### Report of the Head of Planning & Enforcement Services

Address 20A KEATS WAY WEST DRAYTON

**Development:** Two storey, 3-bed attached dwelling with associated parking and amenity

space (Retrospective)

**LBH Ref Nos**: 53368/APP/2011/2384

**Drawing Nos:** 20A/UB7/9DR/11/01

Design and Access Statement

Date Plans Received: 03/10/2011 Date(s) of Amendment(s):

**Date Application Valid:** 09/11/2011

#### 1. SUMMARY

This application seeks retrospective permission for the retention of the two storey side extension to 20A Keats Way to be used as a separate dwelling.

The application proposal is still considered to be unacceptable as there would be insufficient internal floorspace and external amenity space provision and Liftimes Homes compliance has not been demonstrated. The scheme is recommended for refusal.

#### 2. RECOMMENDATION

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

#### 1 NON2 Non Standard reason for refusal

The proposal fails to provide amenity space of sufficient size and quality commensurate with the size and layout of the proposal and thus results in over-development of the site detrimental to the residential amenity of future occupiers contrary to Policy BE23 of the Hillingdon Unitary Development Plan Saved Policies (September 2007), Policy 3.5 of the London Plan (2011) and the adopted Supplementary Planning Document HDAS: Residential Layouts.

#### 2 NON2 Non Standard reason for refusal

The floor area for the proposed dwelling is below the minimum required for a three-bedroom, two storey dwelling. As such the proposal would fail to provide a satisfactory residential environment for future occupiers, contrary to Policy BE19 of the Hillingdon Unitary Development Plan (Saved Policies September 2007), Policy 3.5 and Table 3.3 of the London Plan (2011) and the adopted Supplementary Planning Document HDAS: Residential Layouts.

#### 3 NON2 Non Standard reason for refusal

The proposal would fail to meet all relevant Lifetime Home Standards to the detriment of the residential amenity of future occupiers and contrary to policies 3.1, 3.8 and 7.2 of the London Plan (2011) and the adopted Supplementary Planning Document HDAS: Accessible Hillingdon.

### **INFORMATIVES**

1 | 152 | Compulsory Informative (1)

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

# 2 I53 Compulsory Informative (2)

The decision to REFUSE planning permission has been taken having regard to the policies and proposals in the Hillingdon Unitary Development Plan Saved Policies (September 2007) set out below, including Supplementary Planning Guidance, and to all relevant material considerations, including the London Plan (July 2011) and national guidance.

AM7	Consideration of traffic generated by proposed developments.
AM14	New development and car parking standards.
BE13	New development must harmonise with the existing street scene.
BE15	Alterations and extensions to existing buildings
BE19	New development must improve or complement the character of the area.
BE20	Daylight and sunlight considerations.
BE21	Siting, bulk and proximity of new buildings/extensions.
BE22	Residential extensions/buildings of two or more storeys.
BE23	Requires the provision of adequate amenity space.
BE24	Requires new development to ensure adequate levels of privacy to neighbours.
BE38	Retention of topographical and landscape features and provision of new planting and landscaping in development proposals.
HDAS-EXT	Residential Extensions, Hillingdon Design & Access Statement, Supplementary Planning Document, adopted December 2008
HDAS-LAY	Residential Layouts, Hillingdon Design & Access Statement, Supplementary Planning Document, adopted July 2006
LDF-AH	Accessible Hillingdon, Local Development Framework, Supplementary Planning Document, adopted January 2010
LPP 3.3	(2011) Increasing housing supply
LPP 3.4	(2011) Optimising housing potential
LPP 3.5	(2011) Quality and design of housing developments
LPP 3.8	(2011) Housing Choice
LPP 5.3	(2011) Sustainable design and construction
LPP 7.2	(2011) An inclusive environment

# 3. CONSIDERATIONS

## 3.1 Site and Locality

The application site is located on the west side of Keats Way and comprises a modest two storey end of terrace house. The site is within an area of residential development, as identified in the Adopted Hillingdon Unitary Development Plan (UDP) Saved Policies (September 2007).

The property has been extended to the rear with a part single, part two storey extension

and to the side with a two storey extension.

The two storey side/rear extension is being used as a separate dwelling and is the subject of this application.

A detached outbuilding exists to the rear garden, which appears part complete. This is not part of this application.

