

Planning Design and Access Statement
137 Ducks Hill Road, Northwood,
HA6 2SQ

October 2018



hghplanning.co.uk

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Appendices

- Appendix 1: Appeal decision - 103, 105, 107 Ducks Hill Road, Northwood (Ref: APP/R5510/A/11/2153688)
- Appendix 2: Appeal decision - 38-40 Ducks Hill Road, Northwood (Ref: APP/R5510/W/17/3177014)
- Appendix 3: Appeal decision - 16 & 18 Kingsend, Ruslip (Ref: APP/R5510/A/13/2197430)
- Appendix 4: Materials Schedule

1.0 Introduction

- 1.1 On behalf of our client, Gavacan Homes Ltd, hgh Consulting have been instructed to prepare and submit a planning application for an amended scheme for the redevelopment of the site comprising 137 Duck's Hill Road, Northwood, HA6 2SQ. This is following the withdrawal of a previous planning application (LPA ref: 16109/APP/2018/1302) by the applicant on 20th June 2018.
- 1.2 The applicants have undertaken pre-application discussions with officers at the London Borough of Hillingdon (LBH) and the submitted scheme is the result of a number of iterations, taking into account feedback from officers.
- 1.3 The site is located in the London Borough of Hillingdon (LBH) and currently comprises a large detached two storey dwelling set in a substantial plot. The site area is 0.185ha. Figure 1 is an aerial photo of the application site and the site location plan showing the proposed scheme can be seen at Figure 2.



Figure 1: Aerial photograph of site



Figure 2: Site Location Plan

- 1.4 The description of the development remains the same as the previous application proposal and is for:
- “Demolition of existing dwellinghouse and erection of a new building to provide 8 self-contained flats with associated parking, widening of existing vehicular access, cycle and refuse store, amenity areas and landscaping”.**
- 1.5 This statement sets out an overview of the site and surroundings and planning history of the site. It describes the evolution of the scheme proposals and how the current scheme has been designed to respond to comments from officers. It then reviews relevant national and local planning policy and sets out the planning justifications for the scheme. The statement concludes that the development is acceptable in planning policy terms and should be supported by the Council.
- 1.6 The Planning Statement should be read in conjunction with the accompanying scheme drawings prepared by Fluent Architects, as well as the other application documentation referred to in section 1.8.
- 1.7 The proposed residential scheme seeks to redevelop the existing dwelling on the site to provide a flatted development. The proposed scheme makes a more efficient use of an accessibly and sustainably located site.

1.8 Executive Summary – Key Principles of the Proposed Scheme:

- Reuse of previously developed and underutilised land;
- Contribution to identified housing shortfall, need and increased housing targets especially on small sites;
- A readily developable site that can be bought forward for development at an early stage by a local housebuilder.
- A suburban location characterised by residential use and benefitting from accessibility to local shops, transport and other services;
- 8 self-contained residential units proposed at a density of 41u/ha which is within the density thresholds in the London Plan for this type of location;
- The three bedroom unit re-provides a family unit on the site;
- High quality of design with references to architectural form, features and materials of the existing dwellings and existing local vernacular;
- The scale and height of the proposed building reflects the existing building on the site and other developments on Ducks Hill Road;
- The siting and layout of the development provides appropriate separation distances to neighbouring properties ensuring that there will be no material loss of amenity (sun/daylight, overshadowing) or overbearing relationship with existing neighbouring properties;
- Provision of 14 car parking spaces to the front of the development, including 2 disabled and 5 electric active charging points;
- The scheme exceeds the required standard for amenity space set out in the Hillingdon Local Plan with a total amenity area of 666.9sqm;
- The development will achieve Lifetime Homes standards, and will replace the existing buildings that have low suitability credentials; and
- Provide local infrastructural financial contributions through Mayoral and Hillingdon CIL.

Consultant Team

- 1.9 hgh Consulting has been appointed to prepare this Planning, Design and Access Statement and submit a detailed planning application in respect of this proposal. Fluent Architects are the scheme architects for the application and their proposals form the basis of this application submission.

1.10 Planning Application Submission Documentation:

- Planning Application Forms
- CIL Additional Information Form
- Drawings and Plans (Fluent Architects)
- Planning and Design and Access Statement (HGH Consulting)
- Phase II Arboricultural Impact Assessment including Tree Survey, Tree Constraints Plan and Tree Protection Plan (Arbol EuroConsulting)
- Transport Note (Sterling Maynard Transportation Consultants)

1.11 The application is being made following the withdrawal of an application in June 2018 by the same applicant, within 12 months of the original application being received by LBH (April 2018) and relates to the development of the same character and description as the development to which the earlier application and no other land. As such under Regulation 9 of The Town and Country Planning (Fees for Applications, Deemed Applications, Requests and Site Visits) (England) Regulations 2012 no planning application fee is required.

2.0 Site Description

- 2.1 The application site is located in the LBH and currently comprises a large detached two storey dwelling with single storey garages at either side within a large plot. There is a large driveway to the front of the dwelling and a large garden to the rear. Land to the rear of 137 Ducks Hill Road which is currently separated from Fringewood Close by a close boarded fence is included within the application site increasing the land to the rear. The application site has an overall area of 0.186h.
- 2.2 The house is Georgian style, brick built with a tiled roof and two chimneys and is fairly dominant in the street scene on this part of Ducks Hill Road.



Figure 3: 137 Ducks Hill Road

- 2.3 The front of the site is bounded by a hedgerow. The sides and rear of the site has a close bordered boundary fence and is screened to both the sides and the rear by a dense hedgerow and trees (see figure 4). The existing dwelling has two vehicle crossovers one onto Ducks Hill Road and the other at the junction of Ducks Hill Road with Fringewood Close.



Figure 4: Side and rear of 137 Ducks Hill Road

Area Characteristics

- 2.4 The immediate surrounding area is residential in character with large detached houses set in large plots, which have large frontages and rear gardens. Directly to the south of the application site are a number of other detached dwellings two storeys in height. Apart from the neighbouring dwelling No. 141 Ducks Hill Road, these dwellings are accessed from Fringewood Close to the rear. The rear of these properties back onto Ducks Hill Road, the boundary treatment comprises low brick walls, hedges and trees (figure 5).



