension of an existing retirement home, which is also material to the

determination of the principle of development. No objection is therefore raised to the principle of the extension at this stage.

The final submission should include information on the need for this particular type of development, which could include information on the existing occupancy / waiting list for Denville Hall.

#### Ancillary Uses

The proposal includes a series of uses that could be described as ancillary to the existing care home, including a cafe/restaurant. No objection is raised to this subject to them remaining of a scale that is ancillary to the overall use of the building as a retirement home.

#### 2. Design

The Planning (Listed Buildings and Conservation Areas) Act 1990 requires that the Local Planning Authority pay special regard to the desirability of preserving listed buildings, their setting and any architectural features that they possess.

The NPPF (2021) Chapter 16 requires the conserving and enhancing of the historic environment. Paragraphs 189-208 require consideration of the impact of a proposed development on the significance of a designated heritage asset and assessment of the identification of any harm. In particular, where there is harm identified. Paragraph 201 states that "Where a proposal will lead to less than substantial harm to the significance of a heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use".

Policy HC1 of the London Plan (2021) requires development to identify, value, conserve, restore, re-use and incorporate heritage assets, including registered historic parks, where appropriate. Development affecting heritage assets and their settings should conserve their significance, by being sympathetic to their form, scale, materials and architectural detail.

Policy HE1 of the Local Plan: Part One (2012) states the Council will conserve and enhance Hillingdon's distinct and varied environment, its settings and the wider historic landscape, which includes Registered Parks and Gardens and historic landscapes, both natural and designed.

Policy DMHB 1 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020) states:

- A) The Council will expect development proposals to avoid harm to the historic environment. Development that has an effect on heritage assets will only be supported where:
  - i) it sustains and enhances the significance of the heritage asset and puts them into viable uses consistent with their conservation;
  - ii) it will not lead to a loss of significance or harm to an asset, unless it can be demonstrated that it will provide public benefit that would outweigh the harm or loss, in accordance with the NPPF;
  - iii) it makes a positive contribution to the local character and distinctiveness of the area;
  - iv) any extensions or alterations are designed in sympathy, without detracting from or competing with the heritage asset;
  - v) the proposal would relate appropriately in terms of siting, style, scale, massing, height, design and materials;
  - vi) buildings and structures within the curtilage of a heritage asset, or in close proximity to it, do not compromise its setting; and
  - vii) opportunities are taken to conserve or enhance the setting, so that the significance of the asset can be appreciated more readily.

Policy DMHB 2 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020) states:

- A) Applications for Listed Building Consent and planning permission to alter, extend, or change the use of a statutorily Listed Building will only be permitted if they are considered to retain its significance and value and are appropriate in terms of the fabric, historic integrity, spatial quality and layout of the building. Any additions or alterations to a Listed Building should be sympathetic in terms of scale, proportion, detailed design, materials and workmanship.
- B) Applications should include a Heritage Statement that demonstrates a clear understanding of the importance of the building and the impact of the proposals on its significance.
- C) The substantial harm to or total loss of significance of a statutory Listed Building will only be permitted in exceptional circumstances when the nature of the heritage asset prevents all reasonable use of the building, no viable use can be found through marketing, grant-funding or charitable or public ownership and the loss is outweighed by bringing the site back into use. In such circumstances, full archaeological recording of the building will be required.
- D) Planning permission will not be granted for proposals which are considered detrimental to the setting of a Listed Building.

Policy DMHB 3 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020) states:

- A) There is a general presumption in favour of the retention of buildings, structures and features included in the Local List. The Council will take into account the effect of a proposal on the building's significance and the scale of any harm or loss when considering planning applications, including those for major alterations and extensions. Proposals will be permitted where they retain the significance, appearance, character or setting of a Locally Listed Building.
- B) Applications should include a Heritage Statement that demonstrates a clear understanding of the importance of the structure and the impact of the proposals on the significance of the Locally Listed Building.
- C) Replacement will only be considered if it can be demonstrated that the community benefits of such a proposal significantly outweigh those of retaining the Locally Listed Building.

