
HOUSEHOLDER REPORT

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References: P/2022/0601 00260/A/P3

Address: Vine Lodge Church Road TW7 4PH

Proposal: Demolition of existing house and garage and erection of two houses with associated landscaping, vehicular parking, cycle and bin storage.

Drawing numbers: PL2/SM/3142 – 00, PL2/SM/3142 – 01, PL2/SM/3142 – 02, PL2/SM/3142 – 03, PL2/SM/3142 – 04, PL2/SM/3142 – 05, PL2/SM/3142 – 06, PL2/SM/3142 – 07, PL2/SM/3142 – 08, 101, 102, 103, 104, Energy Statement, Reasonable Exception Statement (RES), Regulations Compliance Report, Tree Report, Bin Store received 4 February 2022

Application received: 4 February 2022

1.0 RELEVANT FACTS - SITE AND CONTEXT



1.1 The application site comprises of a detached dwelling which fronts Church

House has 200 years of history and is an important part of the Conservation Area	See Section 6.5-6.12
Modern property would be at odds with wider Conservation Area	See Section 6.5-6.12
Proposal would result in loss of mature trees and loss of ecological benefit within the area	See Section 6.29 – 6.30
Proposal would not be compatible with council's sustainability objectives and would cause net energy loss	See Section 6.31 – 6.34
New building is not in keeping with the distinct character and should be refurbished rather than demolished	See Section 6.5-6.12
Creation of large basement could lead to drainage problems	Noted
Harm to living conditions for neighbouring properties including loss of privacy and light	See Section 6.13 – 6.16
Excessive parking would be provided on side	See Section 6.23 – 6.28
Disruption and dust would result from building works	See Section 6.13 – 6.16
Discrepancies on the planning application form	Noted
Proposal would not preserve or enhance the quality of the Conservation Area	See Section 6.5-6.12
Allowing decimation of garden space reduces biodiversity and increases danger of climate change	See Section 6.29 – 6.30
Proposal could set precedent that demolition in conservation area is acceptable	See Section 6.5-6.12

Proposal would go against the spirit of council's own assessment of threats to the Conservation Area	See Section 6.5-6.12
Proposal is one of the last remaining 'Davis' style working men's villas in the area	See Section 6.5-6.12

5.0 POLICY

Determining applications for full or outline planning permission

- 5.1 The determination must be made in accordance with the development plan unless material considerations indicate otherwise. Local finance considerations must also be assessed.

Determining applications in a conservation area

- 5.2 In considering whether to grant planning permission with respect to any buildings or other land in a conservation area, special attention shall be paid to the desirability of preserving or enhancing the character or appearance of the conservation area.

National Planning Policy Framework

- 5.3 The National Planning Policy Framework (NPPF) was revised on 20 July 2021. The National Planning Practice Guidance (NPPG) is an online guidance resource that supports the NPPF. These may be material considerations. They will be cited in application reports where relevant to the case at hand

Development Plan

- 5.4 The Development Plan for the Borough comprises the Council's Local Plan (adopted by the Council on 15 September 2015), the West London Waste Plan and the London Plan 2021 (published by the Greater London Authority on 2 March 2021).
- 5.5 The Council is undertaking Local Plan Reviews: the West of Borough, Great West Corridor and Site Allocations Local Plan reviews. None is relevant in this case.
- 5.6 The adopted Local Plan and emerging Local Plan Review documents can be viewed on the Planning Policy pages of the Hounslow website and will be cited in reports where they are relevant to the case at hand.