Figure 5: 141 Ducks Hill Road with the rear gardens of properties on Fringewood Close beyond

- 2.5 To the north of the application site, on Ducks Hill Road there are a number of other large detached dwellings, mostly two storeys in height, with a number of dwellings having dormers in the roof. These properties, like the application site are characterised by large frontages and large rear gardens. The front boundary treatments to these properties comprise a combination of railings, gates, walls, hedges and trees.



Figure 6: 137 Ducks Hill Road and neighbouring houses to the north

- 2.6 The opposite side of Ducks Hill Road (to the west of the application site) is also characterised by large detached dwellings with large front driveways and large gardens to the rear (see figure 7).



Figure 7: Ducks Hill Road – opposite application site

- 2.7 Further north, on Ducks Hill Road, there are several flatted developments. These are all three storeys in height, have parking to the front and large rear communal gardens (example at Figure 8).



Figure 8: Example of flatted development on Ducks Hill Road

Planning Designations

- 2.8 Ducks Hill Road is designated as a London Distributor Road on Hillingdon's adopted proposals map (see figure 9). The application site is 'white land' with no site-specific designations. A residential area east of the site beyond Fringewood Close is designated as an Area of Special Local Character, however this is remote from the application site.

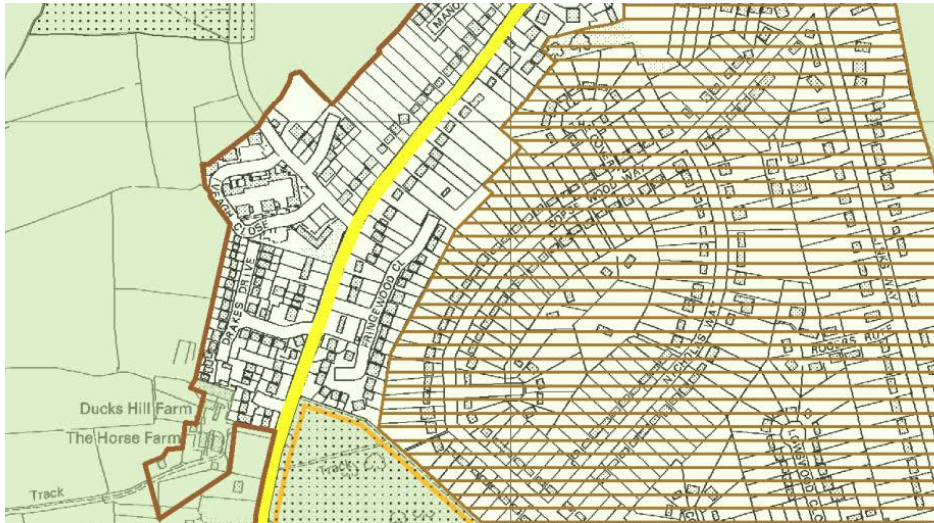


Figure 9: LBH adopted Proposals Map

- 2.9 The only change to the emerging proposals map is the omission of Ducks Hill Road as a London Distributor Road (see figure 10).



Figure 10: LBH emerging Proposals Map

- 2.10 As confirmed in the Phase II Arboricultural Impact Assessment three of the trees within the application site are subject to LBH TPO (No. 516).
- 2.11 The application site has a Public Transportation Accessibility Level (PTAL) of 1a (see figure 11) with Green Lane District Centre is approximately 1 mile to the north east and Northwood Underground Station approximately 1.2 miles to the north east. Approximately 60m to the north of the site is a bus stop serving the 331 to Ruislip Underground Station and approximately 100m to the south on the opposite side of Duck Hills Road is another bus stop serving the 331 to Uxbridge via Northwood Underground Station.

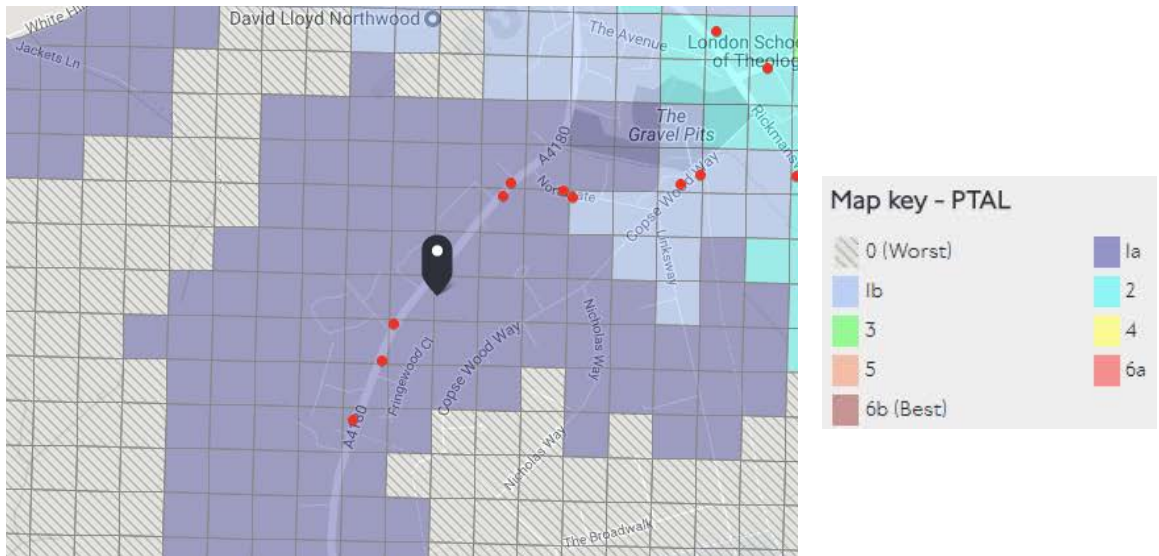


Figure 11: TfL PTAL map

Flood Risk

- 2.12 The entire application site falls within Flood Zone 1, as defined on the Environment Agency flood map for planning (see Figure 12). The site is not at risk of flooding, nor is there a requirement for a Flood Risk Assessment (FRA) to support the application as the site is under 1ha in area.

