

Report of the Head of Planning & Enforcement

Address HAREFIELD PLACE THE DRIVE ICKENHAM

Development: Erection of a new building for use as a care home (Use Class C2), the refurbishment , alteration and change of use of Harefield Place to a care home (Use Class C2), provision of ancillary amenity space and car parking (involving the demolition of existing office extensions) .

LBH Ref Nos: 12571/APP/2010/319

Drawing Nos:

- 12774/1
- 12774/4
- 12774/3
- 12774/6
- 12774/7
- 12774/8
- 12774/9
- 12774/10
- 12774/11
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- 5763/PL/002/F
- 5763/PL/003/C
- 5763/PL/004/D
- 5763/PL/005/C
- 5763/PL/008/D
- 5763/PL/009/D
- 290702-P-01 (Tree Survey)
- 290702-P-02 (Tree Removal)
- 290702-P-03 (Tree Protection)
- 5763/PL/001
- Design and Access Statement
- Planning Statement
- Historic Buildings Report
- Affordable Housing Statement
- Transport Statement
- Interim Travel Plan
- Arboricultural Impact Assessment & Tree Survey including Plan 256/01-01/B (Landscape Masterplan)
- Flood Risk Assessment
- Energy Assessment
- Ecological Baseline Assessment

5763 (Illustrative Drawings brochure)
12774/5

Date Plans Received: 16/02/2010

Date(s) of Amendment(s):

Date Application Valid: 16/02/2010

1. SUMMARY

Planning permission is sought for the change of use of a grade II listed building and the replacement of the existing annexe with a new extension to provide for a residential care home for the elderly. The original house and 1980's annex was last used as a company head quarters. The application has been advertised as a departure from the development plan as the proposal constitutes inappropriate development in the Green Belt.

151 surrounding residents have been consulted. One letter of objection and representations from The Drive Residents' Association (Noergh) and the Ickenham residents Association have been received. The main concern surrounds the damage to private roads leading to the site resulting from construction and operational traffic.

No objections are raised to the principle of a change of use of the main house from offices to a residential care home. However, it is considered that the proposed replacement extension, which would be considerably larger than the existing annex, constitutes inappropriate development in the Green Belt and the applicant has failed to demonstrate very special circumstances to justify why permission should be granted. Furthermore, this substantial increase in floor space on the site would increase the amount of built development and would therefore result in harm to the openness of the Green Belt.

It is also considered that the proposed new 3 storey annex building, by virtue of its siting, scale, bulk and massing and its linkage with the main house, would have a detrimental effect upon the setting of the listed building. In addition, the application has failed to demonstrate that the proposed development could be completed without detriment to the recognised ecological value of this area, or that the development would not increase the risk of flooding. Finally the proposal would fail to meet the requirements set out in the London Plan for on-site energy generation and sustainability. The application is therefore recommended for refusal.

2. RECOMMENDATION

1 NON2 Non Standard reason for refusal

The proposed residential care home constitutes inappropriate development in the Green Belt and the applicants have failed to demonstrate that there are very special circumstances or material considerations that would override the provisions of the

development plan or Government policy, or mitigate against the impact on the Green Belt site. The proposed annex, by reason of its siting, height and bulk, and associated infrastructure works, would result in an urbanising effect and have a detrimental impact on the open character, amenity and function of the Green Belt and on the character of the area generally, contrary to Policies OL1, BE38 and BE13 of the Unitary Development Plan Saved Policies (September 2007), London Plan Policy 3D.7 and Planning Policy Guidance Note 2 Green Belts.

2 NON2 Non Standard reason for refusal

The proposed replacement annexe building, by virtue of its size, siting, bulk and design is considered out of character and detrimental to the setting of the listed building, contrary to Policies BE10 and BE13 of the adopted Hillingdon Unitary Development Plan Saved Policies September 2007.

3 NON2 Non Standard reason for refusal

The application has failed to demonstrate that the proposed development could be completed without detriment to the recognised ecological value of this area. The proposal is therefore contrary to policy EC1 of the Hillingdon Unitary development Plan Saved Policies September 2007 and policy 3D.14 of the London Plan and the provisions of PPS9 (Biodiversity and Geological Conservation).

4 NON2 Non Standard reason for refusal

The application has failed to demonstrate that the development would not increase the risk of flooding, contrary to Policies OE7 and OE8 of the Hillingdon Unitary Development Plan Saved Policies 2007, Policy 4B.6 of The London Plan (February 2008) and Planning Policy Statement 25: Development and Flood Risk.

5 NON2 Non Standard reason for refusal

The application has not demonstrated that satisfactory energy conservation measures have been incorporated into the layout and design, or that the scheme will have satisfactorily addressed the issues relating to the mitigation of and adaptation to climate change and to minimising carbon dioxide emissions. Accordingly, the proposal would fail to meet the requirements set out in the London Plan for on-site energy generation and sustainability and is considered contrary to Policies 4A.4, 4A 6 and 4A.7 of the London Plan (February 2008).

6 NON2 Non Standard reason for refusal

The applicant has failed to provide contributions towards the improvements of services and facilities as a consequence of demands created by the proposed development (in respect of off site highway works, environmental improvements, construction training and health improvements). The scheme therefore conflicts with Policy R17 of the London Borough of Hillingdon Unitary Development Plan Saved Policies September 2007 and the adopted Supplementary Planning Document: Planning Obligations.

INFORMATIVES

1 I52 Compulsory Informative (1)

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

2 I53 Compulsory Informative (2)

The decision to REFUSE planning permission has been taken having regard to the policies and proposals in the Hillingdon Unitary Development Plan Saved Policies (September 2007) set out below, including Supplementary Planning Guidance, and to all relevant material considerations, including the London Plan (February 2008) and national guidance.

AM14	New development and car parking standards.
AM15	Provision of reserved parking spaces for disabled persons
AM2	Development proposals - assessment of traffic generation, impact on congestion and public transport availability and capacity
AM9	Provision of cycle routes, consideration of cyclists' needs in design of highway improvement schemes, provision of cycle parking facilities
BE1	Development within archaeological priority areas
BE10	Proposals detrimental to the setting of a listed building
BE13	New development must harmonise with the existing street scene.
BE18	Design considerations - pedestrian security and safety
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.
BE8	Planning applications for alteration or extension of listed buildings
BE9	Listed building consent applications for alterations or extensions
EC1	Protection of sites of special scientific interest, nature conservation importance and nature reserves
EC3	Potential effects of development on sites of nature conservation importance
H10	Proposals for hostels or other accommodation for people in need of care
H4	Mix of housing units
OE1	Protection of the character and amenities of surrounding properties and the local area
OE5	Siting of noise-sensitive developments
OL1	Green Belt - acceptable open land uses and restrictions on new development
OL2	Green Belt -landscaping improvements
OL4	Green Belt - replacement or extension of buildings
OL5	Development proposals adjacent to the Green Belt
R17	Use of planning obligations to supplement the provision of recreation, leisure and community facilities

3. CONSIDERATIONS

3.1 Site and Locality

The original house is grade II listed and dates from the late 18th century. It comprises a building of 2 storeys, an attic plus basement. The centre block is 8 windows wide, with 3 windows wide projecting end pavilions. It is constructed of stock brick with a stone cornice and stone-coped parapet concealing hipped slate roofs with a modern cupola. There are gauged, near-flat brick arches to the sash windows (all modern) with glazing bars and a central Doric porch. Below this is a two leaf, 6-panel double door with elliptical patterned fanlight over. The garden front has a 7-window centre block with stepped, set-back side wings of 2 and 3 bays and stone pilasters to the corners. There is a segmental one-storey bow to the right of centre and a number of dormers to the roof.

The building is sited within landscaped grounds of approximately 10 acres. This falls dramatically away to the south west (garden front) and rises up to a plateau to the north east, beyond the main front of the building. Some remnants of early landscaping remain, including a large informal pond located to the north east of the house. There are a large number of trees on the site which are protected by Tree Preservation Order No. 236.

The site is located within the Green Belt, the Colne Valley Regional Park and falls within a Nature Conservation Site of Borough or grade II Local Importance.

3.2 Proposed Scheme

Planning permission is sought to develop the site as a residential care home to provide for older people. The development will involve the conversion of the existing historic main building and the replacement of the existing annexe with a new extension, to provide a total of 108 suites.

The proposed new annexe is designed as a three storey quadrangle building, formed around an interior courtyard, located in broadly the same position as the existing extension to the main house.

The accommodation will comprise 63 assisted living units, 30 dementia care units and 15 nursing units. The proposals also include community and communal space in the form of living rooms on most floors, informal seating areas and dining rooms. Support facilities, including laundries, management offices, storage, kitchens and staff accommodation are also provided within the scheme.

The application is supported by a number of reports that assess the impact of the proposal. A summary and some key conclusions from these reports are provided below:

- Planning Statement

The statement describes the development and provides a policy context and planning assessment for the proposal. The statement concludes that the proposal represents an efficient use of this previously developed site, providing much needed specialised housing for the elderly and would be sensitively developed, with minimal alterations to the Grade 2 listed building. The annex would be carefully designed to respect the setting of the listed building and cause no adverse impacts on the Green Belt and ecology of the area.

- Design and Access Statement

This report outlines the context for the development and provides a justification for the design, number of units, layout, scale, landscaping, appearance and access for the proposed development.

- Arboricultural Impacts Assessment and Tree Survey

The Assessment concludes that trees to be removed are of poor quality and their removal

would not represent a loss to public amenity. New tree planting would contribute to the setting of the listed building, while the protection of retained trees during construction can be achieved by following recognised standards and compliance with conditions..

- Energy Assessment

The assessment concludes that the use of biomass boilers will provide the majority of the heating energy for the heating and domestic hot water systems to achieve significant renewable energy targets and reductions in carbon emissions.

- Report on Ground Investigation

The report concludes that the level of contaminants encountered are not considered sufficient to pose any significant threats to end users of the site for residential purposes.

- Transport Statement

The statement concludes that satisfactory access, visibility splays, servicing and car parking can be provided. In addition, the scheme would significantly reduce the existing level of traffic at local peak hour periods.

- Interim Travel Plan

The Travel Plan has been designed to encourage the proposed staff and visitors to use sustainable means of transport and contains a variety of incentives and measures to encourage use of means of travel other than the car.

- Flood Risk Assessment

This assessment seeks to identify and assess the risk of flooding to and from the development and demonstrate how these flood risks will be managed, taking climate change into account. The Assessment concludes that the site is in Flood Zone 1 with a low probability of flooding and the proposal will not create a flood risk.

- Ecological Baseline Report

The Report includes an extended Phase 1 survey. A desk study was also carried out. The report confirms the potential presence of nesting birds, bat roosts, great crested newts and invasive plant species. The report recommends additional great crested newt, bat and schedule 9 plant surveys are carried out.

- Affordable Housing Statement

The statement concludes that a requirement for affordable housing does not apply as the proposal is for a care home (Class C2), which is distinct from sheltered housing or other forms of Class C3 development.

- Historic Building Report

The report provides an historic context for the listed building and ground. It provides an assessment of the internal spaces, the internal fabric and structure, interior decoration and character, exterior structure and fabric and building form and character. The appendix contains key demolition plans.

3.3 Relevant Planning History

12571/H/78/2133 Harefield Place The Drive Ickenham

Listed building consent to develop/alter

Decision: 17-08-1979 Approved

12571/J/78/2132 Harefield Place The Drive Ickenham

Office development - 1,351 sq.m (Full)

Decision: 17-08-1979 Approved

12571/L/79/0509 Harefield Place The Drive Ickenham

Change of use from residential accommodation for staff of former U.C. Hospital to private dwelling

Decision: 25-07-1979 Approved

Comment on Relevant Planning History

Harefield Place was originally built in 1786 as a manor house. By 1813 most of the original structure had been demolished, but the remains became Harefield Place. The building continued in residential use until 1934, when it was converted to a convalescent and maternity home for women. Subsequently it was used as residential accommodation for staff of Harefield Hospital.

In 1979 planning permission was granted for residential conversion of the building. In the same year planning permission and listed building consent was granted for office use with the addition of an annexe. Various minor permissions were subsequently granted, including works required for improved security and increased car parking provision.

4. Planning Policies and Standards

London Plan Consolidation (February 2008): Policies 3D.9 (Green Belt), 3A.3, 4B.1, 4B.2, 7.1 (Urban Design); 4B.5 7.2 (Inclusive design), Chapter 4A, 5.2 (Climate change and mitigation)

The Mayor's Biodiversity Strategy

Planning Policy Statement 1 (Delivering Sustainable Development)

Planning Policy Statement 3 (Housing)

Planning Policy Statement 5 (Heritage)

Planning Policy Statement 9 (Biodiversity and Geological Conservation)

Planning Policy Statement 25 (Development and Flood Risk)

Planning Policy Guidance Note 2 (Green Belts)

Planning Policy Guidance Note 13 (Transport)

Planning Policy Guidance Note 17 (Planning for Open Space, Sport and Recreation)

Planning Policy Guidance Note 24 (Planning and Noise)

Hillingdon Design and Accessibility Statement (HDAS)

Council's Supplementary Planning Guidance Community Safety by Design

Council's Supplementary Planning Document: Planning Obligations Strategy

UDP / LDF Designation and London Plan

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

Part 1 Policies:

PT1.10 To seek to ensure that development does not adversely affect the amenity and the character of the area.

PT1.16 To seek to ensure enough of new residential units are designed to wheelchair and

mobility standards.

- PT1.21 To seek publicly accessible recreational open space in association with proposals for development where appropriate to help reduce deficiencies in recreational open space or to ensure that provision does not fall below accepted standards.
- PT1.30 To promote and improve opportunities for everyone in Hillingdon, including in particular women, elderly people, people with disabilities and ethnic minorities.
- PT1.39 To seek where appropriate planning obligations to achieve benefits to the community related to the scale and type of development proposed.

