

Report of the Head of Planning, Sport and Green Spaces

Address 205 & 207 HAREFIELD ROAD UXBRIDGE

Development: Extensions to both existing properties to create a single block of 20 flats comprising 5 x studio flats, 9 x 1-bed flats and 6 x 2-bed flats with on-site parking and amenity space, new access point, landscaping and ancillary development.

LBH Ref Nos: 73106/APP/2017/2980

Drawing Nos: 205UXB/PL04A (Proposed Information
205/207UXB/PL12 (Proposed Information
205/207UXB/PL14 (Proposed Information
Desgin & Access Statement dated July 2017
205207UXB/PL01 (Information as Existing
Economic Viability Appraisal Report, prepared by U.L.L. Property dated Jul
2017
Daylight & Sunlight Report, prepared by Waterslade dated August 2017
Desgin & Access Statement
205/207UXB/PL10F (Proposed Information
205/207/UXB/PL03D (Existing Elevations Information
205/207/UXB/PL04B (Existing Plans)
205/207/UXB/PL05 (Existing Elevations (B & D)
205/207UXB/PL11A (Proposed Information
205/207UXB/PL13A (Proposed Information
205/207/UXB/PL15 (Proposed Elevations (B & D)
Unnumbered Plan - Example 1
Transport Assessment, prepared by The Cunningham Consultancy Limited,
amended October 2017
Arboricultural Impact Assessment, prepared by AGB Environmental dater
03/11/17
Energy Statement, prepared by Energy Report dated 17/07/17 (received
23/11/17)
205/207/UXB/PL22 (In Relation the Abrook Arms
205/207/UXB/PL23 (In Relation the Abrook Arms
205/207/UXB/PL24 (In Relation the Abrook Arms
205/207/UXB/PL25 (In Relation the Abrook Arms

Date Plans Received:	14/08/2017	Date(s) of Amendment(s):	06/10/2017
Date Application Valid:	14/08/2017		03/10/2017
			14/08/2017
			06/12/2017

1. SUMMARY

This application seeks full planning permission for the provision of extensions to nos. 205 and 207 Harefield Road, to merge the properties to provide a single block of 20 flats with associated car parking and amenity space.

A number of objections have been received to the scheme and, despite submission of amended plans, significant concerns remains over the appropriateness of the development is this location.

Whilst the intensification of residential use of the site is acceptable in principle, concern is raised over the housing mix proposed and it is considered that the layout, size, scale, bulk, mass and design of the scheme would detract from the visual amenities of the area and could not be supported in this instance.

Insufficient parking provision has been provided and the application has failed to demonstrate that the development would not have an unacceptable impact on the residential amenity of adjoining occupants through loss of outlook, noise and disturbance.

The development would have an urbanising impact on the site and locality and result in the unacceptable loss of trees and vegetation. Furthermore, the applicant has failed to demonstrate that the development would not result in an increased risk of flooding.

The scheme fails to comply with current Local Plan, London Plan and NPPF planning policies and, accordingly, refusal is recommended.

2. RECOMMENDATION

REFUSAL for the following reasons:

1 NON2 Design

The development, by virtue of the amalgamation of the two sites, its considerable bulk and scale, its use for small flats in an area of family housing, its use of the back garden for parking (and the necessary levelled hardstandings required for this on this steeply sloping site), and the loss of a significant number trees and shrubs in the front and rear gardens, which provide the characteristic backdrop to this side of the road, would be entirely out of keeping in this location. Furthermore, the incorporation of large crown roofs, small half hips, sash windows, gables with balconies and stone window surrounds and detailing, in contrast to the much more traditional, and less formal, character of the road, combined with the sheer size and bulk of the building would exacerbate the design deficiencies and render it very prominent in the streetscene. Accordingly, the development would be contrary policy BE1 of the Hillingdon Local Plan: Part One - Strategic Policies (November 2012), Policies BE13, BE15 and BE19 of the Hillingdon Local Plan: Part Two - Saved UDP Policies (November 2012) and the adopted Supplementary Planning Document HDAS: Residential Extensions.

2 NON2 Impact on neighbours

The proposed development, by virtue of its layout, size, scale, bulk, mass and design, would be detrimental to the amenities of the adjoining occupier at 209 Harefield Road by reason of overdominance, overshadowing, visual intrusion and loss of outlook. Therefore the proposal would be contrary to policies BE19, BE20 and BE21 of the Hillingdon Local Plan: Part Two - Saved UDP Policies (November 2012) and the Council's adopted Supplementary Planning Document HDAS: Residential Layouts.

3 NON2 Impact on future occupants

The proposed development, by reason of its substandard room and unit sizes would fail to provide a satisfactory standard of accommodation to the detriment of the amenities of future occupants, contrary to policy 3.5 of the London Plan (2016) and the DCLG Technical housing standards - nationally described space standard (March 2015).

4 NON2 Housing mix

The proposed development fails to provide a satisfactory mix of housing units of different sizes, especially in terms of dwellings suitable for families, contrary to the aims of policy H2 of the Hillingdon Local Plan: Part One - Strategic Policies, policies H4 and H5 of the

Hillingdon Local Plan: Part Two Saved UDP Policies (November 2012), policy 3.8 of the London Plan (2016) and Hillingdon's published Housing Market Assessment.

5 NON2 Loss of trees

The development, by reason of its unacceptable tree loss and the urbanising effect of the scheme, which necessitates the sacrifice of back garden space to provide additional car parking, would be contrary to policies BE23 and BE38 of the Hillingdon Local Plan: Part Two - Saved UDP Policies (November 2012).

6 NON2 Flood risk

The proposal involves an extension to the basement and a significant increase in hardstanding. No drainage strategy or assessment of the scheme's impact on drainage, flooding, groundwater conditions and structural stability has been provided to demonstrate that the development will not cause harm to the built and natural environment and local amenity and will not result in flooding or ground instability. The development fails to demonstrate that the scheme will:

- a) Maintain the structural stability of the building and neighbouring properties;
- b) Avoid adversely affecting drainage and run-off or causing other damage to the water environment;
- c) Avoid cumulative impacts upon structural stability or the water environment in the local area.

Accordingly, the development is contrary to policy EM6 of the Hillingdon Local Plan: Part One - Strategic Policies (November 2012), policy OE8 of the Hillingdon Local Plan: Part Two - Saved UDP Policies (November 2012), policy 5.12 of the London Plan (March 2016), and the National Planning Policy Framework (March 2012).

7 NON2 Noise/disturbance/contamination

The application fails to demonstrate that the development will not have an unacceptable impact on future and neighbouring occupants by way of traffic noise, disturbance or contamination, contrary to policies OE1, OE3, OE5 and OE11 of the Hillingdon Local Plan: Part Two - Saved UDP Policies (November 2012) and policies 7.15 and 5.21 of the London Plan (2016).

8 NON2 Parking

The development fails to provide sufficient parking to cater for the number of units proposed contrary to policy AM14 of the Hillingdon Local Plan: Part Two - Saved UDP Policies (November 2012) and the Council's adopted car parking standards.

9 NON2 Non Standard reason for refusal

The applicant has failed to provide contributions towards the improvement of services and facilities as a consequence of demands created by the proposed development (in respect of Affordable Housing, Construction Training and Project Management and Monitoring). The scheme therefore conflicts with Policy R17 of the London Borough of Hillingdon Local Plan part 2 (November 2012) and the Council's Planning Obligations SPD July 2014.

3. CONSIDERATIONS

3.1 Site and Locality

The application site comprises an approximately 2,900m² broadly rectangular shaped plot

located on the north west site of Harefield Road in Uxbridge. It is currently occupied by nos. 205 and 207 Harefield Road, both mid-twentieth century detached residential properties, with associated frontage parking and rear gardens.

No.205 occupies the southern half of the site and comprises a two-storey four-bedroom detached residential property with an attached garage. It has a single access from Harefield Road and driveway parking is provided to the front of the property, its boundary with Harefield Road defined by hedge planting. To the rear it has a sizeable garden which is predominantly laid to lawn. There is a significant level change across the site which slopes away from the road to the west for the length of the plot.

No.207 occupies the northern half of the site and comprises a two-storey five-bedroom detached property with small basement and roof accommodation and a detached single garage to its northern side. It has two accesses from Harefield Road which serve the front garden and driveway. The property frontage is defined by tree and hedge planting. To the rear it has a sizeable semi-wild garden, laid to lawn with significant hedge and tree planting around its boundaries and towards the rear of the site. As with no.205, there are significant level changes across the site, which slopes steeply away from the road to the west for the length of the plot. Although both plots slope steeply these are more extreme towards the north of the application site.

The application site falls within a predominately residential area and this part of Harefield Road is characterised by detached residential properties located on spacious plots with leafy frontages and rear gardens. The site is bounded to the north and south by detached residential properties. Residential properties are also located on the opposite side of Harefield Road. To the west the site is bounded by a field, beyond which is the Fray's River.

The entire application site falls within the developed area as designated in the Hillingdon Local Plan. Land adjoining to the west falls within the Green Belt and is designated as a Nature Conservation Site of Metropolitan or Borough Grade I Importance. Harefield Road is designated as a Local Distributor Road.

3.2 Proposed Scheme

This application seeks full planning permission to extend and merge 205 and 207 Harefield Road to create a single residential block comprising 20 flatted units.