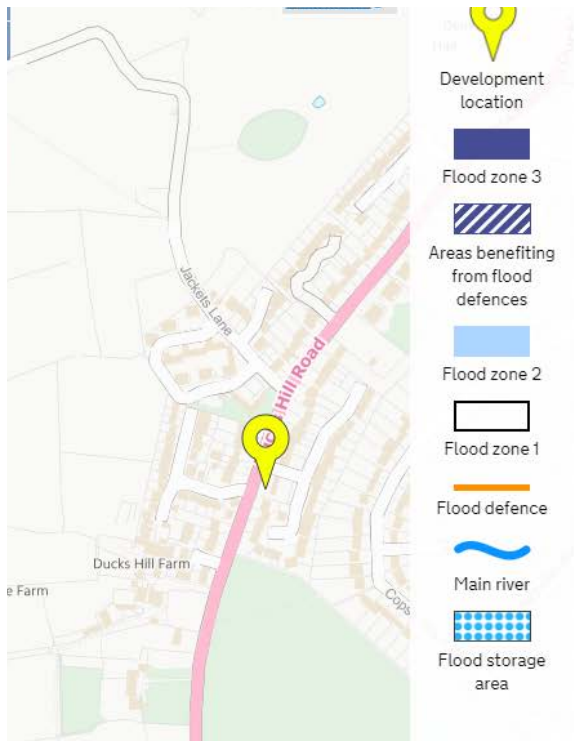


Figure 12 – EA Flood Risk Map

Summary

- 2.13 The application site is in a residential area characterised by large detached, mostly two storey dwellings (some with windows in roofs), set within large plots. The houses typically have large frontages and with large rear gardens. There are also several three storey flatted developments on Ducks Hill Road, with frontage parking and communal amenity space to the rear. Although the site is within PTAL 1a, it is in very close proximity to bus stops and is walking distance from Northwood Underground Station and Green Lane District Centre.

3.0 Planning History

Recent Planning History

- 3.1 The most recent planning application on the site was a planning application submitted by Gavacan Homes on 27th April 2018 (LPA ref: 16109/APP/2018/1302) for the following proposed development:
- “Demolition of existing dwellinghouse and erection of a new building to provide 8 self-contained flats with associated parking, widening of existing vehicular access, cycle and refuse store, amenity areas and landscaping”.**
- 3.2 Following feedback from officers primarily in relation to the size, scale and bulk of the proposed building and the car parking arrangements/landscape to the front of the building, the applicants formally withdrew the planning application on 20th June 2018.
- 3.3 LBH confirmed that the Council’s Highways Department had no objections to the proposals.

Other Planning History

- 3.4 A desktop planning history for the site using the Council’s online planning application database has been undertaken. The only planning history relating to the application site is an application to carry out tree surgery to two Oak Trees (T8 and T10 of TPO516) (LPA ref: 16109/TRE/2010/7). The application was decided on 31 March 2010. There is no decision notice on the Council’s website, the website states that the status of the decision was a split decision.

4.0 Pre-Application Advice & Evolution Of Revised Scheme

- 4.1 Since the withdrawal of the planning application, the design and siting of the proposed development has been through several iterations resulting in the current submitted scheme. The site layout plans and front elevations for each of the iterations are reproduced in Figures 13 to 18 below.

Pre-Application Scheme (July 2018)

- 4.2 Following the withdrawal of the previous planning application on 20th June 2018, the applicants revised the proposals in order to address officers’ concerns. A revised scheme (Figures 14 and 17) was submitted for formal pre-application advice on 27th July 2018. The amendments made were as follows:
- 1) Re-siting of the proposed building to further north. This is to move the building further away from the adjoining property to the south and to retain and protect the English Oak Tree (T10 of TPO 516).

- 2) Reduction in the overall size of the proposed building through taking 600mm off each flank and a reduction to the rear of the proposed building of approximately 3000mm at ground floor level and 1500mm at the first floor and roof level.
- 3) Alterations to the shape of the roof by increasing the dummy pitch that runs around the top of the roof which reduces the amount of flat roof;
- 4) The parapet wall has been removed from the front elevation to soften its appearance and help reduce the mass and bulk of the property.
- 5) The introduction of a 1.8m high glass privacy screen to the balcony on the southern side of the building to prevent any overlooking from the balcony to the adjoining property to the south.
- 6) The orientation and amount of parking has been revised to allow for more breaks in the parking and larger areas to introduce soft landscaping along the front boundary and the front of the building. The amount of parking has been reduced from 15 spaces to 14 spaces.
- 7) The bin store has been re-located to the north side of the site with access from Fringewood Close.
- 8) The retention of the tree T10 (English Oak) within the TPO 516 in the rear garden. Some pruning works may be required as has been undertaken in the past.

- 4.3 The combination of the amendments to the building (2-3 above) reduced the overall size, scale and bulk of the proposals including a reduction in the size and bulk of the proposed roof from the withdrawn scheme. The revised scheme was considered to be in keeping with the general character of the area.
- 4.4 In addition to the reduction to the depth and width of the proposed building and the re-siting of the building further away from the boundary of the neighbouring dwelling, a 1.8m high glass privacy screen was introduced to the proposed balcony to the southern side of the property. The privacy screen will be of a high quality, visually attractive and will alleviate any concerns that have been raised by officers in respect of overlooking to the neighbouring properties. Furthermore, as with the withdrawn scheme, the proposed building will not breach the 45 degree line and will result in no adverse impacts on the amenity of the occupiers of neighbouring properties.
- 4.5 The relocation of the bin store to the north side of the site is considered to be a more discrete location and the bin store will not be visible from Ducks Hill Road. Furthermore, the repositioned bin store is considered to be in a more convenient location for bin collection.
- 4.6 The existing property '*Fringewood*' has limited landscape to the front of the site in the form of a hedge and is prominent in the streetscene. A Tree Survey and Arboricultural Impact Assessment (AIA) were submitted in support of the withdrawn planning application. The AIA confirms that there are three trees covered by TPO 516, two in the rear garden and one on the frontage. The withdrawn scheme proposed the removal of the oak tree in the rear garden.
- 4.7 The re-design of the car parking at the front of the site enables soft landscaping to be introduced along the front boundary and to the front of the building, as well as grass crete parking spaces as illustrated on the submitted Landscape Plan. The amended scheme also proposed that the oak tree in the rear garden will now be retained. The retention of the TPO oak tree and introduction of landscaping will improve the character and appearance of the area and the streetscene. The AIA

and Tree Protection Plan has been amended to demonstrate that this Oak Tree can be retained within the proposed development.