Part 2 Policies:

- AM14 New development and car parking standards.
- AM15 Provision of reserved parking spaces for disabled persons
- AM2 Development proposals - assessment of traffic generation, impact on congestion and public transport availability and capacity
- AM9 Provision of cycle routes, consideration of cyclists' needs in design of highway improvement schemes, provision of cycle parking facilities
- BE1 Development within archaeological priority areas
- BE10 Proposals detrimental to the setting of a listed building
- BE13 New development must harmonise with the existing street scene.
- BE18 Design considerations - pedestrian security and safety
- 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.
- BE8 Planning applications for alteration or extension of listed buildings
- BE9 Listed building consent applications for alterations or extensions
- EC1 Protection of sites of special scientific interest, nature conservation importance and nature reserves
- EC3 Potential effects of development on sites of nature conservation importance
- H10 Proposals for hostels or other accommodation for people in need of care
- H4 Mix of housing units
- OE1 Protection of the character and amenities of surrounding properties and the local area
- OE5 Siting of noise-sensitive developments
- OL1 Green Belt - acceptable open land uses and restrictions on new development

OL2	Green Belt -landscaping improvements
OL4	Green Belt - replacement or extension of buildings
OL5	Development proposals adjacent to the Green Belt
R17	Use of planning obligations to supplement the provision of recreation, leisure and community facilities

5. Advertisement and Site Notice

5.1 Advertisement Expiry Date:- **18th March 2010**

5.2 Site Notice Expiry Date:- Not applicable

6. Consultations

External Consultees

The application has been advertised as a departure from the Development Plan. A total of 151 surrounding property owners/occupiers have been consulted. 1 letter of objection has been received. The issues raised are summarised below:

1. Concerned about the impact on the three private roads that lead to the site. Although public rights of way, they are all privately maintained and already heavily used by non-residential traffic.
2. The proposed development will require access to the site for heavy plant and machinery with almost certain damage to the roads that are not constructed to withstand such use.
3. It is unreasonable that the residents should bear the costs of repairing damage inflicted for the profit of another party and it should be a condition of any planning approval that all the roads are made good by the developer and restored to good condition.
4. Safety and environmental issues with access to the site from The Drive. Access to the North end of The Drive from Harvil Road is virtually impossible for any sizeable vehicle, so all heavy traffic from Harvil Road would have to pass along Highfield Drive. The gateway to Harefield Place is very narrow and the entrance road angled so that it is almost impossible for large vehicles to enter from the north. If vehicles do manoeuvre to pass through the gate there will be extensive damage to the verges and possible destruction of trees and shrubs.
5. The only sensible route for transporters carrying large plant and machinery is to enter at the south end of The Drive and exit back towards the south end. The Drive has a number of speed bumps which have implications for low loaders and will be damaged by excessively heavy vehicles.
6. The project needs a comprehensive and acceptable traffic management plan before any approval could be considered. This should not include any changes to the entrance that would detract from the nature of The Drive as a very pleasant residential road.
7. No general objection to the development of Harefield Place as a residential care home, but it should be done with due consideration for the effect on the neighbourhood during construction and subsequent operation of the site.

GREATER LONDON AUTHORITY

The Mayor considers that the application does not comply with the London Plan, for the reasons set out in paragraph 80 of the report summarised below, but that the possible remedies set out in paragraph 82 of the report could address these deficiencies.

If your Council subsequently resolves to grant permission on the application, it must consult the Mayor again under Article 5 of the Order and allow him fourteen days to decide whether to allow the draft decision to proceed unchanged, or direct the Council under Article 6 to refuse the application. You should therefore send me a copy of any representations made in respect of the

application and a copy of any officer's report, together with a statement of the decision your authority proposes to make, a statement of any conditions the authority proposes to impose and (if applicable) a draft of any planning obligation it proposes to enter into and details of any proposed planning contribution.

If your Council resolves to refuse permission it need not consult the Mayor again (pursuant to Article 5(2) of the Order) and your Council may therefore proceed to determine the application without further reference to the GLA. However, you should still send a copy of the decision notice to the Mayor, pursuant to Article 5 (3) of the Order.

Summary of GLA Stage 1 Report.

Strategic Issues

The 'very special circumstance' provided do not justify the scale of the inappropriate development in the Green belt. There remain concerns in relation to design, inclusive design, climate change mitigation and adaptation and transport, which should be addressed.

Conclusion

The London Plan Policies in Green Belt, biodiversity, urban design, inclusive design, climate change mitigation and adaptation, transport and parking are relevant to this application. The application complies with some of these policies but not with others for the following reasons:

- Green Belt: The very special circumstances provided do not justify the scale of the inappropriate development on Green Belt. The proposal does not comply with Policy 3D.9 of the London Plan.
- Biodiversity: The proposed mitigation measures are welcomed. However, a very thorough and robust biodiversity management and monitoring plan must be placed and it must be secured through conditions.
- Urban design: Further information required and concerns should be addressed.
- Inclusive design: The internal design access arrangement complies with the London Plan inclusive design Policies, provided externally, the footway to the site incorporates variations in colour brightness and texture, to assist the visually impaired.
- Climate change mitigation and adaptation: Further information is required, including the use of green and brown roof, which should be secured by condition.
- Transport: The access arrangement of the new footway to the site comply with 'Inclusive Mobility guidance of DfT.

Whilst the application is broadly acceptable in strategic planning terms, on balance, the application does not comply with the London Plan. The following changes might however remedy the above mentioned deficiencies and could possibly lead to the application becoming compliant with the London Plan:

- Green Belt: Either reduce the scale of the development or provide further justification.
- Urban design: Provide further information to address outstanding concerns
- Inclusive design: Address concerns in relation to the footway to the site
- Climate Change: provide further information, include the use of green and brown roofs
- Transport/Parking Address the access arrangement of the new footway. Submit a delivery/servicing plan and construction logistic plan.

Transport for London (TfL)

The site is located in Ickenham approximately 2.4km to the north of Uxbridge town centre. The closest road on the Transport for London Road Network (TLRN) is the A40 which meets the B467 Swakeleys Road approximately 700m to the south of the site. There are no roads classified under the TfL Strategic Road Network close to the site.

The site is within 350m of a hail and ride bus stopping facility for the U9 service on Harvil Road and bus stops served by the U1, U9 and U10 are located on Swakeleys Road approximately 630m to the south of the site. There are no London Underground stations or rail stations within walking distance of the site. The Public Transport Accessibility Level (PTAL) is a very poor rating of 1 on a scale of 1 to 6 where 6 represents the highest rating.

The proposed development is a residential care home of 108 rooms with 33 car parking spaces including 3 disabled bays, two motorcycle bays, a service bay and 18 cycle parking spaces. The buildings on the site were previously used as offices. The application is supported by a Transport Statement document and Interim Travel Plan produced by Peter Evans Partnership.

Pedestrian access

It is welcome that a new footway into the site will be provided adjacent to the vehicular access from The Drive to the main building entrance. It is noted that a section of this route would be provided as a shared surface, however, it is important that shared surfaces include colour and tactile delineation to make it clear to visually impaired pedestrians where it is safe for them to walk. TfL request that either a well designated 2.0m width footway be provided with kerbs for the whole route into the building or that the shared surface include a tactile strip to comply with the Inclusive Mobility guidance produced by DfT.

TfL request that a footway be provided to connect the footway along the site access to the footway on Harvil Road to create a continuous walking route to the site for access to buses on Harvil Road. TfL requests that the applicant provide details of the street lighting in the area to demonstrate whether safe pedestrian access is possible after dark. Should deficiencies be identified a contribution should be secured in the S106 towards improving the street lighting.

Trip Generation and impact assessment

The TRICS database was used to assess the development trips, this is considered to be acceptable given the location of the site and its characteristics. TfL accept that the development proposals will not result in a discernible impact on the operation of the local highway network. Given the size and nature of the proposals it is considered that there would not be a noticeable impact on local bus services and hence no contribution towards capacity improvements is required.

Travel Planning

The draft Travel Plan that has been provided is not considered to be acceptable on the basis that there is insufficient information provided on the targets, the action plan and the funding arrangements for the Travel Plan. The Travel Plan should be improved on both of these items to ensure that it attains a pass in the Attribute review system.

Additional documents

A Delivery and Servicing Plan (DSP) and Construction Logistics Plan (CLP) should be secured by planning condition or through the S106 agreement. These documents should be prepared in line with TfL guidance.

Traffic Management Act

Should this application be granted planning permission, the developer and their representatives are reminded that this does not discharge the requirements under the Traffic Management Act 2004. Formal notifications and approval may be needed for both the permanent highway scheme and any temporary highway works required during the construction phase of the development.

ENVIRONMENT AGENCY

Environment Agency position In the absence of an acceptable Flood Risk Assessment (FRA) we OBJECT to the grant of planning permission and recommend refusal on this basis for the following reason:

The FRA submitted with this application does not comply with the requirements set out in Annex E, paragraph E3 of Planning Policy Statement 25 (PPS 25). The submitted FRA does not therefore, provide a suitable basis for assessment to be made of the flood risks arising from the proposed development. In particular, the submitted FRA fails to:

1. Show that it would be feasible to balance surface water runoff to the Greenfield run off rate for all events up to the 1 in 100 year storm (including climate change) and set out how this will be achieved.
2. Show how Sustainable Drainage Systems (SUDS) such as permeable pavements (with sub base storage), filter drains and strips, swales (for conveyance), temporary basins, ponds, wetlands and green/brown roofs will be maximised on this site with any obstacles to their use clearly justified.
3. Show how storage will be provided to attenuate the 1 in 100 year storm event, taking into account the effects of climate change.

It appears that the current crescent shaped extension building is to be demolished and replaced by a new building with a larger footprint. The assessment that the increase in footprint is negligible and therefore there would be no material increase in flood risk is not considered adequate, as it is not supported by sufficient evidence. In line with the London Borough of Hillingdon Strategic Flood Risk Assessment, for all development sites over 1 hectare in size, surface water runoff should be limited to Greenfield rates. In the case of the proposed development, only a small proportion of the site is being developed, so it is considered appropriate to only apply this requirement to the new build. The proposals will be considered acceptable from a flood risk perspective, if information can be submitted to demonstrate that surface water runoff arising from the new build will be restricted to Greenfield rates and that attenuation in the form of SUDS will be implemented in order to attenuate all storm events up to and including the 1 in 100 year event, taking into account the effects of climate change. It is considered positive that rainwater harvesting is to be installed, however, there has been no quantitative assessment to demonstrate that the 1 in 100 year storm event, taking into account the effects of climate change, can be attenuated. Overall, a quantitative assessment must be provided to demonstrate that the risk of flooding to adjacent land will be reduced as far as practicable and will not be increased, as a result of the proposed development.

The hierarchical approach to SUDS selection should be used at the site investigation stage to help select the most sustainable drainage techniques for the site. At this stage land should be set aside specifically for SUDS. Traditional piped or tanked systems are not true SUDS techniques and should only be considered if it can be justified that all sustainable options in the hierarchy are not possible. A drainage scheme should be submitted that provides a sustainable drainage strategy. This should contain evidence that all potential options have been considered and suitable justification where options have been discounted.

ENGLISH HERITAGE

This application for planning permission to replace a modern extension to a Grade II listed building is submitted in conjunction with Listed Building Consent (your ref: 12571/APP/2010/355).

The advice of English Heritage is contained within our response to the Listed Building Consent (our ref: L00084633.)

In summary, it is considered that the proposed replacement extension would have a detrimental effect upon the setting of the listed building, by virtue of its scale, bulk and massing and its junctioning with the main house. It is therefore advised that further negotiation be undertaken to achieve an improved scheme that addresses these issues.

Recommendation

We would urge you to address the above issues, and recommend that the application should be

determined in accordance with national and local policy guidance and on the basis of your specialist conservation advice. It is not necessary for us to be consulted again. However, if you would like further advice, please contact us to explain your request. Please note that this response relates to historic building and historic area matters only.

NATURAL ENGLAND

Effects on SINC

This development is located within the Harefield Hall and Lodge SINC. It is not possible to conclude, from the information available in the Ecological Baseline Report, whether overall the development will result in permanent adverse effects on the SINC. You should be satisfied that the proposed avoidance and mitigation measures will ensure that the SINC will not be adversely affected as a result of the development. You should be aiming for overall enhancement of the SINC.

Protected Species

Bats

The Ecological Baseline Report states that there are trees on site which have medium and high potential to support bats. Paragraph 5.5.1.3 states that no trees identified as suitable for bats should be damaged or destroyed or significantly disturbed during the works. This includes noisy working practices nearby and increased lighting. If this is not possible further surveys are recommended. However, later in the report (Section 6) it says that due to the potential presence of protected species on site the following surveys [including bat surveys] are recommended, unless it can be demonstrated that they are unlikely to be impacted. This information is unclear, and you should request further information from the applicant on whether the development has potential to affect bats. If there is potential for trees with medium or high potential to support bats to be affected by the works, further surveys should be undertaken prior to granting planning permission.

Great Crested Newts

Similarly to above, one section of the report states that the presence of great crested newts in the pond cannot be ruled out. Another section (paragraph 5.5.1.4) states that careful consideration should be given to works around the pond and if this is not possible surveys are needed.

It is not clear from the information whether the works will affect the pond, or if there is potential suitable terrestrial habitat which could be affected. We recommend that you go back to the applicant to confirm whether there are potential impacts. If the pond or terrestrial habitat associated with the pond may be affected, great crested newt surveys should be undertaken prior to granting planning permission.

Reptiles

The Ecological Baseline Report identifies that there are areas suitable for reptiles on site and recommends a precautionary approach to the works. It is not clear from the report whether the areas suitable for reptiles will be affected by the development. Again, you should request further information from the applicant on this matter. If areas identified as being suitable for reptiles will be affected, reptile surveys will need to be undertaken.

Recommendations

Other than in relation to our comments above, we generally concur with the recommendations set out on page 25 of the report. These should be secured through the use of a planning condition.

The final recommendation is the possible enhancement of the site through the production of an EcMP and installation of bird/bat boxes and other features. As this development is located within a SINC, we recommend that you ensure an EcMP is produced as a condition to the development, prior to undertaking any works. It is not clear what is meant by other features. This should be

clarified.

Finally, as recognised in the report, lighting associated with both the construction and operational phases of the development has potential to affect bats. You should ensure that a lighting strategy is produced as a condition of the development, to reduce impacts as far as possible.

THAMES WATER

Waste Comments

Surface Water Drainage - With regard to surface water drainage it is the responsibility of a developer to make proper provision for drainage to ground, water courses or a suitable sewer. In respect of surface water it is recommended that the applicant should ensure that storm flows are attenuated or regulated into the receiving public network through on or off site storage. When it is proposed to connect to a combined public sewer, the site drainage should be separate and combined at the final manhole nearest the boundary. Connections are not permitted for the removal of Ground Water. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required. They can be contacted on 0845 850 2777. Reason - to ensure that the surface water discharge from the site shall not be detrimental to the existing sewerage system.