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

- A) All development, including extensions, alterations and new buildings will be required to be designed to the highest standards and, incorporate principles of good design including:
  - i) harmonising with the local context by taking into account the surrounding:
    - scale of development, considering the height, mass and bulk of adjacent structures;
    - building plot sizes and widths, plot coverage and established street patterns;
    - building lines and setbacks, rooflines, streetscape rhythm, for example, gaps between structures and other streetscape elements, such as degree of enclosure;
    - architectural composition and quality of detailing;
    - local topography, views both from and to the site; and
    - impact on neighbouring open spaces and their environment.
  - ii) ensuring the use of high quality building materials and finishes;
  - iii) ensuring that the internal design and layout of development maximises sustainability and is adaptable to different activities;
  - iv) protecting features of positive value within and adjacent to the site, including the safeguarding of heritage assets, designated and un-designated, and their settings; and
  - v) landscaping and tree planting to protect and enhance amenity, biodiversity and green infrastructure.
- B) Development proposals should not adversely impact on the amenity, daylight and sunlight of adjacent properties and open space.
- C) Development will be required to ensure that the design safeguards the satisfactory re-development of any adjoining sites which have development potential. In the case of proposals for major development sites, the Council will expect developers to prepare master plans and design codes and to agree these with the Council before developing detailed designs.
- D) Development proposals should make sufficient provision for well designed internal and

external storage space for general, recycling and organic waste, with suitable access for collection. External bins should be located and screened to avoid nuisance and adverse visual impacts to occupiers and neighbours.

The proposals are within the setting of a Grade II Listed Building - The Cottage, and a Locally Listed Building (non-designated heritage asset) - Denville Hall. The application site area is fairly extensive and includes three separate buildings. All three properties share the same principal access off Ducks Hill Road, adjacent to the Grade II Listed cottage.

The site itself has an extensive history, with 16th century origins. The original 16th century house was historically known as Maze Farmhouse. For this reason, the site has the potential of some archaeological interest. It has notable historic associations, however in the mid-19th century it was rebuilt by Daniel Norton in a Victorian Gothic style and the site was renamed Northwood Hall. The hall was then subsequently renamed Denville Hall in 1925 when the property was purchased by Alfred Denville, who converted the house to a retirement home for actors.

Denville Hall is a Locally Listed Building. The original building largely dates from 1851 however has been significantly extended to the rear. The original property is two-storeys with an attic. Constructed in a stock brick it has a steep plain tiled roof. The site associated to Denville Hall includes two detached houses, Nos 48 and 60, which are located within the curtilage of the Locally Listed Building. The buildings date from the 1930s when the estate associated to Denville Hall was sold off and developed for housing. The buildings form part of the originally development of the road. They were originally constructed as single residential dwelling houses, and whilst share a principal access from Duck Hill Road, Nos 48 and 60 still retain direct access to Ducks Hill Road.

No 60 is located directly to the north-west of the Grade II Listed cottage fronting onto Ducks Hill Road. It is a single storey bungalow building, constructed of traditional materials. The proximity of the building to the Grade II listed cottage has resulted in some harm to what was original an open rural environment. Nevertheless, the low rise nature of the existing property allows it to quietly exist the setting of the cottage. No 48 is a two-storey building with a gable roof form. It also appears constructed of traditional materials. The current condition of the existing buildings is partly due to neglect.

The Grade II listed cottage is a single storey building constructed of flint and red brick. It dates from the late 18th century and originally formed part of the historic Denville (Northwood) Hall estate. Access to the cottage is located along the south elevation and includes a projecting open porch canopy. Brick hoodmoulds feature over the casement windows. The east elevation fronting onto the road is gable ended and features a canted bay window at ground floor and small casement to the side and above. The casement windows are of historic and architectural interest, with small diamond glazing bars, significantly contributing to the significance of the heritage asset. To the rear the property has been extended, with built form extending up to the rear site boundary. There is also a detached garage structure to the north of the historic cottage. It should be noted that the drawings do not accurately show the existing built form on the site associated to the listed cottage. The site associated to the cottage is open in character and appearance with a low rise brick and flint boundary wall to the front. The openness of the site allow for some views of the bungalow to the rear of the listed building, from the street scene.

#### Assessment - Impact

The proposed demolition of the existing buildings would warrant further investigation by means of a site visit by the Council's Conservation and Design Officer. If deemed admissible the existing buildings would need to be recorded. The level/detail of the building recording would need to be confirmed following a site visit.

#### Building A

The proposed Building A would result in a larger and bulkier built form, directly adjacent to the existing Listed Building. The building would have a greater presence, particularly due to the increased height and no longer sit quietly within the setting of the Listed Building, exacerbating the harm already caused.

As proposed, Building A would be considered unacceptable and fails to preserve the setting of the Listed Building.