4.8 A pre-application meeting was held on 3rd September 2018 where the applicants presented the amended scheme to a senior planning officer, Ms Liz Arnold. Officers advised the following:

- The proposed building was sited too close to the northern site boundary with Fringewood Close and should be sited at least 2m from this boundary;
- Concerns were still raised regarding the overall scale of the building, despite the reduction to the width and depth of the building;
- Concerns were raised regarding the size of the proposed crown roof; and
- The parapet wall should be re-instated from the original design to assist to reduce the appearance of scale of the building and roofscape.

Post Pre-application Amendments

4.9 Following the pre-application meeting, the applicant has made further amendments to the scheme proposals, which now form the basis of the revised subject planning application scheme. These further amendments include:

- 1) The re-siting of the building so that the distance from the site boundary with Fringewood Close is 2m as recommended by LBH. This distance was agreed on the basis that the side elevation closest to the boundary of No. 135 Ducks Hill Road is also two storeys. The applicants can confirm that this is the case.
- 2) The building will be sited further away from the neighbouring property of No. 141 Ducks Hill Road to the south (approximately 4.8m).
- 3) The parapet wall is reinstated following discussions with LBH to enhance the design.
- 4) The building has been reduced in depth at the rear by 3m on the ground floor and 1.5m on the first floor.
- 5) The overall width of the building at the front has been reduced by 3m.
- 6) Reduction in the height of the building to be the same as that of the withdrawn scheme. Overall reduced scale and form of development with the combined reductions in width and depth of the scheme. Improved relationship and separation to immediate neighbours on Ducks Hill Road.

