

## Report of the Head of Planning, Transportation and Regeneration

**Address** THE SIX BELLS PH DUCKS HILL ROAD RUISLIP

**Development:** Proposed barn extension to provide an extended dining area at ground floor and 8 no. guest rooms at first floor, adding a guest house use to the existing public house/restaurant to create a mixed use (Sui Generis), with associated works and landscaping.

**LBH Ref Nos:** 14387/APP/2020/4126

**Drawing Nos:** Case of Need  
Design Access & Planning Statement (Dated 12th December 2020)  
BS 5837:2012 Tree Survey, Arboricultural Impact Assessment, Draft Arboricultural Method Statement & Tree Protection Plan (Dated 27th August 2020)  
Heritage Impact Assessment (Dated 12th December 2020)  
VSA20/11 - 011  
Location Plan  
VSA20/11 - 003  
VSA20/11 - 004  
VSA20/11 - 005  
VSA20/11 - 008  
VSA20/11 - 009  
VSA20/11 - 01C  
VSA20/11 - 001A  
VSA20/11 - 002A  
VSA20/11 - 006A  
VSA20/11 - 007A

**Date Plans Received:** 15/12/2020

**Date(s) of Amendment(s):** 15/12/2020

**Date Application Valid:** 15/12/2020

### 1. SUMMARY

This application seeks permission for a barn building extension to provide a restaurant at ground floor and 8 no. guest rooms at first floor, adding a guest house use to the existing public house/restaurant to create a mixed use (Sui Generis).

Notably, the proposed development is considered to pose 'less than substantial harm' to the setting of the Grade II Listed Building. In accordance with paragraph 196 of the NPPF (February 2019), this harm is weighed against the public benefits of the proposal. As outlined within the main body of the report, the proposed development is considered to provide public benefits to outweigh the harm posed.

In terms of Green Belt considerations, the proposed development is considered to constitute inappropriate development within the Green Belt requiring very special circumstances. These do not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations. In terms of the harm posed, this is viewed in the context of the previously approved applications (references 14387/APP/2018/1383 and 14387/APP/2018/1385) which establish merit for the development of the footprint adjoining

the Public House. Following the reduction in height and length relative to that previously refused (references 14387/APP/2020/2775 and 14387/APP/2020/2776), and taking into consideration the buildings proposed location within the previously developed area of the site, the proposed development would not be considered to significantly harm the openness of the Green Belt.

In conjunction with this, the proposed development would support the viability of the Public House, this being a use which is generally considered to be at risk of closure if they are unable to adapt to changing economic circumstances. In turn, the development would safeguard the long term preservation of the heritage asset whilst also safeguarding an important community use for the local community. Its importance is evidenced by the limited number of public houses within the area and the receipt of a supporting petition with 30 signatories, as well as support received from the Eastcote Conservation Panel, the Eastcote Residents Association and the Ruislip, Northwood and Eastcote Local History Society.

Given the above, it is considered that the harm posed to the openness of the Green Belt is sufficiently limited for the development to be considered on-balance acceptable.

For the reasons outlined within the report, the proposed development is recommended for approval subject to planning conditions.

## **2. RECOMMENDATION**

**APPROVAL subject to the following:**

### **1 COM3 Time Limit**

The development hereby permitted shall be begun before the expiration of three years from the date of this permission.

#### **REASON**

To comply with Section 91 of the Town and Country Planning Act 1990.

### **2 COM4 Accordance with Approved Plans**

The development hereby permitted shall not be carried out except in complete accordance with the details shown on the submitted plans, numbers VSA20/11 - 006A, VSA20/11 - 007A, VSA20/11 - 008, VSA20/11 - 009, VSA20/11 - 010, VSA20/11 - 011 and shall thereafter be retained/maintained for as long as the development remains in existence.

#### **REASON**

To ensure the development complies with the provisions Hillingdon Local Plan Parts 1 (November 2012) and 2 (January 2020) and the London Plan (March 2016).

### **3 COM5 General compliance with supporting documentation**

The development hereby permitted shall not be carried out except in complete accordance with the specified supporting plans and/or documents:

- BS 5837:2012 Tree Survey, Arboricultural Impact Assessment, Draft Arboricultural Method Statement & Tree Protection Plan (Dated 27th August 2020)

Thereafter the development shall be retained/maintained in accordance with these details for as long as the development remains in existence

#### **REASON**

To ensure that the development complies with the provisions Hillingdon Local Plan Parts 1 (November 2012) and 2 (January 2020) and the London Plan (March 2016).

**4 NONSC Unauthorised Timber Structures**

All unauthorised timber structures within the confines of the site shall be removed prior to the commencement of the development hereby approved.

**REASON**

As planning permission has not been granted for such structures and to ensure that the development presents a satisfactory appearance in accordance with Policy DMHB 11 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020).

**5 NONSC Restriction of Uses**

Notwithstanding the Town and Country Planning (Use Classes) Order 1987 (as amended), or in any provision equivalent to that Class in any statutory instrument revoking and re-enacting that Order with or without modification, the development shall not be used for any purpose other than as a dining area at ground floor and guest house at first floor.

**REASON**

To ensure that the provisions of the proposed development are secured to the public house / restaurant use to prevent detrimental impacts to the local highway network, in accordance with Policies DMT 1, DMT 2 and DMT 5 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020).

**6 COM23 Hours of Use**

The restaurant hereby approved shall not be open for customers outside the following hours: -

- 1200 to 2400 from Monday to Friday
- 1200 to 2400 on Saturday
- 1200 to 2200 on Sunday and Public or Bank Holidays.

**REASON**

To safeguard the residential amenity of the occupiers of adjoining and nearby properties in accordance with Policy DMHB 11 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020).

**7 COM7 Materials (Submission)**

No development shall take place until details of all materials and external surfaces have been submitted to and approved in writing by the Local Planning Authority. Thereafter the development shall be constructed in accordance with the approved details and be retained as such.

Details should include information relating to make, product/type, colour and photographs/images.

Thereafter the development shall be carried out and maintained in full accordance with the approved details.

**REASON**

To ensure that the development presents a satisfactory appearance in accordance with Policy DMHB 11 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020).

## **8 NONSC Bin and Cycle Storage Details**

Prior to the commencement of above ground works, detailed elevations, material specifications and screening details of the bin and cycle storage hereby approved shall be submitted to and approved in writing by the Local Planning Authority.

Thereafter the development shall be carried out and maintained in full accordance with the approved details.

### **REASON**

To ensure that the development presents a satisfactory appearance and does not injure the visual amenities of the Green Belt setting, in accordance with Policies DMHB 11 and DMEI 4 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020).

## **9 COM9 Landscaping (car parking & refuse/cycle storage)**

Prior to commencement of above ground works, a landscape scheme shall be submitted to and approved in writing by the Local Planning Authority. The scheme shall include: -

1. Details of Soft Landscaping
  - 1.a Planting plans (at not less than a scale of 1:100),
  - 1.b Written specification of planting and cultivation works to be undertaken,
  - 1.c Schedule of plants giving species, plant sizes, and proposed numbers/densities where appropriate
2. Details of Hard Landscaping
  - 2.a Refuse storage
  - 2.b Secure and covered cycle storage demonstrating capacity for at least 9 no. bicycles
  - 2.c Means of enclosure/boundary treatments
  - 2.d Car parking layouts demonstrating the provision of:
    - 42 no. car parking spaces, including 2 no. accessible car parking spaces
    - 1 no. car parking space served by an active electric vehicle charging point
    - 1 no. car parking space served by a passive electric vehicle charging point
  - 2.e Hard surfacing materials
  - 2.f External lighting
  - 2.g Other structures (if relevant)
3. Details of Landscape Maintenance
  - 3.a Landscape Maintenance Schedule for a minimum period of 5 years.
  - 3.b Proposals for the replacement of any tree, shrub, or area of surfing/seeding within the landscaping scheme which dies or in the opinion of the Local Planning Authority becomes seriously damaged or diseased.
4. Schedule for Implementation
5. Other
  - 5.a Existing and proposed functional services above and below ground
  - 5.b Proposed finishing levels or contours

Thereafter the development shall be carried out and maintained in full accordance with the approved details.

### **REASON**

To ensure that the proposed development will preserve and enhance the visual amenities

of the locality and provide adequate facilities in compliance with Policies DMHB 11, DMHB 14 and DMT 6 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020) and Policy 5.17 of the London Plan (March 2016).

**10 COM10 Tree to be retained**

Trees, hedges and shrubs shown to be retained on the approved plan shall not be damaged, uprooted, felled, lopped or topped without the prior written consent of the Local Planning Authority. If any retained tree, hedge or shrub is removed or severely damaged during construction, or is found to be seriously diseased or dying another tree, hedge or shrub shall be planted at the same place or, if planting in the same place would leave the new tree, hedge or shrub susceptible to disease, then the planting should be in a position to be first agreed in writing with the Local Planning Authority and shall be of a size and species to be agreed in writing by the Local Planning Authority and shall be planted in the first planting season following the completion of the development or the occupation of the buildings, whichever is the earlier. Where damage is less severe, a schedule of remedial works necessary to ameliorate the effect of damage by tree surgery, feeding or groundwork shall be agreed in writing with the Local Planning Authority. New planting should comply with BS 3936 (1992) 'Nursery Stock, Part 1, Specification for Trees and Shrubs'. Remedial work should be carried out to BS 3998:2010 'Tree work - Recommendations' and BS 4428 (1989) 'Code of Practice for General Landscape Operations (Excluding Hard Surfaces)'. The agreed work shall be completed in the first planting season following the completion of the development or the occupation of the buildings, whichever is the earlier.

**REASON**

To ensure that the trees and other vegetation continue to make a valuable contribution to the amenity of the area in accordance with policy DMHB 14 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020) and to comply with Section 197 of the Town and Country Planning Act 1990.

**11 COM8 Tree Protection**

No site clearance or construction work shall take place until the details have been submitted to, and approved in writing by, the Local Planning Authority with respect to:

1. A method statement outlining the sequence of development on the site including demolition, building works and tree protection measures.
2. Detailed drawings showing the position and type of fencing to protect the entire root areas/crown spread of trees, hedges and other vegetation to be retained shall be submitted to the Local Planning Authority for approval. No site clearance works or development shall be commenced until these drawings have been approved and the fencing has been erected in accordance with the details approved. Unless otherwise agreed in writing by the Local Planning Authority such fencing should be a minimum height of 1.5 metres.

Thereafter, the development shall be implemented in accordance with the approved details. The fencing shall be retained in position until development is completed.

The area within the approved protective fencing shall remain undisturbed during the course of the works and in particular in these areas:

- 2.a There shall be no changes in ground levels;
- 2.b No materials or plant shall be stored;
- 2.c No buildings or temporary buildings shall be erected or stationed.
- 2.d No materials or waste shall be burnt; and.

2.e No drain runs or other trenches shall be dug or otherwise created, without the prior written consent of the Local Planning Authority.

3. Where the arboricultural method statement recommends that the tree protection measures for a site will be monitored and supervised by an arboricultural consultant at key stages of the development, records of the site inspections / meetings shall be submitted to the Local Planning Authority.

#### REASON

To ensure that trees and other vegetation can and will be retained on site and not damaged during construction work and to ensure that the development conforms with Policy DMHB 14 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020).

### **12 NONSC Sustainable Water Management**

Prior to the commencement of the superstructure (excluding demolition and site clearance), a scheme for the provision of sustainable water management shall be submitted to and approved in writing by the Local Planning Authority. The scheme shall clearly demonstrate that sustainable drainage systems (SUDS) have been incorporated into the designs of the development in accordance with the hierarchy set out in accordance with Policy 5.15 of the London Plan and will:

- i. provide information about the design storm period and intensity, the method employed to delay and control the surface water discharged from the site and the measures taken to prevent pollution of the receiving groundwater and/or surface waters;
- ii. include a timetable for its implementation; and
- iii. provide a management and maintenance plan for the lifetime of the development which shall include the arrangements for adoption by any public authority or statutory undertaker and any other arrangements to secure the operation of the scheme throughout its lifetime. The scheme shall also demonstrate the use of methods to minimise the use of potable water through water collection, reuse and recycling and will:
- iv. provide details of water collection facilities to capture excess rainwater;
- v. provide details of how rain and grey water will be recycled and reused in the development.

Thereafter the development shall be implemented and retained/maintained in accordance with these details for as long as the development remains in existence.

#### REASON

To ensure the development does not increase the risk of flooding in accordance with Policies DME1 9 and DME1 10 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020) and Policies 5.12 and 5.13 of the London Plan (March 2016).

### **13 NONSC Written Scheme of Investigation**

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

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

B. Where appropriate, details of a programme for delivering related positive public benefit

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

#### REASON

To safeguard the archaeological interest on this site, in accordance with Policy DMHB 7 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020), Policy 7.8 of the London Plan (March 2016), Policy HC1 of the London Plan (December 2020) and the National Planning Policy Framework (February 2019).

### **14 NONSC Ecological Enhancement Scheme**

Prior to commencement of above ground works, a scheme to protect and enhance the nature conservation interest of the site shall be submitted to and approved in writing by the Local Planning Authority.

Thereafter the development shall be carried out and maintained in full accordance with the approved details.

#### REASON

In order to encourage a wide diversity of wildlife on the existing semi-natural habitat of the site, in accordance with Policies DME1 7 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020) and Policy 7.19 of the London Plan (March 2016).

### **15 COM31 Secured by Design**

The building(s) shall achieve 'Secured by Design' accreditation awarded by the Hillingdon Metropolitan Police Crime Prevention Design Adviser (CPDA) on behalf of the Association of Chief Police Officers (ACPO). No building shall be occupied until accreditation has been achieved.

#### REASON

In pursuance of the Council's duty under section 17 of the Crime and Disorder Act 1998 to consider crime and disorder implications in exercising its planning functions; to promote the well being of the area in pursuance of the Council's powers under section 2 of the Local Government Act 2000 to ensure the development provides a safe and secure environment in accordance with Policy DMHB 15 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020) and Policies 7.1 and 7.3 of the London Plan (March 2016).