Thames Water would recommend that petrol/oil interceptors be fitted in all car parking/washing/repair facilities. Failure to enforce the effective use of petrol/oil interceptors could result in oil-polluted discharges entering local watercourses.

Thames Water recommends the installation of a properly maintained fat trap on all catering establishments. We further recommend, in line with best practice for the disposal of Fats, Oils and Grease, the collection of waste oil by a contractor, particularly to recycle for the production of bio diesel. Failure to implement these recommendations may result in this and other properties suffering blocked drains, sewage flooding and pollution to local watercourses. Further information on the above is available in a leaflet, 'Best Management Practices for Catering Establishments' which can be requested by telephoning 020 8507 4321

Water Comments

With regard to water supply, this comes within the area covered by the Veolia Water Company. For your information the address to write to is - Veolia Water Company The Hub, Tamblin Way, Hatfield, Herts, AL10 9EZ - Tel - 0845 782 3333.

ICKENHAM RESIDENTS' ASSOCIATION

As an Association we represent approximately 70% of the households in the Village and have a mandate to review and monitor all planning applications and proposed planning applications, which may affect the character of the Village. We look at each proposed development or application for change of use on its merits and also take into account the views of those residents immediately affected. In this case, we are aware residents in the vicinity of The Drive have some concerns at this application, some of whom, for example The Drive Residents Associations are in direct contact with you.

Having considered the appropriate planning guidance, our preliminary thoughts are set out below:

Background

The applicant, Harefield Care Limited, propose to develop a registered residential care home for older people, utilising the Grade II listed building on the site but replacing the existing annexe with a new extension to provide 108 suites. This includes a category of clients for "Assisted Living" 63 rooms (this category is for the elderly who can cope reasonably well but need some help to varying degrees), "Demented Care" 30 rooms, this includes Alzheimers, and finally "Nursing Care" 15

rooms for the elderly who need general nursing care. The accommodation seems to be rooms for single occupancy, and the various groups will be in designated parts of the proposed building.

The site is currently occupied by Blockbuster Video (Class B1) as their headquarters, although their use of the site has reduced significantly over time and they now occupy approximately 60% of the building. We understand that their lease runs for approximately a further 6 years. The site has had planning permission and listed building consent for offices since 1979 with subsequent alterations also being permitted.

Originally known as Harefield Lodge, the property has been a private house and was bought by the local council in 1934 for use as a convalescent and maternity home for women before passing into private office use.

The site is located within the Green Belt (not Brownfield site as suggested in the report by the Peter Evans Partnership, page 15, paragraph 5.1) and the Colne Valley Regional Park.

General Principle Change of Use to a Care Home

There is an increasing social need for care and nursing homes across England and Wales, as reflected in PPS3 and a number of comprehensive reports already referred to by the applicant. However, there is also an increasing move towards providing care in people's own homes out of preference. The July 2006 Ickenham Ward Profile published by the Hillingdon PCT gave a resident population of about 10,000. From 2001 to 2011 Ickenham had a projected population decrease of 2.1%. However, these statistics were based on 2005 projections, before the development at Ickenham Park (415 dwellings including some assisted living units plus an 80 bed care home at the former RAF West Ruislip off the High Road, Ickenham) was in contemplation. Construction on Ickenham Park has started and the first residents are expected to move in from September 2010. We therefore anticipate an increasing population to 2011 and continuing, contrary to the official statistics.

As at 2006, the average age of the community in Ickenham (41.9 years) was older when compared to that of Hillingdon (36.9 years). The 2001 census suggested that 16.5% of Ickenham's population were in the 60 to 74 age bracket, and 9.4% were in the 75+ bracket. From 1991 to 2001, the largest increase was in the 75-84 age group. As an Association we therefore note that there is an increasing need for care home provision for older people in the immediate area.

We have investigated care home provision for older people in the local area including Hillingdon, Harefield, Hayes, Uxbridge, Ickenham, Ruislip, Northwood. Given the proximity to the county boundary we have also included South Bucks, including Denham, Chalfont St Peter, Gerrards Cross and Iver. There are approximately 30 care homes in total in that area. They all vary in who operates them, from local authorities, private groups for example BUPA, and individual privately run homes. Apart from assisted living or sheltered housing accommodation (for example the extensive Denham Garden Village), the only care home provision in Ickenham itself is at Woodlands Care Home in Long Lane, Ickenham; a privately run care home with 17 residents. In addition, McCarthy & Stone will be constructing an 80 bed assisted living home on Ickenham Park, referred to above. There are also small care homes just across the ward boundary in West Ruislip, including 64 rooms at the Blenheim care home.

Outside of Ickenham, the closest are Clare House, Harefield Road, Uxbridge (BUPA) with 43 residents. In Denham we have Denham Manor with 53 residents, and in Harefield, the Harefield Nursing Centre (BUPA) with 40 residents. The Cedar House Nursing Home in Harefield has 42 residents. The largest in size is in Chalfont St Peter, Chalfont Lodge Care Centre, with 119 residents.

Most care homes are nursing homes and are therefore much smaller than the proposed "Harefield

Place" except for Chalfont Lodge, run by the Barchester Health Care Group. The average size of home is possibly between 30 and 40 people.

Given this background, the Association therefore notes and supports the rationale behind the proposed change of use application but asks LBH and the applicant to ensure that full and proper consideration is given, with Hillingdon PCT, to the likely future need for care home provision for older people, in light of population forecasts for the over 65 age range and in light of the fact that 80 beds plus assisted living units will be coming available on Ickenham Park in the next 2 years. We are concerned to ensure that this proposed development does not result in an overprovision of places.

We also ask LBH to consider the impact of the size of the home on the green belt, staffing and traffic issues (see below) when considering the maximum size.

Green Belt and other Conservation Issues

We note that the site falls within the Green Belt and the Colne Valley Regional Park. PPG2 makes it clear that the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the most important attribute of Green Belts is their openness.

Provided that it does not result in disproportionate additions over and above the size of the original building, the extension or alteration of dwellings is not inappropriate in Green Belts.

The re-use of buildings inside a Green Belt is not inappropriate development providing:

- (a) it does not have a materially greater impact than the present use on the openness of the Green Belt and the purposes of including land in it;
- (b) strict control is exercised over the extension of re-used buildings and over any associated uses of land surrounding the building which might conflict with the openness of the Green Belt and the purposes of including land in it (e.g. because they involve extensive external storage, or extensive hard-standing, car parking, boundary walling or fencing);
- (c) the buildings are of permanent and substantial construction and are capable of conversion without major or complete reconstruction; and
- (d) the form, bulk and general design of the buildings are in keeping with their surroundings. (Conversion proposals may be more acceptable if they respect local building styles and materials, though the use of equivalent natural materials that are not local should not be ruled out). (para 3.8, PPG2)

On this one occasion, provided paragraph 3.8 PPG2 and OL2, OL4 and OL5 (Hillingdon Unitary Development Plan (UDP)) are complied with, and subject to satisfactory evidence of the need for 108 (or such lesser maximum number as LBH and the PCT consider appropriate) further care home beds for older people, this Association does not object to the proposed re-use, notwithstanding the provisions of OL1 UDP which states that the LPA will not grant planning permission for new buildings or for changes of use of existing land and buildings, other than for purposes essential for and associated with agriculture, horticulture, forestry and nature conservation, open air recreational facilities or cemeteries.

However, with regard to the proposed demolition of the modern annexe and replacement with a new extension, we understand that this will result in a 75% increase in the building footprint, which does concern us given the strategic location of the property within the Green Belt. At this stage we are not convinced that the applicant has provided sufficient evidence to justify the size and bulk of this extension, particularly if the further consideration of the need for care home places shows that 108 suites results in significant overprovision of places for the elderly in the area. We therefore reserve our position in this respect, pending further information from LBH and the applicant.

We note the proposals to harmonise the new buildings through sympathetic construction and

landscaping. However, if the Colne Valley Regional Park and the London Wildlife Trust have not been consulted on the application then we urge the applicant and LBH to do so, particularly in light of the ecological impact of the proposed development. Conditions must be included to protect the screening and landscaping of the property in the long term.

Staffing

We have looked at the application form for the number of employees that may be needed, and there was no answer given. However, in the travel plan, information was given to suggest that the day staffing requirement may be in the region of 36 people, although we seek clarification of the point.

There will be 3 staff shifts over the 24 hours, mornings, afternoons and the night shift.

The morning shift starts between 6-8 am (the main shift). The afternoon shift will be from mid-afternoon until the night shift, which will commence between 10.00pm - 11.00pm. The staffing level at night is proposed to be about 5-6 people. From the travel plans we have identified that the applicant probably envisages approximately 36 members of staff during the day.

Obviously staffing numbers will be determined by the number of residents, on which we have already commented.

No mention has been made within the application of likely staffing numbers covering roles such as catering, office management, secretarial, security and gardening. The full staff complement will need to be factored into the consideration of transport and access, as will the expected number of regular visits by hairdressers, those providing activities to residents etc.

Construction

We are surprised at the absence of a construction management plan given that this is a full rather than outline application. No information has been given as to the likely timescale for demolition and construction work. Further information is essential on the safeguards and mitigation measures to limit the disruption to local residents and the sensitive environment during the construction phase, such as daily and time limits on the number of vehicles permitted to access the site; procedures to be put in place to ensure removal of mud/dust from roads and footpaths at the site access point and immediate access roads; consideration of the effect of construction traffic on the integrity and maintenance of the access roads; monitoring of any properties along or nearby any access routes for vibration damage caused by the presence of the lorries; strict time limits on the hours of working with regular breaks to give nearby residents some respite; regular monitoring of noise levels. In the absence of any detail we are unable to comment further at this stage.

Traffic and Access

This is our main area of concern for the reasons set out below. That said, we note that traffic movements for the proposed care home are likely to be less than those applicable to the site when used as an office development, which we understand engaged approximately 140 people when fully operational. However, the nature of the care home means that the site will change to 24 hour access rather than access during standard office hours, with the resultant additional disruption to residents along Highfield Drive and The Drive, particularly at weekends and evenings.

Beyond the construction phase, the main traffic movements will involve staff, visitors and deliveries.

Deliveries will be by necessity by lorries or vans of varying sizes. The waste management plans for the site need to be looked at carefully including the timing and regularity of refuse collection vehicles, on which little information has been given. Further consideration is needed as to whether laundry will be handled in-house or whether deliveries and collections by an outside organisation need to be factored in alongside catering, stationery and medical supply deliveries. Some

consideration is needed to limiting the hours that deliveries can be made so as to limit the disruption to residents, and if possible limiting deliveries to weekdays.

Given its location, we consider it naive to think that staff and visitors will use public transport or even cycle to the site. The nearest bus stop is in Swakeleys Road and whilst there are regular bus services (approximately every 15 minutes) from this stop, anyone using this bus route will need to walk down The Drive to access the site, a 15 minute walk. The Drive is unlit and without pavement access for much of its length. It is unlikely that any staff member will wish to use this route during the early morning, dusk or evening and this will therefore impact on all of the proposed shifts.

The alternative is the hail and ride bus route along Harvil Road, which allows for pedestrian access along Highfield Drive and into The Drive. However, the frequency of bus services along this route is much less (approximately every 30 minutes).

In particular, we consider that the suggestion that staff will cycle to work to be naive. The main access roads of Swakeleys Road and Harvil Road are heavily congested at peak times and known local accident blackspots, updated accident data is available from the local police, with the most recent occurring near the Swakeleys Road/Harvil Road junction at the end of January 2010. Outside of peak times the 30mph speed limit is rarely observed and temporary flashing speed signs and police speed traps are regularly used on these stretches of road. As a side point, this also has a knock on effect to the safety of the junctions between Harvil Road and Highfield Drive/The Drive, particularly for vehicles exiting the side roads or turning right from Harvil Road into the side roads. Cyclists are particularly at risk. Access and lack of lighting along The Drive does not lend itself to cyclists and the road condition of The Drive and parts of Highfield Drive are particularly poor and therefore potentially hazardous to cyclists.

Ickenham Station is approximately 2.7km (1.7 miles) from the site (as opposed to the 1.5km quoted in the application) and is a 30 minute walk downhill; longer when walking uphill from the station to the site. Anyone using the station would probably need to also use the bus to access the site.

The nearest shops in Ickenham are a 2.4km (1.5 miles) walk away and will not be easily accessible to residents or staff, except those with transport. Uxbridge High Street is 2.7km (1.7 miles) away.

We therefore suggest that consideration is given to a staff and residents mini bus that runs to and from strategic points such as Ickenham village centre or the station. Blockbuster provides a mini bus service for staff with pick ups from local stations.

In terms of parking spaces, we consider that 33 spaces in total does not reflect the reality that many staff will drive, or reflect the fact that at shift handover there could be almost double the staff on duty.

Visitors will probably drive out of choice. Whilst 3 disabled parking spaces meet the minimum requirements, we consider that 6 would be more appropriate to reflect the fact that residents may have visitors of equivalent age who may suffer mobility difficulties. Further, relatives and friends may wish to collect residents by car and may need to use the disabled spaces for this purpose.

Over access to the site, we are concerned at the impact of additional 24 hour traffic along Highfield Drive and The Drive. Larger vehicles currently use The Drive out of preference to access the site because of the angle of access into Harefield Place's access road. We note the proposals to widen the main entrance but given the buildings listed status, we are concerned at the impact of this change. Whilst there have been no accidents that we have been aware of in this location, if the entrance is to be widened then we ask that this be done sympathetically so as to ensure that the entrance retains its rural/residential feel. We assume that access to the car park will remain via the North East entrance but this is not clear from the documentation.

Whilst at present the north end of The Drive is unsuitable for regular traffic, subject to consultation with residents in that part of The Drive and The Drive Residents Associations and the neighbouring farmer, one possible solution may be to try and widen the north end of The Drive and improve the junction with Harvil Road, so as to improve access at this point. We must make it clear that we are not proposing a separate new access road from Harvil Road, simply improvement of the existing access road with an appropriate s106 agreement to cover ongoing maintenance of this stretch of The Drive. However, the presence of a tree protected by a TPO and a listed building at the junction may preclude this as an option.

Therefore, if that is not possible and the Highfield Drive access route must remain the preferred route, then we must ask that an appropriate s106 agreement is negotiated so as to require the owner/occupier of Harefield Place to contribute to the upkeep and maintenance of The Drive and Highfield Drive. Some thought should also be given to improvements to the junction of Highfield Drive and Harvil Road, given the concerns raised above in relation to the safety of traffic turning right into or out of Highfield Drive. The exact arrangements should be a matter for discussion between the affected residents/owners of the 2 roads, although we do understand that the ownership of The Drive is somewhat complex and in places uncertain.