The dwelling has an area of hardstanding to the front, to the north is a public footpath which is directly adjacent to the flank elevation. To the south, east and west of the site are residential dwellings.

#### 3.2 **Proposed Scheme**

The proposed development seeks part retrospective permission to retain the side extension to 20A Keats Way as a separate 3-bedroom dwelling.

The scheme follows on the the previously refused application 53368/APP/2010/1505 which was dismissed at Appeal. The application seeks changes to the current arrangement of the property.

The proposed property would have an open plan lounge, separate kitchen and shower room on the ground floor. The first floor would consist of three bedrooms and a bathroom. There would be amenity space to the rear garden of some 45sq.m and the frontage would be used for off street parking for one vehicle, accessed via the existing crossover.

#### 3.3 **Relevant Planning History**

20a Keats Way West Drayton 53368/98/1843

Erection of a two storey side and a single storey rear extension

**Decision**: 29-10-1998 **Approved** 

53368/APP/2005/1964 20a Keats Way West Drayton

> ERECTION OF A TWO STOREY SIDE EXTENSION AND PART SINGLE, PART TWO STOREY REAR EXTENSION INCORPORATING EXISTING REAR ADDITION

**Decision:** 07-09-2005 Refused

53368/APP/2005/2666 20a Keats Way West Drayton

ERECTION OF TWO-STOREY SIDE AND SINGLE STOREY REAR EXTENSION

**Decision:** 17-11-2005 **Approved** 

53368/APP/2005/959 20a Keats Way West Drayton

> ERECTION OF A PART SINGLE STOREY, PART TWO STOREY AND PART FIRST FLOOR REAR EXTENSION, AND ERECTION OF A TWO STOREY SIDE EXTENSION COMPRISING

AN INTERNAL STAIRCASE

**Decision:** 23-05-2005 Refused 53368/APP/2007/3848 20a Keats Way West Drayton

RETENTION OF PART FIRST FLOOR REAR EXTENSION.

**Decision:** 05-08-2008 NFA

53368/APP/2007/546 20a Keats Way West Drayton

ERECTION OF A TWO STOREY SIDE EXTENSION AND PART TWO STOREY/PART SINGLE STOREY REAR EXTENSION (RETROSPECTIVE APPLICATION).

Decision: 09-05-2007 Refused

53368/APP/2008/524 20a Keats Way West Drayton

The erection of a first floor rear extension.

The erection of a mono-pitched roof over the approved single storey rear extension. Non-compliance with approved drawings for the erection of a two storey side and single storey rear extension (insertion of an extra window at first floor level and door in the front elevation of the two storey side elevation and an extra window at first floor level and door in the side elevation of the two storey side extension, not shown on the approved drawings). (Appeal against enforcement notice; application for planning permission deemed to have been made pursuant to Section 174 of The Town and Country Planning Act 1990)

**Decision:** Appeal: 30-05-2008 Allowed

53368/APP/2010/1505 20a Keats Way West Drayton

Conversion of existing dwelling to 2 three-bedroom dwellings (Retrospective application.)

Decision: 30-09-2010 Refused Appeal: 16-05-2011 Dismissed

53368/APP/2010/592 20a Keats Way West Drayton

TO SUBDIVIDE NO. 20A KEATS WAY

FEE TRANSFERED TO NEW APPLICATION REF: 53368/APP/2010/1505

**Decision:** 19-05-2010 NFA

## Comment on Relevant Planning History

Planning approval was granted for a two storey side and single storey rear extension in November 2005, however the owner did not build these extensions in accordance with the approved plans.

A subsequent enforcement investigation resulted in an enforcement notice being issued by the Council on the 19 December 2007, for the unauthorised erection of a first floor rear extension, the unauthorised erection of a mono-pitched roof over the approved single storey rear extension and non-compliance with the approved drawings for the erection of a two storey side and single storey rear extension.

The owner appealed against the Council's decision to issue the enforcement notice and

the appeal was upheld by the Planning Inspectorate and the notice was quashed on the 30 May 2008. The external appearance of the building would remain as was considered acceptable by the Inspector under this decision.

Following subsequent investigations, the Council's enforcement team became aware that the property was being used as more than one dwelling.