### **16 NONSC External Lighting**

No floodlighting or other form of external lighting shall be installed unless it is in accordance with details which have previously been submitted to and approved in writing by the Local Planning Authority. Such details shall include location, height, type and direction of light sources and intensity of illumination. Any lighting that is so installed shall not thereafter be altered other than for routine maintenance which does not change its details.

#### REASON

To safeguard the amenity of surrounding properties in accordance with Policy DMHB 11 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020).

Also, to protect the ecological value of the area in accordance with Policy DMEI 7 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020).

**17 NONSC Air Extraction System or External Plant**

No new air extraction system or external plant shall be used on the premises until a scheme for the control of noise and odour emanating from the site has been submitted to and approved in writing by the Local Planning Authority. The approved scheme shall then be fully implemented before the development is occupied/the use commences and thereafter shall be retained and maintained in good working order for so long as the building remains in use.

**REASON**

To safeguard the amenity of the occupants of surrounding properties in accordance with Policy DMHB 11 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020) and Policy 7.15 of the London Plan (March 2016).

**18 NONSC Sound Insulation**

Prior to the commencement of the superstructure (excluding demolition and site clearance), a scheme for the control of noise transmission to the adjoining dwellings shall be submitted to and approved in writing by the Local Planning Authority. The scheme shall be fully implemented before the development is occupied/use commences and thereafter shall be retained and maintained in good working order for so long as the building remains in use.

**REASON**

To safeguard the amenity of the occupants of surrounding properties in accordance with Policy DMHB 11 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020) and Policy 7.15 of the London Plan (March 2016).

**19 NONSC Control of Amplified Music**

The use of the building hereby approved shall not commence until a scheme for the control of amplified music emanating from the building has been submitted to and approved in writing by the Local Planning Authority. The scheme shall include such combination of physical works, administrative procedures, noise limits and other measures as may be approved by the Local Planning Authority. The scheme shall be fully implemented before the use commences and thereafter shall be retained and maintained in good working order for so long as the building remains in use.

**REASON**

To safeguard the amenity of the occupants of surrounding properties in accordance with Policy DMHB 11 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020) and Policy 7.15 of the London Plan (March 2016).

**20 NONSC Construction Management & Logistics Plan**

Prior to the commencement of the superstructure (excluding demolition and site clearance), a Construction Management and Logistics Plan shall be submitted to and approved in writing by the Local Planning Authority. The plan shall detail:

- (i) The phasing of development works
- (ii) The hours during which development works will occur
- (iii) A programme to demonstrate that the most valuable or potentially contaminating materials and fittings can be removed safely and intact for later re-use or processing.
- (iv) Measures to prevent mud and dirt tracking onto footways and adjoining roads (including wheel washing facilities).



- (v) Traffic management and access arrangements (vehicular and pedestrian) and parking provisions for contractors during the development process (including measures to reduce the numbers of construction vehicles accessing the site during peak hours).
- (vi) Measures to reduce the impact of the development on local air quality and dust through minimising emissions throughout the demolition and construction process.
- (vii) The storage of demolition/construction materials on site.

The approved details shall be implemented and maintained throughout the duration of the demolition and construction process.

#### REASON

To safeguard the amenity of surrounding areas and to ensure that highway and pedestrian safety is not prejudiced, in accordance with Policies DMHB 11 and DMT 1 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020) and Policy 7.15 of the London Plan (March 2016).

#### **21 NONSC Accessible Guest Room**

The accessible bedroom hereby approved as 'Bedroom 8' on drawing reference VSA20/11 - 008 shall be designed and implemented in accordance with Figure 52, incorporating either Figure 30 or 33 of British Standard BS8300-2:2018.

#### REASON

To ensure that people with disabilities have adequate access to the development in accordance with Policy DME 6 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020) and Policies 4.5 and 7.2 of the London Plan (March 2016).

#### **22 NONSC Fire Evacuation Statement**

Prior to the occupation of the proposed development, details demonstrating that disabled people can evacuate from the intended first floor accommodation in a safe and dignified way during a fire evacuation situation shall be submitted to and approved in writing by the Local Planning Authority.

The approved details shall be implemented and maintained throughout the operation of the development.

#### REASON

To ensure that disabled people can evacuate from the intended first floor accommodation in a safe and dignified way during a fire evacuation, in accordance with Policy D12 of the Publication London Plan (December 2020).

### INFORMATIVES

#### **1 I52 Compulsory Informative (1)**

The decision to GRANT 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 GRANT planning permission has been taken having regard to the policies

and proposals in the Hillingdon Local Plan Part 1 (2012) and Part 2 (2020) set out below, including Supplementary Planning Guidance, and to all relevant material considerations, including The London Plan - The Spatial Development Strategy for London consolidated with alterations since 2011 (2016) and national guidance.

DMCI 1	Retention of Existing Community Sport and Education Facilities
DME 5	Hotels and Visitor Accommodation
DMEI 10	Water Management, Efficiency and Quality
DMEI 14	Air Quality
DMEI 4	Development on the Green Belt or Metropolitan Open Land
DMEI 7	Biodiversity Protection and Enhancement
DMEI 9	Management of Flood Risk
DMHB 1	Heritage Assets
DMHB 11	Design of New Development
DMHB 14	Trees and Landscaping
DMHB 2	Listed Buildings
DMHB 7	Archaeological Priority Areas and archaeological Priority Zones
DMT 1	Managing Transport Impacts
DMT 2	Highways Impacts
DMT 6	Vehicle Parking
LPP 5.10	(2016) Urban Greening
LPP 5.12	(2016) Flood risk management
LPP 5.13	(2016) Sustainable drainage
LPP 6.13	(2016) Parking
LPP 6.3	(2016) Assessing effects of development on transport capacity
LPP 6.9	(2016) Cycling
LPP 7.14	(2016) Improving air quality
LPP 7.15	(2016) Reducing and managing noise, improving and enhancing the acoustic environment and promoting appropriate soundscapes.
LPP 7.16	(2016) Green Belt
LPP 7.19	(2016) Biodiversity and access to nature
LPP 7.4	(2016) Local character
LPP 7.6	(2016) Architecture
LPP 7.8	(2016) Heritage assets and archaeology
NPPF- 11	NPPF-11 2018 - Making effective use of land
NPPF- 12	NPPF-12 2018 - Achieving well-designed places
NPPF- 13	NPPF-13 2018 - Protecting Green Belt land
NPPF- 15	NPPF-15 2018 - Conserving and enhancing the natural environment
NPPF- 16	NPPF-16 2018 - Conserving & enhancing the historic environment
NPPF- 2	NPPF-2 2018 - Achieving sustainable development
NPPF- 6	NPPF-6 2018 - Building a strong, competitive economy
NPPF- 8	NPPF-8 2018 - Promoting healthy and safe communities

### **3                      170                      LBH worked applicant in a positive & proactive (Granting)**

In dealing with the application the Council has implemented the requirement in the National Planning Policy Framework to work with the applicant in a positive and proactive way. We have made available detailed advice in the form of our statutory policies from Local Plan Part 1, Local Plan Part 2, Supplementary Planning Documents, Planning Briefs and other informal written guidance, as well as offering a full pre-application advice service, in order to ensure that the applicant has been given every opportunity to submit an application which is likely to be considered favourably.

#### **4 173 Community Infrastructure Levy (CIL) (Granting Consent)**

Under the terms of the Planning Act 2008 (as amended) and Community Infrastructure Levy Regulations 2010 (as amended), this development is liable to pay the London Borough of Hillingdon Community Infrastructure Levy (CIL) and the Mayor of London's Community Infrastructure Levy (CIL). This will be calculated in accordance with the London Borough of Hillingdon CIL Charging Schedule 2014 and the Mayor of London's CIL Charging Schedule 2012. Before commencement of works the development parties must notify the London Borough of Hillingdon of the commencement date for the construction works (by submitting a Commencement Notice) and assume liability to pay CIL (by submitting an Assumption of Liability Notice) to the Council at [planning@hillingdon.gov.uk](mailto:planning@hillingdon.gov.uk). The Council will then issue a Demand Notice setting out the date and the amount of CIL that is payable. Failure to submit a valid Assumption of Liability Notice and Commencement Notice prior to commencement of the development may result in surcharges being imposed.

The above forms can be found on the planning portal at: [www.planningportal.gov.uk/planning/applications/howtoapply/whattosubmit/cil](http://www.planningportal.gov.uk/planning/applications/howtoapply/whattosubmit/cil)

Pre-Commencement Conditions: These conditions are important from a CIL liability perspective as a scheme will not become CIL liable until all of the pre-commencement conditions have been discharged/complied with.

#### **5**

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

### **3. CONSIDERATIONS**

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

The site is located on the west side of Ducks Hill Road, just north of the junction with Reservoir Road and contains a building known as the Six Bells Public House, which is Grade II listed (first listed on 10-Apr-1972), under the Planning (Listed Buildings and Conservation Areas) Act 1990 as amended, for its special architectural or historic interest.

The Six Bells Public House has been occupied and restored as part of the planning permission (reference 14387/APP/2018/1383) and Listed Building Consent (reference 14387/APP/2018/1385) granted in 2018. The barn building extension granted under these permissions has not, however, been started. The extant permissions were granted with the understanding that the extension to the Public House would provide extra space for the restaurant and make the project financially viable and self sustaining in order to secure the long term preservation of the heritage asset.

The application site forms part of designated Green Belt land and the Ruislip Motte & Bailey Archaeological Priority Area. Based on TfL's webCAT planning tool, the site has a poor Public Transport Accessibility Level (PTAL) rating of 1b. Based on the Council's GIS, the site forms part of Flood Zone 1 and a Critical Drainage Area.

### 3.2 Proposed Scheme

This application seeks permission for a barn building extension to provide a restaurant at ground floor and 8 no. guest rooms at first floor, changing the use from a public house/restaurant to mixed use (Sui Generis), with associated works and landscaping. Based on measurements taken from the submitted plans, the proposed barn structure would measure as follows:

- Length: 20.33m
- Width: 9.01m
- Height at the eaves: 4m
- Highest point: 7.75m
- Footprint:  $20.33 \times 9.01 = 183.17\text{m}^2$
- Volume:  $(4 \times 9.01 \times 20.33) + (3.75 \times 9.01 \times 20.33)/2 = 732.69 + 343.45 = 1076.14\text{m}^3$

### 3.3 Relevant Planning History

14387/APP/2018/1383      The Six Bells Ph Ducks Hill Road Ruislip

Restoration of the Six Bells Public House, to include minor alterations to fittings internally and a new extension independent of the historic building to increase dining capacity.

**Decision:** 02-10-2018      Approved

14387/APP/2018/1385      The Six Bells Ph Ducks Hill Road Ruislip

Restoration of the Six Bells Public House, to include minor alterations to fittings internally and a new extension independent of the historic building to increase dining capacity (Listed Building Consent).

**Decision:** 18-10-2018      Approved

14387/APP/2019/528      The Six Bells Ph Ducks Hill Road Ruislip

Application for a Non-Material Amendment to planning permission Ref: 14387/APP/2018/1383 dated 18/10/18 (Restoration of the Six Bells Public House, to include minor alterations to fittings internally and a new extension independent of the historic building to increase dining capacity) to reduce the footprint of the proposed extension

**Decision:** 17-04-2019      Refused

14387/APP/2020/2775      The Six Bells Ph Ducks Hill Road Ruislip

Proposed barn extension to provide a restaurant at ground floor and 10 no. guest rooms at first floor, changing the use from a public house/restaurant to mixed use (Sui Generis), with associated works and landscaping.

**Decision:** 18-11-2020      Refused

14387/APP/2020/2776      The Six Bells Ph Ducks Hill Road Ruislip

Proposed barn extension to provide a restaurant at ground floor and 10 no. guest rooms at first floor (Application for Listed Building Consent)

**Decision:** 18-11-2020      Refused

### **Comment on Relevant Planning History**

Planning permission (reference 14387/APP/2018/1383) and Listed Building Consent (reference 14387/APP/2018/1385) granted the restoration of the Six Bells Public House, to include minor alterations to fittings internally and a new extension independent of the historic building to increase dining capacity. The Public House has since been occupied and restored but has not formally been extended. A site visit indicates that the building has been extended temporarily to provide additional capacity.

A planning application (reference 14387/APP/2020/2775) and Listed Building Consent application (reference 14387/APP/2020/2776) for a barn extension to provide a restaurant at ground floor and 10 no. guest rooms at first floor has been refused. The reasons for refusal are outlined as follows:

The proposed development, by reason of its siting, size, scale, and design, would constitute inappropriate development within designated Green Belt land and very special circumstances do not exist to outweigh the harm to the Green Belt by reason of inappropriateness. As such, the proposal is contrary to Policy EM2 of the Hillingdon Local Plan: Part 1 - Strategic Policies (November 2012), Policy DME1 4 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020), Policy 7.16 of the London Plan (March 2016) and the National Planning Policy Framework (February 2019).

The proposed development, by reason of its siting, size, scale, and design, would fail to preserve the significance of the Grade II Listed Building by posing 'less than substantial harm' to the significance of the designated heritage asset. Further, the proposed development is not considered to provide public benefits sufficient to outweigh the harm posed. As such, the proposal is contrary to Policies BE1 and HE1 of the Hillingdon Local Plan: Part 1 - Strategic Policies (November 2012), Policies DMHB 1, DMHB 2 and DMHB 11 of the Hillingdon Local Plan Part 2 - Development Management Policies (January 2020), Policy 7.8 of the London Plan (March 2016) and the National Planning Policy Framework (February 2019).

The proposed development, by reason of its siting, size, scale, and design, would be detrimental to the character, appearance and visual amenities of the street scene. As such, the proposal is contrary to Policies BE1 of the Hillingdon Local Plan: Part 1 - Strategic Policies (November 2012), Policy DMHB 11 of the Hillingdon Local Plan Part 2 - Development Management Policies (January 2020), Policies 7.4 and 7.6 of the London Plan (March 2016) and the National Planning Policy Framework (February 2019).