#### Building B

There are some concerns in regard to the scale of Building B and inclusion of a crown roof element. Ideally new built forms should avoid high level flat roof areas and propose fully pitched roof forms.

#### Building C

Building C would be considered to be an extension to the Locally Listed Building. Whilst it would not harm any historic built fabric it would result in the site being further developed. The proposed addition would have some impact on the setting of the non-designated heritage asset however, a compromise from a historic environment perspective could be met considering the lightweight appearance of the structure.

#### Glazed link

The proposed link between Building C and Building A is not considered to be acceptable to the Council's Conservation and Design Officer. It would result in development sprawling across the site. A physical separation is important in order to maintain actual openness to the site not just visually.

### ARCHAEOLOGY

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

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

### TREE/LANDSCAPE

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

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

Where trees are to be removed, proposals for replanting of new trees on-site must be provided or include contributions to off site provision.

This site is occupied by five buildings situated within a spacious parkland setting among fine specimen trees, located on the west side of Ducks Hill Road. Some of the trees on the site are highly visible from the public realm and make a significant contribution to the character and appearance of the area.

Four trees, which are located in the northern part of the site, between Denville Hall and 48 Ducks Hill Road, are protected by TPO 424; T1 *Pinus radiata*, T2 an ash, T3 a hawthorn and T4 an oak. The land to the west of the site is designated Green Belt.

This pre-application submission includes a tree report, dated July 2021, by GHA Trees, however, not all of the required accompanying plans have been submitted - there is no arboricultural implications or tree protection plan - without which it is not possible assess the full impact of development.

Notwithstanding that, the tree report has identified and assessed 61 trees and groups, of which there are 4 x A grade trees; T1 Monterey pine, T29 sweetgum, T32 oak and T41 wellingtonia. There are 16 x B grade trees; T3, T17, T40, T45, T46, T47, T48, T49, T51, T54, T55, T56, T57, T58, T59 and T60. According to BS5837:2012, all A and B grade trees are worthy of retention on development sites.

5 of the 16 B grade trees will be removed to enable the development, together with the three U grade, whose poor condition and short lifespan suggests they should be removed. All other trees are C grade.

It is worth noting that a number of trees recommended for removal are ash, whose removal is recommended due to the possibility of ash die back disease, as opposed to the space required for the three new buildings. The felling of these trees is open to question, depending on whether the trees are already affected - and to what extent. Further details should be included within any future planning application.

The most significant visual impact will be caused by building A, on the eastern edge of the site and the proposed new access point and car park. The D&AS includes a brief description of the landscape design concept in section 4.0 and tree commentary at 4.2. It also refers to the ecology report in 4.3. The ecology report contains recommendations in chapter 7.0 which should be incorporated into the landscape plan and / or architect's detailing (bat access tiles in the roof).

According to the survey information the layout design appears to safeguard most of the better quality trees, however, without an accurate tree constraints plan, arboricultural impact assessment and tree protection measures it is not safe to assume that all of the retained trees can be adequately safeguarded.

The removal of ash trees should not automatically be considered necessary, unless evidence of their decline due to ash dieback disease has been regularly monitored and felling can be justified.

While tree loss from the site is regrettable, this may be justified if appropriate replacement planting is secured as part of a high quality landscape design.

## ECOLOGY

Paragraph 170 of the NPPF (February 2019) states that planning decisions should contribute to and enhance the natural and local environment by among other measures, minimising impacts on and providing net gains for biodiversity, including by establishing coherent

ecological networks that are more resilient to current and future pressures.

Policy DMEI 7 of the Hillingdon Local Plan: Part Two (2020) requires the design and layout of new development should retain and enhance any existing features of biodiversity or geological value within the site.

The pre-application advice submission includes a Reptile Survey and a Nocturnal Emergence / Dawn re-entry Bat Survey. The reptile surveys undertaken between July and September 2021 confirmed the likely absence of reptiles from within the survey area. As a bat roost has been identified, no works to this building will be allowed in the absence of a Bat Mitigation Class Licence (BMCL) or a European Protected Species (EPS) licence from Natural England. Therefore, prior to any works being undertaken which are likely to result in a breach of the legislation, a development licence must be obtained from Natural England. Prior to a licence being issued, planning permission must be granted and relevant conditions relating to protected species must be discharged.

A future planning application submission should focus on how to improve the ecological footprint of the site in the context of its urban setting. To facilitate net biodiversity gain on the site, we would expect to see landscaping with nectar rich planting, a water feature with wildlife value (i.e. not purely ornamental), green walls and roofs and features built into the fabric of the buildings such as bird boxes.

