

24 November 2015

Harefield Place, The Drive Ickenham

in the London Borough of Hillingdon

planning application no.12571/APP/2015/3649

Strategic planning application stage 1 referral

Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008.

The proposal

Detailed application for the demolition of existing modern U-shaped extension. Conversion of existing Grade II listed building and erection of a replacement extension building to provide 25 self-contained apartments, with associated basement car, cycle and motorcycle parking, private and communal amenity spaces and landscape enhancement, retaining existing entrance piers, the main vehicular entrance on The Drive and existing secondary servicing access with ancillary outbuildings (planning and listed building consent application).

The applicant

The applicant is **Manorgrove Homes (UK) LTD**, and the architect is **Willcox and Meilwes**.

Strategic issues

Green Belt, heritage, change of use, loss of office space, affordable housing, housing mix and tenure split, space standards, design, inclusive access, energy, flooding and transport are the key strategic issues relevant to this proposed development.

Recommendation

That Hillingdon Council be advised that the application does not fully comply with the London Plan, for the reasons set out in paragraph 68 of this report; but that the possible remedies set out in that paragraph of the report could address these deficiencies. The application does not need to be referred back to the Mayor if the Council resolves to refuse permission, but it must be referred back if the Council resolves to grant permission.

Context

1 On 16 October 2015 the Mayor of London received documents from Hillingdon Council notifying him of a planning application of potential strategic importance to develop the above site for the above uses. Under the provisions of The Town & Country Planning (Mayor of London) Order 2008 the Mayor has until 26 November 2015 to provide the Council with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor's use in deciding what decision to make.

2 The application is referable under Category 3D of the Schedule to the Order 2008: *"Development on land allocated as Green Belt...which would involve the construction of a building with a floor space of more than 1,000 square metres."*

3 Once Hillingdon Council has resolved to determine the application, it is required to refer it back to the Mayor for his decision, as to whether to direct refusal or allow the Council to determine it itself, unless otherwise advised. In this instance, if the Council resolves to refuse permission it need not refer the application back to the Mayor.

4 The Mayor of London's statement on this case will be made available on the GLA website www.london.gov.uk.

Site description

5 The site known as Harefield Place, as shown in Figure 1, is set in about 3.7 hectares in extent, comprising office accommodation with associated parking. It is the former headquarters of Blockbuster UK and located on the west side of The Drive, Ickenham. It is within half a mile of the A40M at the Swakeleys roundabout, which itself is 1.5 miles from Junction 1 of the M40, and 2.5 miles from Junction 16 of the M25.

6 The whole of the site is located within the Metropolitan Green Belt, a Nature Conservation Site of Borough Grade II or Local Importance and the Colne Valley Park. At present the grounds are unmaintained and overgrown. The land falls dramatically away from the existing buildings to the south west 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 east of the house.

7 The Drive is a private road of two storey-detached house, which is Grade II listed that dates from the late 18th century is of mixed architectural style and quality set in medium to large plots. This forms the eastern boundary of the site. To the north of the site is open land and to the south and south west is Ickenham Golf Course.



Figure 1: the application site in context (Source: applicant's design and access statement)

8 To the west of the site is Buckingham Golf Course and to the south, 1.1km away is the A40 Western Avenue which forms part of the Transport for London Road Network (TLRN). The site was previously used as a hospital and its last use, up until 2012, was for office uses. The nearest bus stop is on Swakeleys Road approximately 750mts away to the east of the site where the U1 bus route

passes through with a frequency of roughly 4 buses per hour. The nearest London Underground services are found at West Ruislip (on the Central line) and Ickenham (on the Piccadilly line) stations, both are approximately 2km from the site westwards. As a result of this the public transport access level (PTAL) score of the site is 1a; the lowest score out of a range of 1-6, where 6 is the most accessible.

Details of the proposal

9 This full planning application is for a change of use from offices (Class B1 (a)) to residential (Class C3) and involves the conversion of part of the listed building and the demolition and replacement of the modern U-shaped extension to provide residential flats. The existing main listed building will be largely retained.