Given the deadline for responses and the size of the application, this is by necessity a preliminary overview of our initial thoughts. We will continue to liaise closely with The Drive Residents Associations and may submit further comments in due course.

As this is a major application we understand that it will be considered at the North Planning Committee in due course. We will send a petition in at a later stage to allow us to address the North Planning Committee but in the meantime encourage the applicant to consider the points raised in this letter and to consult further with local residents, ourselves and The Drive Residents Associations.

THE ASSOCIATION OF THE RESIDENTS OF THE DRIVE - No response.

THE DRIVE RESIDENT'S ASSOCIATION - No response.

THE DRIVE (NORTH END) RESIDENT'S ASSOCIATION

We recognise the dilemma for the freeholder, as this site has many constraints as an office resulting in periods of vacancy and we wish to ensure this listed building is preserved for the long term. We also appreciate the growing need for care of the ageing population and while the residents are sympathetic to the increased needs for care home provision, we are concerned about aspects of this application.

This location is somewhat remote, which will limit the ability of active residents to access the community of Ickenham, and we are interested to learn from the strategic plans of Social Services what increases in long term care provision are required in this Borough, and how the Government's goal of increased provision of care in the home might affect this.

If time permits prior to the Planning Committee review, we would be willing to a meeting with the applicant and Planning to discuss resolution or mitigation of some of these issues.

A list of our concerns is outlined below:

- o We have not seen a report from the Conservation Officer, but wish to ensure the Planning Committee considers the impact on the historical context of this building.
- o The proposed alterations to the main entrance in The Drive may not be appropriate for a listed building, and requires consideration in the context of a rural location.

- o Green Belt development - the proposed 156% increase in the area of the modern wing is very substantial and represents a 75% increase in total internal floor space (3,293m² to 5,818m²). The scale of this development in the Green Belt is hard to justify. Conditions relating to the 1978 application restricted aggregate floor space to 30,000ft², and this new proposal represents a material change to the existing development and the Green Belt. We request that the Planning Committee carefully considers the appropriateness of significant additional development in the Green Belt and for this reason alone we must object to this application.
- o In the event of approval, we request a condition to restrict change of use to a care home.
- o The travel plan has admirable goals for staff to cycle or use public transport. Since conversion into offices there has only been an occasional cyclist despite a young and active workforce and the provision of shower facilities. This is probably due to road congestion and overall distances travelled. Further, due to distance from bus stops etc. it has been necessary from commencement of occupation for Blockbuster to provide a minibus to collect staff from local stations. We therefore request a schedule of total employees anticipated at the home (medical, care, catering, cleaning, maintenance, administration, etc.) and car movements assuming they all drive.
- o Our understanding of the Ickenham demographics suggest that the relatively high cost of living may result in staff having to live some distance away, which undermines the public transport initiative. Can the applicant use demographic data to indicate the areas where the pool of staff might be drawn from?
- o Staffing levels - we are not familiar with guidelines the Care Commission or Regulation and Quality Improvement Authority provide for day and night ratios of care staff to residents (high, medium or low dependency, etc.), and would be grateful if this can be provided so we are clear about staff requirements.
- o The car parking provision seems optimistic in view of the expected daytime care staff, medical visitors, cleaning staff, catering staff, administration staff, hairdressing, entertainment etc., as well as traffic relating to visitors, respite provision, and external equipment maintenance. This needs further review.
- o Deliveries - the application indicates an increase in HGV and commercial vehicle deliveries compared to the existing commercial office. Current deliveries are limited to occasional waste paper and rubbish collection, delivery of calor gas, occasional stationery and canteen supplies. There is a 3.5 tonne restriction throughout The Drive. This is a residential area - we request a condition that no weekday operational deliveries will be permitted prior to 08.00 or after 17.30pm, with none at weekends as there has been some history of unsocial hours disturbance to residents by HGVs delivering.
- o We are not familiar with biomass as a heat source, so would be grateful if the applicant can explain how this will be delivered to the site, and at what frequency?
- o The 1978 application to convert Uxbridge County Hospital (12571H/78/2133 etc) was resisted by this Association and other local associations. One of the conditions was that the commercial development would present minimal nuisance to the residents, due to operation during weekdays only and between 09.00-17.30 hrs. This new application is in conflict with that condition, and residents are concerned that out of hours traffic movements will increase and might create disturbance in a residential area.
- o The application contains no project plan or construction management plan. Unless the residents can determine the means of traffic management, routing, number of vehicle movements, hours of operation, provision of wheel washes, dust control, etc. during demolition and construction, they are unable to support this application. A condition will be required to maintain the free flow of traffic.
- o Health and safety - The Drive and part of Highfield Drive have no pavements and are narrow. The children of residents do walk or cycle to school along these roads so the safety of pedestrians and cyclists during demolition and construction must be addressed. Despite the speed ramps, vehicles do still travel at excessive speed along The Drive in the last 4 weeks a car was craned out of a garden by 4-wheel hoist.
- o All of the access roads are privately maintained. At the time of the 1978 application the destruction of residential roads and ongoing maintenance was a contentious issue. After significant discussion, Estates & General (original developer) agreed to reinstate all of the roads, but the

current applicant has not addressed damage to the roads that demolition and construction will cause. This is unacceptable. The North end of The Drive has no proper foundation (e.g. only hoggin and ballast) and heavy construction traffic will cause significant damage to the road.

- o HGVs do speed through The Drive despite the traffic calming, causing significant vibration in some properties. At least one house is suffering from cracks that are attributed to HGV related vibration; so strict speed limit adherence will be necessary.

- o Road maintenance - the applicant comments on the poor state of the North End of The Drive. While the 1980 development was being completed, London Borough of Hillingdon made an agreement for the Leisure Department of LBH and the Freehold owner of Harefield Place to make an annual maintenance contribution of both sections of The Drive. This recognised that resident traffic was less than 20% of the total and that traffic and deliveries to the commercial premises at The Golf Club and Harefield Place significantly shortened the life of the road surface - on roads that were not designed to support the volume and weight of traffic using them. In 1991 when our Association undertook some maintenance, the Freehold owner and LBH refused to honour that agreement. As a result of the wear and tear the road has been worn out and the residents are faced with a significant cost of repair. As a condition of this application we request a S106 or similar to ensure the commercial premises provide a reasonable financial contribution towards road maintenance in The Drive and Highfield Drive.

- o The junction of The Drive and Harvil Road is very dangerous and there are frequent accidents and near misses due to poor visibility and excessive speed - LBH's street lamp on the corner of Harvil is regularly damaged by HGVs that are unable to navigate the tight entrance. We request that the Highways Department review the road safety implications and propose ways to improve it.

- o Utilities - has the applicant received assurances that the local water supply, sewers and electricity infrastructure are sufficiently robust to support the additional demands?

- o Ecology and wildlife - the site is a haven for wildlife (many bats, deer, badgers, foxes, a brace of pheasants, tawny owls, woodpeckers, and other wild birds). There is no mention how the diverse wildlife will be protected during demolition and construction phases and this must be addressed.

- o A plan of all trees and shrubs to be removed and proposed new plantings is required.

- o Lighting - the application refers to additional lighting in the grounds. This is a rural and sensitive location. The residents request that the existing light levels are measured and request a condition for no increase in lighting or light pollution as a result of this development. We note that the lights in the north car park were replaced about 5 years ago and the level of light pollution increased substantially.

- o Fortunately, the proposed development appears to be completely shielded from view by the residents due to topography and vegetation. In the event of approval this has to be reinforced by a condition that prevents subsequent alteration that would significantly detract from the Green Belt and the rural location if the new building became visible.

However, in the event of approval we expect you will take careful consideration of our concerns when evaluating this proposal, and at the very least:

1. apply the requested conditions
2. ensure a detailed project plan and construction management plan are agreed with the residents and Planning Officers
3. apply a S106 order or similar to address the urgent need to make fair and reasonable arrangements for repair and maintenance of all private roads on which these premises depend for access.

METROPOLITAN POLICE CRIME PREVENTION OFFICER - The scheme should achieve Secure by Design accreditation.

Internal Consultees

POLICY AND ENVIRONMENTAL PLANNING

Ecology

I object to the proposed development as the submitted ecological assessment does not fully consider the impacts of the development. The conclusion of the report states:

Due to the potential presence of legally protected species on the site the following surveys are recommended, unless it can be demonstrated that they are unlikely to be impacted through the design, construction and operation practices.

- If the pond is to be directly impacted, great crested newt surveys
- If suitable bat trees are to be impacted, bat surveys to establish use of the site by these species
- If the pond or significant areas of vegetation are likely to be removed, schedule 9 plant survey at a more suitable time of year.

The problem relates to the word 'if'. The ecology report should make an assessment of the impacts and confirm whether the development will or will not have any impacts. Impacts on European protected species must be established before permission is granted.

- Confirmation of the actual (not likely) impacts the development will have on the protected species is required.
- If impacts are identified, confirmation of the types of impacts, and the methods for avoiding and mitigating them is required.
- If no impacts are likely then further ecological enhancements can be covered by conditions.

Energy

Further information on the size of the boiler and its heat production related to the baseline heat load of the development is required. In addition, the use of a small scale biomass boiler in an air quality management area needs to have pollution abatement technology fitted. The London Air Quality Strategy (in consultation) requires Local Authorities to carefully scrutinise the use of biomass units in relation to their impacts on air quality. This specific matter should be referred to the Council's Environmental Protection Unit.

CONSERVATION OFFICER

PROPOSAL: Conversion of existing office (original building) and new build annex for use as a care home.

BACKGROUND: The site is located within the Green Belt, the Colne Valley Regional Park and falls within a Nature Conservation Site of Borough or grade II Local Importance.

The original house is grade II listed and dates from the late 18th century. It comprises a building of 2 storeys, an attic plus basement. The centre block is 8 windows wide, with 3 windows wide projecting end pavilions. It is constructed of stock brick with a stone cornice and stone-coped parapet concealing hipped slate roofs with a modern cupola. There are gauged, near-flat brick arches to the sash windows (all modern) with glazing bars and a central Doric porch. Below this is a two leaf, 6-panel double door with elliptical patterned fanlight over. The garden front has a 7-window centre block with stepped, set-back side wings of 2 and 3 bays and stone pilasters to the corners. There is a segmental two-storey bow to the right of centre and a number of dormers to the roof.

The building fell into a derelict state and was extensively repaired and rebuilt in the 1980s when the modern curved 2 storey office addition (over an extensive basement) was constructed. The house currently appears to be in a very good state of repair.

The building is sited within landscaped grounds of approximately 10 acres. This falls dramatically away to the south west (garden front) and rises up to a plateau to the north east, beyond the main front of the building. Some remnants of early landscaping remain, including a large informal pond located to the north east of the house.

The existing modern curved addition, over a basement, is of very good quality in design terms and sits comfortably with the house. No objection would, however, be raised in principle to its demolition, provided that proposed in its place was of a similar, or preferably, better quality.

CONSIDERATION: The application is supported by an historic buildings assessment, which includes some useful information, but no details of the original appearance or layout of the house, for example, historic photos and old OS maps (which would also illustrate the position and footprint of garden features and outbuildings) and marked up floor plans illustrating the existing original walls.

It would also have been helpful if the proposed and survey drawings were of the same scale and if the site survey covered the same area as the site proposal drawings. The proposal drawings for the listed building are also of a small scale given the size of the project and could be more detailed in terms of indicating the retention of existing features and new works.

In terms of the proposals, we are concerned that the proposed annex would be considerably larger and more extensive in footprint than the existing addition. Overall, because of its height, bulk and massing, it would not appear as a secondary element to the original house. Its positioning with regard to the end (northern) elevation of the house would also result in this part of the house being partially obscured. The addition would also sit uncomfortably close to the boundary of the site to the north-west, potentially creating a rather cramped appearance to this part of the site.

The garden front is one of the most prominent features of the existing house and the relationship of the proposed addition to this elevation is of concern. Whilst the addition would be set back, given its length and height, the latter emphasised by the very prominent mansard roof (with almost vertical lower section), over large dormer windows and projecting symmetrical three storey element, it would appear rather as a second house than an addition to the original.

The current addition is in the form of a crescent above basement level, giving the original house prominence when viewed from the south and west - it should be noted that this elevation is visible from long views into the site e.g. from the A40. This unusual form also ensures that the later addition recedes in views of the main frontage from the entrance road.

In terms of internal changes to the listed building, there appears to be the partial loss of some original internal walls within and adjacent to the corridors at ground and first floors; between two of the first floor bedrooms and a small area at second floor-although this area has been radically altered. Ideally, the new curved partitions within the proposed cafe bar at ground floor should also reflect the more traditional linear corridor layout that exists elsewhere in the house. These matters could, however, be overcome by some minor revisions. Further details of the works to raise the floor level of the attic should be provided at the application stage together with cross-sections of the proposed stairwells and new lift shaft.

It appears that the whole roof of the main part of the listed building is proposed to be raised (approx. 600mm) and extended to the north-west. This would create an over large and significantly more prominent roof form than currently exists and would also make the modern cupola, which houses the lift motor room, more noticeable. No justification has been given for this work. Whilst the roof is a modern structure, the additional bulk and extended form as proposed, would negatively impact on the appearance of the historic building and blur the roof form between the main structure and the wing. This work would not be acceptable in listed building terms.

The proposed additional dormers to the garden front, whilst acceptable in listed building terms, are shown on the floor plan but not the proposed elevational drawings. The new dormer to south-east elevation, whilst also considered acceptable in principle, is shown in a different position on the proposed elevation to that of the proposed floor plan. The removal of the escape stair on the garden front is to be welcomed.

The new entrance link between the existing and proposed structures should not encroach any further across the elevation of listed building than at present. The design of this element is important and its stepped form and poor detailing are of concern. The current brick archway is a more convincing link.

A terrace has been proposed to the garden front, the appropriateness of which would need to be assessed by the Council's landscape architect, although few details have been provided of this feature and nothing with regard to its design rationale. The position of the current terrace may well reflect the position of the lost raised arcaded feature to this side of the building.

Within the grounds a new plant room/building has been proposed details of this have not been provided.