The development would accommodate 5 x studio flats, 9 x 1 bed flats and 6 x 2 bed flats over 3/4 storeys, including basement and roof accommodation. The sloping nature of the site is such that the building would have the appearance of a three-storey block (including roof accommodation) as viewed from Harefield Road, but a four-storey block (including roof accommodation) as viewed from the rear.

Whilst the new block would not project forward of the existing building line, a new frontage would be provided to the existing properties to ensure a seamless merge between the existing development and proposed extensions. As viewed from Harefield Road, the block would be characterised by two gable end projections and a large crown roof with dormer windows.

Externally, parking would be provided to the front and rear of the block, to provide 23 parking spaces, including two disability standard spaces. A single access would be provided from Harefield Road with access to the rear car park gained via a driveway

alongside the northern boundary of the site. Refuse and cycle stores would be provided towards the front of the property.

A number of existing mature trees would be removed to accommodate the rear parking area. Amenity space would be provided beyond the car park to the rear of the site.

3.3 Relevant Planning History

Comment on Relevant Planning History

The planning history is summarised above. Most notably, in parallel with this current application the applicant also submitted individual applications to extend both of the properties. These have both recently been refused planning permission and are discussed in more detail below.

205 Harefield Road

12886/APP/2017/1478 - Two storey side/rear extension - refused 31/10/17 for the following reasons:

1. The proposed extensions, by reason of their overall size, scale, bulk, siting in close proximity to the side boundary and design, including a crown roof, introducing a roof form substantially different to that of the original and adjoining properties, would result in a disproportionate and incongruous addition that would fail to harmonise with the architectural composition of the original dwelling and would be detrimental to the character, appearance and visual amenities of the street scene contrary to Policy BE1 of the Hillingdon Local Plan: Part One - Strategic Policies (November 2012), Policies BE13, BE15 and BE19 of the Hillingdon Local Plan: Part Two - Unitary Development Plan Saved Policies (November 2012) and the adopted Supplementary Planning Document HDAS: Residential Extensions.

2. The proposed extensions, by virtue of their overall size, scale, bulk and proximity, would be detrimental to the amenities of the adjoining occupier at 207 Harefield Road by reason of overdominance, overshadowing, visual intrusion, loss of light and loss of outlook. Therefore the proposal would be contrary to policies BE19, BE20 and BE22 of the Hillingdon Local Plan: Part Two - Saved UDP Policies (November 2012) and the Council's adopted Supplementary Planning Document HDAS: Residential Extensions.

3. The submitted Tree Survey and Arboricultural Implication Assessment has failed to demonstrate that the development will safeguard existing trees on the site and further fails to demonstrate protection for and long-term retention of the trees. The proposal is therefore contrary to Policies BE19 and BE38 of the Hillingdon Local Plan: Part Two - Saved UDP Policies (November 2012) and the Council's adopted Supplementary Planning Document HDAS: Residential Extensions.

207 Harefield Road

4268/APP/2017/1480 - Installation of basement level, two storey rear extension and alterations to roof - refused 31/10/17 for the following reasons:

1. The proposed two storey rear extension, by virtue of its size, scale, bulk, design and staggered siting, would be detrimental to the amenities of the adjoining occupier at 209 Harefield Road by reason of overdominance, overshadowing, visual intrusion and loss of

outlook. Therefore the proposal would be contrary to policies BE19, BE20 and BE21 of the Hillingdon Local Plan: Part Two - Saved UDP Policies (November 2012) and the Council's adopted Supplementary Planning Document HDAS: Residential Extensions.

2. The proposed two storey rear extension, by reason of its overall size, scale, bulk and crown roof design, introducing a roof form substantially different to that of the original house, would result in a disproportionate and incongruous addition that would fail to appear subordinate to the appearance of the original house. It would be detrimental to the appearance of the original house and would detract from the character and appearance of the street scene and the area in general, contrary to Policy BE1 of the Hillingdon Local Plan: Part One - Strategic Policies (November 2012), Policies BE13, BE15 and BE19 of the adopted Hillingdon Local Plan - Saved UDP Policies (November 2012) and the adopted Supplementary Planning Document HDAS: Residential Extensions.

3. The proposed development, by reason of the close proximity of the proposed driveway to the rear parking and turning area would be detrimental to the residential amenity of the occupants of 209 Harefield Road by reason of the noise and disturbance resulting from the use of this driveway. As such the proposal would be contrary to policies BE19, BE21 and OE1 of the Hillingdon Local Plan: Part Two - Saved UDP Policies (November 2012) and the Council's adopted Supplementary Planning Document HDAS: Residential Extensions.

4. The proposal would result in the loss of/damage to existing trees on and adjoining the site resulting in an urbanising impact. The proposal is therefore detrimental to the visual amenity of the street scene and the wider area contrary to Policies BE19 and BE38 of the Hillingdon Local Plan: Part Two - Saved UDP Policies (November 2012) and the adopted Supplementary Planning Document HDAS: Residential Extensions.

4. Planning Policies and Standards

National Planning Policy Framework
London Plan (2015)

Hillingdon Local plan: Part 1 - Strategic Policies (November 2012)

Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012)

Hillingdon Supplementary Planning Document: Accessible Hillingdon

Hillingdon Supplementary Planning Document: Residential Layouts

Hillingdon Supplementary Planning Guidance - Community Safety by Design

Hillingdon Supplementary Planning Guidance - Noise

Hillingdon Supplementary Planning Guidance - Contamination

Hillingdon Supplementary Planning Document - Air Quality

Hillingdon Supplementary Planning Document - Planning Obligations

UDP / LDF Designation and London Plan

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

Part 1 Policies:

PT1.BE1 (2012) Built Environment

PT1.EM1 (2012) Climate Change Adaptation and Mitigation

PT1.EM11 (2012) Sustainable Waste Management

PT1.EM6 (2012) Flood Risk Management

PT1.EM8 (2012) Land, Water, Air and Noise

PT1.H1 (2012) Housing Growth

Part 2 Policies:

- BE13 New development must harmonise with the existing street scene.
- BE15 Alterations and extensions to existing buildings
- BE19 New development must improve or complement the character of the area.
- BE20 Daylight and sunlight considerations.
- BE21 Siting, bulk and proximity of new buildings/extensions.
- BE23 Requires the provision of adequate amenity space.
- BE24 Requires new development to ensure adequate levels of privacy to neighbours.
- BE38 Retention of topographical and landscape features and provision of new planting and landscaping in development proposals.
- OL5 Development proposals adjacent to the Green Belt
- OE1 Protection of the character and amenities of surrounding properties and the local area
- OE3 Buildings or uses likely to cause noise annoyance - mitigation measures
- OE5 Siting of noise-sensitive developments
- OE8 Development likely to result in increased flood risk due to additional surface water run-off - requirement for attenuation measures
- OE11 Development involving hazardous substances and contaminated land - requirement for ameliorative measures
- H3 Loss and replacement of residential accommodation
- H4 Mix of housing units
- H5 Dwellings suitable for large families
- R17 Use of planning obligations to supplement the provision of recreation, leisure and community facilities
- AM2 Development proposals - assessment of traffic generation, impact on congestion and public transport availability and capacity
- AM7 Consideration of traffic generated by proposed developments.
- AM9 Provision of cycle routes, consideration of cyclists' needs in design of highway improvement schemes, provision of cycle parking facilities
- AM14 New development and car parking standards.
- AM15 Provision of reserved parking spaces for disabled persons
- LPP 3.4 (2015) Optimising housing potential
- LPP 3.5 (2016) Quality and design of housing developments
- LPP 3.8 (2016) Housing Choice
- LPP 3.12 (2016) Negotiating affordable housing on individual private residential and mixed-

	use schemes
LPP 3.13	(2016) Affordable housing thresholds
LPP 5.1	(2016) Climate Change Mitigation
LPP 5.2	(2016) Minimising Carbon Dioxide Emissions
LPP 5.3	(2016) Sustainable design and construction
LPP 5.7	(2016) Renewable energy
LPP 5.21	(2016) Contaminated land
LPP 6.1	(2016) Strategic Approach
LPP 6.9	(2016) Cycling
LPP 6.13	(2016) Parking
LPP 7.2	(2016) An inclusive environment
LPP 7.3	(2016) Designing out crime
LPP 7.4	(2016) Local character
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 7.21	(2016) Trees and woodlands
LPP 8.2	(2016) Planning obligations
LPP 8.3	(2016) Community infrastructure levy
NPPF	National Planning Policy Framework
HDAS-LAY	Residential Layouts, Hillingdon Design & Access Statement, Supplementary Planning Document, adopted July 2006

5. Advertisement and Site Notice

5.1 Advertisement Expiry Date:- **27th September 2017**

5.2 Site Notice Expiry Date:- Not applicable

6. Consultations

External Consultees

Consultation letters were sent to 12 local owner/occupiers and the North Uxbridge Residents' Association. Site and press notices were also posted. Seven letters of objection have been received, which raise the following concerns:

- i) Its size, scale, height, bulk and position too close to the road would be extremely imposing. It is overbearing, out of scale and the size is not in keeping with the neighbouring family homes.
- ii) The development would be out of keeping with the character and appearance of the surrounding area and be detrimental to the street, which borders an area of special interest.
- iii) The supporting documents are not factually true - the care home is not opposite, does not have roof accommodation, is set back from the road and well screened by vegetation and the only flats along Harefield Road are not close to the application site.
- iv) Loss of trees will dramatically change the landscape and reduce visual and noise screening of the A40.
- v) Overdevelopment of the site.