10 The total residential development will be 25 self-contained apartments.

- 9 units in the listed building and 16 units in the new replacement building.
- 16 x 2 bed and 9 x 3 bed residential units.

11 The proposal incorporates associated basement car, cycle and motorcycle parking, private and communal amenity spaces and landscape enhancement, retaining existing entrance piers, the main vehicular entrance on The Drive and existing secondary servicing access with ancillary outbuildings (planning and listed building consent application).

Case history

12 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) – Withdrawn 4th May 2010 .

13 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) (Application for Listed Building Consent) – Withdrawn 4th May 2010.

14 Both applications were considered by the Mayor and in the GLA's stage 1 report (PDU/2595) key strategic concerns in particular on the principle of land use were raised and that the very special circumstances that were put forward by the applicant did not justify the inappropriate development on Green Belt. As both applications were withdrawn there were no stage 2 referrals to the Mayor.

Strategic planning issues and relevant policies and guidance

15 The relevant issues and corresponding policies are as follows:

- Green Belt *London Plan;*
- Historic Environment *London Plan;*
- Employment *London Plan;*
- Housing *London Plan; Housing SPG; Housing Strategy; draft interim Housing SPG; Shaping Neighbourhoods: Play and Informal Recreation SPG; Shaping Neighbourhoods: Character and Context SPG;*
- Affordable housing *London Plan; draft interim Housing SPG; Housing SPG; Housing Strategy;*
- Urban design *London Plan; Shaping Neighbourhoods: Character and Context SPG; Housing SPG; draft interim Housing SPG; Shaping Neighbourhoods: Play and Informal Recreation SPG;*
- Access *London Plan; Accessible London: achieving an inclusive environment SPG;*

- Sustainable development *London Plan; Sustainable Design and Construction SPG; Mayor's Climate Change Adaptation Strategy; Mayor's Climate Change Mitigation and Energy Strategy; Mayor's Water Strategy;*
- Flooding *London Plan;*
- Transport *London Plan; the Mayor's Transport Strategy;*

16 For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area 2012 Hillingdon Local Plan: Part 1 - Strategic Policies, and the Part 2 - Saved policies of the Unitary Development Plan (2012), and the London Plan (Consolidated with Alterations since 2011).

17 The National Planning Policy Framework and Technical Guide to the National Planning Policy Framework, the draft Minor Alteration to the London Plan (MALP, 2015), and the Council's emerging Local Plan: Part 2 - Development Management Policies and Site Allocations and Designations are also relevant material considerations.

Principle of land use: change of use – office to residential use on Green Belt

Green Belt

18 The NPPF states that that re-use of buildings in the Green Belt, provided that the buildings are of permanent and substantial construction, is not inappropriate development within the Green Belt. Given the listed range is of solid construction, it is considered appropriate for reuse. Comparing the impact on the Green Belt of the previous use with the proposed conversion of the main house for residential, the impact in terms of activity is considered to be comparable. Therefore in terms of national Green Belt policy, the conversion of this element of the scheme to residential development in the form of flats would be acceptable in principle.

19 New buildings are generally inappropriate, but subject to a number of exceptions set out in para 89 of the NPPF, including the limited infilling of previously developed land, provided it has no greater impact on the openness of the Green Belt, the proposed development could be acceptable. However, if the proposal is considered to have a greater impact on the openness of the Green Belt, then the proposal would amount to inappropriate development in the Green Belt, and there would be a need to establish whether very special circumstances arise. Given the level of information submitted, it is likely that the new extension would have a greater impact on the openness of the Green Belt than the existing annexe. Should the replacement building be considered to have disproportionately changed the bulk of the existing extension, as stated above, very special circumstances would need to be demonstrated and the scheme treated as a departure if minded to grant permission.

20 Very special circumstances (VSC): The applicant has put forward justification which in combination they contend would amount to 'very special circumstances', which should be afforded significant weight in the assessment and determination of the planning application. It is summarised as follows.