In an attempt to regularise the situation, the owner submitted planning application 53368/APP/2010/1505 seeking approval for two units. This was refused for the following reasons:

- 1. The proposal would provide an indoor living area of an unsatisfactory size for the occupiers of one of the proposed dwellings. The proposal would therefore give rise to a substandard form of living accommodation for future occupiers contrary to Policies BE19 and H7 (iv) of the Unitary Development Plan Saved Policies (September 2007) and design principles 4.7 and 4.8 of the Council's Design Guide Residential Layouts.
- 2. The proposed development fails to provide sufficient off street parking provision which meets the Council's approved parking standards to service the proposed dwellings. The development would therefore lead to additional on street parking to the detriment of public and highway safety and is therefore contrary to Policies AM7 and AM14 of the Hillingdon Unitary Development Plan Saved Policies (September 2007) and the Council's adopted car parking standards.
- 3. The proposal fails to provide amenity space of sufficient size and quality commensurate with the size and layout of the proposed dwellings. As such the proposal would provide a substandard form of accommodation for future residents contrary to Policy BE23 of the Hillingdon Unitary Development Plan Saved Policies (September 2007), and the Council's HDAS (SPD): Residential Layouts.
- 4. The application has failed to demonstrate that the dwellings would be designed to 'Lifetime Homes' standards. The development is therefore contrary to Policy 3A.5 of the London Plan (February 2008) and the Local Development Framework Accessible Hillingdon Supplementary Planning Document (January 2010).

A subsequent appeal against this decision was dismissed and the current proposal seeks to address the Inspector's concerns.

### 4. Planning Policies and Standards

**NPPF** 

The London Plan (2011)

The London Borough of Hillingdon Unitary Development Plan Saved Policies (September 2007)

HDAS: Residential Layouts

HDAS: Accessible Hillingdon

Supplementary Planning Guidance for Planning Obligations

#### **UDP / LDF Designation and London Plan**

The following UDP Policies are considered relevant to the application:-

Part 1 Policies:

### Part 2 Policies:

AM7	Consideration of traffic generated by proposed developments.
AM14	New development and car parking standards.
BE13	New development must harmonise with the existing street scene.
BE15	Alterations and extensions to existing buildings
BE19	New development must improve or complement the character of the area.
BE20	Daylight and sunlight considerations.
BE21	Siting, bulk and proximity of new buildings/extensions.
BE22	Residential extensions/buildings of two or more storeys.
BE23	Requires the provision of adequate amenity space.
BE24	Requires new development to ensure adequate levels of privacy to neighbours.
BE38	Retention of topographical and landscape features and provision of new planting and landscaping in development proposals.
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LPP 3.5	(2011) Quality and design of housing developments
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LPP 5.3	(2011) Sustainable design and construction
LPP 7.2	(2011) An inclusive environment
5 Advertisement and Site Notice	

#### 5. Advertisement and Site Notice

- **5.1** Advertisement Expiry Date:- Not applicable
- **5.2** Site Notice Expiry Date:- Not applicable

#### 6. Consultations

#### **External Consultees**

Sixteen neighbouring residents notified of the development on 15/11/2011. Four comments were received:

- (i) An extra room has been built in the tiny rear garden. It is an eyesore that is highly visible from all angles. it does not match any of the buildings in the surrounding area.
- (ii) My original objection was mainly about the side door which I still feel should be removed. This doorway does not meet lifetime homes standards and is extremely dangerous for any one with a disability. Also, even though the Council's original objection was about the lack of amenity space the owner has now erected a building in the garden which is not shown on the plans. The owner seems to think he is allowed to do whatever he likes and has flaunted planning procedures in his

last two projects, this one and 11 Coleridge Way, West Drayton. Also in this application there is nothing about meeting the Code for Sustainability or any discussion about Education supplements as was the case in my recent application.

- (iii) Is this a new building or the one already erected, if the former strongly abject to the massive over development of this site. If the later, what is the new structure being built in the garden.
- (iv) This house has already had a rear extension. There is now an extra rear extension under construction which is not shown on the plan. Also under construction a large room at the rear of the garden, not shown on plan. The garden space will now be less than required.

BAA Airports: No objection.

#### **Internal Consultees**

Trees/Landscape Officer:

LANDSCAPE CONTEXT: The site is occupied by an attached house which forms the end of a terrace of three. The front garden is totally paved and provides off-street parking. There are no trees or other significant landscape features nearby and no protected trees which could be affected by the development.