Improvements to the landscaping around the entrance to the house and within the forecourt area are to be welcomed, ideally, more soft landscaping should be sought to soften the appearance of the other existing parking areas, particularly those closest to the house. The true impact of the new light well to the dementia unit within the front forecourt area is not shown on the layout plans. The grading of the land beyond the retaining wall as shown in the cross-section would result in a wide light well. This would cut onto the forecourt and reveal the elevation of the new addition to almost full height, which would be visible against the listed building. This would have a negative impact on the setting of the listed structure.

Proposals for the restoration of the garden should be required as part of the scheme, at present the landscape proposals appear rather sketchy.

CONCLUSION: Not acceptable, the new addition because of its size and design would be detrimental to the immediate and wider setting of the listed building and the proposed works to the listed building, in particular works at roof level, would have a negative impact on its historic fabric, form and overall appearance.

S106 OFFICER

Proposal:

Erection of a new building for use as a care home (Use Class C2), the refurbishment, alteration and change of use of Harefield Place to a care home (Use Class C2), provision of ancillary amenity space and car parking (involving the demolition of existing office extensions).

The number of beds proposed is 108. Given the nature of the proposal it is likely that there will only be 1 person per room, therefore the total population is 108.

The likely planning obligations, should the application be recommended for approval are as follows:

1. Transport and transport related issues: In line with the SPD on Transport there may be the need for a s278/s38 agreement to be entered into to cover any and all highways works need as a result of this application. Given the scale of the proposal it is likely that a sustainable travel plan could be sought for the scheme.

2. Health: In line with the SPD for Health a contribution in the sum of £23,400.36 will be sought if a

bid is received demonstrating need by the local PCT.

3. Environmental Impacts: In line with the SPD and given the location of his proposed change of use, there may be the need for some form of conversation and or green belt/trees contribution to off-set any negative impacts of the proposal on the immediate environment. This is something that should be explored in conjunction with the Council's specialist planning team.

4. Construction Training: In line with the SPD either and in-kind scheme or a cash contribution equal to £2,500 for every £1 million build cost could be sought for construction training, depending upon the estimated costs of converting this building.

5. Project Mgmt and Monitoring: In line with the SPD if a s106 agreement is entered into then a contribution towards project management and monitoring will be sought equal to 5% of the total cash contributions secured from this proposal.

ENVIRONMENTAL PROTECTION UNIT (EPU)

No objections are raised to this development. However should approval be recommended, the following conditions should be applied.

Delivery and waste collections;

The premises shall not be used for deliveries and collections, including waste collections other than between the hours of 0800 hrs and 2000 hrs, Monday to Saturday and not at all on Sundays or Bank Holidays.

Reason: To safeguard the amenity of surrounding areas.

Suitable hours of use should be applied when known.

The rating level of the noise emitted from the plant and equipment hereby approved shall be at least 5dB lower than the existing background noise level. The noise levels shall be determined at the nearest residential premises in accordance with British Standard 4142, Method for rating industrial noise affecting mixed residential and industrial areas.

The standard construction informative should be attached in the event of an approval.

TREE AND LANDSCAPE OFFICER

THE SITE (Landscape):

The sloping site is located in the Green Belt and Colne Valley Regional Park, and within a site (16) of Borough (Grade 2) importance for nature conservation. The listed building and the extensive landscaped grounds in which it is set are described by the Principal Conservation and Urban Design Officer.

THE TREES & LOCAL LANDSCAPE:

The trees and woodland on the site are important features in the local landscape and the landscape setting of the listed building. Tree Preservation Order number 236 (TPO 236) protects most of the trees and groups, including the belt of trees on the slope between the house and the main (upper car park).

The majority of the trees (and groups) constrain the development of the site, which should make provision for the retention of landscape features of merit and landscaping (as part of a scheme for the restoration of the historic landscape).

The trees on and close to the site, which are shown on the topographical survey drawing, have

been surveyed, in accordance with the recommendations of BS 5837:2005. The results and interpretation of the results of the survey are presented in the Arboricultural Impact Assessment (report dated January 2010). The report includes tree survey, trees for (retention and) removal, and tree protection plans, and is allied to a tree constraints plan, which is also submitted with the application.

A total of 145 individual trees and 12 groups were assessed and categorised according to the guidance. The common species are oak, yew and ash. Two trees are categorised as 'A' grade (good quality and landscape value, where protection and retention is most desirable as part of any redevelopment). 61 trees are categorised as 'B' grade (fair quality and value, worthy of protection and retention as part of any redevelopment). 62 trees are 'C' rated (low quality and value), which could be retained but, subject to replacement planting, are not a constraint on the development of the site. 32 trees are 'R' (fell) rated.

Based on the recommendations of BS 5837, the design of the scheme for the development of the site should be informed by the tree survey and the arboricultural impact assessment (and constraints plan), which considers construction-related issues as well as information about the shade effect of the buildings and trees.

The tree survey/constraints drawing shows the root protection areas (RPAs) for the trees (other than 'R' grade), which define construction exclusion zones necessary to safeguard trees from built development, or interference within the root zone, and hence limits the size of the building envelope(s).

CONSIDERATION:

The redevelopment of the site involves the retention of the listed building and the demolition of the existing extension and the construction of a new building. The scheme utilises (and modifies) the existing access from The Drive and the existing car parks.

The scheme makes provision for the retention of the trees of high and moderate quality and value ('A' and 'B' category), and other trees and groups of trees of merit in landscape terms. To facilitate the development 13 trees or groups of trees will be lost (access 5 no., car park/plant room, 4 no., extension 4 no.). Of these trees, only one (T115 Poplar) is of moderate value (B category) and is part of the belt on the slope. The rest are of low value (C category). The other 'R' category trees are listed for removal for health and safety reasons or for the benefit of more valuable trees. The applicants indicate that the removal of these trees will also provide space for new tree planting as part of the reinstatement and management of the grounds. In this context, there is no objection to the loss of 13 trees or groups of trees across the site or to the widening of the drive. There is, however, an inconsistency, which should be resolved, between the tree reports/plans, which indicate that T63 (B category oak) will be crown-lifted for views up the slope to the pond and the site plan, which shows T63 removed.

The scheme includes a terrace to the garden front and car park in front of the building, and works around and associated with the pond, and the application also includes a landscape master plan. However, the application does not include proposals, based on research of the history and development of the landscape of Harefield Place, for the restoration of the gardens/grounds and features, and details of hard and soft landscaping, possibly including the terrace. If necessary, such information and information about boundary treatments could be required by conditions.

Details of landscaping and landscape maintenance, and long-term management should also be required by conditions.

Details of services (including drains and lighting) and levels, and an arboricultural (demolition,

construction and tree protection) method statement should be required by conditions.

CONCLUSION:

Overall, subject to conditions TL1 (services and levels), TL2, TL5 (also including details of tree works), TL6, TL7, TL21, and a condition (based on model condition 31 in Circular 11/95) requiring the submission and approval, and implementation, of landscape restoration and long-term landscape management plans for the site, the application is acceptable in terms of Saved Policies OL26 and BE38 of the UDP.

HIGHWAY ENGINEER

The highways aspect of the proposals including access, visibility splays, servicing facilities, cycle parking and car parking is considered satisfactory in principle.

A continuous footway of 2m desirable width with crossing points should be provided.

The development is considered to result in a reduction of traffic to/from the site.

Parking designation should be submitted to and agreed with the LPA. A robust travel plan is needed to promote sustainable travel and reduce single occupancy car travel to/from site.

Access gates should be set back 10m (min) from the carriageway.

Given the status of The Drive and Highfield Drive as private streets, the applicant should be advised through an informative attached to any permission that the condition of the above streets at the end of development should at least commensurate with that which existed prior to commencement of the development.

The applicant should therefore also be advised that before any works connected with the proposed development are undertaken within the limits of the streets, it will be necessary for them to obtain the agreement of the owner(s) of the sub-soil upon which The Drive and Highfield Drive are laid out.

ACCESS OFFICER

In assessing this application and framing the following recommendations, reference has been made to the Accessible Hillingdon SPD (adopted January 2010), and the Care Quality Commission (CQC): National Minimum Standards for Care Homes for Older People', and BS 8300; 2009.

The following observations are provided:

1. Given the nature of the proposed development, at least one enlarged accessible parking bay, 3m x 6m, should be provided. In accordance with BS 8300:2009, clause 4.2.1.1, a setting down point and parking space, 4.8m x 8m, for taxis, Dial-a-Ride and accessible minibus vehicles with tail lifts, should be provided in close proximity to the main entrance.
2. The ratio of 1 assisted bath (or assisted shower room provided this meets residents needs) to 8 service users does not appear to have been met. The design, as proposed, does not seem to support this fundamental CQC design requirement.
3. CQC environment design standards require room layouts and ensuite facilities to be conducive to the needs of all residents, including wheelchair users. A proportion, if not all, ensuite bathrooms should allow provision for and independent wheelchair user to perform a side, oblique and lateral transfer in a safe and dignified manner. Reference to BS 8300:2009, clause 12.3, is advised. In

addition, drainage should be shown in all ensuite bathrooms and specified technically on plan.

4. Fire rated lifts should be incorporated into the scheme. The lifts should be designed and integrated to support Horizontal Evacuation in accordance with the Council's Supplementary Planning Document 'Accessible Hillingdon', adopted January 2010. To this end, the two lifts will need to be relocated into two separate 'fire compartments'.

5. Consideration should be given to ensure that arrangements exist to provide adequate means of escape for all, including wheelchair users. Fire exits should incorporate a suitably level threshold and should open onto a suitably level area.

NB: The applicant is reminded of the duties set out in the Disability Discrimination Act 1995, with regard to employment and service provision. Whilst an employers duty to make reasonable adjustment is owed to an individual employee or job applicant, the responsibility of service providers is to disabled people at large, and the duty is anticipatory. The failure to take reasonable steps at this stage to facilitate access will therefore count against the service provider, if/when challenged by a disabled person. It is therefore recommended that the applicant takes full advantage of the opportunity that this development offers, to improve the accessibility of the premises to people with mobility and sensory impairments.

Conclusion:

Based on the information available, I consider that the proposed development would necessitate a substantial redesign to successfully incorporate the principles of access and inclusion and, indeed, the design standards that Care Quality Commission will ultimately require.

I would strongly recommend that the Council engages in further discussions, and seeks more detailed information in this regard, prior to any grant of planning permission.

7. MAIN PLANNING ISSUES

7.01 The principle of the development

The site is located within the Green Belt. Policy 3D.9 of the London Plan seeks to maintain the protection of London's Green Belt with a presumption against inappropriate development except in very special circumstances. The reference to inappropriate development flows directly from Planning Policy Guidance Note 2 (PPG2), which sets out national planning policy on Green Belt. PPG2 states that the most important attribute of the Green Belt is its openness. Paragraph 3.4 states that the construction of new buildings in the Green Belt is inappropriate unless it is for the following purposes:

- Agriculture and forestry;
- Essential facilities for outdoor sport and outdoor recreation; for cemeteries, and for other uses of land which preserve the openness of the Green Belt and which do not conflict with the purpose of including land in it;
- Limited extension, alteration or replacement of existing dwellings;
- Limited infilling in existing villages and limited affordable housing for local community needs under development plan policies according with PPG3;
- Limited infilling or redevelopment of major existing developed sites identified in adopted local plans, which meets the criteria in paragraph C3 or C4 of Annex C.

PPG2 makes clear that inappropriate development is, by definition, harmful to the Green Belt, and should not be approved except in very special circumstances. The guidance adds that such circumstances will not exist unless the harm is clearly outweighed by other considerations and that it is for the applicant to show why permission should be granted. Policy OL1 of the adopted Hillingdon Unitary Development Plan endorses this London Plan and national guidance.

In terms of the change of use of the existing Manor House, paragraphs 3.7 and 3.8 of PPG2 (Green Belts) state that the conversion of existing buildings is not inappropriate development, provided certain criteria are met, including exercising strict control over any extension. A residential care home falls within Class C2: Residential Institutions of the Use Classes Order and implies a residential use, albeit different to a dwelling house C3 Use Class.

Saved Policy H10 of the UDP specifies criteria for the development of care homes. The policy requires care homes to be conveniently located for local shops, services and public transport facilities and to comply with the Council's car parking standards and have regard to the Council's amenity guidelines. The UDP indicates that there is an identified need for housing for elderly people in Hillingdon, for both Category I and Category II dwellings. Residential care homes (as defined in the Residential Homes Act, 1984) will be required to be capable of complying with the standards set by the Council's Social Services Department. Although this is a relatively remote site, there is no objection in principle to the change of use of the existing Manor House from Class B1 (Business) to Class C2 (Residential Institutions).

In addition, the proposed change of use of the main listed building would secure its long term active use, as promoted by PPS5.

However, the proposal also involves the demolition of the 3 storey 1980's annexe and its replacement with a new three storey extension which would be 2,525 sq.m larger than the existing annexe, representing a 76% overall increase in floor area on the site.

In terms of the replacement of the existing extension to the original listed range, Policy OL4 establishes criteria where replacement or extension of buildings within the Green Belt would be considered appropriate. It would need to be demonstrated that the proposed replacement extension would not result in a change in the bulk and character of the original building, would not significantly increase the built up appearance of the site, or have a detrimental effect on the visual amenity of the Green Belt.

In terms of bulk, case law indicates that any increase in size over 50% in floor area would be considered disproportionate. Normally the threshold used is the size of the building in 1948 or as first constructed if after 1948. The floor area of the replacement extension would therefore need to be considered in relation to that of the original (listed) building.

While the principle of a replacement extension of similar floor area can be established through policy OL4, the new annexe building will be 247% larger than the original listed building and over twice the size of the existing annex. In addition, the site has not been identified in the Unitary Development Plan as being suitable for limited infilling or for the provision of housing for local community needs, nor is it identified as a Major Developed Site. Furthermore, it is not a damaged, derelict or degraded land. The proposal to provide additional built development is therefore considered to constitute inappropriate development in the Green Belt and it will be necessary for the applicant to demonstrate very special circumstances to justify why permission should be granted.

The applicant has submitted that very special circumstances exist as set out below:

1. The replacement annexe is proposed in the same location as the current annexe. The setback of the new building from the historic building and its reduced height and use of mansard roofing would reduce the bulk of the building, ensuring it has a clearly subservient relationship to the listed building.
2. The sensitive design of the replacement annexe and its siting would ensure that the

development would not significantly increase the built up appearance of the site.

3. The extensive tree cover across the site means that external views would be limited. In addition, sensitive design and use of materials will ensure that the new annexe would be in keeping with the historic building and will serve to integrate the annexe with its surroundings.