- vi) Impact on the sewer and water system.
- vii) It's not clear why there are two concurrent applications for very similar development, why the applicant's address is different and whether the surveys are consistent.
- viii) This will set a precedent for similar developments along Harefield Road.
- ix) Its location on a bend with the entrance in the middle will make this an accident hot spot.
- x) Increased strain on local amenities such as schools and doctors, which are oversubscribed.
- xi) Impact on the social and economic area as a whole by changing the demographics of an area - Uxbridge needs to protect its identity.
- xii) There is regular congestion every evening with queuing traffic heading towards the Park Road/A40. This will significantly add to an already over congested road.
- xiii) Highway and pedestrian safety - the site is on a bend and crossing is already dangerous.
- xiv) Additional cars, boilers, drainage pipes, waste, surface water, etc, will have a negative impact on the local environment and will add significantly to pollution levels - there are no provisions to offset these impacts.
- xv) Overlooking, especially from balconies and the car park encroachment to the rear.
- xvi) The description of the development states balconies will be added at the rear but the picture shows balconies at the front too very close to the road.
- xvii) With St Andrew's development still taking shape, there are plenty of flats already available in the Uxbridge area.
- xviii) Increased noise from extra people and cars.
- xix) Inadequate access for emergency vehicles.
- xx) Insufficient parking.
- xxi) Disruption on the road and the inevitable noise and pollution during construction will be excessive, making life most unpleasant for local residents and the Nursing Home.
- xxii) Overshadowing of adjacent properties.
- xxiii) Loss of outlook.
- xxiv) Due to the change in levels it would be like a four-storey building when viewed from the rear.
- xxv) Visual impact resulting from significant loss of garden and creation of car park.
- xxvi) Loss of the garage to 207 and creation of an access road will add significant noise and disturbance to the neighbouring property.
- xxvii) Potential structural impacts to neighbouring properties, especially due to change in levels.
- xxviii) The properties are located on a blind bend and exiting their driveways is hazardous.
- xxix) The TA is misleading as it was carried out during the summer and the photos are deceptive.
- xxx) Additional traffic from the redevelopment of the Abrook Arms needs to be considered.

The local Ward Councillor has requested Committee determination.

Internal Consultees

URBAN DESIGN OFFICER

The site comprises two detached houses of mid 20th century date, secluded amongst tall hedges and trees and set at an angle to the road. Harefield Road was formerly an old country lane known as Pages Lane, and it still retains its historic characteristics of modest width, tall hedges to either side, many mature trees to side boundaries and front and rear gardens, and large detached family houses. The north side of the road, wherein lies the application site, falls sharply away to the north, down through the Green Belt to the Frays River. The only obvious exception to the detached houses in this area, and further up on the other side of the road, is Clare House, the BUPA care home, which was, from 1914 to 1978, the home of the Uxbridge and District Cottage Hospital.

This proposal would involve the joining of the two existing properties and their extension, re-fronting and conversion to form a block of 20 flats, mainly 1 bed, with 2 bed and studios, with parking in the front and back gardens and the construction of a brick wall with railings along the double front boundary.

This proposal would be entirely out of keeping in this location, by virtue of the amalgamation of the

two sites, its considerable bulk and scale, its use for small flats in an area of family housing, its use of the back garden for parking (and the necessary levelled hardstandings required for this on this steeply sloping site), the loss of the green frontage and the loss of a significant number of the trees and shrubs in the front and rear gardens, which provide the characteristic backdrop to this side of the road. The proposed front boundary of a long, brick wall with railings and tall brick piers with stone ball finials would appear very urban and detract significantly from the character of the area, while the sparse planting proposed would in no way compensate for the loss of the tall hedges.

Although the inner footings of the current buildings would survive within the new build, the houses would be extended and re-fronted with new fenestration. The design would incorporate large crown roofs, small half hips, sash windows, gables with balconies and stone window surrounds and detailing, in contrast to the much more traditional, and less formal, character of the road. The sheer size and bulk of the building and lack of screening would exacerbate the design deficiencies and render it very prominent in the streetscene.

Recommendation: Unacceptable in principle

Officer comment: It should be noted that amended plans were provided which show increased landscaping to the front boundary. The Council's Conservation and Urban Design Officer has confirmed that these are insufficient to address the fundamental concerns raised.

TREES/LANDSCAPE OFFICER

This site is occupied by two neighbouring two-storey detached houses on the north-west side of Harefield Road. Both plots slope down away from the road and have steep stepped access to the spacious rear gardens which extend down the valley to the edge of the River Frays and the Frays Nature Reserve. Both houses are set back from the road and are well screened by a mix of established trees, shrubs and hedges. While the existing vegetation contributes to the character and appearance of this residential street, there are no TPO's or Conservation Area designations affecting the site.

A Tree report has been prepared by AGB which assesses the condition and value of 13No. individual trees and five groups. According to this assessment there are no grade 'A' trees, 11No. 'B1' and 7No 'C1.'

The proposed development will necessitate the removal of five individual 'B1' trees (T1 Japanese Maple, T2 Lime, T4 Yew, T7 Yew and T8 Weeping Willow) and two groups of 'B1' trees (G1 and G2). The report concludes that the amount of proposed tree removal is significant but will have minimal visual impact with only limited public visibility - and the opportunity to accommodate new planting.

While there is no objection to the survey assessment, the collective value of these trees is higher than the individual values imply. -

- Furthermore the loss of tree cover, particularly in the front gardens, will be highly conspicuous from the public realm and will be detrimental to the character of the area. The visual impact of the vegetation clearance will be exacerbated by the increased parking requirements to both the front and rear of the building.

Recommendation: This application is unacceptable due to the loss of trees and urbanising effect of the scheme caused by the scale and scope of the development, the effects of which are contrary to saved policy BE38.

Officer comment:

Following receipt of amended plans and an amended Arboricultural Report the Trees/Landscape Officer has reiterated the original concerns, commenting as follows:

The revised tree report seeks to address some of the concerns raised about tree loss from the front garden.

To this end the report now proposes the retention of four grade 'B' trees and groups: T1 the Japanese maple, T4 the yew and groups G1 and G2.

The report (summary) notes that reduced dig methodology will be required to safeguard these trees. Concern remains that working space is required around the building (typically < 3 metres). Furthermore the existing sloping front garden/drive space will be required to accommodate construction traffic including plant, deliveries and storage of materials. These details have not been fully factored in to a construction method statement.

The current proposed tree loss includes includes three 'B' grade trees: T2 a lime, T7 a yew and T8 a willow together with four C grade trees.

RECOMMENDATION

The application remains unacceptable due to the detrimental impact of the development on the character and appearance of the area.

This is due in part to tree loss and in part to the urbanising effect of the development which necessitates the sacrifice of back garden space to provide additional car parking and is contrary to saved policies BE23 and BE38.

FLOOD & WATER MANAGEMENT OFFICER

Recommendation: Objection

The proposal involves an extension to the basement therefore a site groundwater investigation is required. If groundwater is detected on site suitable mitigation is required. As one has not been submitted the application should be refused.

The management of surface water is a material planning consideration for all major development. Therefore an assessment or drainage statement is required with all major applications. As one has not been submitted, the application should therefore be refused.

Comments on the Planning Application:

Groundwater

When determining proposals for basement and other underground development, the Council will require an assessment of the scheme's impact on drainage, flooding, groundwater conditions and structural stability, where appropriate. The Council will

only permit basement and other underground development that does not cause harm to the built and natural environment and local amenity and does not result in flooding or ground instability. We will require developers to demonstrate by methodologies appropriate to the site that their proposals:

- a) Maintain the structural stability of the building and neighbouring properties;
- b) Avoid adversely affecting drainage and run-off or causing other damage to the water environment;
- c) Avoid cumulative impacts upon structural stability or the water environment in the local area;

Reason:

The proposal could increase flood risk and is therefore not in accordance with;

- Policy EM6 Flood Risk Management in Hillingdon Local Plan: Part 1- Strategic Policies (Nov 2012)
- Policy DMHD 3: Basement Development in emerging Hillingdon Local Plan Part 2 Development Management Policies,
- Policy 5.12 Flood Risk Management of the London Plan (March 2016), and
- Planning Practice Guidance (March 2014).

A site investigation must be undertaken to inform the proposal, and where groundwater is found suitable mitigation provided. For information a proposal where a basement extends the full width of a plot will not be looked on favourably.

Surface Water

Prior to commencement, 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 how it, Manages Water and demonstrate ways of controlling the surface water on site by providing information on:

a) Suds features:

- i. incorporating sustainable urban drainage (SuDs) in accordance with the hierarchy set out in Policy 5.15 of the London Plan. Where the proposal does not utilise the most sustainable solution, justification must be provided,
- ii. calculations showing storm period and intensity and volume of storage required to control surface water and size of features to control that volume to Greenfield run off rates at a variety of return periods including 1 in 1 year, 1 in 30, 1 in 100, and 1 in 100 plus Climate change,
- iii. where identified in an area at risk of surface water flooding, include additional provision within calculations for surface water from off site
- iv. where it is intended to have above ground storage, overland flooding should be mapped, both designed and exceedance routes above the 100, plus climate change, including flow paths depths and velocities identified as well as any hazards, (safe access and egress must be demonstrated).

b) Capacity of Receptors

- i. Capacity demonstrated for Thames Water foul and surface water network, and provide confirmation of any upgrade work required having been implemented and receiving watercourse as appropriate.
- ii. Where infiltration techniques (soakaway) or a basement are proposed a site investigation must be provided to establish the level of groundwater on the site, and to demonstrate the suitability of infiltration techniques proposed on the site. (This should be undertaken at the appropriate time of year as groundwater levels fluctuate).
- iii. Where groundwater is found within the site and a basement is proposed suitable mitigation methods must be provided to ensure the risk to others is not increased.
- iv. identify vulnerable receptors, ie WFD status and prevent pollution of the receiving groundwater and/or surface waters through appropriate methods;

c) Minimise water use .