PROPOSAL: The proposal is a retrospective application to address the issues raised in the Planning Inspector's report (refused application ref: 2010/1505).

LANDSCAPE CONSIDERATIONS: Saved policy BE38 seeks the retention and utilisation of topographical and landscape features of merit and the provision of new planting and landscaping wherever it is appropriate.

- · No trees or other landscape features of merit will be affected by the development and the Inspector's report makes no reference to the existing or proposed landscape quality of the site.
- The local planning authority seeks the retention of 25% of the area of front gardens to be retained as soft landscape. In this case, the loss of soft landscaped front garden is thought to pre-date the application and the retention of off-street parking spaces accepted by the Planning Inspector.
- · DCLG/EA guidance requires new driveways to be permeable, to meet SUDS requirements. The existing concrete hard-standing is not permeable. However, its installation is thought to pre-date the current application.

RECOMMENDATIONS: No objection and, in this case, no need for landscape conditions.

#### Access Officer:

In assessing this application, reference has been made to London Plan July 2011, Policy 3.8 (Housing Choice) and the Council's Supplementary Planning Document 'Accessible Hillingdon' adopted January 2010. The scheme should be revised and compliance with all 16 Lifetime Home standards (as relevant) should be shown on plan. The following access observations are provided:

- 1. The proposed first-floor bathroom should be designed in accordance with Lifetime Home standards. At least 700mm should be provided to one side of the WC, with 1100mm provided between the front edge of the toilet pan and a door or wall opposite.
- 2. To allow bathrooms to be used as wet rooms in future, plans should indicate floor gulley drainage.
- 3. Whilst the plan submitted refers to the potential installation of a future through the ceiling wheelchair lift, it fails to demonstrate the location of the lift opening. The plan should be amended accordingly to ensure that adequate circulation and living space would remain with a lift car in situ.

Conclusion: No objection would be raised on the proviso that the above issues are addressed and demonstrated on a revised plan.

#### 7. MAIN PLANNING ISSUES

# 7.01 The principle of the development

The proposed development seeks part retrospective permission to retain the side extension to 20A Keats Way as a separate 3-bedroom dwelling. The principle of the development is considered to be acceptable. The site is located within a residential area and the development proposed is residential in nature.

# 7.02 Density of the proposed development

The site area is around 0.013Ha. The site has a PTAL of 1b, and the London Plan recommends that the density should not exceed 150 to 200 HR/Ha or 50 to 75 U/Ha. The scheme proposes a total of 5 habitable rooms. With a site area of 0.013Ha, this would equate to a density of 76 U/Ha or 384 HR/Ha, which exceeds the guidance in the London Plan. However, given the small scale nature of the development, the more important factors are the quality of the development in terms of size of units and amenity space provision and these issues are considered below.

# 7.03 Impact on archaeology/CAs/LBs or Areas of Special Character

The site is not located within a Conservation Area, Area of Special Character nor does it impact on any Listed Building or have an impact on archaeology.

# 7.04 Airport safeguarding

No objection has been raised to the scheme by BAA. The proposal would not impact on airport safeguarding.

### 7.05 Impact on the green belt

The site is not located within the Green Belt.

#### 7.07 Impact on the character & appearance of the area

Policy BE19 states that new development within residential areas should complement and improve the amenity and character of the area.

There are no alterations proposed to the external appearance of the property from when it was used as an extension to the parent dwelling apart from the retention of a new door on the front elevation. Although the previously refused application raised issue with the front door and its impact on the character of the area, the Inspector raised no such concerns. Hence the proposal would be considered, on balance not to be out of keeping with the character and appearance of the street scene or wider area, in accordance with UDP policies BE13, BE15 and BE19.

## 7.08 Impact on neighbours

There are no extensions proposed to the property and it is considered that the scheme would not cause an unacceptable loss of light or outlook to adjoining occupiers. In this regard the proposal is considered to accord with policies BE20 and BE21 of the UDP Saved Polices (September 2007).

With regard to privacy, the proposal would not result in any additional windows and it is not considered the proposal would result in any loss of privacy over that which would have occurred before the house was converted into two units. Therefore, the proposal is considered to comply with Policy BE24 of the UDP Saved Polices (September 2007).

### 7.09 Living conditions for future occupiers

Reasons for refusal 1 and 3 of application 53368/APP/2010/1505 related to the provide unsatisfactory size of the indoor living area and the proposed amenity space.