4.10 The following pages illustrate the evolution of the scheme from the original withdrawn proposals.

Evolution of scheme

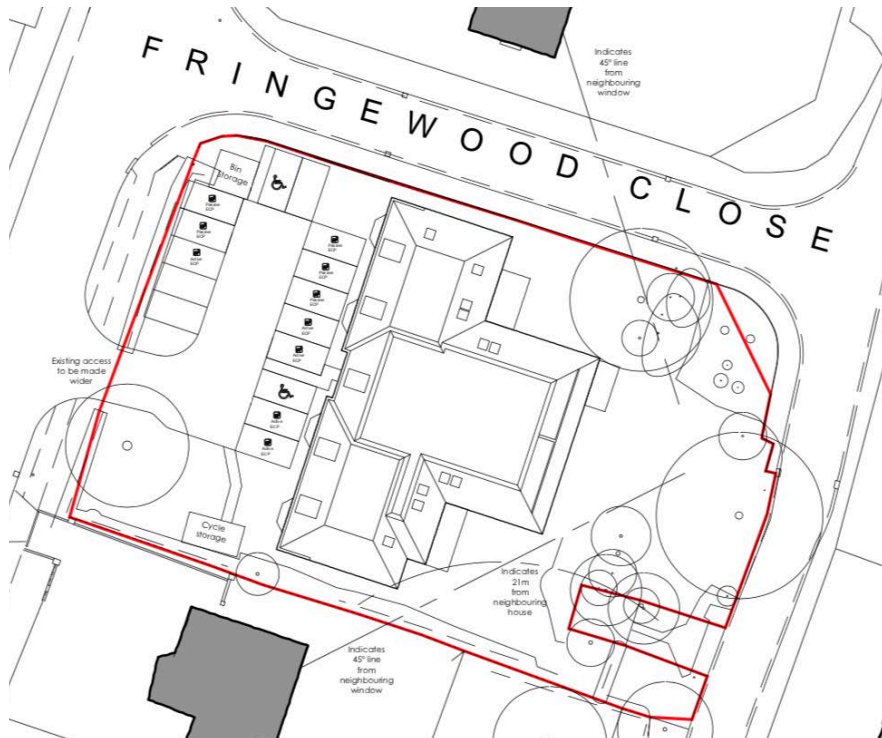


Figure 13: Site Plan for withdrawn scheme

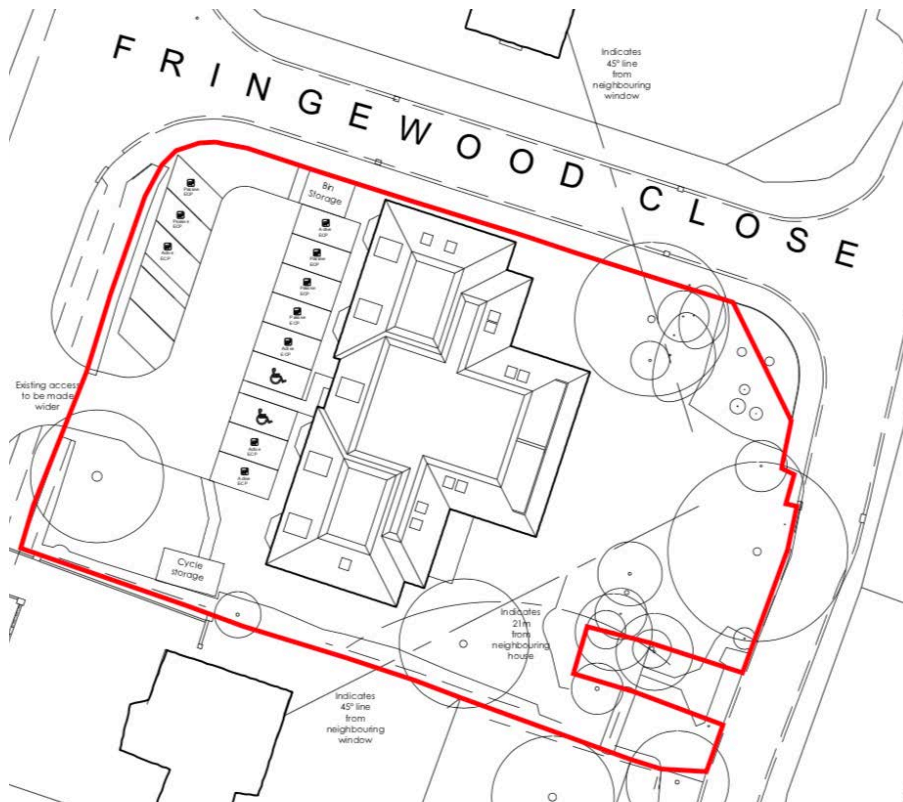


Figure 14: Site Plan for pre-application scheme.

- Building sited further towards the north
- Building sited further from the boundary to the south
- Reduction in overall size of building
- Orientation and amount of parking revised to allow breaks in the parking and more landscaping
- Relocation of the bin store to a more discrete location

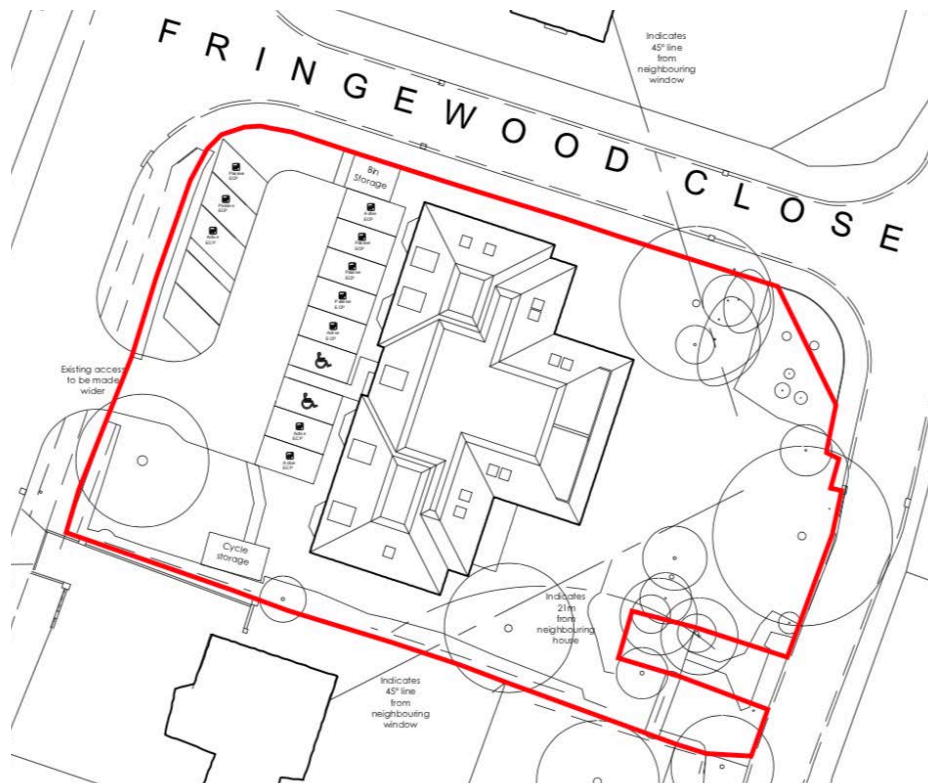


Figure 15: Site Plan for application scheme

- The distance from the north site boundary has been amended to 2m.
- The building has been reduced in depth at the rear by 3m on the ground floor
- The overall width of the building has been reduced by 3m



Figure 16: Front elevation of withdrawn scheme



Figure 17: Front elevation of pre-application scheme (blue line represents outline of withdrawn scheme)



Figure 18: Front elevation of application scheme (blue line represents outline of withdrawn scheme)

4.11 In summary the application scheme has responded to comments raised by officers as follows:

- The overall width and depth of the proposed building has been reduced to reduce the overall scale and bulk;
- The overall reduction in size of the proposed building has enabled the siting of the building to be amended leaving a 2m gap between the northern boundary of the application site and an increased gap of approximately 4.8m with the neighbouring property of No. 141 Ducks Hill Road;
- The building has been re-sited and reduced in size facilitating the retention of the TPO Oak Tree;
- Amendments have been made to the roof to reduce the crown roof element;
- The proposed car parking layout has been amended to incorporate gaps and an increased amount of soft landscape to the front of the site;
- The proposed refuse store has been relocated further back into the site to a more discrete location;

4.12 The applicants consider that the above amendments respond to all the concerns raised by officers to the withdrawn scheme.

The Proposed Development

4.13 The proposal is for the redevelopment of the site to provide a new residential building as set out in the proposed description of development below:

“Demolition of existing dwellinghouse and erection of a new building to provide 8 self-contained flats with associated parking, widening of existing vehicular access, cycle and refuse store, amenity areas and landscaping”.

4.14 A summary of the key characteristics of the proposed development is provided below:

The Proposed Development

- 7 x 2 bed residential units; and
- 1 x 3 bed residential unit.

Access and Parking

- 14 parking spaces, including two disabled parking spaces and five electric charging spaces are provided to the front of the building;
- 16 cycle parking spaces are provided on the southern boundary of the site in the car parking area;
- The existing northern access point will be removed; and
- The existing southern access point will be retained and widened.

Amenity Provision

- Private balcony space for 3 units, all of which exceed the minimum sizes for balconies in the London Plan;
- Private patio space for the 3 ground floor units; and
- A communal rear garden (extended from the existing garden) shared by all units totalling 666.9 sqm of communal space. This figure exceeds the Hillingdon Local Plan Part 2 amenity space standard of 25sqm per 2 bedroom flat and 30sqm per 3 bedroom flat.