## **4. Planning Policies and Standards**

Development Plan

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 West London Waste Plan (2015)

## The London Plan - Consolidated With Alterations (2016)

### Material Considerations

The National Planning Policy Framework (NPPF) (2019) is also a material consideration in planning decisions, as well as relevant supplementary planning documents and guidance.

### Emerging Planning Policies

Paragraph 48 of the National Planning Policy Framework (NPPF) 2019 states that 'Local Planning Authorities may give weight to relevant policies in emerging plans according to:

- (a) the stage of preparation of the emerging plan (the more advanced its preparation, the greater the weight that may be given);
- (b) the extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given); and
- (c) the degree of consistency of the relevant policies in the emerging plan to this Framework (the closer the policies in the emerging plan to the policies in the Framework, the greater the weight that may be given).

### Draft London Plan (Intend to Publish Version, December 2020)

The GLA consulted upon a draft new London Plan between December 2017 and March 2018 with the intention of replacing the previous versions of the existing London Plan. The Plan was subject to examination hearings from February to May 2019, and a Consolidated Draft Plan with amendments was published in July 2019. The Panel of Inspectors appointed by the Secretary of State issued their report and recommendations to the Mayor on 8th October 2019.

The Mayor considered the Inspectors' recommendations and, on 9th December 2019, issued to the Secretary of State his intention to publish the London Plan along with a statement of reasons for the Inspectors' recommendations that the Mayor did not wish to accept. The Secretary of State responded on the 13th March 2020 and stated that he was exercising his powers under section 337 of the Greater London Authority Act 1999 to direct that modifications are required.

On 9th December 2020, the Mayor wrote to the Secretary of State to advise of his intention to formally approve a new draft London Plan, which included his best understanding of the modifications required. The Secretary of State responded on 10th December 2020 requesting that the draft London Plan was re-submitted with more specific amendments to address the 11 previous Directions and 2 additional Directions. On 21st December 2020, the Mayor formally approved a new London Plan, the 'Publication London Plan'. This has been submitted to the Secretary of State. The Secretary of State has 6 weeks to respond or can request a further extension of time. The Mayor can only publish the Plan after the Secretary of State has given approval.

More limited weight should be attached to parts of draft London Plan policies where the Secretary of State has directed specific amendments. Greater weight may be attached to policies that are not subject to the specific amendments from the Secretary of State.

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

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

Part 1 Policies:

PT1.BE1	(2012) Built Environment
PT1.CI1	(2012) Community Infrastructure Provision
PT1.EM2	(2012) Green Belt, Metropolitan Open Land and Green Chains
PT1.EM6	(2012) Flood Risk Management
PT1.EM7	(2012) Biodiversity and Geological Conservation
PT1.EM8	(2012) Land, Water, Air and Noise
PT1.HE1	(2012) Heritage

Part 2 Policies:

DMCI 1	Retention of Existing Community Sport and Education Facilities
DME 5	Hotels and Visitor Accommodation
DMEI 10	Water Management, Efficiency and Quality
DMEI 14	Air Quality
DMEI 4	Development on the Green Belt or Metropolitan Open Land
DMEI 7	Biodiversity Protection and Enhancement
DMEI 9	Management of Flood Risk
DMHB 1	Heritage Assets
DMHB 11	Design of New Development
DMHB 14	Trees and Landscaping
DMHB 2	Listed Buildings
DMHB 7	Archaeological Priority Areas and archaeological Priority Zones
DMT 1	Managing Transport Impacts
DMT 2	Highways Impacts
DMT 6	Vehicle Parking
LPP 5.10	(2016) Urban Greening
LPP 5.12	(2016) Flood risk management
LPP 5.13	(2016) Sustainable drainage
LPP 6.13	(2016) Parking
LPP 6.3	(2016) Assessing effects of development on transport capacity
LPP 6.9	(2016) Cycling
LPP 7.14	(2016) Improving air quality
LPP 7.15	(2016) Reducing and managing noise, improving and enhancing the acoustic environment and promoting appropriate soundscapes.
LPP 7.16	(2016) Green Belt
LPP 7.19	(2016) Biodiversity and access to nature

LPP 7.4	(2016) Local character
LPP 7.6	(2016) Architecture
LPP 7.8	(2016) Heritage assets and archaeology
NPPF- 11	NPPF-11 2018 - Making effective use of land
NPPF- 12	NPPF-12 2018 - Achieving well-designed places
NPPF- 13	NPPF-13 2018 - Protecting Green Belt land
NPPF- 15	NPPF-15 2018 - Conserving and enhancing the natural environment
NPPF- 16	NPPF-16 2018 - Conserving & enhancing the historic environment
NPPF- 2	NPPF-2 2018 - Achieving sustainable development
NPPF- 6	NPPF-6 2018 - Building a strong, competitive economy
NPPF- 8	NPPF-8 2018 - Promoting healthy and safe communities

## **5. Advertisement and Site Notice**

**5.1** Advertisement Expiry Date:- **3rd February 2021**

**5.2** Site Notice Expiry Date:- **25th January 2021**



14th January 2021

## 6. Consultations

### External Consultees

A petition in support of the proposed development has been received with 30 signatories.

Letters have been sent to neighbouring properties, a site notice has been displayed and the application has been advertised in the local paper. A total of 10 comments in support of the proposed development have been received and are summarised as follows:

- The pub is well run and provides a much needed service.
- The proposal provides additional benefits to the area.
- Overnight accommodation is needed in the area.
- The proposal will create jobs and benefit local businesses.
- Additional signage provided by the applicant at the entrance to our driveway would assist patrons in finding the correct place to turn into the Six Bells car park.
- A visible pick-up/drop-off zone to the Six Bells car park should be provided to help patrons guide pick-up and drop-off drivers.
- The plans show some of the windows, on the south side of the proposed building, would have direct line of sight into several neighbouring properties, compromising privacy. This could be solved by planting screening.
- An approval should contain condition(s) prohibiting further development for a reasonable period (e.g. 25-50 years) to ensure that any approval given in this application is utilised and does not lead to additional applications that change the special character of the site and surroundings.

#### PLANNING OFFICER COMMENT:

All material planning considerations are addressed in detail within the main body of the report. It should be noted that a condition which restricts any further development for any number of years is considered to be unreasonable and would not accord with Paragraph 55 of the National Planning Policy Framework (February 2019).

#### COUNCILLOR CORTHORNE:

I am writing to express my support for this fresh application following the recent committee decision.

I am given to understand that there has been dialogue between the applicant and officers and changes to the original proposals has been made to the scale and bulk of the development, which make it acceptable in planning policy terms.

I've previously indicated that the economic benefits should be recognised as part of the overall planning balance, and with these changes feel this should now be supported.

#### CHAIR OF THE RUISLIP NORTHWOOD AND EASTCOTE LOCAL HISTORY SOCIETY:

As Chair of the Ruislip Northwood and Eastcote Local History Society, I support this application as being sympathetic to the adjacent grade II listed building and less bulky than the already granted application for this site (14387/APP/2018/1383). This new building will provide greater economic viability to the site and more certainty that the listed building will continue to be used and kept in good repair, bearing in mind the long period of disuse when it was at risk.

#### GREATER LONDON ARCHAEOLOGICAL ADVISORY SERVICE:

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

NPPF Section 16 and the Draft London Plan (2017 Policy HC1) recognise the positive contribution of heritage assets of all kinds and make the conservation of archaeological interest a material planning consideration. NPPF paragraph 189 says applicants should provide an archaeological assessment if their development could affect a heritage asset of archaeological interest.

If you grant planning consent, paragraph 199 of the NPPF says that applicants should record the significance of any heritage assets that the development harms.

Applicants should also improve knowledge of assets and make this public.

The planning application lies in an area of archaeological interest (Archaeological Priority Area) identified for the Local Plan: Ruislip.

The application involves the construction of a large new 'barn' within the Ruislip historic village Archaeological Priority Area and adjacent to the 18th century listed pub. The groundworks are unlikely to have a major impact but may reveal evidence related to the occupation of this northernmost part of the historic village.

I have looked at this proposal and at the Greater London Historic Environment Record. I advise that the development could cause harm to archaeological remains. However the significance of the asset and scale of harm to it is such that the effect can be managed using a planning condition.

NPPF paragraphs 185 and 192 and Draft London Plan Policy HC1 emphasise the positive contributions heritage assets can make to sustainable communities and places. Where appropriate, applicants should therefore also expect to identify enhancement opportunities.

I therefore recommend the following condition on any consent:

#### Condition

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

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

B. Where appropriate, details of a programme for delivering related positive public benefits

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

#### Informative

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

(England) Order 2015.

This pre-commencement condition is necessary to safeguard the archaeological interest on this site. Approval of the WSI before works begin on site provides clarity on what investigations are required, and their timing in relation to the development programme. If the applicant does not agree to this precommencement condition please let us know their reasons and any alternatives suggested. Without this pre-commencement condition being imposed the application should be refused as it would not comply with NPPF paragraph 199.

#### EASTCOTE CONSERVATION PANEL & EASTCOTE RESIDENTS' ASSOCIATION:

The Six Bell PH, is a listed building, with several centuries of history.

The previous application was refused because the proposed barn extension was too large and was not subsidiary to the listed building.

The proposed extension has now been reduced in length and the ridge height is now one metre lower, the same height as the original building. Being set to one side of the listed building, it does not appear to be over dominant.

A Tree Survey has been submitted this time, which clarifies the extent of any tree removal. It appears that a very small number of trees will be removed none of which are large important trees.

There are several areas which need attention but can be conditioned. These are set out below.

- The outdoor lighting for the car park and the buildings, needs to consider the proximity of the site to Mad Bess Woods part of the SSSI. Excessively bright lights and light spill can disturb the bat population of the woods. All species of bats are protected. A design for the layout of all outdoor lighting, which meets Health & Safety rules for a public space and protects the woods from light pollution can be a condition to be dispersed before construction takes place. RIBA and the Institute for Lighting Professionals publish guidelines to cover this situation.
- Opening hours, those stated within the application are reasonable. Very late night opening is not sought. To prevent later changes to these hours, which, would cause inconvenience to local residents, a condition stating that change of opening hours must receive planning permission.
- Noise, a condition which states that any music, live or recorded, [amplified sound] any use of a PA system should not be audible from the nearest dwelling. Even if 'entertainments' are not proposed at the present time, it is possible in the future the Six Bells may come under a different ownership, then this condition if in place can be enforced. This would stop any harm to the surrounding residents.
- That any change of use of the new building from a dining hall to a function room or night club be prohibited. We do appreciate that there are at not any plans at present to change the use, however, looking to the future it is possible another owner may have different ideas. If we have these conditions then changes cannot be made without planning permission.
- Car Parking, should the number of vehicles overflow onto the highway, contingency plans should be in force to deal with inconsiderate parking. For example using the grounds of the Garden Centre opposite to the Six Bells.
- Care needs to be taken that patrons do not leave litter outside of the premises, in line with the Environmental Protection Act 1990. A condition making the owner responsible for any litter dropped outside of the grounds by customers, in the vicinity of the site, to be responsible for cleaning up.
- Any change of signage needs planning permission, we would ask that the name and the pictorial sign for The Six bells is kept. The original Six Bells was located on the corner of Breakspear Road with Howletts Lane moving to the present site in 1810. It was the custom to name a PH after the number of bells in the church tower. St. Martin le Tour Ruislip has six bells. The name like the building is centuries old and part of the history of Ruislip.

To sum up, we do not have any objections to this proposal, subject to safeguarding conditions as set out above, being added to any grant of planning permission that may be given.

#### PLANNING OFFICER COMMENT:

All relevant material planning considerations are addressed within the main body of the report and planning conditions are attached as such. It should be noted that the upkeep of the premises is within the remit of the operator and not a matter to be controlled by the Local Planning Authority.

#### **Internal Consultees**

##### PLANNING POLICY OFFICER:

#### Guest Bedrooms (C1)

The proposal includes the addition of 8 new guest bedrooms, to be located above the new extension to the restaurant/bar. The new guest bedrooms would not be a standalone building. Guests would use the same entrance as the restaurant/bar and presumably check-in at the same entrance lobby. Guests would be required to utilise the staircase next to the extension to the restaurant/bar. Their experience would presumably be managed by the same members of staff as those running the restaurant/bar element of the business. If breakfast was to be served, presumably this would also involve using an element of the restaurant/bar.

Paragraph 86 of the NPPF (2019) states that local planning authorities should apply a sequential test to planning applications for main town centre uses which are neither in an existing centre nor in accordance with an up-to-date plan. The addition of 10 new guest bedrooms is deemed to fall under the category of 'tourism development' which is a main town centre use as defined by the NPPF (2019). The development is not within or on the edge of a town centre and is not identified as a sequentially preferable location for new hotel bedrooms in the Development Plan. A sequential test of some degree is therefore required.

The National Planning Practice Guidance (NPPG) is clear that the application of a sequential test needs to be proportionate and appropriate for the given proposal. As outlined above, the proposal appears essentially linked to the existing use of the building and therefore it would not be pragmatic to request a full sequential test of the Borough is undertaken for alternative sites. A statement outlining how the bedrooms would be linked to the existing facility should be sufficient.

As outlined above, the location of new guest bedrooms in this location would not conform to development plan policies regarding the location of new visitor accommodation. An assessment therefore needs to be made as to whether there are other material considerations to indicate departing from these policies, such as keeping a heritage asset in active use and therefore making it accessible to the public.

#### Green Belt

It is noted that approval has been granted for an extension to increase dining capacity (14387/APP/2018/1383) and that this is yet to be completed. It was concluded that this development would be inappropriate in the Green Belt, but that very special circumstances existed to outweigh this harm and any other harm resulting from the proposal.

The proposal would have a materially larger footprint and volume than the one that was approved and therefore a greater impact on openness from a spatial perspective. It is noted however that the footprint and volume is less than the previously refused application (14387/APP/2020/4126). It does not appear that any views would be materially impacted when the approved scheme is considered. It is also noted that there would be some intrusion into existing soft landscaping areas to facilitate an

increase in car parking.