- i. incorporate water saving measures and equipment.
- ii. provide details of how rain and grey water will be recycled and reused in the development.

d) Long Term Management and Maintenance of the drainage system.

- i. Provide a management and maintenance plan
- ii Include details of Inspection regimes, performance specification, (remediation and timescales for the resolving of issues where a PMC).
- lii Where overland flooding is proposed, the plan should include the appropriate actions to define those areas and actions required to ensure the safety of the users of the site should that be required.
- iii. Clear plans showing all of the drainage network above and below ground. The responsibility of different parties such as the landowner, PMC, sewers offered for adoption and that to be adopted by the Council Highways services.

e) From commencement on site

- i. How temporary measures will be implemented to ensure no increase in flood risk from

commencement on site including any clearance or demolition works.

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 that surface water run off is controlled to ensure the development does not increase the risk of flooding contrary to:

- Policy EM6 Flood Risk Management in Hillingdon Local Plan: Part 1- Strategic Policies (Nov 2012)
- Policy DMEI 10 Water Management, Efficiency and Quality in emerging Hillingdon Local Plan Part 2 Development Management Policies,
- Policy 5.12 Flood Risk Management of the London Plan (March 2016) and
- To be handled as close to its source as possible in compliance with Policy 5.13 Sustainable Drainage of the London Plan (March 2016), and
- Conserve water supplies in accordance with Policy 5.15 Water use and supplies of the London Plan (March 2016).
- National Planning Policy Framework (March 2012), and the
- Planning Practice Guidance (March 2014).

Officer comments:

Whilst the Flood Water Management Officer's comments are noted and supported it must be noted that the Hillingdon Local Plan: Part 2 - Development Management Policies is an emerging plan, which is not yet adopted and so is of very limited weight at this stage.

HIGHWAY ENGINEER

This application is for the extensions to existing detached properties to create a block of flats in Harefield Road Uxbridge.

Harefield Road is a classified road (B467) and there are current waiting restrictions in place to deter traffic parking on the road that would inhibit the free flow of traffic.

The existing dwellings have three vehicular crossovers to provide access to adequate driveway parking.

The site has a PTAL value of 1b (very poor) which suggests there will be a very strong reliance on private car trips to and from the site.

The applicant has supplied a Transport Assessment by Cunningham Consultancy (July 2017) in support of the application.

There has been no pre-app discussions on the proposals which is surprising given the scale of the proposals.

The proposal consists of amalgamating the existing two detached dwellings to create 5xstudio,9x1b and 6x2b flats.

According to the application form there are 22 car parking spaces provided which equates to an average of 1.1 spaces per flat.

The proposal includes a new single access point off Harefield Road to replace the existing three access points. The design of that access in terms of visibility and sight distances would have to be conditioned along with the re-instatement of the existing access points.

In an area of such poor PTAL score I would be expecting at least 1 car parking space per studio and 1 bed flat and 1.5 spaces per 2 bed flat. This is seen as a minimum given the poor accessibility and given that visitor parking on Harefield Road is not an option given its width and classified road status.

If the applicant could provide another on-site car parking space then I would have thought that 23 spaces would have been acceptable. If a pre-app had been carried out these issues would have been discussed earlier.

The proposed development will produce additional trips but that should not be significant when the traffic flows along Harefield Road are concerned.

The TA suggests 20 cycle parking spaces will be provided and secure covered cycle parking spaces should be conditioned.

There is a refuse area shown on the plans close to Harefield Road.

On the basis of the above comments highway concerns are raised over the level of on-site car parking provision. Should this be overcome other issues could be conditioned.

Officer comment: Following receipt of amended plans the Highway Engineer has provided further comments as follows:

Further to my earlier comments I note there has been revisions to the previous plans but there was no increase in on-site car parking as I suggested. On that basis I suggest you refuse the application. If you are of a mind to recommend approving this scheme I suggest you condition the following:

1. EVCP at the rate of 20% active and 20% passive for all car parking spaces on site.
2. At least 20 secure covered cycle parking spaces.
- 3 Refuse/recycling bins suitable for the number of flats in a storage area no more than 10m from the public highway.
4. Visibility splays provided at the entrance/exit that accords with the guidance in Manual for Streets
5. The future residents of the site will not be eligible for residents parking permits and this agreement will be secured by a S106 agreement.

ACCESS OFFICER

As this proposal would essentially result in an extension to the existing buildings, I have concluded that the prescribed standards for accessible housing, as set out in Approved Document M to the Building Regulations, should not be applied to this development.

Conclusion: acceptable from an accessibility standpoint.

ENVIRONMENTAL PROTECTION UNIT

Reports on noise and land contamination should be provided. Once provided and if satisfactory relevant conditions would be required.

ENVIRONMENTAL OFFICER

I object to the proposed development as it does not comply with London Plan Policy 5.2 relating to energy.

The proposed development presents a broadly appropriate strategy to demonstrate compliance with policy 5.2 however the technological reliance on reducing CO2 comes from the use of PVs.

The energy strategy states:

Details of the PV installation and roof area measurements can be found in Appendix C.

There is no appendix referenced in the contents page. There is no appendix c in the document.

In addition, the roof plan submitted with the application shows no PVs. The roof is a mix of pitched (with dormers) and flat (with roof lights) thus reducing the available space for PVs of which there is a large amount required. The problems are increased further due to the orientation of the roof which is on an east/west access (length ways); this reduces the optimal arrangement for the location of PVs.

The applicant will need to:

- 1 - Demonstrate that the required amount of PVs can be located on the roof given the other roof mounted design features
- 2 - Demonstrate that the pvs that can be located on the roof have an optimum efficiency - this will require an update to the sun path analysis
- 3 - provide elevations and roof plans showing the inclusion of PVs
- 4 - provide an updated energy strategy that includes an assessment of the efficiency of the PVs based on the design of the property.

Officer comment:

The applicant has provided a revised Energy Statement. The Environmental Officer has advised that whilst the report is acceptable, there is a disconnect with the submitted roof plans and elevations, which need to be updated and presented to show the energy strategy can be incorporated within the development.

7. MAIN PLANNING ISSUES

7.01 The principle of the development

The site falls within the developed area as shown in the Hillingdon Local Plan. It does not fall within the Green Belt, a Conservation Area or any other designation which could preclude residential development.

Policy H1 of the Local Plan: Part 1 - Strategic Policies gives general support to housing provision to meet and exceed the Council's minimum strategic dwelling requirement, where this can be achieved, in accordance with other Local Plan policies.

London Plan (2016) policy 3.3 similarly seeks to ensure that London's housing needs are met. This objective is reiterated in the Mayor of London's Supplementary Planning Guidance (SPG) on Housing, although it must be noted that the SPG is clear that in achieving housing targets, full account must be given to other policy objectives and that to address London's strategic housing requirement and reconcile any local disparities between housing need and supply, boroughs should identify and proactively seek to enable extra housing capacity through the preparation of their Local Plans.

At a national level, Chapter 6 of the National Planning Policy Framework (NPPF), similarly seeks to increase housing supply, confirming that local authorities should, through their Local Plans, demonstrate how housing targets and objectives will be met. Particular emphasis is given to housing delivery over the next five years, but authorities are also required to consider growth beyond this.

Notwithstanding this general policy support for new residential developments, it is clear that careful consideration must be given to the ability of development proposals to also meet

other planning policies and also the ability of authorities to meet their housing needs.

With regard to compliance with other planning policies, significant concerns are raised on a number of key planning matters, including design, impact on trees and landscaping, sustainability, drainage, and residential amenity. These matters are discussed in more detail throughout this report.

With regard to the borough's ability to meet its housing need, the designation of the Hayes Housing Zone in the south of the borough together with other pipeline residential schemes is such that this Council is anticipated to exceed its requirements for housing delivery for the foreseeable future. With this in mind, it is difficult to justify the development on need alone.

Important consideration must also be given to the mix of units proposed.

Local Plan: Part 1 policy H2 identifies a need for more larger affordable units. Local Plan: Part 2 policies H4 and H5 seek to ensure a practicable mix of housing units are provided within residential schemes. One and two bedroom developments are encouraged within town centres, while larger family units are promoted elsewhere. London Plan Policy 3.8 states that new developments should offer a range of choices, in terms of the mix of housing sizes and types. The Mayor of London's Housing Supplementary Planning Guidance (March 2016) generally supports larger units where there is demand.

The Council's Emerging Development Management (Local Plan Part 2) Policy DMH2 'Housing Mix' requires a more balanced housing mix reflecting its latest information on housing mix, which shows a high need for more family sized accommodation, particularly 3 and 4 bed units. Hillingdon's published Housing Market Assessment confirms this need. Whilst the emerging Local Plan Part 2 is subject to an Examination In Public and has limited weight at present, it does emphasise the growing need for family housing (i.e. 3 and 4 bedroom units).