5.7 London Plan Policies

- GG2** Making the Best Use of Land
- GG4** Delivering the Homes Londoners Need
- D4** Delivering good design

D6	Housing Quality and Standards
D10	Basement development
D12	Fire safety
H1	Increasing housing supply
H2	Small Sites
G6	Biodiversity and access to nature
G7	Trees and Woodlands
HC1	Heritage Conservation and Growth
SI1	Improving air quality
SI2	Minimising greenhouse gas emissions
SI5	Water infrastructure
T5	Cycling
T6	Car parking

5.8 Local Plan Policies

CC1	Context and Character
CC2	Urban Design and Architecture
CC4	Heritage
SC1	Housing growth
SC3	Meeting the need for a mix of housing size and type
SC4	Scale and density of new housing development
SC5	Ensuring suitable internal and external space
SC7	Residential extensions and alterations
G7	Biodiversity
EC2	Developing a sustainable transport network
EQ1	Energy and carbon reduction
EQ4	Air quality
EQ7	Sustainable waste management

5.9 Technical Housing Standards – Nationally Described Space Standards

5.10 Residential Crossovers and Off-Street Parking Policy October 2016

5.11 Spring Grove Conservation Area Appraisal October 2019

5.12 Housing Supplementary Planning Guidance March 2016

6.0 ASSESSMENT

6.1 The main planning issues to be considered are:

- Principle of development
- Design, appearance and impact on Spring Grove Conservation Area
- Impact on neighbours' living conditions
- Standard of accommodation
- Transport and access
- Sustainability
- Biodiversity and Trees
- Fire Safety

Principle of Development:

- 6.2 The NPPF, London Plan and Local Plan place emphasis on Local Authorities to provide housing. Local Plan Policy SC1 (Housing growth) seeks to maximize the supply of housing in the Borough, to meet housing need in a manner consistent with relevant development principles. This Policy also recognises the important contribution of small infill sites to provide additional dwellings, expecting the design of these to respond to and reflect local context and character. London Plan Policy H1 (Increasing London's Housing Supply) recognises the need for more homes in London in order to promote opportunity and provide a real choice for all Londoners in ways that meet their needs at a price they can afford.
- 6.3 London Plan Policy H1 (Increasing Housing Supply) sets the Borough a Housing Target to provide for 17,820 homes over the plan period (2019/20-2028/29). Policy H2 (Small Sites) would introduce a specific target for new homes delivered on small sites over the plan period, for Hounslow this would be 2,800.
- 6.4 The application is not located within the Local Plan and one additional dwelling on site would make a modest contribution to this target. Local Plan policy SC1 retains a presumption against the development of new residential dwellings within the curtilage of existing dwellings when there would be conflict with other policies within the plan. It is considered for the reasons outlined below that the proposal would be in conflict with policies within the Local Plan and is therefore unacceptable in principle.

Design, Appearance and Impact on Spring Grove Conservation Area:

- 6.5 Policy CC1 (Context and Character) seeks to recognise the context and varied character of the borough's places and to ensure that all new development conserves and takes opportunities to enhance their special qualities and heritage and to enhance particular features or qualities that contribute to an area's character and respond to any local architectural vernacular that contributes to an area's character.
- 6.6 Policy CC2 (Urban Design and Architecture) seeks to retain, promote and support high quality urban design and architecture to create attractive, distinctive, and liveable places. Development proposals should respond

meaningfully and sensitively to the site, its characteristics and constraints, and the layout grain, massing and height of surrounding buildings.