The very special circumstances will need to be reviewed to see if they all remain relevant, particularly noting that the restoration of the building has been completed and the restaurant/bar has been operating since 2018, with an option to increase capacity still remaining under the previous permission.

Please note that very special circumstances must not only outweigh the harm to the openness caused by the application, but also any other harm resulting from the proposal. Comments on conservation and design will therefore be particularly pertinent.

#### PARTNERSHIPS AND BUSINESS ENGAGEMENT MANAGER:

The application to extend the previously approved extension is supported from an economic development perspective. The investment in the premises will sustain a resource for the local community and it is refreshing to see investment in a commercial concern that is not linked to residential development.

It is noted that the extension will accommodate 10 ensuite bedrooms that will be used to provide bed and breakfast accommodation.

The application is supported for a number of reasons. It serves to secure the future of an established and popular community facility. The applicant advises that this development is crucial to the future viability of the business and given the financial challenges the licenced premises faced it is difficult to argue with this view.

The days of public houses in locations such as the Six Bells surviving on 'locals' calling in for a couple of drinks are long gone. Public houses outside town centres have had to shift their focus to being family friendly establishments offering food and as with the Six Bells, party and function facilities.

The closure of public houses' which do not or can not adapt to changing economic circumstances is a very real concern. Real Estate advisers the Altus Group reported that already in 2020 (up to the middle of September) 315 pubs have closed. This follows on from 2019 when 473 pubs in England closed or were converted to other purposes. 2018 saw 914 pubs close.

It is noted that the proposal will create and secure ten full time and twenty part time jobs. At a time when unemployment is rising this is welcome news. Due to the hours the licenced sector operate and the fact that the proposal is to offer bed and breakfast, it is anticipated that the jobs on offer will by and large be taken by members of the immediate or local community. The creation of new employment in the licenced premises sector is at present very much against the current trend. At the end of September 2020 Fullers Brewery, one of the region's biggest owners of public houses announced that it was likely to make at least 10% of its staff in its chain redundant.

It is also worth noting that the contract for delivering the new development could potentially go to a local building contractor. Whilst this cannot be guaranteed, developments of this scale are likely to attract local firms to bid. They will have the advantage of already using mainly local employees and source materials through local supply chains.

#### PLANNING OFFICER COMMENT:

It should be noted that the proposal is for 8 no. guest rooms and not 10 no. ensuite bedrooms as referred to in the comments above.

## TREES AND LANDSCAPING OFFICER:

This site is occupied by a grade II listed building (formerly a pub) and ancillary buildings located at the bottom end (south) of Ducks Hill Road on the west side. The site is predominantly flat. The buildings sit within a spacious and very sylvan plot, an outlier of Mad Bess Woods, situated to the north. Parking and informal external amenity space is located among the open woodland with the buildings located at the southern end of the site. The trees are not protected by TPO or Conservation Area, however, their collective value adds significantly to the character and appearance of the area forming an attractive interface between the more suburban character to the south and the rural Green Belt land to the north. The site lies within the Green Belt.

### Comment

The site has been the subject of several applications in recent years, most recently application ref. 2020/2775. The current proposal is to extend the footprint of the 2018/1383 approved scheme and add a single-storey extension to provide accommodation. The proposal is supported by a 'draft' tree report, by Usherwood, dated August 2020. This includes an arboricultural impact assessment, draft arboricultural method statement and tree protection plan. The report has identified and assessed the condition and value of 33 trees. There are no 'A' grade trees. 21 trees are category 'B'; T1, T2, T6, T7, T11-14, T17-20, T22, T25-27, T30, T32-34 and T39 (all oaks and Field maples. The remaining trees are 'C' or 'U' grade, categories that are not normally considered to be a constraint on development. Three 'C' grade trees will be removed to facilitate the development; T4, T8 and T9. Two 'U' grade trees (very poor quality / condition); T5 and T16 will be removed for sound arboricultural reasons. Further to the need to remove selected trees, a 'draft' method statement describes how no-dig porous surfacing for car parking can be achieved. - Final details were 'under discussion' at the time of the report. A tree pruning works schedule is also being drawn up to specify require management of the existing trees on the site. There is no objection to the scheme with regard to the minimal tree loss and landscape impact, subject to the special circumstances required to justify the development within the Green Belt.

### Recommendation

No objection subject to pre-commencement condition RES8 and conditions RES9 (parts 1,2,4 and 5) and RES10.

## ACCESS OFFICER:

This proposal seeks to provide a restaurant on the ground floor with 8 overnight B & B style bedrooms within the roof space of a previously approved structure. In framing the following accessibility observations reference is made to the 2016 London Plan and its contained policy 4.5. Reference is also made to the 2019 (intend to publish) London Plan and its policy D12, E10 and T6.5.

1. No concerns are raised on the four proposed accessible parking spaces.
2. The accessible bedroom shown on plan should accord with Figure 52, incorporating either Figure 30 or 33 of British Standard BS8300-2:2018.
3. In accordance with Policy D12 details should be submitted to ensure that disabled people can evacuate from the intended first floor accommodation in a safe and dignified way during a fire evacuation situation. The Equality Act 2010 seeks to protect people accessing goods, facilities and services from discrimination on the basis of a 'protected characteristic', which includes those with a disability. As part of the Act, service providers are obliged to improve access to and within the structure of their building, particularly in situations where reasonable adjustment can be incorporated with relative ease. The Act states that service providers should think ahead to take steps to address barriers that impede disabled people.

Conclusion: further details are requested in respect of point 3 above.

## HIGHWAYS OFFICER:

### Site Characteristics & Background

The site consists of an existing Public House (PH) which is proposed to be extended with the introduction of a C1 use '8 guest room' facility. An established vehicular access serves a 32 space car park for the existing A3 use.

The address is located in Ruislip on Ducks Hill Road which is a heavily trafficked 'Classified' road and is located adjacent to Ducks Hill garden centre and in proximity of Ruislip Lido. This section of road is generally dominated by residential units devoid of on-site parking provisions. Ducks Hill Road is extensively covered by all day waiting restrictions in order to assist in maintaining an unimpeded flow of traffic on this heavily trafficked road. A relatively new Controlled Parking Zone (CPZ) encompassing the address and general location has been introduced in the area and operates for seven days a week between the hours of 9am and 7pm. The PTAL for the site is considered as low at a level of 2 and therefore heightens dependency on use of private motor transport.

A recent and similar application (14387/APP/2020/2775) for a restaurant extension and a '10- guest room' Hotel was refused on excessive scale but not on transport/Highway grounds.

### 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.

In order to comply to the maximum parking standard for the A3 extension there would be a requirement for 4-5 on-plot on plot spaces to be provided (based on 1 space per 35m<sup>2</sup> GIFA) whilst the '8' guest room C1 use class provision would demand an individual site assessment.

Any final quantum would normally be expected to be allocated from the existing 32 spaces designated for the current A3 use although this allocation would potentially diminish availability for established restaurant patrons and is therefore undesirable. However it is noted that the existing provision exceeds prevailing adopted standards related to public houses located outside town centres hence it could be argued that there is an over-provision in the first place.

Notwithstanding this point, the applicant has indicated an extension to the car park which would facilitate 10 additional spaces on amenity space (protected by 'permeable matting') adjacent to the existing car park hard standing with the addition of 2 new disabled compliant bays within the existing hard standing area of the car park. In total an additional 12 spaces would be provided which is considered representative and therefore acceptable given the likely parking demands of the proposal.

In summary, there are no specific parking related concerns with this proposal given the extensive parking controls on the local highway network which would lessen any potential untoward displacement onto the public highway road network as a consequence of the extension and C1 provision.

### Disabled Compliant Parking Provision

In accord with the parking standard - 10% of parking spaces should be disabled compliant equating to 1 space. 2 are to be provided within the proposed total quantum. There are no further observations.

### Cycling Parking Provision

The applicant informs that there are 10 on-plot spaces in place.

### A3 use

In accord with the parking standard, a secure and accessible space should be provided per 20 staff and 20 customers.

### C1 use

One secure and accessible space should be provided per 10 staff.

The above requirements have not been demonstrated as part of the submission but can be secured via planning condition.

### Vehicular Trip Generation

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

It is anticipated that there will be no measurable or specific impact on the 'key' peak morning and afternoon traffic periods given the scale of proposal and activity profiles which are statistically concentrated outside peak periods. Hence any uplift would be considered marginal in generation terms and therefore can be absorbed within the local road network without notable detriment to traffic congestion and road safety.

### Vehicular Access Provision

The existing vehicular access into the site is to remain and would serve both the proposed A3 & C1 use class components. This shared arrangement is considered satisfactory and fit for purpose.

### Operational Refuse Requirements

Historically the Council's Waste Management (WM) department have stated that stopping a refuse vehicle outside of this address is not permitted owing to the presence of parking restrictions on the immediate highway (operating seven days a week from 8am to 6.30pm). They would therefore be precluded from exercising their refuse collection duty from the public highway. It has been suggested that their vehicles should be able to enter and leave the site envelope in a forward gear or reverse into the site for a distance not exceeding 12m which, on safety grounds, is the recommended best practice for large service vehicles.

Unfortunately it is not feasible for refuse vehicles to enter and leave the site in a forward gear due to internal site constraints nor would the Highway Authority suggest reversing into the site from the heavily trafficked Ducks Hill Road as general road safety could be compromised even with adherence to the aforementioned maximum recommended reversing distance of 12m.

Refuse collection should therefore be undertaken directly from the public highway, as is norm, irrespective of any waiting restrictions present on the public highway which to not preclude the stopping of a refuse vehicle whilst exercising their refuse collection duty on this or any other public highway.

There are no further observations.



## Construction Logistics Plan (CLP)

A full and detailed CLP will be a requirement given the constraints and sensitivities of the local road network in order to avoid/minimise potential detriment to the public realm. It will need to be secured under planning condition.

## Conclusion

The application has been reviewed by the Highway Authority who are satisfied that the proposal would not discernibly exacerbate congestion or parking stress, and would not raise any measurable highway safety concerns, in accordance with Local Plan: Part 2 Development Plan Policies DMT 1, DMT 2 & DMT 6 and Policies 6.3, 6.9, and 6.13 of the London Plan (2016).

## CONSERVATION OFFICER:

### 1. Summary of comments: Objection

### 2. Historic Environment Designation (s)

- Grade II Listed Building - The Six Bells PH - NHLE: 1080240
- Ruislip Motte and Bailey Archaeological Priority Area (APA)

### 3. Assessment - Background/ Significance

The origin of The Six Bells public house (PH) is thought to date from the late 17th/ early 18th century however the site has benefitted from alterations over time. The building is originally of timber frame construction and externally finished in a painted brick to the front and side however the rear elevations remain as exposed red brick. It is a two-storey building with a cellar. The barrel drop can be seen along the pavement to the front of the building. There is a notable dentil detail below the half-hipped roof form, which is externally finished in plain clay tiles. Two tall chimney stacks bookend the original portion of the building along the south-east side elevation and one to the north-west side elevation. The front elevation is double fronted and symmetrical in appearance with a centrally positioned entrance door and a 19th century hood over the door with decorative barge boards. The former door comprised of a 3 panel door however this appears to have been altered to a modern 4 panel door. The replacement of the front door does not appear to be detailed as part of the consented works in 2018, therefore is likely to be unauthorised. The sash windows are positioned either side of the entrance door at ground and first floor. The ground floor sash windows are large, recessed openings with vertically sliding 10 over 10 multi-paned sash windows. The sash boxes are set behind the brickwork, a requirement following the 1774 Building Act. The first floor windows are proportionately smaller providing a sense of hierarchy to the building. The windows are of historic interest contributing to the building's significance. They can be a good indicator of the building's historic development overtime.

Evidence of historic structural movement can be seen by the existence of traditional wall tie pattress plates particularly towards the southern end of the building.

The building has benefitted from a number of additions overtime, including a collection of 20th century single storey built forms to the rear comprising of the kitchens and toilets. The piecemeal nature of the rear additions somewhat detracts from the overall composition of the building. There is also a single storey addition to the north-west side elevation used as a dining area. This is subservient in character, externally finished in dark stained weatherboarding and a plain tiled roof to match the original property. It was not uncommon for traditional buildings to have a small number of ancillary structures within the associated site area, usually used as a store or to house animals. From looking at historic maps there were a couple of small ancillary structures to the north-east of

the main building.

Originally the building was formed part of a small hamlet historically known as Cheapside. The hamlet of Cheapside formed part of a group of three hamlets on the edge of what was Common Wood outside the enclosed Park Wood in Ruislip, the other two were known as Cannons Bridge and Park Hearne. Collectively they were referred to as Ruislip Common, as we know it today. Documentary evidence references Cannons Bridge as the earliest hamlet within the area. It wasn't until a mid-16th century Terrier that the land near Cannons Bridge was referred to as Cheapside. However, in the late 17th century it became known as 'in the withies' and then later changed to Withy Lane during the Victorian era. Prior to The Six Bells the small hamlet was served by a public house known as 'The Black Potts' which was located to the west of the application site. The license to serve beer/alcohol at The Six Bells was ideal due to its proximity to the road along a historic route and was most likely to reason The Black Potts ceased to exist. It was part of the route from Rickmansworth to Ealing, via Ruislip (a notable manorial holding). This would have aided in its establishment as a public house, as a stop along this historic route as well as serving the community of the small hamlet. (Source: Ruislip, Northwood and Eastcote Local History Society, Journal 2004, Article 04/1 by Eileen M. Bowlit)

The heritage value of the Listed Building is duly recognised by its notable historic and architectural interest. It forms part of the history of the area and is a good example of a traditional building of its time. The strong communal value of the site is evident and contributes to the significance of the heritage asset. It must be duly noted, as defined in Annex 2: Glossary, National Planning Policy Framework (NPPF), June 2019 is, 'Significance derives not only from a heritage asset's physical presence but also from its setting.'

The setting of the heritage asset and impact of the proposed development has been assessed with reference to Historic England 2017 Good Practice Advice Planning Note 3 (GPAN3), The Setting of Heritage Assets.