21 The applicant has stated that the physical restoration/conversion of the Grade II listed building, significantly improved high architectural quality and subservient nature of the replacement building; enhancement to the north east wing and comprehensive reinstatement of the historic landscape and landscaping of the extensive top car park to complement this key heritage asset in Hillingdon Borough.

22 GLA officer's comments on the VSC: It is acknowledged that there will be significant improvement through the physical restoration/conversion of the Grade II listed building the element of the proposals related to this building and this can be considered as appropriate development, as there will be no significant changes in footprint, massing and height.

23 However, the extension element of the proposal, i.e. the proposed new block to the north east of the listed building that replaces the existing U-Shaped building could have a greater impact

upon the immediate setting of the historic house and the openness of the Green Belt. As shown in the figure below, the revised scheme seems to have reduced the footprint of the extension element of the proposed development. However, the applicant should submit in a table format the comparison between the existing and proposed element of the extension the parameters in the built form (footprint, floor space, height and spread of development), so that a like-for-like or a lesser replacement of the existing extension can be demonstrated. The justifications put forward such as enhanced landscaping and improved design of the basement car park do not in GLA's officers opinion represent very special circumstances.

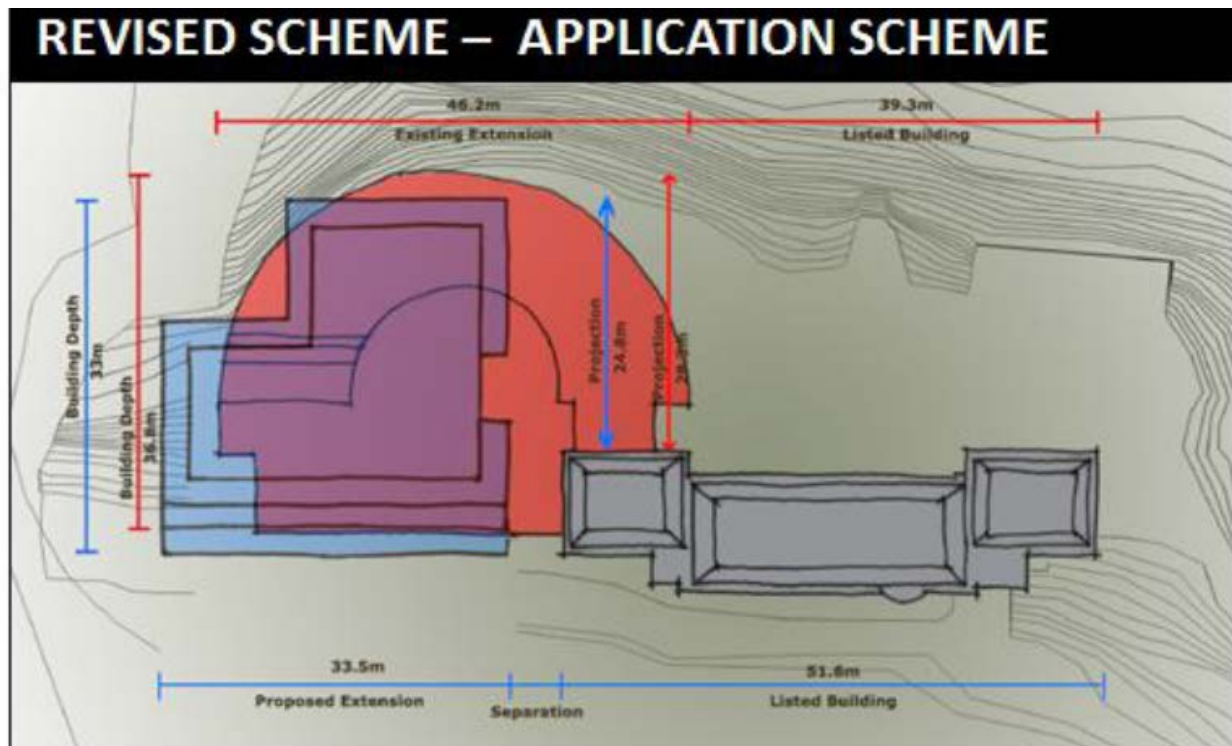


Illustration of comparative assessment of the existing and proposed extension of the scheme: Source –applicant's planning statement.