- 6.7 The site is in the Spring Grove Conservation Area. The Planning (Listed Buildings and Conservation Areas) Act 1990 provides specific protection for buildings and areas of special architectural or historic interest. Policy CC4 (Heritage) seeks to ensure that any development affecting a conservation area must conserve and take opportunities to enhance the character or appearance of the area, and respect the grain, scale, form, proportions and materials of the surrounding area and existing architecture. The Council expects development proposals to retain and reuse any building in a conservation area which makes, or can be adapted to make, a positive contribution to the character of the area.
- 6.8 This application proposes the demolition of an existing property within the Spring Grove Conservation Area. This submission has not been accompanied by either a Heritage Assessment or Design & Access Statement which outlines the justification for its removal. Whilst the property itself is not listed as a positive contributor to the Conservation Area, this is likely due to the presence of the existing brick wall and limited visibility from the street. The existing building is in keeping with the character of this part of the conservation area and appears to have been part of the original Davies development of Spring Grove and therefore forms an important part of this Conservation Area which largely focuses on the original development of Spring Grove.
- 6.9 The proposed replacement building would not respect the character of the Conservation Area. The Council expects any proposal for a replacement building within the Conservation Area to be of an exceptional design quality, which this is not. The proposal is very pastiche and does not build on the existing high quality of the existing building on the site. Without the submission of a Heritage Assessment or Design & Access Statement it is not clear how the proposal has been developed and informed by the existing site and conservation and the design references are being drawn on for the new building.
- 6.10 The proposed development would be out of keeping with the surrounding area, which comprises of a mixture of 1930s buildings and Edwardian Arts and Craft Style semi-detached properties. The scale of the building would be out of keeping with its surrounds and would have a significantly larger footprint than the existing. It would also be significantly higher than the existing building. The Spring Grove Conservation Area Appraisal identifies the loss of architectural detailing and original materials and the over intensification of plots as threats to the Conservation Area. The Conservation Area Appraisal also highlights the opportunity for 'redevelopment to be of a good and compatible quality and style'. The proposal would not result in a building that is of a compatible style or quality to the existing building within this part of the Spring Grove Conservation Area.
- 6.11 The submission has also included no detailing of proposed landscaping. The majority of the surrounding properties have large landscaped front gardens which contribute to the setting of the individual plots and the conservation

area as a whole. The proposal intends to remove the existing landscaping and trees at the front of the property and replace this with hard surfacing for the parking of cars. This domination of hard surfacing and car parking would be unacceptable and would be further out of keeping with the character of the surrounding Conservation Area.

- 6.12 Overall, the proposed development would result in an addition which would of a scale and design that would appear obtrusive and visually incongruous within this part of the Spring Grove Conservation Area. It would fail to preserve or enhance the character and appearance of the Spring Grove Conservation Area and would instead result in substantial harm to the designated heritage asset, which is not outweighed by any wider public benefits. The proposal is therefore contrary to Local Plan Policies CC1, CC2, CC4 and SC4 and the aims and principles of the National Planning Policy Framework (2021) which seeks to preserve and enhance the historic environment.

Impact on Neighbours' Living Conditions:

- 6.13 Policy CC2 (Urban Design and Architecture) of the Local Plan states that development proposals should avoid harm to neighbours' outlook and overshadowing and ensure sufficient daylight to proposed and adjoining/ adjacent dwellings.
- 6.14 The proposed development would add significantly to the bulk on the application site. The proposed dwelling would have a maximum height of 9.4 metres, which is considered excessive for a development of this type. The proposal represents an unneighbourly form of development which would harm the amenity value of the gardens of neighbouring properties. The proposal would appear as an overbearing and visually intrusive form of development.
- 6.15 The proposal includes four first floor side facing windows on both side elevations. As none of these are considered to be the sole windows to habitable rooms, obscure glazing could be secured via condition to prevent overlooking and protect the privacy of neighbouring properties.
- 6.16 If permission were to be granted a condition would be used to restrict construction hours to protect neighbouring amenity. As a basement is proposed a Construction Method Statement would also be required and could be secured via condition.

6.17 Standard of Accommodation:

Internal Space Provision:

- 6.18 The Nationally Described Space Standards (NDSS) states that all new dwellings should have adequate sized rooms and layouts. These Standards give a minimum gross internal floor area for new homes relative to the number of occupants whilst also taking account of commonly required furniture and the spaces needed for different activities and moving around. These standards are reflected in Local Plan policy SC5 (Ensuring Suitable Internal

and External Space) and London Plan Policy D6 (Housing Quality and Standards).

- 6.19 At 368 square metres, both properties would significantly exceed the requirements for a three-storey, four-bedroom, seven-person house. All bedrooms would comply with the NDSS. The basements would not contain any primary living accommodation.
- 6.20 Each property would have openings on three sides, to allow for adequate ventilation and prevent overheating.