The surroundings of a heritage asset contribute to how it is experienced, and the setting of a heritage asset can be influenced by a number of natural and/or human factors. Whilst the wider environment to the east and south of the site has changed, to the north and west it has remained undeveloped. This strongly contributes to the sites sense of openness and semi-rural environment, appropriately protected by the Greenbelt designation of the land. It is a key reminder of the once rural past of the area and small hamlets which established settlement in this location. The immediate experience of the Listed Building has somewhat been compromised by the existing rear additions and the large expanse of hard standing to the north. Nevertheless, the semi-rural environment, wider woodland backdrop and low-density of development neighbouring the site contributes to the building's setting. Whilst some additions are not entirely in keeping, the hierarchy of the site has been maintained. The 2018 approved structure to the rear is intended to remain subservient to the original building. These elements form part of the building's setting, positively contributing to its significance.

As briefly mentioned above, consent was granted in 2018 for a subservient extension to the rear of the building to allow for an increased dining provision for the business, enabling the repair of the building at that time. Whilst the historic portion of the building has been restored and is currently in use, the rear addition is yet to be constructed. As existing a large, enclosed timber pergola structure with a solid flat roof form has been erected on site providing a substantial area of covered seating. The structure has been enclosed with Perspex and extends up to Ducks Hill Road. This structure is located within the curtilage of the Listed Building and has a negative impact upon its setting. It does not benefit from planning permission or listed building consent.

#### 4. Assessment - Impact

The principle of the proposed development would be the same as the previous scheme, refused in December 2020 (planning refs:14387/APP/2020/2775 and 14387/APP/2020/2776). In comparison to the refused scheme the number of bedrooms proposed has been reduced to 8. The built form itself has been reduced at the rear, the drawing annotation indicates 3m, in any instance this would need to be accurately checked on the submitted drawing. The building would be the same width as previously proposed, positioned in the same location and proximity to the listed building. The design concept would still adopt the barn-style approach.

In light of the above, the proposed development would still have a harmful impact on the setting of the listed building. The assessment below is not significantly different to comments provided in relation to the refused scheme.

The submitted existing and proposed floor plans fail to include the small single storey structure attached to the south-east side elevation of the listed building. This should be clearly included on the submitted drawings to ensure plans accurately depict the existing site situation.

Paragraph 1.7.1 within the submitted Heritage Impact Assessment refers to the building as 'at risk' however it is clearly evident the building has been restored alongside the recent erection of the large enclosed pergola structure, with the site in use as a bar and grill restaurant.

Whilst the principle of a structure in the proposed location on the site has been established in order to increase the dining capacity for the restaurant, the 2018 approved, barn-like structure would remain subservient to the listed building and at such time of approval a balanced judgement was made taking into account the condition of the listed building.

The proposed development, which would be notably larger than the approved structure, would negatively affect the setting of the Listed Building. The building would be bulkier in form exacerbated by its increased scale, bulk, footprint and height. It would have a greater dominant presence on the site and be highly visible from the street scene and within the site itself. The development would fail to respect the scale and setting of the original Listed Building. The lack of subservience would diminish any sense of hierarchy to the site. The Listed Building in itself is an important historic built asset recognised by its Grade II designation and strongly contributes to the historic settlement of the area. The existing and proposed additions to the building and site, cumulatively, would no longer be ancillary to the original building harming its significance and setting.

The 2-storey structure would fail to relate to the original, approved, design concept as an ancillary, subtle addition to the site, competing with the original listed building. The roof ridge height appears to match the listed building along the south east elevation however it appears to be slightly higher along the north west elevation. This may be due to variations to the ground levels however the development should remain entirely subordinate to the principal heritage asset.

As noted above whilst the design of the building appears to be somewhat influenced by a barn style structure, as proposed it fails to respect and truly embrace the architectural principles and qualities of a traditional agricultural barn. The barn structure would dominate the site as the larger built form drawing undue attention to it. The reference made in the supporting design and access statement and heritage statement shows a photograph of the Grade I listed medieval barn in Harmondsworth however incorrectly describes it as The Great Barn in Ruislip. In this instance a threshing barn would be an inappropriate design precedent. It would establish a farmstead character to the site. Historically the site has not operated as a typical historic farmstead, the concept of erecting a barn style building would deviate from the character and significance of the site as a public house, in turn failing to respect or preserve the setting of the Listed Building.

Historic timber framed barns are typically characterised by steeply pitched, tiled roof forms. The roof form tends to dominate the appearance of the building, in turn reducing the bulk of the structure,

above the ground floor level. The proposed roof pitch would be shallow resulting in a higher eaves line and the timber clad elevations dominating the appearance of the building. Whilst the building may be reduced in length, the bulk and volume would essentially be relocated as part of the first-floor space.

The inclusion of multiple roof lights and windows to the gable ends of the proposed barn would result in a pastiche building. Furthermore, it is unclear why a window opening is required into what appears to be a storeroom, to the front of the building at first floor, further obscured by shelving internally. The submitted drawings do not include the detailed infrastructure that would be necessary for the proposed use, including soil vent pipes, mechanical ventilation, rainwater goods, fire safety measures etc. Such infrastructure poorly applied can diminish the overall design aesthetic. It is assumed the proposed lift would be a platform lift therefore not requiring an over run. The inclusion of a lift over-run as an 'add-on' feature would be inappropriate and an incongruous feature considering the slope of the roof.

The use of the roof space for 8 guest rooms would establish a permanent alternative new use on the site. There is no evidence before me indicating that the site or building was used primarily as a historic inn.

The argument that the development is required for the preservation of the Listed Building is unfounded and lacks evidence to justify the proposal. As existing the Listed Building has been restored and there is no evidence before me as to why the approved additional dining facility would not enable the continued care and maintenance of the building. Any development proposed as a means of supporting the care and repair of a listed building must be considered for the benefit of a heritage asset itself.

The submitted information fails to demonstrate the need for the specified 8 guest rooms and increase to the internal dining capacity, which appears to be laid out as an event space. It would need to be clearly demonstrated in any instance that the income generated from the proposed development would solely be used for the care and repair of the designated heritage asset. As submitted, it would fail to demonstrate that the proposal would be minimum necessary to secure the long-term future of the designated heritage asset. In any instance, if we were to consider this type of development, quantitative evidence would be required to justify the harm caused by the development and it would need to meet a number of tests.

To confirm the building was not formally included on Historic England's Heritage at Risk register. The 2018 approved scheme recognised that the building was in need of repair, with the additional dining capacity contributing to the future preservation of the building. The Listed Building's former 'state' is now irrelevant taking into account the condition of the building at present.

The proposal appears to be connected to the circumstances of the present time rather than the urgent need for repairs to the Listed Building to allow for its use. There is no indication on how permanent the current circumstances are. The permanent nature and negative impact of the proposed development must be materially considered.

The development would detract from the site's significance as a public house and would be considered a negative contributor to the setting of the heritage asset. The proposed development would result in significant permanent harm to the setting of the Listed Building. It would need to be noted that harm to the setting of a heritage asset is not limited to physical or visual impact. Other considerations including to how users interact with site and its history form part of the building's significance.

The proposed development would erode the setting of the Listed Building. Taking into consideration the paragraph 196 of the National Planning Policy Framework (2019) the proposed development

would result in less than substantial harm to the setting and significance of the listed building. In any instance under sections 16 and 66 of the Planning (Listed Building and Conservation Areas) Act 1990 a statutory duty is placed upon the decision maker(s) to pay special attention to the preservation of the Listed Building and its setting. Paragraph 193 (NPPF, 2019) would also be relevant in this instance.

5. Conclusion: Objection - Harm to the setting of the Listed Building

## **7. MAIN PLANNING ISSUES**

### **7.01 The principle of the development**

#### **COMMUNITY FACILITY**

Paragraph 92 of the NPPF (February 2019) states that planning policies and decisions should plan positively for the provision and use of shared spaces, community facilities (such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments.

Policy HC7 of the Publication London Plan (December 2020) states that planning decisions should:

- 1) protect public houses where they have a heritage, economic, social or cultural value to local communities, or where they contribute to wider policy objectives for town centres, night-time economy areas, Cultural Quarters and Creative Enterprise Zones
- 2) support proposals for new public houses where they would stimulate town centres, Cultural Quarters, the night-time economy and mixed-use development, taking into account potential negative impacts.

Policy CI1 of the Hillingdon Local Plan: Part 1 - Strategic Policies (November 2012) and Policy DMCI 1 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020) generally supports the retention of community facilities.

As evidenced above, it is considered that there is general support for proposals which retain community facilities such as public houses.

#### **PRINCIPLE OF GUESTHOUSE USE**

Under application reference 14387/APP/2018/1383, it was established that the application site was considered to fall within both Use Class A3 and A4. Following changes to the Use Classes Order on 1st September 2020, Use Class A3 would now fall under Use Class E and Use Class A4 would now fall under Sui Generis. Based on this, the existing use of the site is considered to be Sui Generis.

It is unclear from the application submission whether the proposed guesthouse use (Use Class C1) would be ancillary to the existing use on site. Nonetheless, the proposed development is considered to propose a change in the use of the site, although it would still be categorised as a mixed use (Sui Generis).

Paragraph 86 of the NPPF (February 2019) states that Local Planning Authorities should apply a sequential test to planning applications for main town centre uses which are neither in an existing centre nor in accordance with an up-to-date plan. The addition of 10 new guest bedrooms is deemed to fall under the category of 'tourism development' which is a main town centre use as defined by the NPPF (February 2019).

However, the National Planning Practice Guidance (NPPG) is clear that the application of a sequential test needs to be proportionate and appropriate for the given proposal. As outlined above, the proposal appears essentially linked to the existing use of the building and therefore it would not be pragmatic to request that a full sequential test of the Borough is undertaken for alternative sites.

Policy DME 5 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020) states that the Council will support a range of visitor accommodation, conference and related uses in accessible sustainable locations, as defined in the Site Allocations and Designations document, subject to:

- i) A high standard of building and site design, including landscaping and placement of signage that makes a positive contribution to local amenity and the streetscape;
- ii) Provision of an accessible layout and rooms in accordance with Policy DME 6: Accessible Hotels and Visitor Accommodation; and
- iii) No adverse impact on nearby land uses or on the amenity of either adjoining occupants or proposed occupants by virtue of noise, lighting, emissions, privacy, overlooking, any other potential nuisance, parking or traffic congestion.

The application site is not located in an accessible and sustainable location, as indicated by the low Public Transport Accessibility Level of 1b. The site is also not within or on the edge of a town centre and is not identified as a sequentially preferable location for new hotel bedrooms in the Development Plan. The principle of such a proposed use is not therefore supported and an assessment of other material considerations is required to establish whether there is a case to depart from these policies.

In terms of the criteria attached to Policy DME 5, the design of the proposed development is considered in Section 07.03 and 07.07, the impact of the proposal on neighbour amenity is addressed within Section 07.08 of the report, accessibility matters are addressed in Section 07.12 of the report and the proposed landscaping arrangements are considered in Section 07.14 of the report.

## EMPLOYMENT GENERATION

Based on the 'Case of Need' document submitted by the applicant, the proposed use would require receptionists, night porters, additional cleaners, bedroom maids, room service attendants, busboys, additional restaurant servers and additional chefs. The applicant therefore anticipates that the new BnB operation will create an extra 24 jobs for the company.

Consideration is given to the HCA's Employment Density Guide 3rd Edition (November 2015) which states that 1 job is generated per 5 beds for a limited service/budget hotel. Accordingly, the proposed 8 guest rooms would generate 2 jobs. The HCA's Employment Density Guide 3rd Edition (November 2015) also states that 1 job is generated per 15 to 20 square metres of restaurant floorspace. The proposed 183.17 square metres of restaurant floorspace would therefore generate between 9 and 12 jobs. Together, the proposed use would generate between 11 and 14 jobs.

Based on the same guidelines, the approved scheme (planning permission reference 14387/APP/2018/1383) would generate between 6 and 8 jobs if implemented in full. As such, the proposed development would generate between 3 and 8 jobs more jobs than the scheme previously permitted. This is a material planning consideration which is afforded weight in the consideration of the proposed development in the following sections.

## **7.02 Density of the proposed development**

Not applicable to the consideration of this application.

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

### **ARCHAEOLOGY**

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.

The application site forms part of the Ruislip Motte & Bailey Archaeological Priority Area. As such, the Greater London Archaeological Advisory Service were consulted as part of the application and advised that groundworks are unlikely to have a major impact but may reveal evidence related to the occupation of this northernmost part of the historic village. Although the development could cause harm to archaeological remains, the significance of the asset and scale of harm to it is such that the effect can be managed using a planning condition. If recommended for approval, a condition would secure the submission of a written scheme of investigation. Subject to such a condition, the proposal would not be considered contrary to Policy DMHB 7 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020).

### **LISTED ASSETS**

The application site does not form part of a Conservation Area but does include the Grade II Listed Six Bells Public House. Accordingly, the following planning policies are considered relevant:

Policy 7.8 of the London Plan (March 2016) states that development affecting heritage assets and their settings should conserve their significance, by being sympathetic to their form, scale, materials and architectural detail.

Policy BE1 of the Hillingdon Local Plan: Part 1 - Strategic Policies (November 2012) seeks a quality of design in all new development that enhances and contributes to the area in terms of form, scale and materials; is appropriate to the identity and context of the townscape; and would improve the quality of the public realm and respect local character.

Policy HE1 of the Hillingdon Local Plan: Part 1 - Strategic Policies (November 2012) states that the Council will conserve and enhance Hillingdon's distinct and varied environment, its settings and the wider historic landscape.

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.

In order to consider the impact of the proposed development, it is considered pertinent to quantify the previously approved development and compare it to the currently proposed development.