The very special circumstances put forward by the applicant are dealt with in detail at appropriate sections of this report. However, in summary, it is not considered that the applicant has made a robust argument that there are specific 'very special circumstances' in terms of siting and design that justify the loss of, or harm to Green Belt in this instance. The substantial increase in floorspace would represent inappropriate development, which by definition, would be harmful to the Green Belt. This view is supported by the Mayor, who concludes that the 'very special circumstances' provided do not justify the scale of the inappropriate development in the Green Belt.

The principle of the new development on this Green Belt site cannot therefore be supported, as it is contrary to local, London Plan and national policy. It is considered that the proposal has failed to demonstrate the very special circumstances required to permit such a scheme in this location and is contrary to Policy OL1 of the adopted Hillingdon Unitary Development Plan, Policy 3D.9 of the London Plan and PPG2 'Green Belts'.

7.02 Density of the proposed development

Not applicable to this development.

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

The site does not fall within an archaeological priority area, conservation area or area of special character. However, the original house is grade II listed and dates from the late 18th century.

Of particular relevance are Saved Policies BE8, BE9, BE10, BE11 and BE12 of the UDP. These seek to

ensure that any development involving listed buildings or curtilage structures does not have any detrimental impact on the overall value of the structure or building. In assessing the impact, there are two main issues: the impact of the conversion of the house and the impact on the setting of the listed building in terms of the location of the new annexe.

In addition, Policies BE13 and BE19 of the UDP attempt to ensure that new development makes a positive contribution to the character and amenity of the area in which it is proposed. Policy BE13 states that, in terms of the built environment, the design of new buildings should complement or improve the character and appearance of the surrounding area and should incorporate design elements which stimulate and sustain visual interest. Policy BE38 of the UDP requires new development proposals to incorporate appropriate landscaping proposals.

The Design and Access Statement demonstrates that the proposal has emerged from a clear design process, which comprises a site evaluation, a historic building report and a consideration of planning history. The Conservation Officer notes however, that the Historic Buildings Assessment, although including some useful information, lacks details of the original appearance or layout of the house, or marked up floor plans illustrating the existing original walls.

The existing modern curved addition, over a basement, is in the view of the Conservation Officer, of very good quality in design terms and sits comfortably with the listed house. This view is largely shared by the Mayor, who considers that although the 1980's annexe

has limited architectural merit, it has a quiet appearance and its form is subservient to the Grade 2 listed building. No objection would, however, be raised in principle to its demolition, provided that what is proposed in its place is of a similar, or preferably, better quality. This latter view is shared by English Heritage, which states that the existing 1980's crescent extension could be removed and replaced, providing that the works resulted in an improved arrangement. This should be an opportunity to achieve a new design that would constitute a better relationship with the listed building.

In terms of the proposals, the Conservation Officer, English Heritage and the Mayor all raise concerns that the proposed annex would be considerably larger and more extensive in footprint than the existing addition. Whilst the new annex building incorporates architectural features such as brick pediments, rendered columns and bay windows, (in an attempt to mirror the appearance of the main building), it is considered that the resultant form does not appear sufficiently subservient to the original listed building. Because of its height, bulk and massing, it would not appear as a secondary element to the original house.

Its positioning with regard to the end (northern) elevation of the house would also result in this part of the house being partially obscured.

The garden frontage is one of the most prominent features of the existing house and the relationship of the proposed addition to this elevation is of concern. The height of the new annex would be emphasised by the very prominent mansard roof (with vertical lower section), over large dormer windows and the asymmetrical three storey element. At present, the current addition recedes above basement level, giving the house prominence when viewed from the south west. By contrast, the proposed annex block would be prominent and overly dominant. Whilst the new annex would be set back, given its length and height, it would appear rather as a second house than an addition to the original listed building. This view is shared by the Mayor who notes that whilst the overall height of the new building is lower than the listed building, the scale and extent of the proposed mansard roof is considered excessive when compared to the main building, which is partially hidden behind the parapet and includes significantly smaller dormer windows.

Details concerning the internal alterations of the listed building are addressed in a separate report on this agenda, relating to the associated listed building consent application. It is however noted by the Conservation Officer that there appears to be the partial loss of some original internal walls to the corridors at ground and first floors; between two of the first floor bedrooms and a small area at second floor, although this area has been radically altered. These matters could be overcome by some minor revisions.

Within the grounds a new plant room/building has been proposed. However, details of this have not been provided and its impact on the setting of the listed building cannot therefore be assessed at this stage. In addition, the true impact of the new light well to the dementia unit within the front forecourt area is not shown on the layout plans. The grading of the land beyond the retaining wall as shown in the cross-section would result in a wide light well. This would cut onto the forecourt and reveal the elevation of the new addition to almost full height, which would be visible against the listed building. It is considered that this would have a negative impact on the setting of the listed structure.

In conclusion, the Conservation Officer considers that the scheme is unacceptable, detrimental to the immediate setting of the listed building. English Heritage conclude that the proposed annex would cause harm to the setting of the listed building, given its scale

and that the application therefore should be considered unacceptable and an improved scheme negotiated. The Mayor considers that the proposed annex has failed to respect the listed building in terms of scale, height and alignment. This is contrary to Saved Policies BE9 and BE10 of the Hillingdon Unitary Development Plan (September 2007).

7.04 Airport safeguarding

There are no airport safeguarding objections to this proposal.

7.05 Impact on the green belt

The sloping site is located in the Green Belt and Colne Valley Regional Park. Planning Policy Guidance 2: Green Belts (PPG2) sets out that there are five purposes of including land in Green Belts:

- . to check the unrestricted sprawl of large built-up areas;
- . to prevent neighbouring towns from merging into one another;
- . to assist in safeguarding the countryside from encroachment;
- . to preserve the setting and special character of historic towns; and
- . to assist in urban regeneration, by encouraging the recycling of derelict land other urban land.

The most important attribute of Green Belts is their openness and the aim of preserving the openness of Green Belt land is reiterated in UDP Saved Policy OL1 and London Plan Policy 3D.7. Development is therefore strictly controlled.

The site currently consists of a Grade 2 listed building and annex, with some car parking, set in extensive grounds and plays an important function in fulfilling its Green Belt objectives.

The proposal also involves the demolition of the 3 storey 1980's annexe (1,619 sq.m) and its replacement with a new three storey extension, with a total floor area of some 4,144 sq.m. Although the height of the proposed building is reduced by 0.5 metres, the replacement building would be some 2,525 sq.m larger than the existing annex. The total floor space on the site would therefore be increased to 5,818 sq.m, compared with the existing floor space of 3,293 sq.m. This represents a 76% overall increase in floor area on the site.

The change in footprint resulting in the enlargement of the building towards the site boundary reduces the area available for landscaping, thereby impacting on the openness of the site. In addition, it is considered that the impact of the new building would be particularly noticeable because of the south western wing, which would lie outside the footprint of the existing semi-circular building. This would not only pose an adverse impact on the setting of the Grade 2 listed building, but also impact on the openness of the Green Belt. It should be noted that parts of the building would be visible from long views into the site e.g. from the A40.

This substantial increase in floor space would increase the amount of built development and would therefore be harmful to the openness of the Green Belt. In addition, it is considered that the extent of the hard surfaced car park is excessive, dominating the arrival area and affecting the appearance of the scheme as a whole.

It is considered that the development would diminish the intrinsic open character of this part of the Green Belt, given the layout, height and massing of the proposed development and the proposal would cause detrimental harm to the visual amenity and recreational value of the site, both in the context of its immediate surroundings and in the wider Green Belt context.

While there is scope for soft landscape enhancement, in the form of new and/or replacement planting within the proposed layout, little detail has been provided and it is not considered that this would mitigate against the built development, which will be visually prominent. Should the proposed development be implemented, this Green Belt land would no longer effectively fulfil its function of checking unrestricted urban sprawl, assist in safeguarding the countryside from encroachment, or preserve the setting and special character of historic importance, contrary to Policy OL1 of the UDP, London Plan Policy 3D.7 and the provisions of PPG2 (Green Belts).

7.06 Environmental Impact

There are no issues relating to ground contamination.

7.07 Impact on the character & appearance of the area

The issues relating to the impact of the proposals on the character and appearance of the areas have been addressed in other sections of this report.

7.08 Impact on neighbours

In relation to outlook, Policy BE21 requires new residential developments to be designed to protect the outlook of adjoining residents. Policy BE24 states that the design of new buildings should protect the privacy of occupiers and their neighbours. In relation to sunlight, Policy BE20 of the UDP seeks to ensure that buildings are laid out to provide adequate sunlight and preserve the amenity of existing houses.

There are no immediate neighbours within the vicinity of the proposed development. As the care home would be sited a sufficient distance away from adjoining properties, it is not considered that there would be any loss of amenity to surrounding occupiers, in compliance with relevant UDP saved Policies and standards.

7.09 Living conditions for future occupiers

Residential care homes would be expected to comply with relevant national standards, including National Minimum Standards for Care Homes for Older People', and BS 8300; 2009. The issue of inclusive design has been dealt with elsewhere in this report.

The site area/room ratio compares favourably with other residential care homes around the Borough. It is also noted that both the proposed floor space standards and amenity space standards exceed the minimum registration criteria as set out in the National Minimum Standards for Care Homes. In terms of amenity space provision, the residents will generally have limited mobility and will be highly dependent on nursing staff. Gardens must be secure to prevent those more mobile but possibly confused residents from wandering off. Open balconies at upper floors are considered unsuitable and dangerous for confused residents, unless screened to above head height.

Although the sizes of individual rooms have been designed to a good standard, concerns remain regarding the level of natural daylight and outlook available to the single aspect bedrooms, located on the second (top) floor to the south west side of the main building. The mayor is unconvinced that the size of the dormer windows would allow adequate natural daylight, sunlight and outlook to these rooms, given that residents are likely to spend most of their time indoors, it is important that they have good access to daylight and outlook for their mental and physical health and well being. However, these rooms do have some degree of outlook and sufficient sunlight/daylight would be provided to them. Furthermore, given the parkland setting of the building and the fact that there are a number of communal facilities available to residents the quality of accommodation provided is considered to be acceptable.

In terms of security and crime prevention, the building is to be protected by an electronic

management system. Enhanced security is to be achieved through natural surveillance lighting and CCTV. The Crime Prevention Officer has advised that this development needs to achieve Secured by Design accreditation but this matter has not been pursued with the applicant, as the application is being recommended for refusal. Details of fencing, gates and other perimeter treatment could be secured by condition, in the event of an approval.

In general, it is considered that good environmental conditions could be provided for future residents, in compliance with Policy H10 and relevant recognised national standards for care homes.

7.10 Traffic impact, car/cycle parking, pedestrian safety

The applicant has submitted a Transport Assessment to consider access, parking, servicing and the traffic impacts on the existing road capacity.

Traffic Generation

The transport statement estimates that the proposed care home would generate some 17 and 11 two way vehicle movements during the morning and evening peak hours respectively. The existing office use would generate some 59 two way movements in the morning peak and 48 two way movements in the evening peak hour. This would equate to a reduction of site traffic by some 71% and 77% in the morning and evening peak hours respectively. Given that the development is considered to result in a reduction of traffic to and from the site, the Highway Engineer raises no objections in this regard.

Pedestrian and Vehicular Access

It is proposed to provide a new footway into the site adjacent to the vehicular access from The Drive, to the main building entrance. It is noted that a section of this route would be provided as a shared surface, however, it is important that shared surfaces include colour and tactile delineation to make it clear to visually impaired pedestrians where it is safe for them to walk. TfL request that either a well designated 2.0m width footway be provided with kerbs for the whole route into the building or that the shared surface include a tactile strip to comply with the Inclusive Mobility guidance produced by DfT. The Highway Engineer considers that a continuous footway of 2m desirable width with crossing points should be provided. Had the development been acceptable in other respects, these details could have been secured by condition.

TfL has also requested that a footway be provided to connect the footway along the site access to the footway on Harvil Road to create a continuous walking route to the site for access to buses on Harvil Road. TfL also requests that the applicant provide details of the street lighting in the area to demonstrate whether safe pedestrian access is possible after dark. Should deficiencies be identified a contribution should be secured in the S106 towards improving the street lighting. Since the application is being recommended for refusal, no negotiations have been entered into with the developer in respect of these works. It is considered that this matter could be covered by condition if the application had been recommended for approval.

In terms of vehicular access, it is proposed to improve the existing access off the Drive, by widening to 5.5 metres into the site. The southern side of the access junction with The drive would be built out to provide a 6m corner radius. The site layout would allow large vehicles to turn around within the site and exit in forward gear.

The Transport Statement notes that traffic is most likely to use Highfield Drive as the main route to the site from the main road network, via Swakeleys Road and Harvil Road. This is

because The Drive to the north of the site is narrow and in poor condition and to the south, The Drive is traffic calmed. However, notwithstanding the proposed widening of the site access, the entrance road angles so that it would be difficult for large vehicles to enter from the north. Large construction vehicles and HGVs would therefore be more likely to access the site via the southern section of The Drive.

The Highway Engineer raises no objections to the proposed access arrangements, subject to the access gates being set back a minimum of 10 metres from the carriageway. Details of the access, gates, visibility splays and servicing facilities could be secured by condition in the event of an approval.

Parking

Elderly persons homes and nursing homes are not covered by the Council's parking standards provided for under the UDP Saved Policies September 2007 and as such, the London Plan parking standards are to be utilised. In this instance C2 sheltered housing schemes require a parking provision to be assessed on an individual basis utilising a transport assessment and travel plan.

In addition to car parking requirements, 1 motorcycle space should be provided per 20 car spaces and 1 bicycle space should be provided per flat. Bicycle spaces should be provided in a secure, lockable enclosure with no more than 4 bicycles per enclosure. Again secure by design principles should be applied when considering siting and design of enclosures.

The proposed development proposes 33 car parking spaces including 3 disabled bays, two motorcycle bays, a service bay and 18 cycle parking spaces. The Highway Engineer is satisfied with this level of provision, subject to details of parking designation being submitted to and agreed with the LPA. this could be covered by a condition, in the event of an approval.

Travel Plan

The application is supported by an 'Interim' Travel Plan, to reduce reliance on private motor car and promote sustainable travel.