The proposed housing mix of only studio, one and two bed units would be contrary to policy H5 of the Local Plan: Part 2 and policy 3.8 of the London Plan (2016) and, without further justification for the lack of family sized units, it is not considered that it could be supported in this location, particularly given the total overall number of units proposed.

In attempts to justify the proposal the applicant has notably drawn the Council's attention to two other developments in the borough, one at 103 Ducks Hill Road in Northwood and one at the former Abrook Arms PH, also along Harefield Road. Planning permission (ref: 64345/APP/2011/1945) was granted for the redevelopment of the former in October 2012 and sought the redevelopment of that site to provide a residential development of 13 units comprising 12 x 2 bedroom and 1 x 3 bedroom apartments. That development is complete. With regard to the latter, planning permission is sought for the redevelopment of that site to provide 18 residential units comprising 3 x 1 bedroom, 12 x 2 bedroom and 3 x 3 bedroom units. The Council's Major Applications Planning Committee resolved to grant planning permission for the scheme on 15th November 2017, subject to finalisation of the S106 agreement. This has yet to be finalised and so to date no planning permission has been granted for that site. Whilst every application must be assessed on its own merits, and with regard to the Ducks Hill Road scheme policy changes since 2011 must be considered, it is notable that in contrast to the application now under consideration, both those examples provided by the applicant provide at least one family sized unit.

In conclusion, whilst there is no objection in principle to the intensification of residential development in this location, the proposal nevertheless fails to provide a satisfactory form of development which would comply with all other relevant planning policies. Accordingly, overall the principle of the development cannot be supported in this instance.

7.02 Density of the proposed development

Policy 3.4 of the London Plan (2016) advises that Boroughs should ensure that development proposals achieve the highest possible intensity of use compatible with local context and the site's public transport accessibility. The London Plan provides a density matrix to establish a strategic framework for appropriate densities at different locations.

The site has a PTAL of 1b and is located within a suburban setting. The London Plan 2016 range for residential sites with a PTAL of 0-1, which fall within a suburban area is 150-200 habitable rooms per hectare (hrph) and, based on an average of 3.1 habitable rooms per unit (noting rooms over 20m² are counted as 2 in compliance with the Council's SPD on Residential Layouts), 40-65 units per hectare (uph).

Based on a site area of approximately 2,900m², the proposed scheme would have a density of 69 uph and 210 hrph. This marginally exceeds London Plan density guidelines and is indicative of overdevelopment of the site, which could lead to difficulty in meeting residential amenity, parking and other relevant standards as discussed later in this report.

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

Not applicable. The site does not fall within a archaeological priority area, conservation area or area of special local character and there are no listed buildings within the vicinity. Notably, whilst residents suggest the site bounds an "area of special interest" Harefield Road and properties either side of it at this point fall within the developed area as designated in the local plan and have no other designation. The North Uxbridge Area of Special Local Character is located beyond residential properties to the south and the proposal would not be easily visible from any part of that area.

7.04 Airport safeguarding

Not applicable. There is no requirement to consult the aerodrome safeguarding bodies on this application.

7.05 Impact on the green belt

The site is bounded by land falling within the green belt to the west. Local Plan: Part 2 policy OL5 seeks to ensure that new development proposals adjacent to or conspicuous from the green belt do not harm its visual amenities.

Notwithstanding the proposed substantial increase in the scale of the development, given the length of the rear gardens and existing tree screening it is not considered that the proposal would have such a significant detrimental impact on the visual amenities of the green belt that refusal could be justified on these grounds.

7.07 Impact on the character & appearance of the area

Policies BE13 and BE19 seek to ensure that new development complements or improves the character and amenity of the area. The scale, bulk and siting of buildings are key determinants in ensuring that the amenity and character of an area is not compromised by new development.

In this instance, the application site is characterised by two detached properties, located on spacious plots, set back from the road and largely screened by existing trees and vegetation. Indeed, such features are key characteristics of both sides of this stretch of Harefield Road, the only exception being Clare House, a BUPA care home located further

north on the opposite of the road. The houses have a wide variety of designs, but are predominantly all two-storey, many with hipped roofs and gable ends. Although there are some examples present, roof accommodation is not a particular characteristic of the area, especially in the front elevation of properties and to the scale of that now proposed.

The proposal seeks to extend and merge the existing two properties to provide a single block comprising 20 flats with car parking to the front and rear. The Council's Conservation and Urban Design Officer has raised strong objections to the visual impact this would have on the street scene and surrounding area, commenting as follows:

"This proposal would be entirely out of keeping in this location, by virtue of the amalgamation of the two sites, its considerable bulk and scale, its use for small flats in an area of family housing, its use of the back garden for parking (and the necessary levelled hardstandings required for this on this steeply sloping site), the loss of the green frontage and the loss of a significant number of the trees and shrubs in the front and rear gardens, which provide the characteristic backdrop to this side of the road. The proposed front boundary of a long, brick wall with railings and tall brick piers with stone ball finials would appear very urban and detract significantly from the character of the area, while the sparse planting proposed would in no way compensate for the loss of the tall hedges.

Although the inner footings of the current buildings would survive within the new build, the houses would be extended and re-fronted with new fenestration. The design would incorporate large crown roofs, small half hips, sash windows, gables with balconies and stone window surrounds and detailing, in contrast to the much more traditional, and less formal, character of the road. The sheer size and bulk of the building and lack of screening would exacerbate the design deficiencies and render it very prominent in the streetscene."

Whilst amended plans have been provided which now show the omission of the originally proposed wall and railings to the frontage and the retention of more trees and vegetation, these do little to address the fundamental concerns raised. Despite the provision of a greener frontage than was originally proposed officers fully concur with the Conservation and Urban Design Officer's view that the development would be totally out of keeping with the character and appearance of the surrounding area and detrimental to the visual amenities of the street scene in this location. The merging of the two properties would close important visual gaps currently available between the properties and have an overall urbanising impact on the site and its surrounds, which would be totally unacceptable in this location.

It is notable that in parallel with this application the applicant also submitted individual applications for extensions to both properties. Despite being smaller in scale than the development now proposed, those applications were nevertheless refused due, in part, to concerns over visual amenity. The amalgamation of the properties through their significant alteration and extension and the creation of a significant area of hardstanding, particularly to the rear of the site, fails to overcome those concerns.

In an attempt to justify the development in this location the applicant has submitted plans drawing comparisons between this scheme and others approved in this borough. The first example relates to a development at 103, 105 and 107 Ducks Hill Road in Northwood (now known as Woodlands, 103 Ducks Hill Road). Outline planning permission (ref: 64345/APP/2011/1945) was granted on 11/01/12 for the redevelopment of that site to provide a pair of linked part 2, part 3 storey blocks with accommodation in the roof space, to provide, 12 two-bedroom and 1 three-bedroom apartments, involving demolition of the

existing properties.

The second example provided relates to the redevelopment of the Abrook Arms PH, which is located just under 200m away to the south west of the application site on the same side of Harefield Road. Planning permission (ref: 18505/APP/2016/3534) is sought for the demolition of the existing public house and erection of a new building comprising 18 residential units and a basement car park. The Council's Majors Planning Committee determined at its meeting of 15th November 2017 to approve planning permission for that scheme subject to completion of the S106 agreement. That agreement is in the process of being completed prior to the issuing of the decision.

These examples are acknowledged. However, they do not provide justification and nor do they set precedent for the development the subject of this current application. Indeed there are also numerous examples of where such developments have been refused, including along Harefield Road (for example a scheme for the demolition of no.188 Harefield Road and the redevelopment of that site to provide a two storey building with rooms in the roof to provide four x 1 bedroom flats and three x 2 bedrooms flats was dismissed at appeal earlier this year (ref: APP/R5510/W/17/3172991). The Inspector notably raised concerns over the failure of that development to retain a visual gap between properties, determining that the loss of such a gap would be out of character with the area).

Every application must be assessed on its own merits, taking into account the characteristics and constraints unique to each individual site. Indeed, the character of Ducks Hill Road surrounding no.103, which is characterised by large mansion blocks and flatted developments in spacious plots, is quite different to that of Harefield Road. Furthermore, the site of the Abrook Arms and the character of Harefield Road in the immediate vicinity of that site is quite different to that of the application site. Therefore, officers disagree with the applicant's assertion that those scheme in any way set a precedent to allow the development proposed.

The proposed development, including the large area of hardstanding to the rear, by reason of its layout, scale, bulk, mass, height and design would be totally out of keeping with the character and appearance of the surrounding area, detrimental to the visual amenities of this part of Harefield Road and contrary to the aims of policies BE13 and BE19 of the Local Plan: Part Two.

7.08 Impact on neighbours

Policies BE19, BE20, BE21, BE23, BE24 and OE1 of the Hillingdon Local Plan: Part Two - Saved UDP Policies (November 2012) seek to safeguard the residential amenity of future and neighbouring occupants. The Council's Supplementary Planning Document (SPD) on Residential Layouts sets out more detailed guidance aimed at avoiding developments which are overdominant or which cause unacceptable levels of overlooking or overshadowing.