Based on measurements taken from the plans, the barn structure approved under permission references 14387/APP/2018/1383 and 14387/APP/2018/1385 approximately measured as follows:

- Length: 18.8m

- Width: 6.33m

- Height at the eaves: 2.92m

- Highest point: 7.04m

- Footprint:  $6.33 \times 18.8 = 119.04\text{m}^2$

- Volume:  $(2.92 \times 6.33 \times 18.8) + (4.12 \times 6.33 \times 18.8)/2 = 347.5 + 245.1 = 592.6\text{m}^3$

Based on measurements taken from the submitted plans, the proposed barn structure would measure as follows:

- Length: 20.33m

- Width: 9.01m

- Height at the eaves: 4m

- Highest point: 7.75m



- Footprint:  $20.33 \times 9.01 = 183.17\text{m}^2$
- Volume:  $(4 \times 9.01 \times 20.33) + (3.75 \times 9.01 \times 20.33)/2 = 732.69 + 343.45 = 1076.14\text{m}^3$

Evidently, the proposed development would increase the footprint of the development by  $64.13\text{m}^2$  (equating to 53.87% increase) and would increase the volume of the development by  $483.54\text{m}^3$  (equating to 81.57% increase).

In terms of the harm posed to the setting of the Grade II Listed Building, it is noted that paragraph 193 of the NPPF (February 2019) states that great weight should be given to the conservation of heritage assets. It is acknowledged that the height and length of the proposed development has been reduced when compared to the previously refused applications (references 14387/APP/2020/2775 and 14387/APP/2020/2776). Specifically, the harm to the setting of the Listed Building should be viewed in the context of the previously approved application which establishes merit for the development of the footprint adjoining the Public House.

As stated by the Council's Conservation Officer, the proposed development would negatively affect the setting of the Listed Building by virtue of its scale, footprint and height. It would have a dominant presence on the site and be highly visible from the street scene and within the site itself. Although the height has been reduced to match that of the existing Public House, the proposed building would not be considered ancillary to the main Listed Building and the infrastructure associated with the proposed use would further erode the setting of the Listed Building. Accordingly, the proposed development would harm the significance and setting of the heritage asset.

In this instance, the extent of harm is considered to be 'less than substantial', therefore requiring consideration of paragraph 196 of the National Planning Policy Framework (February 2019). This states that where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.

It is noted that the development approved under application references 14387/APP/2018/1383 and 14387/APP/2018/1385 provided public benefit by restoring the Grade II Listed Building, reversing the harm caused to its significance, generating local employment, supporting the viability of the business, supporting the preservation of the heritage asset and providing a community hub.

Significantly, the Grade II Listed Building has already been restored and is operating as a public house. In this respect, the harm caused to the heritage asset has been reversed and is not applicable to the current situation. It is acknowledged, however, that the costs of such restoration do have a financial impact on what can be brought forward on-site in terms of further development. Although this is not a public benefit of the current application, it is inherently linked and is therefore afforded some weight in the consideration process.

Based on the HCA's Employment Density Guide 3rd Edition (November 2015), the proposed development would generate a range between 11 and 14 jobs. In comparison, the approved scheme would have generated between 6 and 8 jobs. The proposed development would therefore generate between 3 and 8 jobs more than the scheme previously permitted. It should be noted that the applicant states that the development would create 24 jobs and that the development would utilise local business for its delivery. Accordingly, the employment generation of the proposed development is considered to be

a public benefit of the scheme, although this benefit can be applied to most forms of development in some capacity and is only given limited weight.

It is acknowledged that the proposed development would support the viability of the business and would in turn support the preservation of the heritage asset. This consideration is undermined, to an extent, by the fact that the site has already been permitted a barn extension which would expand its capacity and support its viability. It is noted, however, that at least 315 public houses have closed in England in 2020 and follows the closure of 473 public houses in 2019 and 914 public houses in 2018. The closure of public houses which do not or cannot adapt to changing economic circumstances is therefore a very real concern.

In terms of the circumstances specific to the Six Bells Public House, it is acknowledged that the Public House is only one of three public houses which provides such a use to the local community (based on a 800 metre radius survey of the site). It is worth noting that the site is also not located within a local centre or town centre and does not benefit from the support of such co-locations. This is considered to support the need to diversify the business in order to safeguard its long term viability.

It is agreed that public houses form important hubs for communities. Specifically, paragraph 92 of the NPPF (February 2019) states that planning decisions should plan positively for the provision and use of community facilities such as public houses to enhance the sustainability of communities and residential environments. This is also supported by Policy HC7 of the Publication London Plan. In terms of the current application, it is important to factor in the significant public support for the proposed development, taking the form of a supporting petition with 30 signatories, as well as support from the Eastcote Conservation Panel, the Eastcote Residents Association and the Ruislip, Northwood and Eastcote Local History Society.

As addressed in other sections of the report, planning conditions will also be applied to secure further benefits from the proposed development if recommended for approval. This includes ecological benefits which are to be secured as part of an ecological enhancement scheme.

In accordance with paragraph 196 of the NPPF (February 2019), the 'less than substantial harm' posed to the setting of the heritage asset has been weighed against the public benefits of the proposal. In the context of Public Houses in England and more specifically the Six Bells Public House, the proposed development is considered to provide public benefits to outweigh the harm posed. Conditions are also proposed to safeguard the special architectural and historic interest of the listed building. On balance, the proposed development is accepted and is not considered contrary to Policies BE1 and HE1 of the Hillingdon Local Plan: Part 1 - Strategic Policies (November 2012), Policies DMHB 1 and DMHB 2 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020), Policy 7.8 of the London Plan (March 2016), Policy HC1 of the London Plan (December 2020) and the NPPF (February 2019).

#### **7.04 Airport safeguarding**

Not applicable to the consideration of this application. There is no requirement to consult the aerodrome safeguarding authorities on a development of this nature in this location.

#### **7.05 Impact on the green belt**

GREEN BELT

The suitability of the site to accommodate the proposed development is notably limited due

to its location within Green Belt designated land. The proposal is therefore subject to the planning policy considerations stated below.

Paragraph 143 of the NPPF (February 2019) sets out that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in 'very special circumstances'. Paragraph 144 continues this, stating:

"When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations."

Paragraph 145 of the NPPF (February 2019) states that a local planning authority should regard the construction of new buildings as inappropriate in the Green Belt but that exceptions to this include:

- a) buildings for agriculture and forestry;
- b) the provision of appropriate facilities (in connection with the existing use of land or a change of use) for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments; as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it;
- c) the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building;
- d) the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces;
- e) limited infilling in villages;
- f) limited affordable housing for local community needs under policies set out in the development plan (including policies for rural exception sites); and
- g) limited infilling or the partial or complete redevelopment of previously developed land, whether redundant or in continuing use (excluding temporary buildings), which would:
  - not have a greater impact on the openness of the Green Belt than the existing development; or
  - not cause substantial harm to the openness of the Green Belt, where the development would re-use previously developed land and contribute to meeting an identified affordable housing need within the area of the local planning authority.

Policy 7.16 of the London Plan (March 2016) supports this, stating:

"The strongest protection should be given to London's Green Belt, in accordance with national guidance. Inappropriate development should be refused, except in very special circumstances. Development will be supported if it is appropriate and helps secure the objectives of improving the Green Belt as set out in national guidance."

In terms of local policy, the Hillingdon Local Plan: Part 1 - Strategic Policies (November 2012) gives strong protection to Green Belt land. Policy EM2 states that the Council will seek to maintain the current extent of the Green Belt and any proposals for development in the Green Belt and Metropolitan Open Land will be assessed against national and London Plan (March 2016) policies, including the very special circumstances test.

Policy DMEI 4 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020) states:

- A) Inappropriate development in the Green Belt and Metropolitan Open Land will not be permitted unless there are very special circumstances.

B) Extensions and redevelopment on sites in the Green Belt and Metropolitan Open Land will be permitted only where the proposal would not have a greater impact on the openness of the Green Belt and Metropolitan Open Land, and the purposes of including land within it, than the existing development, having regard to:

- i) the height and bulk of the existing building on the site;
- ii) the proportion of the site that is already developed;
- iii) the footprint, distribution and character of the existing buildings on the site;
- iv) the relationship of the proposal with any development on the site that is to be retained; and
- v) the visual amenity and character of the Green Belt and Metropolitan Open Land.

As noted above, paragraph 145 part c) of the NPPF (February 2019) states that new buildings in the Green Belt may not be inappropriate development if it is an extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building. Part d) of the same paragraph also states that the replacement of a building may not be inappropriate if the new building is in the same use and not materially larger than the one it replaces.

The principle of a barn extension on Green Belt designated land has already been established by the grant of planning permission reference 14387/APP/2018/1383. This permission noted that the floor area of the pre-existing dilapidated outbuildings and play area, which have now been removed, equated to 276 square metres of development. It was therefore acknowledged that the barn extension building did not exceed this quantum of development. Notwithstanding this, it was considered that the building would have a greater impact on the openness of the Green Belt in this location, given that parts of the structure would be higher than the demolished structures and would have a greater mass. The development was considered to constitute inappropriate development in the Green Belt and required very special circumstances.

The following very special circumstances were considered:

- i) The proposals will reverse the loss of significance and harm that the last few years of neglect have caused. The extra restaurant space that the extension will provide, will help the building preserve itself and is designed to complement the character of the Six Bells.
- ii) The proposed scheme will restore the local significance of the Six Bells.
- iii) The extension is designed to provide the accommodation to enable long term viability for any business run within it and at the same time be sympathetic to the character of the listed building.
- iv) The proposed extension is designed in form and materiality to complement the existing building.
- v) The completed scheme will result in a much improved quality of setting for the Six Bells, allowing it to be a more positive part of the community in which it sits.
- vi) The proposals will lead to increased levels of local employment and increase in custom to shops and other community facilities. The Six Bells will contribute to local social cohesion and interaction providing a new place to meet.

At the time, the Planning Officer considered that the benefits, when weighed against the drawbacks of the proposed development, were significant and that very special circumstances weighed in favour of the proposal. The proposed new barn for dining was considered acceptable in principle.

In terms of the current application submission, the impact of the additional development on the openness and visual amenities of the Green Belt is a primary concern. Please refer to

Section 07.03 of the report for a quantification of the previously approved development and a comparison to the currently proposed development. In summary, the proposed development would increase the footprint of the development by 64.13m<sup>2</sup> (equating to 53.87% increase) and would increase the volume of the development by 483.54m<sup>3</sup> (equating to 81.57% increase).

In addition to the increase in building volume, the proposed development would also extend the car park by 8 no. spaces, although this would be achieved through the use of reinforcement mats and crates akin to grasscrete. This would further intensify development within the Green Belt but is only considered to be low level and would not pose significant harm to the openness of the Green Belt.

Overall, it is considered that the proposed barn building extension would have a greater impact on the openness of the Green Belt by virtue of its greater scale and mass when compared to both the pre-existing structures and the approved barn building extension structure. As such, the proposed development is considered to constitute inappropriate development in the Green Belt and very special circumstances are required.

In terms of very special circumstances, these do not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations. The previously approved development was considered to benefit from very special circumstances as it would restore the Grade II Listed Building, reverse the harm caused to its significance, generate local employment, support the viability of the business which would in turn support the preservation of the heritage asset and provide a community hub.

Significantly, the Grade II Listed Building has already been restored and is operating as a public house. In this respect, the harm caused to the heritage asset has been reversed. This very special circumstance is not therefore considered to be applicable to current circumstances.

Based on the HCA's Employment Density Guide 3rd Edition (November 2015), the proposed development would generate a range between 11 and 14 jobs. In comparison, the approved scheme would have generated between 6 and 8 jobs. The proposed development would therefore generate between 3 and 8 jobs more than the scheme previously permitted. The applicant also notes that local business would benefit from the permission. Accordingly, the employment generation of the proposed development is considered to be a benefit of the scheme, although this benefit can be applied to most forms of development in some capacity and is only given limited weight.

It is acknowledged that the proposed development would support the viability of the business and would in turn support the preservation of the heritage asset. This consideration is undermined, to an extent, by the fact that the site has already been permitted a barn extension which would expand its capacity and support its viability. It is noted, however, that 315 public houses had closed in England by September 2020 and follows the closure of 473 public houses in 2019 and 914 public houses in 2018. The closure of public houses which do not or cannot adapt to changing economic circumstances is therefore a very real concern.

It is important to consider the circumstances specific to the Six Bells Public House. Based on a 800 metres radius around the site (equivalent to a 10 minute walk), the following public houses have been identified:

- The Woodman, Breakspear Road, Ruislip, HA4 7SE
- The Waters Edge, Reservoir Road, Ruislip, HA4 7TY

Evidently, the Six Bells Public House is only one of three public houses which provides such a use to the local community. It is worth noting that the site is also not located within a local centre or town centre and does not benefit from the support of such co-locations. This is considered to support the need to diversify the business in order to safeguard its long term viability.

It is agreed that public houses form important hubs for communities. Specifically, paragraph 92 of the NPPF (February 2019) states that planning decisions should plan positively for the provision and use of community facilities such as public houses to enhance the sustainability of communities and residential environments. In terms of the current application, it is important to factor in the significant public support for the proposed development, taking the form of a supporting petition with 30 signatories, as well as support from the Eastcote Conservation Panel, the Eastcote Residents Association and the Ruislip, Northwood and Eastcote Local History Society.

In the context of the above considerations, the proposed development is afforded weight in favour of very special circumstances existing.

In terms of the harm posed, it should be highlighted that paragraph 144 of the NPPF (February 2019) gives substantial weight to any harm to the Green Belt. It is acknowledged that the height and length of the proposed development has been reduced when compared to the previously refused applications (references 14387/APP/2020/2775 and 14387/APP/2020/2776). Specifically, the harm to the Green Belt should be viewed in the context of the previously approved application which establishes merit for the development of the footprint adjoining the Public House. Following the reduction in height and length (relative to that previously refused), and taking into consideration the buildings proposed location within the previously developed area of the site, the proposed development would not be considered to significantly harm the openness of the Green Belt. Accordingly, the level of harm posed to the Green Belt is reduced and weighs in favour of the proposed development.