The site is within 350m of a hail and ride bus stopping facility for the U9 service on Harvil Road and bus stops served by the U1, U9 and U10 are located on Swakeleys Road approximately 630m to the south of the site. There are no London Underground stations or rail stations within walking distance of the site. The Public Transport Accessibility Level (PTAL) is therefore a very poor rating of 1, on a scale of 1 to 6 where 6 represents the highest rating.

The site location is considered to have reasonable links to public transport and provides real opportunities to use sustainable modes of travel. The submitted interim documentation is considered satisfactory, but a full self contained Travel Plan is required, which would require additional information, including targets and monitoring. A full travel plan could be secured through a suitable planning condition, in the event of an approval.

Overall, the Highway Engineer raises no objection to the highways and transportation aspect of the development, which is considered to be in compliance with Saved Policies AM7, AM9, AM14 and AM15 of the Hillingdon Unitary Development Plan. Had the development been acceptable in other respects, any outstanding issues could have been addressed by suitable planning conditions and a S106/278 agreement.

7.11 Urban design, access and security

These issues have been dealt with elsewhere in the report.

7.12 Disabled access

In assessing the issue of disabled access, reference has been made to the Accessible Hillingdon SPD (adopted January 2010) and the Care Quality Commission (CQC): 'National Minimum Standards for Care Homes for Older People', and BS 8300; 2009. Policy 4B.5 of the London Plan also seeks to ensure that proposals achieve the highest standards of accessibility and inclusion.

The Design and Access Statement confirms that the scheme would meet Part M of the Building Regulations. It also makes reference to internal design features. Residents' room sizes all exceed the current national minimum standards of care homes and 10% of the residents' rooms are designed to wheelchair accessibility standards. Level access is provided to all entry points and adequate corridor widths and door openings can be provided. The Mayor considers that the proposed scheme complies with the London Plan, subject to access arrangements for the new external footpath being addressed.

The Access Officer has raised a number of concerns relating to accessible parking, the level of assisted bathrooms, the layouts of ensuite facilities, the lack of fire rated lifts and the lack of information regarding adequate means of fire escape, including wheelchair users. The Access Officer therefore considers that the proposed development would necessitate a substantial redesign to successfully incorporate the principles of access and inclusion and indeed, the design standards that Care Quality Commission will ultimately require. The Access Officer therefore recommends that more detailed information is provided in this regard. Whilst it is acknowledged that there remain outstanding issues with regard to access, it is considered that had the application been acceptable in other respects, these issues could be covered by the imposition of suitably worded conditions, in the event of an approval.

7.13 Provision of affordable & special needs housing

The London Borough of Hillingdon Affordable Housing SPD (May 2006) seeks to secure a minimum of 50% affordable housing on new build schemes that contain 15 units or more. This should then be split in 70% social rented and 30% shared ownership/intermediate housing. The Council's Planning Obligations SPD (July 2008), together with the London Plan Consolidation (2008) supersedes these requirements and schemes with 10 units or more shall secure 50% affordable housing.

The application is supported by an affordable Housing Statement. The care home would provide accommodation for frail older people and separate accommodation for those with Alzheimer's and other memory impairment conditions. The accommodation would range from studio bedrooms, through to non-self contained one and two bedded suites. Communal facilities would be provided throughout, including lounges, a cafe bar, dining room, fitness and therapy rooms, entertainment rooms, dedicated physio/treatment facilities and doctors' rooms. Having regard to the level of care provided, it is considered that the proposed use would fall within Class C2 of the Town and Country Planning (Use Classes) Order 1987 (as amended). This is distinct from Class C3 (dwelling houses), where the affordable housing thresholds would normally apply. The proposal is also distinct from sheltered housing developments, which normally provide no care, other than on-site warden facilities. There are no UDP Saved Policies which require an element of affordable housing within Class C2 care home developments. It is therefore concluded that a requirement for affordable housing does not apply to this development.

7.14 Trees, Landscaping and Ecology

TREES AND LANDSCAPING

Policy BE38 of the Unitary Development Plan Saved Policies states, amongst other things that development proposals will be expected to retain and utilise topographical and landscape features of merit.

The redevelopment of the site involves the retention of the listed building and the demolition of the existing extension and the construction of a new building. The scheme utilises and modifies the existing access from The Drive and the existing car parks. The trees on the site are important features in the historic landscape setting of the listed building in the Green Belt and most of them are protected by TPO 236. There are several individual trees of merit, and a belt of trees and woodland on the slope between the house and the main car park. The trees are, therefore, a major constraint on the development of the site. The retention of trees and landscaping/restoration of the historic landscape associated with the main house, including tree planting, are therefore considered necessary to restore and enhance the landscape, and mitigate impacts on the visual amenity and openness of the Green Belt and the setting of the building.

The trees on and close to the site, have been surveyed, and the results and interpretation of the results of the survey are presented in the Arboricultural Impact Assessment, which includes a tree survey, details of trees for retention and removal, and tree protection plans. A tree constraints plan, has also submitted with the application which shows the root protection areas (RPAs) for the trees.

A total of 145 individual trees and 12 groups were assessed and categorised. The common species are oak, yew and ash. Two trees are categorised as 'A' grade and 61 trees as 'B' grade. 62 trees are 'C' rated, whilst 32 trees are 'R' (fell) rated. The scheme makes provision for the retention of the trees of high and moderate quality and value (A and B category) and other trees and groups of trees of merit in landscape terms. To facilitate the development 13 trees or groups of trees will be lost. The applicants indicate that the removal of these trees will provide space for new tree planting as part of the reinstatement and management of the grounds. In this context, the Tree and Landscape Officer raises no objection to the loss of these trees, or to the widening of the drive.

The scheme includes a terrace to the garden front and car park in front of the building, and works around and associated with the pond, and the application also includes a landscape master plan. However, the Tree and Landscape Officer notes that the application does not include proposals, based on research of the history and development of the landscape of Harefield Place, for the restoration of the gardens/grounds and features and details of hard and soft landscaping, possibly including the terrace. This concern over lack of detail is shared by the Mayor, who considers that further details and examples of landscape treatment should be submitted, in order for a proper assessment of the overall design quality of the scheme. In addition, although improvements to the landscaping around the entrance to the house and within the forecourt area are to be welcomed, ideally, more soft landscaping should be sought to soften the appearance of the other existing parking areas, particularly those closest to the house. However, it is considered that had the application been acceptable in other respects, such information, together with details of boundary treatments, landscape maintenance and long-term management could be required by conditions.

ECOLOGY

Planning Policy Statement 9: Biodiversity and Geological Conservation aims to protect and enhance biodiversity.

London Plan Policy 3D.14 states that the planning of new development and regeneration should have regard to nature conservation and biodiversity and opportunities should be taken to achieve positive gains for conservation through the form and design of development. Where appropriate, measures may include creating, enhancing and managing wildlife habitat and natural landscape and improving access to nature. Where development is proposed which would affect a site of importance for nature conservation or important species, the approach should be to seek to avoid adverse impact on the species or nature conservation value of the site and if that is not possible, to minimise such impact and seek mitigation of any residual impacts. Where, exceptionally, development is to be permitted because the reasons for it are judged to outweigh significant harm to nature conservation, appropriate compensation should be sought.'

UDP Saved Policy EC1 states that the local planning authority will not permit development which would be unacceptably detrimental to designated local nature reserves and other nature reserves. If development is proposed on or in the near vicinity of such sites, applicants must submit an ecological assessment where considered appropriate by the local planning authority to demonstrate that the proposed development will not have unacceptable ecological effects.

Saved Policy EC3 of the UDP requires proposals for development in the vicinity of sites of nature conservation importance to have regard to the potential effects on such sites on changes in the water table and of air, water, soil and other effects, which may arise from the development. Regarding the creation of new habitats.

Saved Policy EC5 of the plan seeks the retention of certain on-site ecological features enhancement of the nature conservation.

This development is located within the Harefield Hall and Lodge Site of Importance for Nature conservation (SINC). An Ecological Baseline Report has been submitted as part of this application.

Natural England generally concurs with the mitigation measures and recommendations set out on of the report. These include:

Planting and management schemes to use native species

Removal of invasive species

Timing wood clearance outside the bird breeding season

Retention of standing and dead wood in situ

Sensitive construction methods to avoid impact on fauna.

The applicant also proposes the installation of bat and bird boxes, the production of an ecological management plan, as well as the control of lighting, which could be secured through the use of planning conditions in the event of an approval.

The Mayor welcomes the proposed mitigation measures, but requests that a very thorough and robust biodiversity management and monitoring plan must be placed and secured through conditions.

Notwithstanding the above, Natural England conclude that it is not possible to assess, from the information available in the Ecological Baseline Report, whether overall the development will result in permanent adverse effects on the SINC. Fundamental objections to the proposed development remain, as it is considered that the submitted ecological assessment does not fully take into account the impacts of the development in

terms of the potential presence of legally protected species on the site, including bats, great crested newts, reptiles and badgers. Additional surveys are required, unless it can be demonstrated that these protected species are unlikely to be impacted through the design, construction and operation of the development.

In terms of legislative framework, bats and their habitats are protected under the 1994 Conservation Regulations and the Wildlife and Countryside Act 1981 as amended Countryside and Rights of Way Act 2000 Natural Environment and Rural Communities Act 2006. Many species of bat are protected under the Habitats directive and are UK Biodiversity Action Plan Species. Bats are therefore a material planning consideration and applying the principles of PPS9 and the London Biodiversity Strategy, the impacts on this species should be thoroughly investigated prior to a planning decision.

The Ecological Baseline Report states that there are trees on site which have medium and high potential to support bats. and that no trees identified as suitable for bats should be damaged or destroyed or significantly disturbed during the works. The report further states that due to the potential presence of protected species on site bat surveys are recommended, unless it can be demonstrated that they are unlikely to be impacted.

Natural England state that this information is unclear and the if there is potential for trees with medium or high potential to support bats to be affected by the works, further surveys should be undertaken prior to granting planning permission. This is in line with Paragraph 98 of ODPM Circular 06/20051 which states that it is essential that the presence or otherwise of protected species, and the extent that they may be affected by the proposed development, is established before the planning permission is granted, otherwise all relevant material considerations may not have been addressed in making the decision.

The need to ensure ecological surveys are carried out should therefore only be left to coverage under planning conditions in exceptional circumstances, with the result that the surveys are carried out after planning permission has been granted. Applying a precautionary approach detailed in Paragraph 26(vi) of PPS1, it is not considered that the application should be approved until it can demonstrate using sound scientific evidence that the development will not have detrimental impact on bats and their habitats.

Similar concerns are raised with regard to great crested newts and reptiles. The Ecological Baseline Report states that the presence of great crested newts in the pond cannot be ruled out, that careful consideration should be given to works around the pond, and if this is not possible, surveys are required. It is not clear from the information whether the works will affect the pond, or if there is potential suitable terrestrial habitat which could be affected. Natural England state that prior to granting planning permission, confirmation is required as to whether there are potential impacts. If the pond or terrestrial habitat associated with the pond may be affected, great crested newt surveys should be undertaken.

With regard to reptiles, the Ecological Baseline Report identifies that there are areas suitable for reptiles on site and recommends a precautionary approach to the works. It is not clear from the report whether the areas suitable for reptiles will be affected by the development. Again, Natural England recommend that reptile surveys will need to be undertaken you if areas identified as being suitable for reptiles will be affected.

The report concludes that there is evidence of badger paths through the site. Applying the principles of PPS9 and the London Biodiversity Strategy, the impacts should be thoroughly investigated prior to a planning decision. Paragraph 124 of Circular 06/2005

states that the likelihood of disturbing a badger sett, or adversely affecting badgers' foraging territory, or links between them, or significantly increasing the likelihood of road or rail casualties amongst badger populations, are capable of being material considerations in planning decisions. Badgers are protected under the Badgers Act 1973 and badger setts under the Badgers Act 1991. The Protection of Badgers Act 1992 consolidated the earlier legislation. Applying a precautionary approach detailed in Paragraph 26(vi) of PPS1, the application should not be approved until it can be demonstrated using sound scientific evidence that the development will not have a detrimental impact on badgers or badger setts.

Overall, it is considered that the application, including the Ecology Report has failed to make a proper assessment of the impacts, or confirm whether the development will or will not have any impacts on protected species. Impacts on European protected species must be established before permission is granted. The application has therefore failed to demonstrate that the proposed development could be completed without detriment to the recognised ecological value of this area. It is therefore considered that the ecological interests of the site and locality would not be protected, contrary to Policies EC1 of the Unitary Development Plan Saved Policies (September 2007), London Plan Policy 3D.14 and PPS9 (Biodiversity and Geological Conservation).

7.15 Sustainable waste management

A bin store is shown to be provided at the south east end of the listed building, within an existing enclosure. Had the application been acceptable in other respects, a condition could have been imposed requiring further details of the refuse and recycling facilities.

7.16 Renewable energy / Sustainability

The Greater London Authority (GLA), through the London Plan (consolidated with alterations since 2004), has clearly outlined the importance of reducing carbon emissions and the role that planning should play in helping to achieve that goal. The London Plan contains a suite of policies relating to climate change in Chapter 4A.

In the supporting text to Policy 4A.1, which outlines the role of developments in contributing to mitigation of and adaptation to climate change, it states that Policies 4A.2-4A.16 include targets that developments should meet in terms of the assessment of and contribution to tackling climate change. There will be a presumption that the targets will be met in full, except where developers can demonstrate that in the particular circumstances of a proposal there are compelling reasons for the relaxation of the targets. In all cases, the most important contribution will be to the achievement of reductions in carbon dioxide emissions. The Mayor considers that the applicant has broadly followed the energy hierarchy in Policy 4A.1. However, although sufficient information has been provided to understand the proposals, further information is required to verify carbon dioxide savings in principle.

Policy 4A.3 (Sustainable design and construction) of the London Plan requires future developments to meet the highest standards of sustainable design and construction. A range of passive design features and demand reduction measures are proposed to reduce carbon emissions of the proposed development. Both air permeability and heat loss parameters will be improved beyond the minimum requirements set by Building Regulations. Other features include low energy lighting, heat recovery and high efficiency motors. These measures are estimated to reduce carbon emissions by 2% beyond Building regulations 2006 through energy efficiency. However the Mayor has requested that consideration as to whether there is scope to reduce emissions further, through demand reduction measures alone.