### **3. Amenity**

Policy BE1 of the Local Plan: Part One (2012) requires developments to be appropriately designed so that they do not adversely affect their surroundings or the local character.

Policy DMHB 11 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020) states that:

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

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

Paragraph 5.40 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020) states: "For the purposes of this policy, outlook is defined as the visual amenity enjoyed by occupants when looking out of their windows or from their garden. The Council will expect new development proposals to carefully consider layout and massing in order to ensure development does not result in an increased sense of enclosure and loss of outlook."

Paragraph 5.41 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020) states: "The Council will aim to minimise the impact of the loss of daylight and sunlight and unacceptable overshadowing caused by new development on habitable rooms, amenity space and public open space".

Concerns are raised with regard to the proximity of the proposed built form of Building A in the south of the site and adjacent neighbouring properties. As designed the proposals would impact on the outlook and amenity of these properties and as such the proposals are deemed to be contrary to Policy DMHB 11 of the Hillingdon Local Plan: Part 2. Any future application should seek to reduce the impact on these neighbouring occupiers by increasing

the separation distances between buildings and reducing the built form proposed.

## NOISE

Policy D14 of the London Plan (2021) states that residential development proposal should manage noise by avoiding significant adverse noise impacts on health and quality of life, mitigating and minimising the existing and potential adverse impacts of noise on, from, within, as a result of, or in the vicinity of new development without placing unreasonable restrictions on existing noise-generating uses, where it is not possible to achieve separation of noise-sensitive development and noise sources without undue impact on other sustainable development objectives, then any potential adverse effects should be controlled and mitigated through applying good acoustic design principles and where it is not possible to achieve separation of noise-sensitive development and noise sources without undue impact on other sustainable development objectives, then any potential adverse effects should be controlled and mitigated through applying good acoustic design principles

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

## SUSTAINABILITY

Policy DMEI 2 requires all developments to make the fullest contribution to minimising carbon dioxide emissions in accordance with London Plan targets. Use of renewables technologies should be explored including PVs and heat pumps. Integration of renewables with the communal amenity space and potential for green roof and/or walls is advised.

### 4. Highways

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

The proposal consists of an established care home facility which is accessed off Duck's Hill Road (DHR) with approximately 29 spaces including 9 visitor and 17 staff spaces. It is proposed to retain the main building (Denville Hall) with the construction of three new buildings (A, B & C). Buildings A & B consisting of 'assisted living' accommodation would replace No's 60 and 48 DHR respectively whilst Building C (single storey restaurant/cafe) would replace a portion of the existing car park. It is anticipated that the reconfiguration and additional builds would increase the number of residents from 17 to 20 with no increase in staffing levels.

The existing car park would be re-configured and increased to 34 spaces in total. 16 spaces would now be accessed via a relocated internal access road (30m due north of existing). The remaining 18 spaces (including 2 disabled compliant) in proximity of Building B would be accessed by the intensified use of an existing secondary access located further north adjacent to 'Muscovy Place' on DHR.

The relocated main access would retain a gated arrangement set-back from the public highway and measure in excess of 5 - 5.5 m in width as is the case at present. The secondary access measures up to 4.5 m in width although the submitted 'Transport Statement' mentions a minimum of available width of 4.8m.

The surrounding road network is devoid of parking restrictions and the location exhibits a 'very poor' public transport accessibility level (PTAL) rating of 1a which heightens dependency on the use of private motor transport.

## Parking Provision

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

### Residential 'Assisted Living' Care Home (C2)

In order to comply with the maximum parking standard there is a requirement for 1 space per 4 dwellings to be provided together with a single space for use by a warden. A provision for emergency vehicle parking is also recommended.

With 20 residents, this would equate to a maximum requirement of approximately 5 spaces. It is accepted that this care home has an established parking provision which already exceeds this requirement hence it would be logical to assume that this level would remain unchanged. Notwithstanding this point, if an increase in provision is still to be pursued then further justification should be provided at a formal application stage.

A 'turning head' is to be provided at the top end of the main access road which can be utilised for emergency vehicle i.e. ambulance parking thereby satisfying this aspect of the parking requirement.

### Electric Vehicle Charging Points (EVCPs)

Within the final parking quantum, there is a requirement for EVCPs to be provided in line with the Local Plan: Part 2 which would equate to a minimum of 5% of spaces allocated for 'active' provision with the same percentage dedicated to 'passive'.