The SPD states that in order to protect the daylight and sunlight available to adjoining properties, and to protect against potential over domination, a minimum distance of 15m should be maintained between adjoining two or more storey buildings. Furthermore, a distance of 21m should be retained in order to ensure there is no unacceptable overlooking. The guidance confirms that a 45 degree angle principle will be applied, taken from windows about ground floor level, when determining overlooking distances and when considering daylight and sunlight issues.

The proposed development would not extend closer to the northern or southern boundaries

than the existing houses. However, it would project significantly further back into the site than the existing. In considering a recent application (ref: 4268/APP/2017/1480) for the installation of basement level, two storey rear extension and alterations to the roof of no.207 the case officer's report states:

"Due to the staggered siting of the application property with a adjacent property at Number 209, the proposed extension would result in a significant increase in rearwards bulk when viewed from the the rear facing windows and gardens at 209 Harefield Road. The proposed extension would result in an unacceptably dominant form of development which would lead to a loss of outlook to the occupants of 209 Harefield Road. The applicant has submitted a daylighting and sunlighting report to confirm that the proposal would not result in an unacceptable loss of light to this property. However concerns remain in terms of the loss of outlook that would occur. Concerns are also raised with regard to the movement of traffic towards the rear garden to enable parking of cars in the basement level. Traffic would access the rear garden of the application property to gain access to the garaging, introducing a feature which is unfamiliar in this quiet and verdant garden and would result in an unacceptable level of noise and disturbance to the occupants of Number 209. The proposed development, by reason of the close proximity of the proposed driveway to the rear parking and turning area would be detrimental to the residential amenity of the occupants of 209 Harefield Road by reason of the noise and disturbance resulting from the use of this driveway. As such the proposal would fail to comply with Policies, BE19, BE21 and OE1 of the Hillingdon Unitary Development Plan Saved Policies (September 2007) and the adopted Supplementary Planning Document HDAS: Residential Extensions."

The current proposal fails to address the above mentioned concerns. Furthermore, it exacerbates them by extending even more deeply into the plot and increasing the quantity of car parking and hard standing to the rear.

The plans now submitted also indicate that the development would encroach on the 45 degree line taken from first floor habitable room windows in the adjoining property at no.209. Despite this, windows proposed in the side elevation of the proposed development would be secondary windows serving living areas and so would be obscure glazed, avoiding any unacceptable loss of privacy. Furthermore, a Daylight & Sunlight Report has been provided which confirms that the development would not result in an unacceptable loss of light to neighbouring dwellings. This is likely to be largely due to the staggered orientation of the properties.

Planning permission (ref: 12886/APP/2017/1478) has also recently been refused for the erection of two-storey side and rear extensions to no.205. In considering that application the case officer's report noted:

"Concerns have been raised by the occupants of adjacent property at 203a Harefield Road that the proposed extensions would result in a loss of privacy to their kitchen and patio area due to the orientation of the application property and its elevated position. Number 203a Harefield Road is set back from the application property enjoying a staggered relationship. There are no clear glazed windows at first floor in the side elevation of Number 203. The proposed extension to the rear of the property would not project beyond the rear elevation of Number 203a and are not considered to result in an unacceptable loss of light, outlook or privacy to the occupants of this property."

The proposed development would project significantly further back than the extension proposed under the previous scheme. Nevertheless, it still would not project beyond the

rear elevation of no.203a and so the previous comments still apply.

In conclusion, whilst it is not considered that the development would result in such an unacceptable degree of overlooking or overshadowing that refusal could be justified on these grounds, it would result in an unacceptably dominant form of development which would lead to a loss of outlook to the occupants of neighbouring properties. Furthermore, the creation of the car park to the rear of the site and provision of an access road adjacent to the boundary with no.209 would result in an increased in noise and disturbance which would be detrimental to residential amenity. Accordingly, the proposal is not considered to comply with the objectives of Local Plan: Part Two policies BE19, BE21 and OE1.

7.09 Living conditions for future occupiers

Policies BE20, BE21, BE23 and BE24 of the Hillingdon Local Plan: Part Two - Saved UDP Policies (November 2012) seek to safeguard the residential amenity of future and neighbouring occupants. The Council's Supplementary Planning Document (SPD) on Residential Layouts sets out more detailed guidance aimed at avoiding developments which would be detrimental to residential amenity.

Matters relating to the relationship between the proposed development and existing properties, in terms of outlook, daylight and privacy, have been addressed in part 7.08 of this report.

In terms of the internal floorspace, the DCLG Technical Housing Standards - Nationally Described Space Standard (March 2015) sets out minimum internal space standards which must be achieved, relating to room sizes, ceiling height and internal floor space requirements. These requirements are reiterated in London Plan 2016 policy 3.5.

In total, the development proposes 5 x 2 person studio flats, 9 x 2 person 1 bed flats and 6 x 3 person 2 bed flats.

The above mentioned standards confirm that a minimum of 50m² internal floorspace must be provided for one-bedroom, two-person flats (notably the standards do not differentiate between studio flats and one-bedroom flats and so the same criteria would apply to both) and 61m² for two-bedroom, three person flats. The standards also set out minimum acceptable room sizes for single and double or twin bedrooms, confirming that at least 7.5m² should be provided for the former and 11.5m² should be provided for the latter.

The applicant has not provided a schedule of accommodation. However unit sizes are clearly shown on the plans in addition to individual room sizes and bedrooms are illustrated to show either a single or double bed providing a clear indication of how many persons the each unit would be designed to cater for.

Based on the drawings provided, several of the units fail to comply with the minimum standards as set out in the DCLG Technical Housing Standards and the London Plan, either due to insufficient room size for the number of occupants shown, or due to insufficient overall unit size. For example, all studio flats are shown to serve two occupants, but the smallest of these is only 38m², falling significantly short of the 50m² required (and also short of the 39m² required for a one person unit). There are also several examples of undersized bedrooms within the 1 and 2 bedroom units.

The proposal therefore fails to comply with minimum standards and would provide unsatisfactory living accommodation for future occupants contrary to London Plan policy.

With regard to amenity space the Council's SPD on Residential Layouts confirms that "developments should incorporate usable, attractively laid out and conveniently located garden space in relation to the flats they serve. It should be of an appropriate size, having regard to the size of the flats and the character of the area." It states that a minimum of 20m² usable external amenity space should be provided for studio and one-bedroom flats and that 25m² should be provided for two-bedroom flats. Accordingly, in total a minimum of 430m² of usable amenity space should be provided.

Over 1,200m² of communal amenity space would be provided by way of a rear garden area in excess of minimum guidelines. Whilst defensible space is shown to some but not all ground floor/basement units facing communal areas it is considered that this could easily be provided through minor alterations to the layout and accordingly, refusal could not be justified on these grounds.

Whilst the scheme meets Council guidelines relating to external amenity space it fails to meet current standards relating to internal floor space. Accordingly, it is not considered that the proposal would adequately serve the needs of future occupiers, contrary to the above mentioned policies and guidance relating to residential amenity.

7.10 Traffic impact, Car/cycle parking, pedestrian safety

Local Plan: Part 2 policies AM2 and AM7 seek to safeguard highway and pedestrian safety and ensure that developments do not have an adverse impact on the surrounding highway network. Policies AM14 and AM15 seek to ensure appropriate levels of car parking are provided.

The applicant has submitted a Transport Assessment in support of the planning application.

In terms of traffic generation, whilst given the increase in the number of units proposed this would increase, it must be acknowledged that given the proposed residential use of the site that trips would be spread across the whole day. Notwithstanding the concerns raised by neighbours about additional traffic exacerbating existing queues along Harefield Road, it is not considered that the development would lead to such a significant increase at any one time that refusal could be justified and, notably, the Council's Highway Engineer has raised no objections on these grounds.

Residents have also raised concerns about highway and pedestrian safety due to the location of the application site on a bend in the road. Given the presence of existing established access points from here, and the ability to secure improved visibility splays through careful management of the frontage boundaries, which could be secured by way of condition, it is not considered refusal could be justified on these grounds in this instance.

In terms of car parking, 22 spaces were originally proposed. The Council's Highway Engineer advised that, given the site's very low PTAL rating, increased provision should be provided to allow for a minimum of 1 car parking space per studio and 1-bed flat and 2 car parking spaces for each 2-bed unit (total 26 spaces). Amended plans were provided which showed one additional space. Subsequent to this further amended plans and a revised Transport Assessment were provided which made additional alterations to the proposed car parking provision to provide only 21 spaces. The Transport Assessment argues that overspill parking could not occur due to the existence of controlled parking schemes and that this complies with London Plan and Local Plan standards. The Local Plan requires a maximum parking provision of 1.5 spaces per unit (ie, 30 spaces). Given the small unit sizes proposed the Council's Highway Engineer has agreed to a slightly lower provision

than this. However, despite this the amended plans fail to address the original concerns raised and the Highway Engineer has, accordingly, maintained an objection based on insufficient parking.

In terms of cycle parking the Transport Assessment confirms that 20 secure cycle parking spaces would be provided. These are not indicated on plan. However, there is sufficient space to provide them on site and, accordingly, they could be secured by way of condition. Similarly, despite appearing on earlier iterations, the latest set of plans fail to show refuse provision (this was previously shown at the front of the site within the car park). The plans indicate that sufficient space remains however such that it would remain possible to provide refuse provision in a suitable location. Accordingly, this could also be secured by condition and refusal could not be justified on these grounds.