24 Therefore, it is not considered that a robust demonstration has been made that there are specific 'very special circumstances' in regard to the extension element of the proposal in terms of impact on the openness of the Green Belt and the loss of or harm to Green Belt in this instance. The applicant is required to submit a full list of parameters of comparisons between the existing and proposed extension to justify the extension element of the proposal so that its impact on the openness of the Green Belt can be fully assessed.

Loss of office space

25 It is acknowledged that the existing buildings have been vacant for some time, with efforts made to let them for office purposes but without success (this is also detailed with evidence base in the marketing report submitted). In view of this, there is considered to be no objection in principle to their conversion to residential use. It is also considered that a satisfactory residential environment could potentially be created for all of the future occupiers.

26 Provided the proposed scheme is not considered to be contrary to Green Belt and Heritage planning policies as a result of the conversions, the scheme would accord with National and London Plan policies in strategic context and no objection would be raised to the redevelopment of the site for residential use. However, the Council should satisfy itself that the loss of office space is acceptable in this instance.



Demonstration of inter-relationship between the proposed design, Green Belt and Heritage: Source-Applicant's design and access statement.

Historic environment – Heritage & design

27 London Plan Policy 7.8 'Heritage Assets and Archaeology' states that development should identify, value, conserve, restore, re-use and incorporate heritage assets where appropriate. The proposal will have an impact on designated heritage assets in terms of the Grade II Listed Harefield Place.

28 The Planning (Listed Buildings and Conservation Areas) Act 1990 sets out the tests for dealing with heritage assets in planning decisions. In relation to listed buildings, all planning decisions should *"have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses"* and in relation to conservation areas, special attention must be paid to *"the desirability of preserving or enhancing the character or appearance of that area"*.

29 The NPPF states that when considering the impact of a proposal on the *significance* of a designated heritage asset, great weight should be given to the asset's conservation, and the more important the asset, the greater the weight should be. Significance is the value of the heritage asset because of its heritage interest, which may be archaeological, architectural, artistic or historic, and may derive from a heritage asset's physical presence or its setting. Where a proposed development will lead to 'substantial harm' to or total loss of the significance of a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss. Where a development will lead to 'less than substantial harm', the harm should be weighed against the public benefits of the proposal, including securing its optimum viable use. Recent judgements have provided detailed consideration of the duty imposed on local planning authorities. The Court of Appeal in *Barnwell Manor* held that a finding of harm to a listed building or its setting is a consideration to which the decision-maker must give considerable weight, and that there should be a strong presumption against granting permission that would harm the character or appearance of a conservation area.

Significance of designated heritage assets

30 This Grade II listed Georgian mansion has been in institutional use as a club, a hospital and offices for nearly a century, and in that time has undergone significant alteration in terms of internal remodelling and extensions, most notably the addition of a well-considered and well-detailed horse-shoe-plan two storey wing of offices in the early 1980s. It is an important heritage asset which given its vacancy for several years and its deteriorating condition is in urgent need of a long-term solution to restore the listed building and secure a sensitive and modest enabling development to bring the site back into a viable use consistent with its conservation.

31 Whilst the reinstatement of the mansion as a free-standing entity and the restoration of the end elevation where the existing horse-shoe extension was attached, is welcomed, the proposed new block to the north east of the listed building would have a greater impact upon the immediate setting of the historic house (particularly its south west facade) than the existing 1980s extension by virtue of its bulk and siting. It is recommended that the design is reconsidered to achieve a more subsidiary new-build development that intrudes to a lesser degree upon the original house, setting it slightly further away to benefit the integrity of the listed building and reappraising the horizontal emphasis of the new build (elevation C) which jars with the traditional vertical proportions of the mansion. It has not been sufficiently demonstrated that the degree of harm to the setting of the listed building exerted by the proposed development in its current form will be outweighed by the benefit of bringing the site back into use; this therefore requires further thought so as to accord with London Plan Policy 7.8 (D). That said, the proposal for the existing 55,000sq ft of tarmac to be reduced by approximately two thirds and the remaining tarmac to be replaced by resin bound gravel, enhancing the setting of the Listed Building, is welcomed.