Harm is also posed to the setting of the Grade II Listed Building. Paragraph 193 of the NPPF (February 2019) states that great weight should be given to the conservation of heritage assets. As noted in Section 07.03, the Conservation Officer concludes that the development poses 'less than substantial harm'. However, also explained in this Section of the report, paragraph 196 of the NPPF (February 2019) states that where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use. On balance, the proposed development is concluded to provide public benefits which outweigh the harm posed.

Taking into consideration the above factors, it is considered that the harm posed is now limited sufficiently for the development to be considered on-balance acceptable. As such, the proposed development is not considered to be contrary to Policy DME1 4 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020), Policy EM2 of the Hillingdon Local Plan: Part 1 - Strategic Policies (November 2012), Policy 7.16 of the London Plan (March 2016) and the National Planning Policy Framework (February 2019).

It should be made clear that the proposed development is at the upper limit for development which is considered to be on-balance acceptable.

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

Policies 7.4 and 7.6 of the London Plan (March 2016) seeks to promote high quality design that is informed by the surrounding historic environment.

Policy BE 1 of the Hillingdon Local Plan: Part 1 - Strategic Policies (November 2012) requires all new development to improve and maintain the quality of the built environment in order to create successful and sustainable neighbourhoods.

Policy DMHB 11 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 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.

The application site is located within an established suburban/rural setting. The site comprises a two storey public house to the south section of the site with extensions and alterations to the rear, a car park within the centre of the site, a play space structure to west side of the site, and woodland and green space to the north and west of the site. Low-rise residential properties are located to the south and south-east, and the Ducks Hill Garden Centre is located to the east.

The proposed development would be equal in height when compared to the existing public house and would not therefore be considered as ancillary as would be expected for an extension. The proposed building would be approximately the same width as the public house and would be approximately 12.75m longer than the public house.

It is important to note that the footprint adjoining the public house has previously been permitted the development of a barn structure (under application references 14387/APP/2018/1383 and 14387/APP/2018/1385). When compared to this permitted scheme, the proposed development would be approximately 1.53m greater in length, 2.68m greater in width and 0.71m greater in height. It is therefore calculated that the footprint of development on-site would be increased by 64.13m<sup>2</sup> (equating to 53.87% increase) and the volume of development would be increased by 483.54m<sup>3</sup> (equating to 81.57% increase). Evidently, the development proposed would be substantially larger than that previously permitted and would have an increased dominant presence on the site.

In terms of its impact on the street scene, it is noted that the proposed building would be set approximately 15m back from Ducks Hills Road. Its reduction in height and length relative to the scheme previously refused (references 14387/APP/2020/2775 and 14387/APP/2020/2776) would also reduce the impact on direct and oblique views attained from Ducks Hill Road, whilst restricting the sprawl of development across the Green Belt site. The proposed development is therefore recognised as an improvement on the scheme previously refused.

It is noted by the Council's Conservation Officer that the site has not historically operated as a historic farmstead. As such, the proposal to erect a medieval threshing barn style building would deviate from the character and significance of the site, failing to respect the character of the area. This position is generally maintained although it is also acknowledged that the site can be brought forward with a barn style development as it has already been permitted. This consideration is therefore given less weight when balancing the acceptability of development.

It is also noted that a bin store and cycle storage is proposed on the north side of the existing car park. In order to ensure that this does not injure the visual amenities of the Green Belt setting, further details of this structure and the associated screening are required. If recommended for approval, this would be secured by condition.

Overall, the proposed development would be considered to be substantial in footprint and volume and would have an impact on the local context. The extent of this impact is less than the scheme previously refused for its detrimental impact to the character, appearance and visual amenities of the street scene. In the context of the public benefits and very special circumstances discussed in Sections 07.03 and 07.05 of the report, this impact is considered to be outweighed. Accordingly, the development would not be considered contrary to Policies BE1 of the Hillingdon Local Plan: Part 1 - Strategic Policies (November 2012), Policy DMHB 11 of the Hillingdon Local Plan Part 2 - Development Management Policies (January 2020) and Policy 7.6 of the London Plan (March 2016).

If recommended for approval, the detail of materials would be secured by condition.

#### **7.08 Impact on neighbours**

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. The Council will also seek to ensure that the design of new development optimises the levels of daylight and sunlight. The Council will expect the impact of the development to be assessed following the methodology set out in the most recent version of the Building Research Establishments (BRE) "Site layout planning for daylight and sunlight: A guide to good practice".

Ducks Hill Garden Centre is located to the east of the application site and woodland and open fields are located to the north and west. The nearest residential properties with respect to the proposed development are located to the south of the application site and include property names: Greenwood, The Glade, The Fuchsia Garden, Davelle, Woodside, Finsceal and Redleaves. At the closest point, The Fuchsia Garden and Davelle would be sited approximately 17 metres from the proposed barn extension. This is considered to be a sufficient distance to avoid issues with regard to neighbour outlook and the receipt of daylight and sunlight by such neighbours.

The proposed development would not meet the required 21 metre separation distance noted above, although it is noted that the south-facing windows provided by the proposed development would be narrow roof lights which are considered to limit the scope for overlooking. The windows would also face the front elevations of the neighbouring properties and are not generally considered to be particularly sensitive elevations in terms of privacy. In light of the proposed rooms being for guest room use, as opposed to residential use, the impact is also considered to be limited.

Given the above considerations, the proposed development is not considered to compromise the amenity of neighbouring properties and is not contrary to part B) of Policy DMHB 11 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020).

#### **7.09 Living conditions for future occupiers**

The proposed guest room floor space is measured approximately as follows:

- Bedroom 1 - 11.70 square metres
- Bedroom 2 - 11.80 square metres
- Bedroom 3 - 11.73 square metres
- Bedroom 4 - 11.74 square metres
- Bedroom 5 - 11.77 square metres
- Bedroom 6 - 11.74 square metres
- Bedroom 7 - 11.72 square metres
- Bedroom 8 - 11.73 square metres

Evidently, the rooms would be equivalent to a double bedroom in floor space, as specified by the National Space Standards (March 2015). Each room would also have access to a rooflight which would provide an element of outlook and natural lighting. It is noted that these rooms are not for residential use and do not require the same standard of accommodation. In light of this, the proposed rooms are considered to provide a satisfactory internal living environment for the purposes of a hotel guest room use.

#### **7.10 Traffic impact, car/cycle parking, pedestrian safety**

Duck's Hill Road is covered by all day waiting restrictions in order to allow an unimpeded flow of traffic on this heavily trafficked road. A Controlled Parking Zone (CPZ)

encompassing the address and general location has been introduced in the area and operates for seven days a week between 9am and 7pm. Based on Transport for London's WebCAT planning tool, the application site has a poor Public Transport Accessibility Level (PTAL) of 1b, emphasising the reliance of local transport network users on the private car.

As the site exists, an established vehicular access serves a 32 no. space car park for the public house/restaurant use.

With regard to highways impacts and considerations, the following policies are considered:

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

A) Development proposals will be required to meet the transport needs of the development and address its transport impacts in a sustainable manner. In order for developments to be acceptable they are required to:

- i) be accessible by public transport, walking and cycling either from the catchment area that it is likely to draw its employees, customers or visitors from and/or the services and facilities necessary to support the development;
- ii) maximise safe, convenient and inclusive accessibility to, and from within developments for pedestrians, cyclists and public transport users;
- iii) provide equal access for all people, including inclusive access for disabled people;
- iv) adequately address delivery, servicing and drop-off requirements; and
- v) have no significant adverse transport or associated air quality and noise impacts on the local and wider environment, particularly on the strategic road network.

B) Development proposals will be required to undertake a satisfactory Transport Assessment and Travel Plan if they meet or exceed the appropriate thresholds. All major developments that fall below these thresholds will be required to produce a satisfactory Transport Statement and Local Level Travel Plan. All these plans should demonstrate how any potential impacts will be mitigated and how such measures will be implemented.

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

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

The National Planning Policy Framework (NPPF) (February 2019) states that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe. Policy 6.3 of the London Plan (March 2016) requires development proposals to ensure that the impacts on transport capacity and the transport network are fully assessed.

## PARKING PROVISION

Based on the proposed mixed use (Sui Generis) which includes an element of public

house use, restaurant use and guest room use, an individual site assessment is required.

The application submission indicates an extension to the car park which would facilitate 8 additional spaces adjacent to the existing car park hard standing, utilising reinforcement mats and crates akin to grasscrete. The existing car park would also be rearranged to provide 2 additional accessible car parking spaces. A total of 10 spaces are proposed, totalling 42 car parking spaces which is considered sufficient and acceptable by the Council's Highways Officer.

## ELECTRICAL VEHICLE CHARGING POINTS

Appendix C, Table 1 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020) states that parking for electric vehicles should be provided at a current minimum of 5% of car parking spaces with 5% passive provision.

If recommended for approval, the provision of 1 active electrical charging point and one passive electrical charging point would be secured by condition.

## ACCESSIBLE PARKING

Appendix C, Table 1 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020) states that: "For commercial developments, 10% of car parking spaces must be for blue badge holders and 5% for brown badge holders, together with one accessible on or off street parking bay designated for blue badge holders, even if no general parking is provided."

The proposed development would provide 2 accessible car parking spaces which is considered to be acceptable by the Council's Highways Officer. If recommended for approval, this would be secured by condition.

## CYCLE PARKING

In conjunction with Policy DMT 6, Appendix C of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020) requires that:

- A3 restaurant uses provide 1 cycle parking space per 20 staff + 1 per 20 customers.
- A4 public house uses provide 1 cycle parking space per 100 square metres
- C1 hotel uses provide 1 cycle parking space per 10 staff

As the proposal would not be creating additional floorspace for A4 public house use, this standard is not considered relevant. Based on the table arrangement shown on the proposed ground floor plan, the additional dining space would accommodate 132 customers at maximum capacity. Also, based on the HCA's Employment Density Guide 3rd Edition (November 2015), the proposed 10 guest rooms would generate 2 jobs and the proposed restaurant floorspace would generate between 9 and 12 jobs.

Accordingly, the proposed development would require 1 cycle space for the C1 staff, 1 cycle space for A3 staff and 7 cycle spaces for A3 customers. The proposed development should therefore provide 9 secure and accessible cycle parking space. If recommended for approval, this would be secured by condition.

## VEHICULAR TRIP GENERATION

As stated by the Council's Highways Officer, there will be no measurable or specific impact on the 'key' peak morning and afternoon traffic periods given the scale of proposal and activity profiles which are statistically concentrated outside peak periods. Any uplift would be considered marginal in generation terms and therefore can be absorbed within the local road network without notable detriment to traffic congestion and road safety.

## ACCESS PROVISION

The existing vehicular access into the site is to remain and would serve both the public house and residential uses. This shared arrangement is considered satisfactory and acceptable.

## CONSTRUCTION LOGISTICS PLAN

A full and detailed Construction Logistics Plan will be a requirement given the constraints and sensitivities of the local road network in order to avoid/minimise potential detriment to the public realm. If recommended for approval, this would be secured by condition.

## SUMMARY

The application has been reviewed by the Highway Authority who are satisfied that the proposal would not discernibly exacerbate congestion or parking stress, and would not raise any measurable highway safety concerns, in accordance with Policies DMT 1, DMT 2 and DMT 6 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020) and Policies 6.3, 6.9, and 6.13 of the London Plan (March 2016).

### **7.11 Urban design, access and security**

Please see sections 07.03 and 07.07 of the report.

### **7.12 Disabled access**

Policy 4.5 of the London Plan (March 2016) requires that at least 10 per cent of bedrooms are wheelchair accessible for hotel development.

Policy 7.2 of the London Plan (March 2016) requires that the all new development provides the highest standards of accessible and inclusive design.

Policy DME 6 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020) states:

A) In order to ensure that inclusive access has been incorporated into the proposal from the onset, the Council will require:

- i) all proposals to meet the requirements of the Accessible Hillingdon SPD;
- ii) a Design and Access Statement to be submitted with the planning application; and
- iii) For proposals of ten rooms or more, an Accessibility Management Plan should be submitted with the planning application.

B) For proposals of 10 rooms or more, the Council will require 10% of hotel rooms to meet wheelchair accessibility standards. In particular, accessible rooms should:

- i) be located along accessible routes, close to lifts on upper floors and close to the reception on the ground floor;
- ii) be situated so that they have equal access to views enjoyed from standard bedrooms; and
- iii) provide appropriate facilities for a wide range of disabilities.

The proposed development would not meet the threshold stated above as it would only provide a total of 8 guest rooms. Nonetheless, Bedroom 8 is proposed as an accessible

bedroom and is located within close proximity to the proposed lift. As stated by the Council's Access Officer, the standard to which the required accessible room has been designed is unknown. The accessible bedroom should be designed in accordance with Figure 52, incorporating either Figure 30 or 33 of British Standard BS8300-2:2018. If recommended for approval, this would be secured by condition. Subject to such a condition, the proposed development would accord with Policy DME 6 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020).

#### **7.13 Provision of affordable & special needs housing**

Not applicable to the consideration of this application.

#### **7.14 Trees, Landscaping and Ecology**

##### **TREES AND LANDSCAPING**

Policy 5.10 of the London Plan (March 2016) states that development proposals should integrate green infrastructure to contribute to urban greening, including the public realm.

Policy DMHB 11 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020) requires that new development is high quality, sustainable, adaptable, and harmonises with the local context. Landscaping and tree planting should also enhance amenity, biodiversity and green infrastructure.

Policy DMHB 14 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020) states:

A) All developments will be expected to retain or enhance existing landscaping, trees, biodiversity or other natural features of merit.

B) Development proposals will be required to provide a landscape scheme that includes hard and soft landscaping appropriate to the character of the area, which supports and enhances biodiversity and amenity particularly in areas deficient in green infrastructure.

Parking and informal external amenity space is located among the open woodland, with the buildings located at the southern end of the site. The trees are not protected by a Tree Preservation Order or Conservation Area. However, as stated by the Council's Trees and Landscaping Officer, their collective value adds significantly to the character and appearance of the area forming an attractive interface between the more suburban character to the south and the rural Green Belt land to the north.