Policy 4A.4 requires that an energy assessment be submitted and details the energy demand and carbon dioxide emissions from proposed major developments should demonstrate the expected energy and carbon dioxide emission savings from the energy efficiency and renewable energy measures incorporated in the development, including the feasibility of CHP/CCHP and community heating systems. The assessment should include:

- calculation of baseline energy demand and carbon dioxide emissions
- proposals for the reduction of energy demand and carbon dioxide emissions from heating, cooling and electrical power (Policy 4A.6)
- proposals for meeting residual energy demands through sustainable energy measures (Policies 4A.7 and 4A.8)
- calculation of the remaining energy demand and carbon dioxide emissions.

A Sustainability Statement has been submitted in support of the scheme. This statement sets out how the proposals would comply with the relevant renewable energy planning policies in accordance with Policy 4A.3 of the London Plan.

The carbon dioxide emissions of the proposal have been estimated using Building Regulations compliance modelling software. However, it is not clear whether the estimate takes into account the whole energy use of the new building. The applicant has failed to clarify whether the estimate includes unregulated emissions. If this is not the case then allowance should be made for this element of the emissions.

Policy 4A.6 (Decentralised Energy: Heating, Cooling and Power) of the London Plan 2008, requires developments to evaluate combined cooling, heat, and power (CCHP) and combined heat and power (CHP) systems and where a new CCHP/CHP system is installed as part of a new development, examine opportunities to extend the scheme beyond the site boundary to adjacent areas. The Mayor will expect all major developments to demonstrate that the proposed heating and cooling systems have been selected in accordance with the following order of preference:

- connection to existing CCHP/CHP distribution networks
- site-wide CCHP/CHP powered by renewable energy
- gas-fired CCHP/CHP or hydrogen fuel cells, both accompanied by renewables
- communal heating and cooling fuelled by renewable sources of energy
- gas fired communal heating and cooling.

The new and existing buildings are to be heated from a new central boiler plant to provide all space heating and hot water, although there is a lack of information on the size of the proposed plant room. Further information on the size of the boiler and its heat production related to the baseline heat load of the development is required.

It is noted that there are no existing or planned district heating networks within the vicinity of the site and given the low density of the surrounding area, it is unlikely that an external district heating network would be developed.

With regard to the feasibility of a CHP, there is currently no natural gas supply to the site and given the low electrical demand, the applicant considers that this is not a practical solution. Nevertheless, the Mayor considers that whilst the lack of easily accessible natural gas supply would be a major constraint, further information on how far away the nearest gas supply is from the development should be provided, as the energy load profiles of the care home would be suited to a CHP.

In terms of cooling, the new building will be generally naturally ventilated and be designed

to minimise the need for active cooling, by minimising direct solar gain in summer.

Policy 4A.7 of the London Plan advises that boroughs should ensure that developments will achieve a reduction in carbon dioxide emissions of 20% from on site renewable energy generation (which can include sources of decentralised renewable energy) unless it can be demonstrated that such provision is not feasible. Regarding the above policy, the onus is on the applicant to demonstrate compliance with the policy.

The applicant is proposing to install a biomass boiler to reduce the carbon emissions of the development by 55% over and above those due to energy efficiency. However, in order to verify these figures, the Mayor requires further details on the sizing of the biomass system, including output capacity and load profiles. Further site specific consideration also needs to be given to the supply, delivery and storage of the biomass.

The Mayor considers that the proposals are on the whole acceptable in principle, but further information and revisions to the scheme would be required, including the consideration of the use of green and brown roofs and photovoltaic panels, in order to comply with London Plan Policies. It is considered that the application as submitted, has not demonstrated that satisfactory energy conservation measures have been incorporated into the layout and design, or that the scheme will have satisfactorily addressed the issues relating to the mitigation of and adaptation to climate change and to minimising carbon dioxide emissions. Accordingly, the proposal would fail to meet the requirements set out in the London Plan for on-site energy generation and sustainability and is considered contrary to Policies 4A.4, 4A 6 and 4A.7 of the London Plan (February 2008).

7.17 Flooding or Drainage Issues

Policies OE7 and OE8 of the UDP seek to ensure that new development incorporates appropriate measures to mitigate against any potential risk of flooding.

Planning Policy Statement 25: Development and Flood Risk requires that a Flood Risk Assessment must accompany proposals for this type and scale of development proposed.

The applicant has submitted a Flood Risk Assessment (FRA), which was referred to the Environment Agency, which has statutory powers on flood risk issues. The Environment Agency's flood map indicates that the application site lies within Flood Zone 1 having a less than 1:1000 probability of flooding from sea or river in any year.

However, the Environment Agency has objected on the basis that the FRA submitted with this application does not comply with the requirements set out in Planning Policy Statement 25 (PPS25). The submitted FRA does not therefore, provide a suitable basis for assessment to be made of the flood risks arising from the proposed development. In line with the London Borough of Hillingdon Strategic Flood Risk Assessment, for all development sites over 1 hectare in size, surface water runoff should be limited to Greenfield rates. The submitted FRA fails to show that it would be feasible to balance surface water runoff to the Greenfield run off rate for all events up to the 1 in 100 year storm (including climate change) and set out how this will be achieved. The Agency has conceded that in the case of the proposed development, only a small proportion of the site is being developed, so it is considered appropriate to only apply this requirement to the new build. However, the assessment included in the FRA that the increase in footprint of the new build is negligible and therefore there would not materially increase the flood risk is not accepted by the Environment Agency, as it is not supported by sufficient evidence.

In addition, the Environment Agency has stated that it will be necessary to show how

Sustainable Drainage Systems (SUDS), such as permeable pavements (with sub base storage), filter drains and strips, swales (for conveyance), temporary basins, ponds, wetlands and green/brown roofs will be maximised on this site, with any obstacles to their use clearly justified. The Agency also requires the applicant to demonstrate how storage will be provided to attenuate the 1 in 100 year storm event, taking into account the effects of climate change.

In light of the above, it is considered that the application has failed to demonstrate that the development would not increase the risk of flooding, contrary to Policies OE7 and OE8 of the

Hillingdon Unitary Development Plan Saved Policies 2007, Policy 4B.6 of The London Plan (February 2008) and Planning Policy Statement 25: Development and Flood Risk.

7.18 Noise or Air Quality Issues

The use of a small scale biomass boiler in an air quality management area needs to have pollution abatement technology fitted. The London Air Quality Strategy (in consultation) requires Local Authorities to carefully scrutinise the use of biomass units in relation to their impacts on air quality. Had the application been recommended for approval this matter could have been covered by condition.

7.19 Comments on Public Consultations

Most of the issues raised relate to the the impact on the Green Belt, the impact on the listed building, access, parking and traffic concerns. These matters have been dealt with in the appropriate sections of the report and in many cases, incorporated into the recommended reasons for refusal.

The issues of the damage to and upkeep of private roads leading to the application site, during the construction and operational phases of the development have been raised by the Ickenham Residents' Association and residents of The Drive. These matters have been addressed in the report. Had the application been recommended for approval, the repair/rehabilitation of road network, resulting from potential damage from construction impacts and operational traffic and improvements to the footways and street lighting leading to public transport links could have been negotiated with the developer and secured via appropriate conditions or legal agreement(s).

Damage to adjoining properties during construction activities is subject to separate legislation and is also not a planning matter.

7.20 Planning Obligations

Policy R17 of the Hillingdon UDP is concerned with securing planning obligations to supplement the provision recreation open space, facilities to support arts, cultural and entertainment activities, and other community, social and education facilities through planning obligations in conjunction with other development proposals. These UDP policies are supported by more specific supplementary planning guidance.

As the application is being recommended for refusal, no negotiations have been entered into with the developer in respect of these contributions. However, if the application were to be considered for approval, the following heads of terms would have been pursued:

(i) Repair/rehabilitation of road network, resulting from potential damage from construction impacts.

(ii) TfL has requested that a footway be provided to connect the footway along the site access to the footway on Harvil Road to create a continuous walking route to the site for access to buses on Harvil Road.

(iii) TfL has also requested that the applicant provide details of the street lighting in the area, to demonstrate whether safe pedestrian access is possible after dark. Should

deficiencies be identified, a contribution should be secured in the S106 towards improving the street lighting.

(iv) Improvements to the road network and site access necessary to facilitate the impact of additional traffic movements (if any), generated by the development.

(v) A travel plan.

(vi) A contribution in the sum of £23,400.36 will be sought if a bid is received demonstrating need by the local Primary Care Trust for health facilities.

(vii) A contribution towards environmental improvements to off-set any negative impacts of the proposal on the immediate environment.

(viii) A contribution equal to £2,500 for every £1 million build cost for construction training, depending upon the estimated costs of converting this building.

(ix) 5% of the financial contributions towards project management and monitoring.

No legal agreement to address this issue has been offered. As such, the proposal fails to comply with Policy R17 of the UDP and it is recommended the application should be refused on this basis.

7.21 Expediency of enforcement action

There are no enforcement issues associated with this site.

7.22 Other Issues

None

8. Observations of the Borough Solicitor

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

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

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

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

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

9. Observations of the Director of Finance

This is not applicable to this application.

10. CONCLUSION

Whilst a change of use of the existing buildings from office to residential care home can be supported in principle, it is considered that the applicant has failed to demonstrate very special circumstances to justify this scale of inappropriate development in the Green belt, arising from the replacement of the existing annex building. It is considered that the new building would have unacceptable impacts on the openness of the Green Belt and on the setting of the grade 2 listed building.

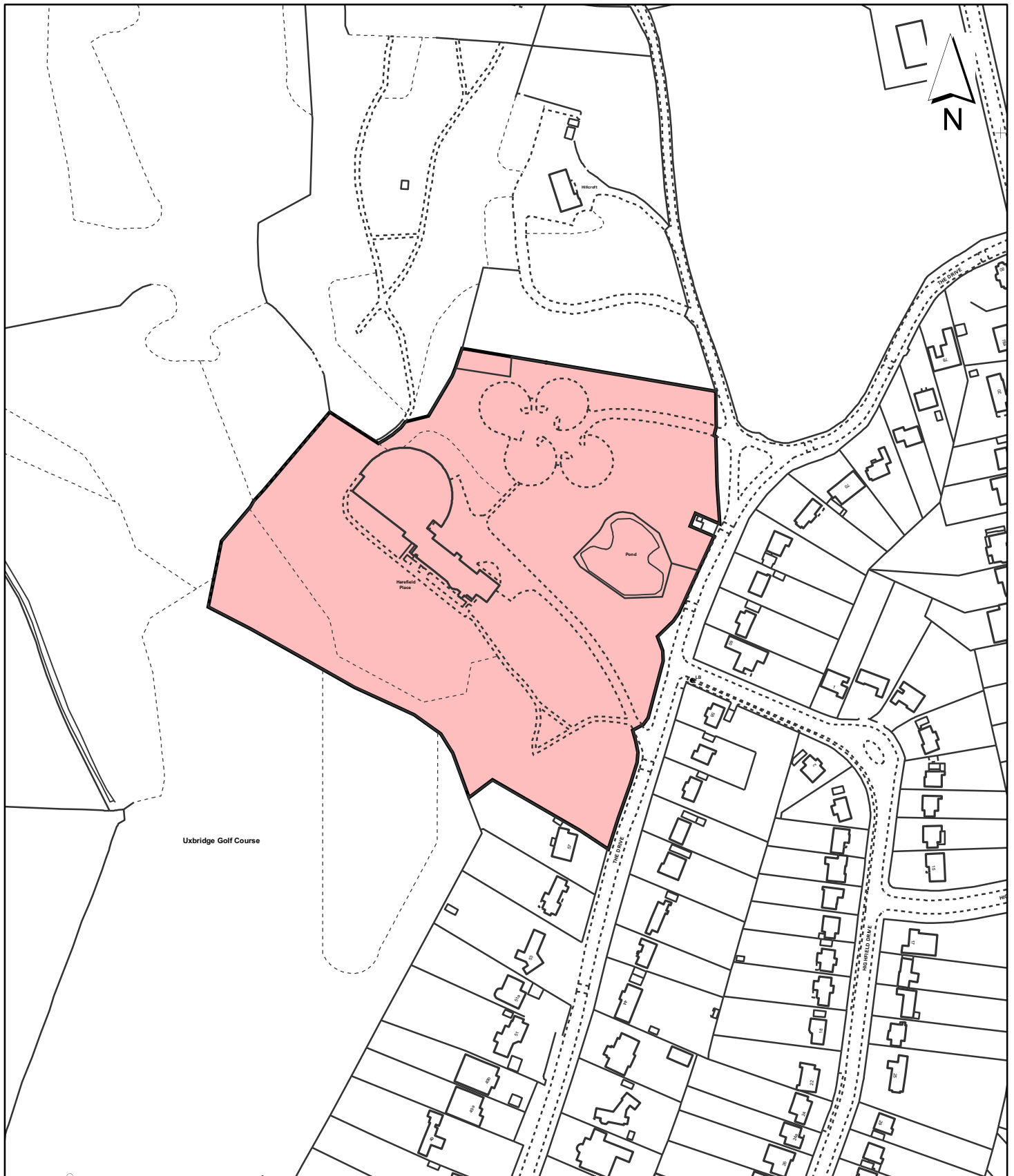
Furthermore, the application has failed to demonstrate that the proposed development could be completed without detriment to the recognised ecological value of this area, or increasing the risk of flooding. The applicant has failed to secure contributions towards the improvements of services and facilities as a consequence of demands created by the proposed development in respect of off site highway improvements, environmental enhancement or health care. Refusal is recommended accordingly.

11. Reference Documents


London Plan Consolidation (February 2008)
Planning Policy Statement 1 (Delivering Sustainable Development)
Planning Policy Statement 3 (Housing)
Planning Policy Statement 5 (Heritage)
Planning Policy Statement 9 (Biodiversity and Geological Conservation)
Planning Policy Statement 25 (Development and Flood Risk)
Planning Policy Guidance Note 2 (Green Belts)
Planning Policy Guidance Note 13 (Transport)
Planning Policy Guidance Note 17 (Planning for Open Space, Sport and Recreation)
Planning Policy Guidance Note 24 (Planning and Noise)
Hillingdon Design and Accessibility Statement (HDAS)
Council's Supplementary Planning Guidance Community Safety by Design
Council's Supplementary Planning Document: Planning Obligations Strategy
Statutory responses

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Notes

 Site boundary

For identification purposes only.

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**LONDON BOROUGH
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Planning &
Community Services**

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Telephone No.: Uxbridge 250111

Planning Application Ref:

12571/APP/2010/319

Scale

1:2,500

Planning Committee

North

Date

April 2010



HILLINGDON
LONDON