32 The Council needs to be satisfied that the substantial remodelling proposed within the listed building respects its historic and architectural significance in terms of fabric and heritage features to be retained, and the proposed layout, so as to avoid conflict between this heritage asset's conservation and the creation of the new residential units within. Furthermore, the Council should consider submitting a request to Historic England to add this listed building to the Heritage at Risk Register.

Housing

Housing choice/mix

33 London Plan Policy 3.8 encourages a full range of housing choice. This is supported by the London Plan Housing SPG, which seeks to secure family accommodation within residential schemes, particularly within the social rented sector, and sets strategic guidance for Councils in assessing their local needs. Policy 3.11 of the London Plan states that within affordable housing provision, priority should be accorded to family housing.

34 The applicant is proposing 25 market units. The housing mix incorporates 16 x 2 bed and 9 x 3 bed residential units. Although, this housing mix offers a range of housing choices, the Council is encouraged to seek more family housing units.

Housing quality/space standards

35 As shown in the Table below, the submitted planning statement confirms that all dwellings will comply with the minimum space standards established by London Plan Policy 3.5 (Table 3.3). This and other components of residential quality are considered below in the urban design section of this report.

36 As shown in the table in the Appendix below, a generous and spacious residential floor space has been provided which exceeds by large margin the minimum space standards of the London Plan. This is welcomed. The other housing quality elements such as the residential floor plans have no single aspect and all of the units are dual aspect. The provision of a tennis court with communal winter garden and private gardens, and recreation area around the pond ensure the quality of life the housing development enables.

Children & young person's play

37 Policy 3.6 of the London Plan sets out that “development proposals that include housing should make provision for play and informal recreation, based on the expected child population generated by the scheme and an assessment of future needs.” Using the methodology within the Mayor’s supplementary planning guidance ‘Providing for Children and Young People’s Play and Informal Recreation’ it is anticipated that there will be approximately five children within the development (based on the proposed housing mix). The guidance sets a benchmark of 10sqm of useable child play space to be provided per child, with under-5 child play space provided on-site.

38 That said, as the London Plan and the SPG do not require children’s play space for a child population of less than ten, provision of children’s play space cannot be pursued in this instance.

Affordable housing

39 London Plan London Plan Policy 3.12 seeks to secure the maximum reasonable amount of affordable housing when negotiating on individual private residential and mixed use schemes. Part C of this policy makes clear that affordable housing should normally be provided on-site unless there are exceptional circumstances that dictate otherwise.

40 The Hillingdon Council’s affordable housing requirement set by its Core Strategy is for 35% as a starting point for negotiations in all developments. Where provision on-site is not practical or viable, the affordable housing should be provided off-site in the vicinity.

41 The planning statement states that on the basis of the costings for the listed building landscape/basement parking etc., the scheme will not achieve the 35% affordable housing provision. The applicant has submitted a financial viability report in which the level of affordable housing to be provided is 0%. The report indicates that even at 0% affordable housing provision the scheme is non-viable with a deficit of -£785,501.

42 In the financial viability assessment the location of the site and the refurbishment cost have been mentioned as key constraints on the ability to deliver the provision of affordable housing. However, it should be noted that, GLA officers having assessed other similar consented housing schemes in the area believe that the above mentioned constraints should not be obstacles at least to provide intermediate units.

43 That said, the applicant should agree that the viability report should be assessed by independent consultants, nominated by the Council and the results of the independent review should be shared with the GLA. Once scrutinised, this will inform affordable housing negotiations and the nature of any affordable housing offer that is ultimately to be secured or not. GLA officers will provide an update on the findings of the viability review, and the affordable housing provision secured, at the Mayor’s decision making stage.