Whilst no objections are raised on trip generation grounds and other issues relating to visibility splays, cycle parking and refuse storage could satisfactorily be addressed by way of condition, the scheme nevertheless provides insufficient parking contrary to policy AM14 of the Local Plan: Part 2 and a reason for refusal is recommended on this basis.

7.11 Urban design, access and security

Policy BE1 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. Policies BE13 and BE19 of the Hillingdon Local Plan: Part Two - Saved UDP Policies (November 2012) seek to ensure that the layout and appearance of new buildings harmonises with the existing street scene and the character and appearance of the surrounding area. In order to safeguard visual and residential amenity, Local Plan: Part 2 policy BE22 confirms that buildings of two-or more storeys in height should be set back from the side boundary of the property for the full height of the building.

Matters relating to urban design have been addressed in part 7.07 of this report. The proposed building, by reason of its layout, size, scale, bulk and mass, would be totally out of keeping with the character and appearance of the surrounding area and detrimental to the visual amenities of the locality. The Council's Conservation and Urban Design Officer has raised strong objections on these grounds and a reason for refusal is recommended on this basis.

With regard to security, no details are provided and no mention is made of this in the submitted Design and Access Statement. Nevertheless, details could be secured by way of condition and if approval was recommended a condition requiring the applicant to achieve secure by design accreditation would be attached.

7.12 Disabled access

The applicant's Design and Access Statement confirms that level access would be provided through provision of ramps and the plans show that a lift would be provided within the building. The Council's Access Officer has advised that despite the limited information provided relating to accessibility that because the application is effectively for the extension (rather than the demolition and rebuild) of two existing houses, that the information provided is sufficient and no objections are raised from an accessibility perspective.

7.13 Provision of affordable & special needs housing

The London Plan sets the policy framework for affordable housing delivery in London. Policies 3.10 -3.13 require that Boroughs should seek the maximum reasonable amount of affordable housing when negotiating on individual private residential schemes, having regard to their affordable housing targets. Policy H2 of the Local Plan: Part 1 proposes that schemes will aim to include 35% of on-site affordable housing on developments of 10 or

more units. The scheme exceeds the threshold of 10 units and above, therefore, affordable housing provision by way of a S106 Legal Agreement would be required.

In this instance no affordable housing is proposed. A financial viability appraisal has been provided to justify this. This has been referred to the Council's specialist Consultant for comment. The Consultant has concluded that the scheme should either make an in lieu financial contribution of £525,809 or provide five affordable housing units (3 x affordable rent & 2 x shared ownership) on site. As the applicant has not confirmed agreement to the above requirements and because no legal agreement has been signed, a further reason for refusal is required.

The applicant is currently considering these options and an update will be provided to Committee. Should the applicant fail to reach agreement with the Council on the affordable housing provision required, an additional reason for refusal would be added on these grounds.

7.14 Trees, landscaping and Ecology

the NPPF states that development proposals should seek to respect and retain, where possible, existing landforms and natural features of development sites, including trees of amenity value, hedges and other landscape features. It states that development should make suitable provision for high quality hard and soft landscape treatments around buildings. Landscape proposals will need to ensure that new development is integrated and positively contributes to or enhances the streetscene. In addition, proposals should seek to create, conserve or enhance biodiversity and improve access to nature by sustaining and, where possible, improving the quality and extent of natural habitat enhancing biodiversity in green spaces and among developments. Local Plan: Part 2 policy BE38 seeks the retention and utilisation of topographical and landscape features of merit and the provision of new planting and landscaping wherever it is appropriate.

The site is characterised by its green frontages and extensive tree and shrub planting to its front and rear. Although not falling within a Conservation Area or protected by way of Tree Preservation Order, the existing trees are of high amenity value and make a significant and positive contribution to the Harefield Road street scene, the Green Belt to the rear of the site and the surrounding area is general.

The merging of the two properties would close important visual gaps currently available between the properties, result in a significant increase in hardstanding to the front and rear of the site, result in tree loss and have an overall urbanising impact on the site and its surrounds.

Although, following objections from both the Council's Trees/Landscaping and Conservation/Urban Design Officers amended plans have been submitted which show greater retention of trees and vegetation concerns nevertheless remain over the feasibility of the tree retention shown and also over the tree loss still proposed. Furthermore, despite the now proposed retention of trees and a boundary hedge to the frontage, it will nevertheless still be necessary to clear a significant amount of vegetation to meet the increased parking requirements to both the front and rear of the building.

At least seven trees would be lost from the rear of the property to allow for the proposed development. These include three grade B trees and four grade C trees. These are all well established trees which collectively have a very high amenity value, adding to the verdant nature of the surrounding area, visible beyond the existing dwellings from Harefield Road and clearly visible to neighbouring properties. Their loss, to accommodate a large area of

hardstanding to the rear of the site would be totally out of keeping with the character and appearance of the surrounding area and could not be supported in this location.

It should be noted that the plans indicate that two trees would be relocated. One of these is a large and mature B Grade weeping willow. Given the size of the tree the feasibility of this and likelihood of successfully re-establishing the tree is strongly called into question. The second tree is a C Grade Cherry Tree. The submitted Arboricultural Report suggests this tree has a limited life expectancy and is suffering from bark damage and decay and so this also seems a questionable decision by the applicant.

The Council's Trees/Landscaping Officer has objected to the urbanising impact of the development and to the loss of trees which, collectively, are considered to be of high amenity value. The scheme is considered to fail to comply with the objections of Local Plan: Part 2 policy BE38 and a reason for refusal is recommended on these grounds.

7.15 Sustainable waste management

London Plan Policy 5.17 requires adequate provision to be made for refuse and recycling facilities for new development.

As mentioned above, no details of refuse storage are provided on the most up to date set of plans provided by the applicant. Nevertheless, although careful consideration would need to be given to the location of proposed new tree planting, it is considered that there is space available to provide them to the front of the site. Full details of refuse provision could be secured by way of condition and, accordingly, refusal cannot be justified, despite the lack of detail provided on this matter at this stage.

7.16 Renewable energy / Sustainability

Policy 5.2 of the London Plan (2016) requires development proposals to make the fullest contribution possible to reducing carbon emissions. Major development schemes must be accompanied by an energy assessment to demonstrate how a 35% target reduction in carbon dioxide emissions (from 2013 Building Regulations) will be achieved, where feasible.

Following initial objections raised by the Council's Environmental Officer an amended Energy Statement was provided. This demonstrates that In addition to energy efficient building measures relating to the building fabric, lighting, ventilation, etc, photovoltaic (PV) panels will be incorporated into the scheme. These measures would achieve a reduction in carbon dioxide emissions in compliance with London Plan requirements.

The Council's Environmental Officer has confirmed that the revised Energy Statement is acceptable but that objections are still raised due to insufficient detail shown on plan to demonstrate that delivery of the scheme is feasible. The applicant has advised that amended plans will be provided to show details of the PVs. However, at the time of writing these are still yet to be received. Nevertheless, full details could be required by way of condition and, accordingly, in light of the amended energy strategy, it is not considered that refusal could be justified on these grounds.

7.17 Flooding or Drainage Issues

The site does not fall within a flood zone and no issues relating to flooding have been identified. Nevertheless,

London Plan policy 5.13 states that development proposals should use sustainable urban drainage systems (SUDS) unless there are good reasons for not doing so. London Plan policy 5.15 requires that new development minimises the use of mains water by incorporating water saving measures.

No drainage strategy has been submitted in support of the application and no details of measures to reduce potable water demand have been provided. The Council's Flood and Water Management Officer has objected to the application due to the applicant's failure to demonstrate that the proposal will not lead to an increased risk of flooding, contrary to the above mentioned policies.

7.18 Noise or Air Quality Issues

Policies 7.14 and 7.15 of the London Plan (March 2016) require development proposals amongst other criteria, to be at least 'air quality neutral' and to manage noise respectively and Policies OE1 and OE3 of the Hillingdon local Plan: Part Two - Saved UDP Policies (November 2012) advise that planning permission will not normally be granted for uses and structures that are likely to be detrimental to the area or amenities of surrounding properties due to various impacts, including noise and vibration or the emission of dust, smell or other pollutants unless sufficient mitigation measures are utilised.

Noise

No Noise Report has been submitted in support of the application. Concern is raised over the increased noise and disturbance which could be caused to neighbouring properties, particularly no. 209 Harefield Road, and future occupants due to the presence of a new vehicular accessway adjacent to the boundary and proposed parking provision to the rear. Officers in the Council's Environmental Protection Unit have advised that in the absence of evidence to demonstrate that suitable mitigation can be provided the scheme cannot be supported.

Air quality

It is not considered that the development would give rise to such an increase in traffic to/from the site that it would have any significant adverse impacts on local air quality. Notably, officers in the Council's Environmental Protection Unit have raised no objections in this regard.

7.19 Comments on Public Consultations

Concerns regarding principle of development, design matters, visual impact, residential amenity, loss of trees, highway impacts and parking have been addressed in the body of the report.

Point (iii) suggests that some of the supporting documents are factually incorrect, particularly in describing the site and locality. Officers have visited the site and are familiar with the area. The errors are noted. However, refusal cannot be justified on these grounds.

Point (vi) raises concerns over impact on the sewer and water system. Should approval be granted Building Regulations and Thames Water requirements would need to be met in this regard.