External Amenity Space:

- 6.21 Local Plan Policy SC5 (Ensuring Suitable Internal and External Space) intends to ensure that new housing improves the quality and design of housing in the borough, and has highest quality internally and externally. It should meet the demands of everyday life for occupants, whilst offering flexibility to meet changing needs and respecting the principle of good neighbourliness. This is to ensure development provides a suitable quantity and quality of external amenity space, appropriate for relaxation as well as essential activities (like waste recycling, drying space and storage).
- 6.22 Policy SC5 would expect dwellings of this size with over five habitable rooms to be provided with 75 square metres of external amenity space. Both properties would significantly exceed this requirement. Further details of landscaping including planting and outdoor furniture could be secured via condition to ensure a high quality space.

Transport and Access:

- 6.23 Local Plan policy EC2 (Developing a Sustainable Local Transport Network) seeks to secure a more sustainable local travel network that maximises opportunities for walking, cycling and using public transport, reduces congestion, improves the public realm and improves health and well-being.
- 6.24 The application site has a Public Transport Accessibility Level of 2 and is therefore considered to have poor access to public transport.
- 6.25 The application proposes two spaces per dwelling which is contrary to London Plan policy T6.1 which specifies four-bedroom dwellings in this PTAL area should have no more than one space per dwelling. This excessive provision of parking would be contrary to the Council's objectives to promote sustainable transport methods and instead promotes excessive car use and ownership.
- 6.26 The parking would be accessed from the existing vehicular crossovers on site. The existing boundary wall significantly exceeds the 600mm required to provide the necessary visibility splays. Had this application been acceptable in all other regards amendments would have been sought to address this point.

- 6.27 If permission were to be granted a condition would be used to restrict future occupiers from accessing parking permits to protect the surrounding areas from overspill parking pressure.
- 6.28 The submission has indicated suitable places for both bin and cycle storage and this would be acceptable in principle, further details would be secured by condition.

Biodiversity and Trees:

- 6.29 London Plan Policy G6 (Biodiversity and access to nature) states that development proposals should wherever possible make a positive contribution to the protection, enhancement, creation and management of biodiversity and Local Plan Policy GB7 (Biodiversity) applies this in a local context.
- 6.30 The proposal would involve the removal of 12 trees on site and no details of replacements have been provided. This would not be acceptable. The London Plan outlines that development proposals should seek to retain any existing trees on site and manage impacts on biodiversity to secure a biodiversity net gain. The proposal does not include detailed landscaping plans nor plans to replace the felled trees at a ratio of at least 2:1. It therefore has not been demonstrated that the proposal would not result in harm to the biodiversity of the area, contrary to London Plan policy G6 and Local Plan policy GB7.

Sustainability:

- 6.31 London Plan policies SI2 (Minimising greenhouse gas emissions), SI3 (Energy infrastructure), SI4 (Managing heat risk) and SI5 (Water infrastructure) state that major developments should be net zero-carbon and that all development proposals to make the fullest contribution to minimising carbon emissions in accordance with the following energy hierarchy:
- (1) Be lean: use less energy
 - (2) Be clean: supply energy efficiently
 - (3) Be green: use renewable energy
 - (4) Be seen: monitor, verify and report on energy performance
- 6.32 Local Plan policies EQ1 (Energy and carbon reduction) and EQ2 (Sustainable design and construction) echo the principles of the above stated London Plan policies in promoting sustainable development and reducing carbon dioxide emissions, and go further in requiring all new developments (major and minor) to meet these London Plan requirements.
- 6.33 The proposed development would exceed the 35 percent reductions required under Local Plan policy EQ1. The proposal would achieve an 80.15 percent reduction over baseline emissions. A carbon offset contribution would be secured via condition to mitigate for the shortfall.

- 6.34 Further details of the use of sustainable materials and water consumption would be secured via condition.

Fire Safety:

- 6.35 Following the publication of the London Plan in March 2021 all applications are required to meet the highest standards of fire safety. As part of this application fire safety information has been submitted to accord with policy D12a of the London Plan and as such the proposal is acceptable in these terms.