Inclusive access

44 Inclusive design principles if embedded into the development and design process from the outset help to ensure that all people, including older people, disabled people, children and young people, can use the places and spaces proposed comfortably, safely and with dignity. The aim of London Plan Policy 7.2 is to ensure that proposals achieve the highest standards of accessibility and inclusion (not just the minimum). The MALP housing standards policy 3.8 specifies that 10% of new dwellings must be fully wheelchair accessible in accordance with Part M4 (3) of the Building Regulations. The remaining 90% of units must be adaptable and accessible in line with Part M4 (2) of the Building Regulations.

45 In terms of the Listed Building the applicant has sought where ever possible to comply with the policies set out in the guidance documents. The applicant has confirmed that 10% of all the residential units will be wheelchair accessible and the planning statement provides assurance that all units will be 100% Lifetime homes compliant. The applicant has demonstrated on floor plans and drawings, at which floors these wheelchair accessible units will be located. This is welcomed.

46 The design and access statement demonstrates that the basement provides 50 car parking spaces. 5 of these (i.e. 10%) are disabled parking spaces based on 1 per wheelchair accessible unit, plus 1 per main entrance, which are indicated on plans and drawings. Whilst the inclusive access measures are welcomed they should be secured by appropriate conditions.

Sustainability/energy

Energy efficiency standards

47 A range of passive design features and demand reduction measures are proposed to reduce the carbon emissions of the proposed development. Both air permeability and heat loss parameters will be improved beyond the minimum backstop values required by building regulations. Other features include low energy lighting. However, the applicant should outline the measures taken to avoid overheating and minimise cooling demand in line with Policy 5.9.

48 The development is estimated to achieve a reduction of 1 tonnes per annum (4%) in regulated CO₂ emissions compared to a 2013 Building Regulations compliant development from energy efficiency measure. Sample SAP worksheets (both DER and TER sheets) for the development including efficiency measures alone should be provided to support the savings claimed.

District heating

49 The applicant has confirmed that there are no existing or planned district heating networks within the vicinity of the proposed development. The applicant is proposing an individual boiler solution. Given the isolated location and the small number of dwellings an individual boiler approach is accepted in this instance.

Combined Heat and Power (CHP)

50 Due to the intermittent nature of the heat load, CHP is not proposed. This is accepted in this instance.

Renewable energy technologies

51 The applicant has investigated the feasibility of a range of renewable energy technologies and is proposing to install 250sqm of Photovoltaic (PV) panels on the roof of the development. A roof layout showing 400sqm floor space is provided for the solar panels including space between rows of panels, which is welcomed. A reduction in regulated CO₂ emissions of 10 tonnes per annum (31%) will be achieved through this third element of the energy hierarchy.

Overall carbon savings

52 The table below shows the residual CO₂ emissions after each stage of the energy hierarchy and the CO₂ emission reductions at each stage of the energy hierarchy.

Table: CO₂ emission reductions from application of the energy hierarchy.

	Total residual regulated CO₂ emissions	Regulated CO₂ emissions reductions	
	(tonnes per annum)	(tonnes per annum)	(%)
Baseline i.e. 2013 Building Regulations	32		
Energy Efficiency	31	1	4%
CHP	31	0	0%
Renewable energy	21	10	31%
Total		11	35%

53 A reduction of 11 tonnes of CO₂ per year in regulated emissions compared to a 2013 Building Regulations compliant development is expected, equivalent to an overall saving of 35%. The carbon dioxide savings meet the target set within Policy 5.2 of the London Plan. The carbon dioxide savings

meet the target set within Policy 5.2 of the London Plan. However, the comments above should be addressed before compliance with London Plan energy policy can be verified.

Flooding

54 Flood Risk: The Flood Risk Assessment confirms that the 3.3ha site is within Flood Zone 1 and that the majority of the site has relatively low risk of surface water flooding. The proposals are therefore acceptable in flood risk terms and comply with London Plan policy 5.12 (Flood Risk). However, there is a small pocket of significant surface water flood risk to the north of the historic building. There is also significant risk of river and surface water flooding in the wider catchment, particularly around Fray's River.

55 Sustainable Drainage: The wider catchment area is shown to have extensive surface water flood risk. The location of the site on a slope leading down to the River Fray makes London Plan policy 5.13 particularly important for this development. The applicant has proposed a greenfield run-off rate in a 1:100 year (+ climate change) storm event, with surface water discharge from the site restricted to 5 l/s.