Point (vii) raises questions over why other application have been submitted for the site in parallel and whether the reports are consistent across the different schemes. The planning history has been discussed in part 3.3 of the report. The applicant is within their rights to submit multiple applications for the same site. The current application must be assessed on its merits against the supporting information provided at the time.

Point (x) raises concerns over increased pressure on local amenities, including schools and health centres. The scheme would be liable to make payments towards the Mayoral

and Hillingdon Community Infrastructure Levies should approval be granted.

Point (xiv) raises concerns over the increased environmental impact of additional cars, boilers, drainage pipes, waste, surface water, etc, particularly with regard to pollution levels. Energy efficiency, drainage and highway impacts are discussed in the report. Environmental Protection Officers have raised no objections on air quality grounds.

Point (xvi) suggests the applicant's description of the development only refers to balconies to the rear but not to the front. This is noted. However, the Council has used an amended and more succinct description of development, which does not given specific mention to positioning of balconies and which was agreed with the applicant at validation stage. Refusal cannot be justified on these grounds.

Point (xix) raises concerns over inadequate access for emergency vehicles. Emergency vehicles could access the site via Harefield Road and the proposed driveways as with all other properties in Harefield Road. The Council's Highway Engineer has notably raised no objections in this regard.

Point (xxi) raises concerns over construction impacts. Construction works are temporary and nuisance can be limited by Environmental Health legislation. Refusal cannot be justified on these grounds.

Point (xxvii) raises concerns over potential structural impacts to neighbouring properties. The applicant would be required to comply with Building Regulations in this regard should approval be granted.

7.20 Planning obligations

Policy R17 of the Hillingdon Local Plan: Part Two - Saved UDP Policies (November 2012) states that the Local Planning Authority will, where appropriate, seek to supplement the provision of recreational open space, facilities to support arts, cultural and entertainment activities, and other community, social and educational facilities through planning obligations in conjunction with other development proposals.

The Community Infrastructure Levy Regulation 2010 (Regulations issued Pursuant to the 2008 Act) and the NPPF have put three tests on the use of planning obligations into law. It is unlawful (since 6th April 2010) to request planning obligations that do not meet the following tests:

- i. necessary to make the development acceptable in planning terms
- ii. directly related to the development, and
- iii. fairly and reasonable related in scale and kind to the development

The effect of the Regulations is that the Council must apply the tests much more strictly and is only to ask for planning obligations that are genuinely necessary and directly related to a development. Should planning obligations be requested that do not meet the policy tests the Council would have acted unlawfully and could be subject to a High Court challenge.

On the basis of the NPPF and the Community Infrastructure Levy Regulation 2010, it is only considered reasonable to request contributions towards the following:

1. Affordable Housing comprising 1 x three bedroom and 1 x one bedroom unit
3. Affordable Housing Review Mechanism
4. Construction Training: £2500 for every £1m build cost + Coordinator costs or an in kind scheme to be provided.
5. Project Management & Monitoring Fee: A financial contribution equal to 5% of the total cash contributions.

The submitted Economic Viability Appraisal Report confirms that the scheme cannot support a contribution towards affordable housing and other obligations or planning costs and therefore, at this stage, it has not been possible to secure the above.

The proposal would also be liable for the Mayor of London and Hillingdon CILs, which would be collected by the Council after implementation (if permission were to be granted).

7.21 Expediency of enforcement action

Not applicable.

7.22 Other Issues

Contamination

In the absence Officers in the Council's Environmental Protection Unit have objected to the proposals advised that a land contamination report should be provided to demonstrate that there are no contamination risks to future occupants. Such a report has not be

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

Significant concern is raised over the appropriateness of the development in this location. It is considered that it would have an unsatisfactory visual impact on the character and appearance of the surrounding area result in an unacceptable loss of visual amenity. Furthermore, it fails to provide sufficient parking, result in the unacceptable loss of valuable trees and vegetation and fails to demonstrate that there would be no increased flood risk as a result of the development.

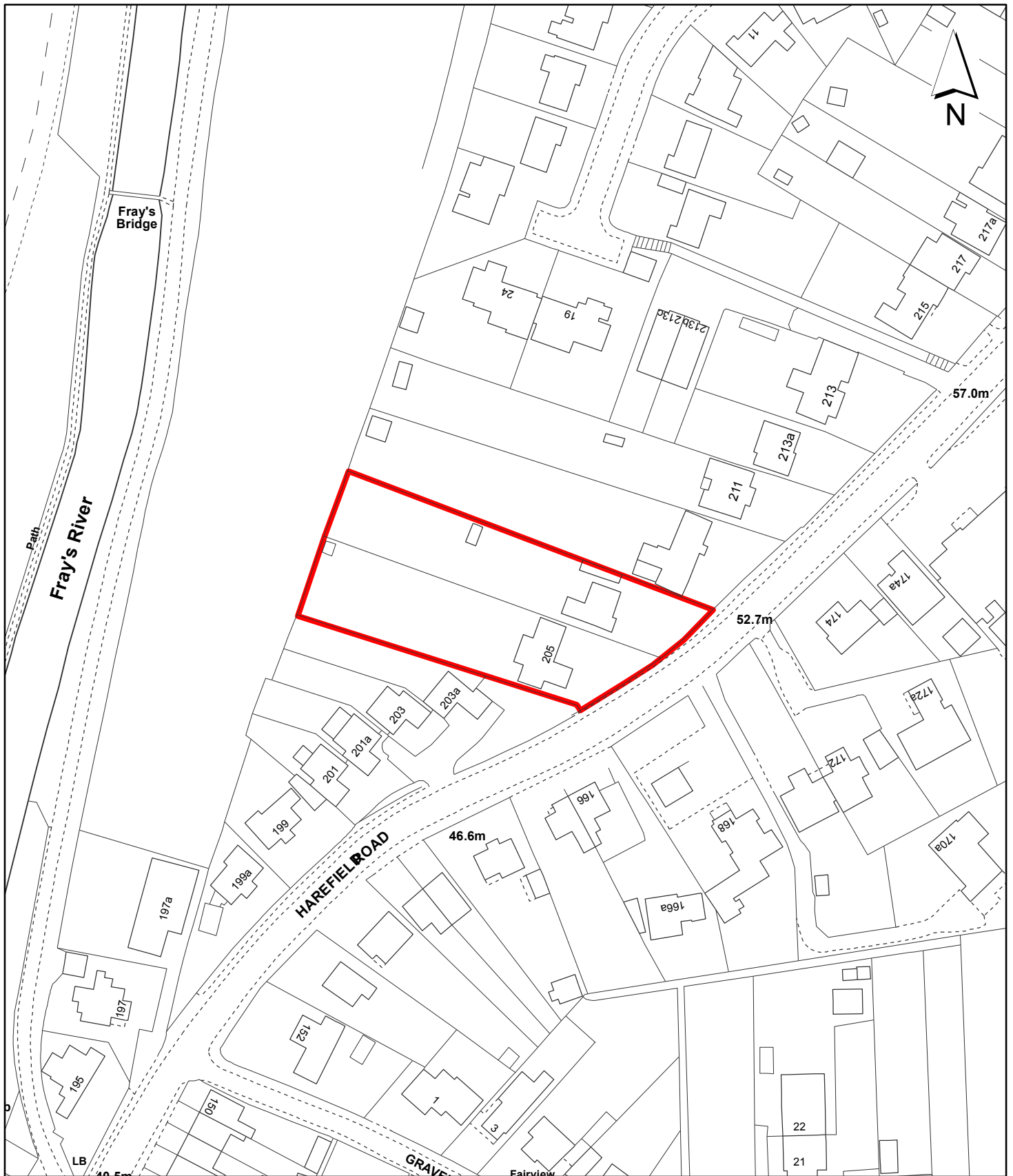
The scheme fails to comply with current Local Plan, London Plan and NPPF planning policies and, accordingly, refusal is recommended.

11. Reference Documents

National Planning Policy Framework
London Plan (2015)
Hillingdon Local plan: Part 1 - Strategic Policies (November 2012)
Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012)
Hillingdon Supplementary Planning Document: Accessible Hillingdon
Hillingdon Supplementary Planning Document: Residential Layouts
Hillingdon Supplementary Planning Guidance - Community Safety by Design
Hillingdon Supplementary Planning Guidance - Noise
Hillingdon Supplementary Planning Guidance - Contamination
Hillingdon Supplementary Planning Document - Air Quality
Hillingdon Supplementary Planning Document - Planning Obligations

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<p>Notes</p> <p> Site boundary</p> <p>For identification purposes only.</p> <p>This copy has been made by or with the authority of the Head of Committee Services pursuant to section 47 of the Copyright, Designs and Patents Act 1988 (the Act).</p> <p>Unless the Act provides a relevant exception to copyright.</p> <p>© Crown copyright and database rights 2013 Ordnance Survey 100019283</p>	<p>Site Address</p> <p>205 & 207 Harefield Road</p>		<p>LONDON BOROUGH OF HILLINGDON</p> <p>Residents Services</p> <p>Civic Centre, Uxbridge, Middx. UB8 1UW Telephone No.: Uxbridge 250111</p>
	<p>Planning Application Ref:</p> <p>73106/APP/2017/2980</p>	<p>Scale</p> <p>1:1,250</p>	
	<p>Planning Committee</p> <p>Major Application</p>	<p>Date</p> <p>January 2017</p>	