Landscaping

- Removal of 2 trees, hedgerow to the rear and a small proportion of hedgerow at the front of the site to enable widening of the access point;
- Retention of all other existing soft landscape;
- Replacement and new soft landscape to include a new rear boundary tree planted area comprising a mix of silver birch, hornbeam and yew and a sweet gum tree by the refuse store to the front of the site;
- New front brick boundary wall with metal railing and gates to front with new soft landscape; and
- 1.8m high close board fence to side and rear.

Refuse / Recycling Provision

- Refuse and recycling store located close to the parking spaces along the northern boundary of the site. Collection can either be from Ducks Hill Road as per existing arrangements or Fringewood Close;

Accessibility

- All units designed to Lifetime Homes standards;
- Lift from ground floor to all floors;
- 10% disabled accessible units (1 unit).

5.0 Planning Policy Context

5.1 Section 38 (6) of the Planning and Compulsory Purchase Act 2004 requires that the determination of any planning application shall be in accordance with the development plan unless material considerations indicate otherwise.

5.2 The adopted development plan for LBH comprises:

- The London Plan - The Spatial Development Strategy for London (March 2016);
- Hillingdon Local Plan Part 1 - Strategic Policies (November 2012); and
- Hillingdon Local Plan Part 2 - Saved UDP Policies (2007).

5.3 Other material planning policy and guidance which are relevant to this application are set out below:

- National Planning Policy Framework (July 2018);
- National Planning Practice Guidance;
- Draft New London Plan (December 2017)
- Hillington Local Plan Part 2 – Development Management Policies (Revised Proposed Submission Version) (October 2015)
- Hillingdon Design and Accessibility SPD (July 2006).

5.4 The most relevant policies and key extracts to this application are outlined in the following section.

National Planning Policy Framework (2018)

5.5 At the centre of the revised NPPF, which sets out the Government's overarching national strategic planning objectives, is still **a presumption in favour of sustainable development**:

"For decision-taking this means: approving development proposals that accord with the development plan without delay." (Para. 11)

5.6 Para. 59 sets out the Government's ongoing commitment to **boosting housing supply** and states:

"To support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay."

5.7 Paragraph 68 emphasises the importance of small and medium sites and the important contribution such sites can make to meeting the housing requirement of an area and recognises how they are often built-out relatively quickly. To promote the development of a good mix of sites local planning authorities should: identify, through the development plan and brownfield registers, land to accommodate at least 10% of their housing requirement on sites no larger than one hectare; and support the development of windfall sites through their policies and decisions – giving great weight to the benefits of using suitable sites within existing settlements for homes.

5.8 Paragraph 108 advises that when assessing applications for development: safe and suitable access to the site should be achieved for all users. Development should only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe (para. 109).

5.9 Developments should allow for the efficient delivery of goods and access by emergency vehicles and be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations (para 110).

- 5.10 NPPF policy is committed to promoting sustainable development by **maximising the reuse of previously developed and underutilised land**:

“Planning policies and decisions should...

- *Encourage multiple benefits from both urban and rural land.*
- *Give substantial weight to the value of using suitable brownfield land within settlements for homes.*
- *Promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively.” (Para. 118)*

- 5.11 To achieve appropriate densities, Paragraph 122 states:

“Planning policies and decisions should support development that makes efficient use of land, taking into account:

- *The identified need for different types of housing and other forms of development, and the availability of land suitable for accommodating it;*
- *Local market conditions and viability;*
- *The availability and capacity of infrastructure and services – both existing and proposed – as well as their potential for further improvement and the scope to promote sustainable travel modes that limit future car use;*
- *The desirability of maintaining an area’s prevailing character and setting (including residential gardens), or of promoting regeneration and change; and*
- *The importance of securing well-designed, attractive and healthy places.”*

- 5.12 In achieving **well-designed places**, Paragraph 124 states:

“Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.:

- 5.13 Paragraph 127 goes on to say:

“Planning policies and decisions should ensure that developments:

- *Will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;*
- *Are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;*
- *Are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);*

- *Establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;*
- *Optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and*
- *Create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users, and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.”*

- 5.14 Paragraph 130 states that design should not be used as a valid reason to object to development if it accords with plan policies.

The London Plan (March 2016)

- 5.15 The London Plan is the overall strategic plan for London. It sets out an integrated economic, social and transport framework for development in London up to 2036. Policies and extracts from the London Plan that are relevant to this proposal are set out below.

Housing

- 5.16 Policy 3.3 sets out the Mayor's plans to significantly increase London's housing supply in order to meet identified need. The commitment to providing a minimum annual average of 42,000 net additional homes in London is outlined in Section B. Section B goes on to state that these additional homes will enhance the environment, improve housing choice and affordability and provide better quality accommodation for London's residents.
- 5.17 Section D of Policy 3.3 states that boroughs should seek to achieve and exceed their minimum borough annual housing target. In Table 3.1, the plan sets out these average annual housing targets for each borough until 2025. These targets are informed by the need for housing as evidenced by the GLA's 2013 Strategic Housing Marketing Assessment and London's housing land capacity as identified through its 2013 Strategic Housing Land Availability Assessment. For Hillingdon, the minimum ten year housing target from 2015-2025 is 5,593 homes, with an annual monitoring target over the same period of 559 homes. At Section D.a, boroughs are obligated to augment their Local Development Framework housing targets where possible with extra housing capacity.
- 5.18 Section E of **Policy 3.3** states that additional development capacity should be sought to supplement the housing targets.
- 5.19 **Policy 3.4** regards optimising housing potential. Housing output should be optimised by achieving the densities set out in the London Plan. As the site is in a suburban location and has a PTAL rating of 1a, the appropriate density range is 150-200 habitable rooms per hectare.