7.0 EQUALITIES DUTIES IMPLICATIONS

- 7.1 The Council has to give due regard to its Equalities Duties, in particular with respect to general duties arising from section 149 of the Equality Act 2010. Having due regard to the need to advance equality involves, in particular, the need to remove or minimize disadvantages suffered by equalities groups.
- 7.2 The Council has considered the relevance of the proposal to the provisions of the Equality Act 2010, in particular for those with the following protected characteristics: age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex, sexual orientation and the Human Rights Act 1998. The assessment concluded that Equalities Duties are not engaged by this proposal. The proposal is also compatible with Human Rights Articles and as the report does not have any significant bearing on the substantive equality duty it is not considered necessary to undertake an Equality Analysis.

8.0 LOCAL FINANCE CONSIDERATIONS AND THE COMMUNITY INFRASTRUCTURE LEVY

- 8.1 Section 70(2) of the Town and Country Planning Act 1990 (as amended) provides that a local planning authority must have regard to a local finance consideration as far as it is material. A local finance consideration means:
- a) a grant or other financial assistance that has been, or will or could be, provided to a relevant authority by a Minister of the Crown; or
 - b) sums that a relevant authority has received, or will or could receive, in payment of Community Infrastructure Levy (CIL).
- 8.2 The weight to be attached to a local finance consideration remains a matter for the decision maker. The Mayor of London's CIL and Hounslow CIL are therefore material considerations.
- 8.3 This proposal would be liable to pay Community Infrastructure Levy. The estimated Hounslow CIL payable is £82,028.57 and Mayoral CIL payable is £35,116.36.

9.0 RECOMMENDATION: REFUSE (FPREFUSAL)

Reasons:

- 1 The proposed development, by virtue of its size, scale, positioning and design would result in an addition which would be bulky, obtrusive and incongruous within the Spring Grove Conservation Area. It would not preserve or enhance the character of the Conservation Area and is therefore contrary to London Plan policies D4 (Delivering good design), D6 (Housing quality and standards) and HC1 (Heritage conservation and growth) Local Plan policies CC1 (Context and character), CC2 (Urban design and architecture), CC4 (heritage) and SC4 (Scale and density of new housing development) and the aims and principles of the National Planning Policy Framework (2021).
- 2 The proposal, by virtue of its increased bulk and intensification of the application site would represent an unneighbourly form of development which would negatively impact the enjoyment of neighbouring properties. It is contrary to Local Plan Policies CC1 (Context and Character), CC2 (Urban Design and Architecture), SC4 (Scale and Density of New Housing Development) and the aims and principles of the National Planning Policy Framework (2021).
- 3 The proposal has not adequately demonstrated that it would have an acceptable impact on biodiversity and urban greening. The proposal includes the felling of 12 trees and no replacements are proposed. The proposal is therefore contrary to London Plan policy G6 (biodiversity and access to nature) and Local Plan policy GB7 (biodiversity) and the aims and principles of the National Planning Policy Framework (2021).
- 4 The proposed development would result in an over-supply of on-site car parking facilities and would fail to promote sustainable methods of transport, contrary to Local Plan Policy EC2 (Developing a sustainable local transport network) and London Plan policy T6.1 (Residential car parking).

Informatives:

- 1 Permission refused following pre-app advice

CONSULTATIONS CHECKED		<input checked="" type="checkbox"/>				
CIL LIABLE	YES	<input checked="" type="checkbox"/>	NO		<input type="checkbox"/>	
DRAFT LIABILITY NOTICE		<input type="checkbox"/>	LIABILITY NOTICE		<input type="checkbox"/>	
PRE-COMMENCEMENT CONDITIONS AGREED BY AGENT?	YES	<input type="checkbox"/>	NO	<input type="checkbox"/>	N/A	<input checked="" type="checkbox"/>
ADVISE ENFORCEMENT OF DECISION	YES	<input type="checkbox"/>	NO		<input checked="" type="checkbox"/>	
PENDING LIST – WEEK NUMBER						

LANDFILL	YES	<input type="checkbox"/>	NO	<input checked="" type="checkbox"/>
AUTHORITY TO ISSUE (Initials)		EGC		