### Disabled Compliant Parking Provision

In accord with the policy standard - 10% of parking spaces should be disabled compliant. 2 such provisions are indicated which is broadly compliant to the standard.

### Mobility Scooter Parking

The London Plan (2021) advises that for age-specific housing, parking and charging spaces for mobility scooters should be provided. Policy H13 highlights the suitable levels of safe storage and charging facilities for residents' mobility scooters. This should be referenced.

### Cycle Parking

'Secure and accessible' on-plot cycle parking provision should fall in line with the London Plan (2021) standards or Hillingdon's Local Plan: Part 2 standards with 1 cycle space per 3 staff which has been acknowledged within the submission.

### Internal Access Road Layout/Main Vehicle Access Provision

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

With reference to the above, an initial vehicle 'swept path' analysis has been submitted and it has been demonstrated that the internal roadway served by the new main site aperture allows acceptable access to all of the surface level parking spaces and can satisfactorily cater for service, refuse collection and emergency vehicles without hindrance by allowing such vehicles to enter and leave the site in a forward gear thereby conforming to established best practice.

Satisfactory highway visibility splays at the relocated main access point are also considered deliverable and should be applied. It is therefore recommended that, on safety grounds, there should be conformity to the relevant mutual inter-visibility sight-line requirements, as per MfS, between vehicles leaving the site and extraneous vehicles/pedestrians on DHR. This aspect has been demonstrated provisionally.

#### Secondary Access Road

An existing relatively narrow vehicular and pedestrian access roadway is in place to serve as a secondary access facility to the site envelope from DHR. It currently serves No.48 DHR which is utilised as ancillary accommodation to Denville Hall. The use of roadway is to be intensified to facilitate access to 18 staff parking spaces located in proximity of Building B. The true width of the access road appears to vary up to a width of 4.5m and there is no opportunity to enhance this variable width due to land constraints.

Within MfS' there is clear guidance as to what road widths are acceptable when proposals, such as the one submitted, are vetted for suitability. It is recommended that ideally road widths should not fall below a threshold of 4.1m (with an absolute minimum of 2.75m for any reasonable length of roadway). This measure is based on providing safe and usable access for both passenger and service/emergency vehicles (i.e. fire tenders etc) allowing concurrent use by pedestrians/cyclists in an unencumbered manner.

Notwithstanding the above, it is noted that this roadway is an established access and falls above the allowable minimum width threshold hence given the scale of proposal and anticipated level of use, it may be considered acceptable in principle. A further demonstration of the adequacy of the roadway in terms of the suitability for two passenger vehicles and pedestrians to safely pass and repass unabated should be presented at the time of formal submission. Accepting that there may be a level of access constraint, there will be a requirement to provide a full fire strategy in accordance with Building Regulations (Fire Safety: Document B) at the time of formal application in order to ensure satisfactory arrangements are in place.

As for the primary access, satisfactory mutual sight-line inter-visibility should be achieved between all road users both pedestrian and vehicular within the site and at the secondary access point onto DHR. The relevant standard within the aforementioned MfS best practice guidance parameters should be referenced and applied to attain the desired visibility splays.

#### Construction Management Plan (CMP)

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

In terms of transport/highways impacts, the acceptability (or otherwise) of a future planning application will be dependent on the evidence and detail provided within the submitted documentation together with an appropriate response to the comments and recommendations made within this appraisal.

#### 5. Other

## Accessibility

The pre-application seeks to refurbish and bring back into use the buildings sited on the parcel of land located on Ducks Hill road 1.2km west of Northwood Underground Station and the Northwood Town Centre, Green Lane Conservation Area. In framing the following accessibility observations at this pre-planning application stage, reference is made to London Plan policy D5, D7, D12, H13 and T6.1. Given the limited information available, the following accessibility and inclusive design comments may change if a full application is submitted and some future point.

A convenient drop off point would be required for door-to-door transport services such as Dial a Ride, taxis, and hospital transport.

Any full planning application would need to provide details of the materials palette, with particular attention given to the wheelchair path around the perimeter, the accessible woodland walk, and the paver types intended for use around the site. Reference should be made to BS8300:2018 to ensure that all materials are suitable and compatible with accessibility standards for older and disabled people, including wheelchair users.

Concern is raised on the appropriateness of the see-through glazed bridge which may cause confusion to people with dementia. Further research and consultation with appropriate organisations should be conducted prior to finalising the design.