The Inspector was in agreement with the Council that the proposal would not provide

adequate living conditions for the occupiers of the dwelling. The internal floorspace of the prooperty proposed to be retained has been measured from the plans to be around 83sq.m (the Appeal documentation makes reference to a figure of 89sq.m). The Inspector considered the floorspace provided would be comensurate for the type of dwelling. The Inspector's consideration related to Section 4.7 of the Council's SPD HDAS: Residential Layouts, which requires an indoor living space of 81sq.m minimum for dwellings with 3 bedrooms. Whilst the appeal decision is a material consideration, the London Plan (July 2011) is more recent and has been adopted since the appeal decision (May 2011) and it is considered that the application should be assessed against the requirements of this plan. The property is considered to be suitable for occupancy by 5 persons (having regard to size of rooms). For a two storey, three bedroom, 5 person dwelling, policy 3.5 and Table 3.3 of the London Plan requires an internal floor area of 96sq.m. The proposal at 83sq.m is significantly below this figure and is considered to be unacceptable and to the detriment of the amenity of future occupiers.

The Inspector raised concern about the internal arrangements of rooms, in particular the fact that rooms considered to be usable for habitable purposes would not have their own source of light and outlook. The proposal rectifies this and it is considered that all the proposed habitable rooms would have an adequate outlook and source of natural light.

In terms of external amenity space, application 53368/APP/2010/1505 did not specify boundaries between the original and new dwelling and hence the exact level of amenty space provision was not specified. However, the Appeal Inspector noted that the space to the rear of the original and new dwelling was around 100sq.m and commented that its equal subdivision would provide convenient and usable private amenity space. The amenity space shown on the application drawings is calculated at around 45sq.m. However, an outbuilding has been constructed within the rear garden of the property, which reduces the amenity space for the occupiers of the dwelling to an unacceptable level of a maximum of around 35sq.m. Given that the SPD HDAS: Residential Layouts specifies that 3 bedroom dwellings should be provided with a minimum of 60sq.m, the provision is unacceptable and to the detriment of the amenity of future occupiers and contrary to UDP policy BE23 and the SPD.

# 7.10 Traffic impact, Car/cycle parking, pedestrian safety

The previous application for the dwelling was refused on the grounds that insufficient off street parking was provided to meet the Council's approved parking standards.

Given the low PTAL level, the Council's Highway Engineer previously advised that two parking spaces should be provided for each dwelling. A total of three off street spaces were indicated for both dwellings. One parking space has been indicated to the application property as part of the current application. On this issue the Inspector commented as follows:

- "13. According to the appellant 3 parking spaces can be provided on the forecourt of the property. The Council contends that a total of 4 parking spaces should be provided to serve the two dwellings. The Council is evidently concerned the development would lead to additional on-street parking to the detriment of highway and pedestrian safety.
- 14. However, the locality does not appear to be subject to undue levels of parking stress. There is no persuasive evidence before me to demonstrate the shortfall of off-street parking within this proposal would adversely affect highway and pedestrian safety or the free flow of traffic. Moreover, there is no compelling evidence to suggest the scheme would lead to increased competition for on-street parking spaces to the extent that

neighbouring residents would be unable to find spaces reasonably near their homes. I conclude the shortfall in off-street parking would not be a decisive objection to this scheme. In this respect it would not be inconsistent with the aims of policy AM7."

Given these comments it is considered that it would be difficult to raise objection to the proposal on parking and highway safety grounds.

# 7.11 Urban design, access and security

External changes are limited, and matters relating to appearance have been dealt with in section 7.07 of this report.

Disabled access considerations are considered in section 7.12 of this report. Should the scheme be approved, then it is recommended that conditions be imposed requiring achievement of Secure By Design accreditation.

#### 7.12 Disabled access

The previous application for the dwelling was refused on the grounds that the application failed to demonstrate that the dwellings would be designed to 'Lifetime Homes' standards.

The Appeal Inspector agreed fully with this concern. Although the applicant has achieved a level of compliance with the Lifetime Homes standards, there are still significant shortfalls as advised by the Council's Access Officer and the proposal is thus contrary to London Plan (2011) policies 3.8 and 7.2 and to the adopted Supplementary Planning Document Hillingdon Design & Accessibility Statement: Accessible Hillingdon.