The submitted Tree Report identifies and assesses the condition and value of 40 trees. There are no 'A' grade trees, 21 trees are category 'B' and the remaining trees are 'C' or 'U' grade, categories that are not normally considered to be a constraint on development. Three 'C' grade trees will be removed to facilitate the development and two 'U' grade trees will be removed for sound arboricultural reasons.

As confirmed by the Council's Trees and Landscaping Officer, there is no objection to the proposed development in this regard, subject to conditions securing details of a landscaping scheme and tree protection measures. The proposal is not therefore considered contrary to Policies DMHB 11 and DMHB 14 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020) and Policy 5.10 of the London Plan (March 2016).

##### **ECOLOGY**

Immediately to the north and west of the site is the designated Mad Bess Woods Nature Conservation Site of Metropolitan or Borough Grade I Importance. The following planning

policies are therefore taken into consideration:

Paragraph 170 of the NPPF (February 2019) states that planning decisions should contribute to and enhance the natural and local environment by: d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures.

Policy 7.19 of the London Plan (March 2016) states that development proposals should wherever possible, make a positive contribution to the protection, enhancement, creation and management of biodiversity.

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

The application site has large areas of scrub grass and tree cover that provides the potential for rich biodiversity. Notably, the current proposals do not require the removal of any important ecological features and is not considered contrary to relevant planning policy. If recommended for approval, an ecological enhancement plan would be secured by condition to ensure further public benefits are provided as part of the development. A condition to ensure that the lighting of the site will not have a significant impact on the ecological value of the site. Subject to such planning conditions, the proposed development would accord with Policy DMEI 7 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020), Policy 7.19 of the London Plan (March 2016) and the National Planning Policy Framework (February 2019).

#### **7.15 Sustainable waste management**

Policy 5.17 of the London Plan (March 2016) sets out the Mayor's spatial policy for waste management, including the requirements for new developments to provide appropriate facilities for the storage of refuse and recycling.

The proposal indicates sufficient bin storage and would accord with Policy 5.17 of the London Plan (March 2016).

#### **7.16 Renewable energy / Sustainability**

Not applicable to the consideration of this application.

#### **7.17 Flooding or Drainage Issues**

The site is located within Flood Zone 1 and is less than 1 hectare in size. As such, no Flood Risk Assessment is required.

Policy 5.12 of the London Plan (March 2016) requires that development proposals must comply with the flood risk assessment and management requirements set out in the NPPF and the associated technical Guidance on flood risk over the lifetime of the development.

Policy 5.13 of the London Plan (March 2016) states that development should utilise sustainable urban drainage systems (SUDS) unless there are practical reasons for not doing so, and should aim to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible.

Policy EM6 of the Hillingdon Local Plan: Part 1 - Strategic Policies (November 2012) states that applicants must demonstrate that Flood Risk can be suitably mitigated.

Policy DMEI 9 of the Hillingdon Local Plan: Part 2 - Development Management Policies

(January 2020) states that proposals that fail to make appropriate provision for flood risk mitigation, or which would increase the risk or consequences of flooding, will be refused.

Policy DMEI 10 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020) states that development within areas identified at risk from surface water flooding which fail to make adequate provision for the control and reduction of surface water run-off rates will be refused.

The proposed development is considered to be an appropriate use in Flood Zone 1. Subject to a condition requiring details of sustainable water management, it is considered that the scheme will accord with Policies DMEI 9 and DMEI 10 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020), Policy EM6 of the Hillingdon Local Plan: Part 1 - Strategic Policies (November 2012) and Policies 5.12 and 5.13 of the London Plan (March 2016).

#### **7.18 Noise or Air Quality Issues**

Policy 7.15 of the London Plan (March 2016) states that development proposals should seek to manage noise by:

- a. avoiding significant adverse noise impacts on health and quality of life as a result of new development;
- b. 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 development or adding unduly to the costs and administrative burdens on existing businesses;
- c. improving and enhancing the acoustic environment and promoting appropriate soundscapes (including Quiet Areas and spaces of relative tranquillity);
- d. separating new noise sensitive development from major noise sources (such as road, rail, air transport and some types of industrial development) through the use of distance, screening or internal layout - in preference to sole reliance on sound insulation;
- e. 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 the application of good acoustic design principles;
- f. having particular regard to the impact of aviation noise on noise sensitive development;
- g. promoting new technologies and improved practices to reduce noise at source, and on the transmission path from source to receiver.

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.

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.

It is acknowledged that the proposed expansion in the uses on-site could generate noise impacts. However, it is considered that mitigation is possible, including the sound insulation of the new building, control of amplified music and control of noise from external plant. If recommended for approval, these matters would be controlled by condition. Subject to such conditions, the proposed development would accord with Policy DMHB 11 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020), Policy

EM8 of the Hillingdon Local Plan: Part 1 - Strategic Policies (November 2012) and Policy 7.15 of the London Plan (March 2016).

## AIR QUALITY

The application site does not form part of an Air Quality Management Area or Focus Area. As such, this is not considered to be a relevant consideration.

### **7.19 Comments on Public Consultations**

Please see Section 06.1 of the report.

### **7.20 Planning Obligations**

None.

### **7.21 Expediency of enforcement action**

It was noted through the officer site visit that temporary timber structures have been erected within the curtilage of the Public House and require planning consent. They are not considered to have a bearing on the determination of the current application, nonetheless an informative has been added to ensure the applicant is aware that they need to be subject to further discussion with the Councils Planning Team.

### **7.22 Other Issues**

## FIRE SAFETY

Policy D12 of the Publication London Plan (December 2020) states:

A) In the interests of fire safety and to ensure the safety of all building users, all development proposals must achieve the highest standards of fire safety and ensure that they:

- 1) identify suitably positioned unobstructed outside space:
  - a) for fire appliances to be positioned on
  - b) appropriate for use as an evacuation assembly point
- 2) are designed to incorporate appropriate features which reduce the risk to life and the risk of serious injury in the event of a fire; including appropriate fire alarm systems and passive and active fire safety measures
- 3) are constructed in an appropriate way to minimise the risk of fire spread
- 4) provide suitable and convenient means of escape, and associated evacuation strategy for all building users
- 5) develop a robust strategy for evacuation which can be periodically updated and published, and which all building users can have confidence in
- 6) provide suitable access and equipment for firefighting which is appropriate for the size and use of the development.

It is noted that Policy D12 only requires the submission of a Fire Statement for major development proposals. As the proposed development would not constitute a major scale form of development, a Fire Statement is not required. However, as stated by the Council's Access Officer, details should be submitted to ensure that disabled people can evacuate from the intended first floor accommodation in a safe and dignified way during a fire evacuation situation. If recommended for approval, these details would be secured by condition. Subject to such a condition, the proposal would accord with Policy D12 of the Publication London Plan (December 2020).

## **8. Observations of the Borough Solicitor**

General

Members must determine planning applications having due regard to the provisions of the



development plan so far as material to the application, any local finance considerations so far as material to the application, and to any other material considerations (including regional and national policy and guidance). Members must also determine applications in accordance with all relevant primary and secondary legislation.

Material considerations are those which are relevant to regulating the development and use of land in the public interest. The considerations must fairly and reasonably relate to the application concerned.

Members should also ensure that their involvement in the determination of planning applications adheres to the Members Code of Conduct as adopted by Full Council and also the guidance contained in Probity in Planning, 2009.

#### Planning Conditions

Members may decide to grant planning consent subject to conditions. Planning consent should not be refused where planning conditions can overcome a reason for refusal. Planning conditions should only be imposed where Members are satisfied that imposing the conditions are necessary, relevant to planning, relevant to the development to be permitted, enforceable, precise and reasonable in all other respects. Where conditions are imposed, the Council is required to provide full reasons for imposing those conditions.

#### Planning Obligations

Members must be satisfied that any planning obligations to be secured by way of an agreement or undertaking pursuant to Section 106 of the Town and Country Planning Act 1990 are necessary to make the development acceptable in planning terms. The obligations must be directly related to the development and fairly and reasonably related to the scale and kind to the development (Regulation 122 of Community Infrastructure Levy 2010).

#### Equalities and Human Rights

Section 149 of the Equalities Act 2010, requires the Council, in considering planning applications to have due regard to the need to eliminate discrimination, advance equality of opportunities and foster good relations between people who have different protected characteristics. The protected characteristics are age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation.

The requirement to have due regard to the above goals means that members should consider whether persons with particular protected characteristics would be affected by a proposal when compared to persons who do not share that protected characteristic. Where equalities issues arise, members should weigh up the equalities impact of the proposals against the other material considerations relating to the planning application. Equalities impacts are not necessarily decisive, but the objective of advancing equalities must be taken into account in weighing up the merits of an application. The weight to be given to any equalities issues is a matter for the decision maker to determine in all of the circumstances.

Members should also consider whether a planning decision would affect human rights, in particular the right to a fair hearing, the right to respect for private and family life, the protection of property and the prohibition of discrimination. Any decision must be proportionate and achieve a fair balance between private interests and the public interest.

## **9. Observations of the Director of Finance**

Not applicable

## **10. CONCLUSION**

In conclusion, the proposed barn building would be considered to pose 'less than substantial harm' to the setting of the Grade II Listed Building and would constitute inappropriate development within the Green Belt. As outlined within the main body of the report, the proposed development is also considered to provide public benefits to outweigh the harm posed to the setting of the Listed Building and very special circumstances are considered to exist. Accordingly, the principle of development and its proposed design is considered to be on-balance acceptable, although it is at the upper limit of what would be considered on-balance acceptable.

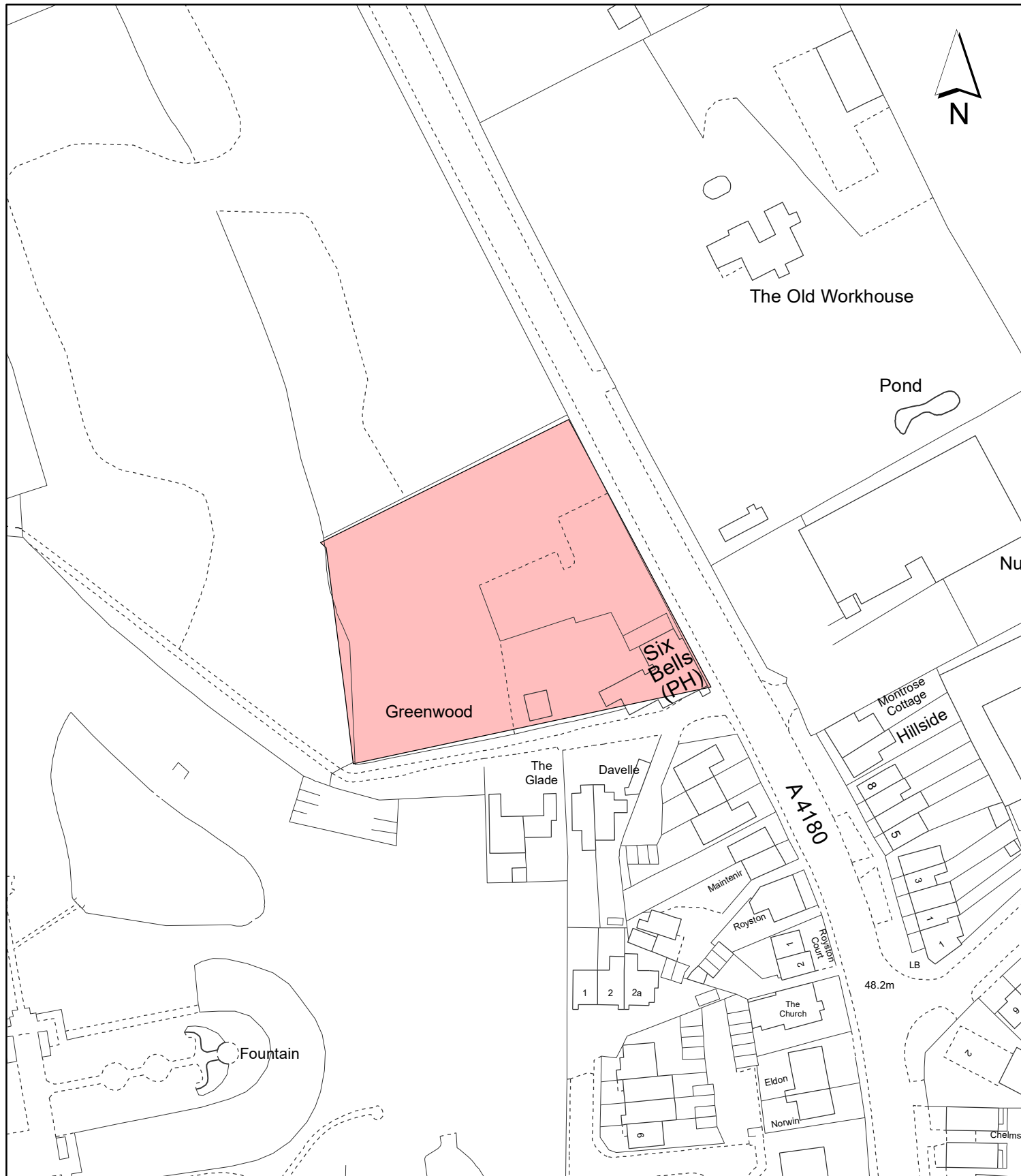
For the reasons outlined within the report, the proposed development is recommended for approval subject to planning conditions.

## **11. Reference Documents**

National Planning Policy Framework (February 2019)  
Publication London Plan (December 2020)  
The London Plan (March 2016)  
Hillingdon Local Plan: Part 1 - Strategic Policies (November 2012)  
Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020)  
Accessible Hillingdon Supplementary Planning Document (September 2017)  
Planning Obligations Supplementary Planning Document (July 2014)

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#### Notes:

 Site boundary

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Site Address:

**THE SIX BELLS PH  
DUCKS HILL ROAD  
RUISLIP**

Planning Application Ref:

**14387/APP/2020/4126**

Planning Committee:

**North**

Scale:

**1:1,250**

Date:

**February 2021**

**LONDON BOROUGH  
OF HILLINGDON**  
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Planning Section**

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**HILLINGDON**  
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