Design

- 5.20 The quality and design requirements of housing developments are set out in **Policy 3.5**. As summarised in Part A, the highest quality is needed both externally and internally and in relation to the development's context and the wider environment. In addition, London's residential environment and attractiveness as a place to live should be protected and enhanced. Part B states that the design of new development should enhance the quality of local places by taking into account their physical context, local character, density, tenure and land use mix. Part C adds that new homes should have adequately sized rooms with layouts that are convenient, efficient and fit for purpose. The minimum space standards for new dwellings are set out in Table 3.3 of the London Plan. For this scheme, the appropriate minimum floorspace for each dwelling is 70sqm (GIA) for two bed apartments and between 74 and 95sqm (GIA for three bed apartments).
- 5.21 **Policy 7.1** regards 'lifetime neighbourhoods' and requires the design of new buildings to help reinforce or enhance the character of the neighbourhood.
- 5.22 **Policy 7.4** outlines objectives for enhancing the local character of places in further detail. Part A states that development should have regard to the form, function and structure of a street or area and the scale, mass and orientation of surrounding buildings. When making planning decisions, part B advises that development that provides high quality design should be positively regarded. Characteristics of high quality developments include those that have regard to the pattern and grain of the existing street in orientation, scale, proportion and mass. Also included are those that make a positive contribution to the character of a place to influence the future character of the area.
- 5.23 **Policy 7.6** states that architecture should make a positive contribution to the streetscape and should incorporate the highest quality materials and design appropriate to its context. In this way, buildings should:
- *"Be of the highest architectural quality;*
 - *Be of a proportion, composition, scale and orientation that enhances, activates and appropriately defines the public realm;*
 - *Comprise details and materials that complement, not necessarily replicate, the local architectural character;*
 - *Not cause unacceptable harm to the amenity of surrounding land and buildings, particularly residential buildings, in relation to privacy, overshadowing, wind and microclimate;*
 - *Provide high quality indoor and outdoor spaces and integrate well with the surrounding streets and open spaces;*
 - *Be adaptable to different activities and land uses;*
 - *Meet the principles of inclusive design; and*
 - *Optimise the potential of sites."*

Draft New London Plan (December 2017 with minor suggested changes August 2018)

- 5.24 **Draft Policy H1** (Increasing Housing Supply) sets the ten-year targets for net housing completions in each borough between 2019/20 and 2028/29. This is to meet the need for 66,000 additional homes per year. The ten-year target for LBH is 15,530, with an annual monitoring target of 1,553 homes per annum. This is a significant increase from the annual target of 559 homes per annum in the adopted London Plan.
- 5.25 Part B of the policy sets out that to ensure that ten-year housing targets are achieved boroughs should prepare delivery-focused Development Plans which encourage development on other appropriate windfall sites not identified in Development Plans through the Plan period. Part B2 of the policy requires boroughs to optimise the potential for housing delivery on all suitable and available brownfield sites through planning decisions especially through small housing sites (criteria e).
- 5.26 Supporting text in paragraph 4.1.3 states:
- “To achieve these housing targets the overall average rate of housing delivery on both large and small sites will need to approximately double compared to current average completion rates.”*
- 5.27 **Draft Policy H2 (Small sites and small housing developments)**, Part A states:
- “Small sites (below 0.25 hectares in size) should play a much greater role in housing delivery to achieve the ten-year housing targets set out in Policy H1 Increasing housing supply. Boroughs should pro-actively support well-designed new homes on small sites through both planning decisions and plan-making in order to:*
- 1) significantly increase the contribution of small sites to meeting London’s housing needs;*
 - 2) diversify the sources, locations, type and mix of housing supply;*
 - 3) support small and medium-sized housebuilders;*
 - 4) support those wishing to bring forward custom, self-build and community-led housing.*
- 4A) achieve the targets for small sites set out in Table 4.2.*
- 5.28 Part B of the policy advises that boroughs should:
- *recognise in planning decisions that local character evolves over time and will need to change in appropriate locations to accommodate additional housing provision and increases in residential density through small housing developments;*
 - *proactively encourage increased housing provision, good design and higher residential densities.*
- 5.29 Table 4.2 sets out ten-year targets (2019/20 -2028/29) for net housing completions on small sites (below 0.25 hectares in size). LBH has a ten-year target of 7,650 units, 765 per annum, meaning that 49% of housing completions in LBH must come from small sites.

5.30 Supporting text in paragraph 4.2.1 states:

“For London to meet its housing needs, small sites below 0.25 hectares in size must make a substantially greater contribution to new supply across the city. Therefore, increasing the rate of housing delivery from small housing sites is a strategic priority. Achieving this objective will require positive and proactive planning by boroughs both in terms of planning decisions and plan-making.”

5.31 Supporting text in paragraph 4.2.8 envisages small housing developments to be within close proximity to existing homes and carefully and creatively designed to avoid an unacceptable level of harm to the amenity of surrounding properties in relation to privacy. Schemes should achieve good design and ensure that existing and proposed homes benefit from satisfactory levels of daylight and sunlight.

5.32 **Policy D1 (London’s form and characteristics)** requires the form and layout of development proposals to use land efficiently by optimising density, connectivity and land use patterns; deliver appropriate outlook, privacy and amenity; and achieve safe secure and inclusive environments.

5.33 Development proposals should ensure that they: enhance local context by delivering buildings that are positively respond to local distinctiveness through their layout, orientation, scale, appearance and shape which due regard to existing and emerging street hierarchy, building types, forms and proportions; be of high quality, with architecture that pays attention to detail, and gives thorough consideration to the practicality of use, flexibility, safety and building lifespan and the use of attractive, robust materials which weather and mature well.

5.34 **Policy D3 (Inclusive design)** seeks to deliver an inclusive environment and meet the needs of all Londoners, development proposals are required to achieve the highest standards of accessible and inclusive design.

5.35 **Policy D4 (Housing quality and standards)** sets out a number of minimum standards that new development must meet including:

- Private internal space – 2b 3P dwellings must be 61sqm, 2b 4P dwellings must be 70sqm. Both must have 2sqm of built in storage. 3b 4P dwellings must be 74sqm and have 2.5sqm of storage. Other standards relate to bedroom sizes and room heights.
- Private outside space – Where there are no higher local standards in the borough development plan documents, a minimum of 5 sqm of private outdoor space should be provided for 1-2 person dwellings and an extra 1 sqm should be provided for each additional occupant, and it must achieve a minimum depth and width of 1.5m.
- Residential development should maximise the provision of dual aspect dwellings;

5.36 **Policy D5 (Accessible housing)** requires at least 10 per cent of dwellings (which are created via works to which Part M volume 1 of the Buildings Regulations applies) meet Building Regulation requirement M4(3) ‘wheelchair user dwellings’, and all dwellings meet (which are created via works to which Part M volume 1 of the Building Regulations applies) meet Building Regulation requirement M4(2) ‘accessible and adaptable dwellings’.