The designs throughout the development need to take account of London Plan policy D5 and D12 to ensure that persons unable to evacuate via a staircase can escape from the buildings in a reliable, safe, and dignified manner during a fire emergency.

A comprehensive Design & Access Statement should support any future planning application, demonstrating how the principles of inclusive design, dementia friendly design has been embedded into the design. Reference should be made to 'Dementia Friendly Housing Guide', Alzheimer's Society publication, March 2017 (updated March 2020).

## Flood Risk

In built up areas there is the risk of flooding from surface water, due to rainwater falling onto impermeable surfaces which is the key flood risk identified for Hillingdon. Any future application should include the provision of sustainable drainage systems (SuDS) to manage surface water on site.

## 6. Planning Obligation and CIL (Mayor and LBH)

### S106 PLANNING OBLIGATIONS

Policy DMCI 7 of the Hillingdon Local Plan: Part 2 Development Management Policies (January 2020) relates to securing planning obligations to supplement the provision recreation open space, facilities to support arts, cultural and entertainment activities, and other community, social and education facilities through planning obligations in conjunction with other development proposals. This policy is supported by more specific supplementary planning guidance.

Should the application be approved, a range of planning obligations may be sought to mitigate the impact of the development, in line with Policy DMCI 7 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020).

### COMMUNITY INFRASTRUCTURE LEVY (CIL)

Please be advised that as from 1 April 2012, all planning approvals for schemes with a net additional internal floor area of 100m<sup>2</sup> or more will be liable for the Mayoral Community

Infrastructure Levy (Mayoral CIL), as legislated by the Community Infrastructure Levy Regulations 2010 and The Community Infrastructure Levy (Amendment) Regulations 2011. The liability payable will be equal to £60 per square metre. The London Borough of Hillingdon is a collecting authority for the Mayor of London and this liability shall be paid to LBH in the first instance.

In addition the development represents Chargeable Development under the Hillingdon Community Infrastructure Levy, which came into effect on 1st August 2014. The liability payable will vary depending on the final use classes proposed and the respective areas.

Should you require further information please refer to the Council's Website [www.hillingdon.gov.uk/index.jsp?articleid=24738](http://www.hillingdon.gov.uk/index.jsp?articleid=24738)

It is important to note that this CIL liability will be in addition to the planning obligations (s106) that the Council may seek from your scheme.

## 7. Application Submission

The Council has an adopted Local Planning Validation Checklist (June 2020). The list of documents to be submitted with a future planning application is likely to include:

- CIL Form
- Location Plan
- Existing Site Plan
- Proposed Site Plan
- Proposed Floor Plans
- Proposed Elevations
- Design and Access Statement
- Planning Statement
- Heritage Impact Assessment
- Construction Method Statement
- Sustainable Drainage Assessment & Proposals
- Arboricultural Impact Assessment
- Landscaping Details
- Ecology Strategy

Please note that this list is not exhaustive and other information may be required on the proposals during the course of any application.

## 8. Conclusion

The proposed development is considered to be an in principle appropriate use in this location and to have the potential to represent an acceptable quality of development.

However, as set out in more detail in the above report, the proposed scheme requires further consideration and amendment. In particular consideration should be given to the proposed quantum and massing of development, the proposed loss of trees, adverse impact on heritage assets and potential detrimental impact on the residential amenity of nearby properties.

**Please be advised that the Council require confirmation that you wish to enter into a PPA as soon as possible, in order to ensure the necessary resource are in place to meet the terms of the PPA.**

Thank you for entering into the Council's pre-application advice service and I trust you have found this service of assistance.

**Planning Guarantee**

For complex applications which are likely to exceed the statutory timeframes, the applicant is encouraged to enter into a Planning Performance Agreement (PPA) to allow for the negotiation of complex cases. Central Government encourages the use of PPAs for larger and more complex planning proposals to bring together the developer, the Local Planning Authority and key stakeholders to work in partnership throughout the planning process.

Providing a PPA helps ensure that major proposals progress through the application process in a timely fashion and result in high quality development but the service is both time consuming and costly. The charge for all Planning Performance Agreements will ensure that adequate resources and expertise can be provided to advise on major development proposals, the charges are determined in a site by site basis.

**Hillingdon are committed to ensure the best possible service provision to all of our applicants. In order to ensure this, we will not be able to facilitate negotiation which would result in an application being determined outside of statutory timeframes, unless the applicant has entered into a Planning Performance Agreement.**