# 7.13 Provision of affordable & special needs housing

As the proposal relates to a single dwelling, the proposal falls below the threshold requiring affordable housing provision.

# 7.14 Trees, landscaping and Ecology

No objections have been raised to the development from the Trees and Landscape officer, the proposal is therefore considered to be in accordance with Policy BE38.

# 7.15 Sustainable waste management

No refuse or recycling storage facilities are shown on the plans. In this case, because it would be possible to accommodate adequate refuse storage facilities on the site, a condition could be imposed on any consent granted requiring the provision of refuse and recycling storage facilities. In this regard, subject to such a condition on any permission, no objection is raised.

# 7.16 Renewable energy / Sustainability

Subject to a condition being imposed on any consent granted, requiring that the scheme meet Level 3 of the Code for Sustainable Homes, then the sustainability objectives of the development would be adequate.

# 7.17 Flooding or Drainage Issues

The application site does not lie within a flood zone and there are no issues relating to drainage.

#### 7.18 Noise or Air Quality Issues

There are no issues raised with regard to noise or air quality issues. The proposal would be in accordance with UDP Policy OE1.

## 7.19 Comments on Public Consultations

The matters raised in the various objections/submissions are discussed within the main body of the report.

### 7.20 Planning obligations

There would be a net increase of 5 habitable rooms. Hence, as the increase in habitable

rooms would be less than 6, it is considered that an educational contrubition would not be required in this instance.

## 7.21 Expediency of enforcement action

An enforcement notice has already been issued against the proposal and a subsequent appeal dismissed. Thus, the applicant/owner would be required to comply with the enforcement notice, in the event of this application being refused.

#### 7.22 Other Issues

There are no other issues to report.

# 8. Observations of the Borough Solicitor

When making their decision, Members must have regard to all relevant planning legislation, regulations, guidance, circulars and Council policies. This will enable them to make an informed decision in respect of an application.

In addition Members should note that the Human Rights Act 1998 (HRA 1998) makes it unlawful for the Council to act incompatibly with Convention rights. Decisions by the Committee must take account of the HRA 1998. Therefore, Members need to be aware of the fact that the HRA 1998 makes the European Convention on Human Rights (the Convention) directly applicable to the actions of public bodies in England and Wales. The specific parts of the Convention relevant to planning matters are Article 6 (right to a fair hearing); Article 8 (right to respect for private and family life); Article 1 of the First Protocol (protection of property) and Article 14 (prohibition of discrimination).

Article 6 deals with procedural fairness. If normal committee procedures are followed, it is unlikely that this article will be breached.

Article 1 of the First Protocol and Article 8 are not absolute rights and infringements of these rights protected under these are allowed in certain defined circumstances, for example where required by law. However any infringement must be proportionate, which means it must achieve a fair balance between the public interest and the private interest infringed and must not go beyond what is needed to achieve its objective.

Article 14 states that the rights under the Convention shall be secured without discrimination on grounds of 'sex, race, colour, language, religion, political or other opinion, national or social origin, association with a national minority, property, birth or other status'.

The power to issue an Enforcement Notice is discretionary and should only be used where the Local Planning Authority are satisfied that there has been a breach or breaches of planning control. It must also be satisfied that it is expedient to issue the Notice having regard to the provisions of the Development Plan and to any other material considerations. Consequently the Council must decide based on the particular circumstances of each individual case the question of expediency. The decision to take enforcement action must be reasonable and not based on irrational factors or taken without proper consideration of the relevant facts and planning issues or based on non-planning grounds. Enforcement action should not be taken purely to regularise the situation.

### 9. Observations of the Director of Finance

Not applicable to this application.

### 10. CONCLUSION

This application seeks retrospective permission for the retention of the two storey side extension to 20A Keats Way to be used as a separate dwelling.

The application proposal is still considered to be unacceptable as there would be insufficient amenity space and internal floorspace provision and Liftimes Homes compliance has not been demonstrated. The scheme is recommended for refusal.

### 11. Reference Documents

NPPF (National Planning Policy Framework) (2012)

The London Plan (2011)

The London Borough of Hillingdon Unitary Development Plan Saved Policies (September 2007)

HDAS: Residential Layouts HDAS: Accessible Hillingdon

Supplementary Planning Guidance for Planning Obligations

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