56 The applicant has made a broad assumption about the lack of permeability of the ground in this location due to the presence of London Clay. This may well be an issue, but even London Clay has some permeability, and the availability of large areas within the grounds offer the opportunity for dispersed infiltration and planted areas capable of soaking or absorbing rainwater, respectively. The applicant has also assumed that rooftop solar panels are incompatible with green / brown roofs. This is not the case, as has been demonstrated at 55 Broadway (<http://www.livingroofs.org/55-broadway-biodiverse-green-roof>) and at other locations (<http://www.livingroofs.org/pvs-and-green-roofs>). Because of these assumptions, proposed sustainable drainage measures include a lined permeable block paving/porous asphalt system and a detention pond. The drainage aspects of the proposals comply with London Plan Policy 5:13.

57 However, there is potential for more sustainable drainage measures, such as swales and green roofs to be incorporated into the designs, in line with the London Plan's drainage hierarchy. These measures may well offer cost savings for the development (as well as contributing to London Plan policies 5.10, 5.11 and 7.19) and mean that engineered attenuation can be reduced or eliminated.

Transport for London's comments

Car parking

58 The proposal states that there will be 50 car parking spaces provided in a basement car park. This represents a ratio of two spaces per unit. Despite the very low PTAL, TfL regards this provision as being excessive. To be in accordance with the London plan policy 6.2, TfL requests that there is a maximum provision of 30 spaces.

59 TfL welcomes the commitment to providing electric vehicle charging facilities. However, TfL requests that 20% of all spaces be fitted with charging points and an additional 20% have passive provision for the future. This is in accordance with London plan policy 6.13. Disabled parking on the site is above 10% which is considered acceptable; and in line with London Plan policy 6.2.

Access, servicing and cycle parking

60 There are two vehicular access points to the site, both from 'The Drive'. According to the report, the northern access point will be used for servicing whilst the southern one will be the main access route. TfL welcomes the differentiation between the vehicular and the pedestrian/ cyclist paths to the main building. One concern found in the design and access statement was the shared route for both the pedestrians and cyclists. This is acceptable in principle, but TfL would stress the path must be wide enough to safely accommodate both road users. Further guidance is available in TfL's 2014 London Cycle Design Standards publication, chapter 8. Furthermore, more clarification on where the cycle storage facilities will be located and their accessibility must be detailed. TfL also

requests confirmation that 2 cycle parking facilities for each housing unit will be provided, which equates to a total of at least 50 spaces on site.

Transport assessment & public transport impact

61 TfL has reviewed the trip generation presented within the Transport Assessment (TA). The applicant has used areas with similar density as the parameters to calculate the trip generation which is therefore considered robust and the resultant person trip rates appear reasonable. Notwithstanding the above car parking comments, which will result in a further reduced level, on this occasion, the trip rate is acceptable and the resultant effect on the surrounding roads and public transport services relatively low.

Mitigations

62 A delivery and servicing plan (DSP) should be provided to determine if there are any detrimental effects on the TLRN. These should be identified and consulted on with TfL. This will ensure compliance with London Plan policy 6.14. TfL expects the development to also be supported by a construction management plan (CMP) and a Construction Logistics Plan (CLP). A travel plan is also expected by TfL as it is a key tool to facilitate this proposal.

63 The Mayor has introduced a London-wide Community Infrastructure Levy (CIL) to help implement the London Plan, particularly policies 6.5 and 8.3 toward the funding of Crossrail. The rate for the borough of Hillingdon is £35 per square metre.

Summary

64 Subject to clarification on cycle parking facilities and shared path along reduction in car parking, amendments to the electric vehicle charging points and necessary mitigations, and the submission of travel plan, DSP and CSP, the proposals could be considered compliant with the London plan transport policies.

Local planning authority's position

65 Hillingdon Council planning officers have yet to confirm their position.

Legal considerations

66 Under the arrangements set out in Article 4 of the Town and Country Planning (Mayor of London) Order 2008 the Mayor is required to provide the local planning authority with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. Unless notified otherwise by the Mayor, the Council must consult the Mayor again under Article 5 of the Order if it subsequently resolves to make a draft decision on the application, in order that the Mayor may decide whether to allow the draft decision to proceed unchanged or direct the Council under Article 6 of the Order to refuse the application. There is no obligation at this present stage for the Mayor to indicate his intentions regarding a possible direction, and no such decision should be inferred from the Mayor's statement and comments.

Financial considerations

67 There are no financial considerations at this stage.

Conclusion

68 London Plan policies on Green Belt, heritage, change of use, loss of office space, affordable housing, housing mix and tenure split, space standards, design, inclusive access, energy, flooding and transport are the key strategic issues relevant to this proposed development are relevant to this application. 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:

- **Principle of development: change of use - office use to residential on Green Belt:** The change of use from office to residential is acceptable. The restoration and redevelopment of the listed building is appropriate development as it complies with the exception in the NPPF. However, the very special circumstances provided for the inappropriate element of the proposal (the extension) do not fully justify the development on Green Belt. Further details in regard to parameters of proposed the built forms are required.
- **Heritage and design:** Whilst the restoration and improvement of the listed building is supported in principle, the proposed extension block to the north east of the listed building would have a greater impact upon the immediate setting of the historic house it requires further thought so as to accord with London Plan Policy 7.8 (D).
- **Housing mix, tenure split and space standards:** The residential space standards provided exceed the minimum space standard of the London Plan. Whilst the scheme offers a range of housing choices, the Council is encouraged to seek more family housing units.
- **Affordable housing:** The applicant has submitted a financial viability report in justification of 0% affordable housing. However, this report needs to be reviewed by independent consultants and the result should be shared with the GLA.
- **Inclusive access:** The redevelopment complies with inclusive access policies of the London Plan, all the measures proposed need to be conditioned.
- **Energy:** The scheme complies with energy policies of the London Plan, provided Sample SAP worksheets (both DER and TER sheets) for the development including efficiency measures are submitted to support the savings claimed. All the proposed measures should be conditioned.
- **Flooding:** The drainage aspects of the proposals comply with London Plan Policy 5:13. However, there is potential for more sustainable drainage measures, such as swales and green roofs to be incorporated into the designs, in line with the London Plan's drainage hierarchy.
- **Transport:** Car parking provision should be reduced. Further clarification is required on cycle parking facilities and shared path ways. Amendments to the electric vehicle charging points and necessary mitigations should be considered. The submission of travel plan, DSP and CSP is required and should be secured.

For further information, contact GLA Planning Unit (Development & Projects Team):

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Appendix

Table: Proposed residential floor area schedule:

	Flat Type	Net (sqm)
Proposed Extension		
Basement		
Unit 1	2 Bed	123.5
Unit 2	2 Bed	123.5
Unit 3	2 Bed	111.2
Ground Floor		
Unit 4	3 Bed	168.2
Unit 5	3 Bed	154.7
Unit 6	2 Bed	139.9
Unit 7	2 Bed	141.7
Unit 8	2 Bed	145.6
First Floor		
Unit 9	3 Bed	159.9
Unit 10	3 Bed	142.8
Unit 11	2 Bed	111.6
Unit 12	3 Bed	136.6
Unit 13	3 Bed	144.6
Second Floor		
Unit 14	3 Bed	161.6
Unit 15	3 Bed	139.5
Unit 16	3 Bed	160.4
Total		2265.3
Listed Building		
Basement		
Unit 17	2 Bed	138.6
Unit 18	2 Bed	140.7
Ground Floor		
Unit 19	2 Bed	146.0
Unit 20	2 Bed	145.4
Unit 21	2 Bed	151.2
First Floor		
Unit 22	2 Bed	150.5
Unit 23	2 Bed	139.4
Unit 24	2 Bed	152.6
Second Floor		
Unit 25	3 Bed	178.4
Stair Access		7.3
Total		1350.1
Overall Total		3615.4