5.37 **Policy D6 (Optimising density)** requires development to make the most efficient use of land and be designed at the optimum density.

London Housing Strategy (August 2018)

- 5.38 The London Housing Strategy sets out the Mayor's vision for housing in the capital, alongside policies and proposals to achieve it.
- 5.39 Policy 3.1 of the strategy seeks to increase the supply of land for new homes. Section Ai) sets forth the intention to:

"Strongly promote appropriate development of new homes on brownfield land, in and around town centres, and through a presumption in favour of appropriate residential development on small sites".

Hillingdon Local Plan

- 5.40 Hillingdon's Local Plan is made up of Part 1- Strategic Policies (previously known as the Core Strategy) which was adopted in November 2012. Saved policies from the Unitary Development Plan (2007) make up the remainder of the currently adopted policies. The emerging Local Plan Part 2- Development Management Policies, Site Allocations and Designations and the Proposals Map will be submitted for examination in March 2018. The consultation versions of these documents were published in October 2015. The following sections review the relevant policies from the Local Plan.

Hillingdon Local Plan: Part 1 – Strategic Policies

- 5.41 The Local Plan: Part 1 sets out a target of a minimum 6,375 dwellings between 2011 and 2026.
- 5.42 Policy H1 relates to Housing Growth with the Council seeking to meet and exceed its minimum strategic dwelling requirement of 4,250 dwellings, annualised at 425 dwellings per year, for the ten year period between 2011 and 2021.
- 5.43 Paragraph 6.23 of this policy relates to design and density and outlines that high quality design for new homes will continue to be a priority and that the density of residential development should take into account the need to optimise the potential of sites compatible with local and historic context.
- 5.44 This should be implemented while respecting the quality, character and amenity of surrounding uses with higher densities most appropriate in sustainable locations with high levels of public transport accessibility.
- 5.45 Policy BE1 relating to the Built Environment requires all new development to improve and maintain the quality of the built environment in order to create successful and sustainable neighbourhoods, where people enjoy living and working and that serve the long-term needs of all residents. All new developments should:
- *"Achieve a high quality of design in all new buildings, alterations, extensions and the public realm which enhances the local distinctiveness of the area, contributes to community cohesion and a sense of place;*
 - *Be designed to be appropriate to the identity and context of Hillingdon's buildings townscapes, landscapes and views, and make a positive contribution to the local area in terms of layout, form, scale and materials and seek to protect the amenity of surrounding land and buildings, particularly residential properties;*

- *Be designed to include 'Lifetime Homes' principles so that they can be readily adapted to meet the needs of those with disabilities and the elderly, 10% of these should be wheelchair accessible or easily adaptable to wheelchair accessibility encouraging places of work and leisure, streets, neighbourhoods, parks and open spaces to be designed to meet the needs of the community at all stages of people's lives;*
- *Improve the quality of the public realm and provide for public and private spaces that are attractive, safe, functional, diverse, sustainable, accessible to all, respect the local character and landscape, integrate with the development, enhance and protect biodiversity through the inclusion of living walls, roofs and areas for wildlife, encourage physical activity and where appropriate introduce public art;*
- *Create safe and secure environments that reduce crime and fear of crime, antisocial behaviour and risks from fire and arson having regard to Secure by Design standards and address resilience to terrorism in major development proposals."*

5.46 Policy EM6 considers Flood Risk Management requiring new development to be directed away from Flood Zones 2 and 3 in accordance with the principles of the National Planning Policy Framework (NPPF). The current site falls within Flood Zone 1 according to the Environment Agency's maps and is therefore considered to be of lower risk of river or coastal flooding.

Unitary Development Plan (2007) Saved Policies

- 5.47 The most relevant 'saved' Unitary Development Plan policies adopted currently as the 'Hillingdon Local Plan: Part Two' are set out below.
- 5.48 **Policy BE13** relates to the layout and appearance of new development, which will not be permitted if it fails to harmonise with the existing street scene or other features of the area, which the local planning authority considers it desirable to retain or enhance.
- 5.49 **Policy BE19**, relating to new development within residential areas, states that the local planning authority will seek to ensure that new development within residential areas complements or improves the amenity and character of the area.
- 5.50 Daylight and Sunlight considerations are set out by **Policy BE20** which states that buildings should be laid out so that adequate daylight and sunlight can penetrate into and between them and the amenities of existing houses are safeguarded.
- 5.51 **Policy BE21** relates to the siting of new buildings and states planning permission will not be granted for new buildings or extensions which by reason of their siting, bulk and proximity, would result in a significant loss of residential amenity.
- 5.52 **Policy BE24** considers the design of new buildings which should protect the privacy of the occupiers and their neighbours.
- 5.53 **Policy OE8** on flooding states that planning permission will not be granted for new development or redevelopment of existing urban areas which would result in an increased flood risk due to additional surface water run-off, unless the proposed development includes appropriate attenuation measures to a standard satisfactory to the Council.

5.54 **Policy AM14** considers car parking standards and states that new development will only be permitted where it is in accordance with the council's adopted car parking standards. These standards set a maximum of 1.5 spaces per dwelling for flats with communal parking areas, albeit the London Plan now supersedes this guidance.

5.55 **Policy AM15** outlines that all car parks provided for new development shall contain conveniently located reserved spaces for disabled persons.

Hillingdon Local Plan: Part 2 – Development Management Policies Revised Proposed Submission Version (October 2015)

5.56 **Policy DMH4** states that the redevelopment of dwellings on a residential road into flatted developments will only be permitted where the proposal will not result in more than 10% of properties on the road being redeveloped into flats.

5.57 **Policy DMHB11** Design of New Development requires all development to be designed to the highest standard and incorporate principles of good design. This includes; harmonising with the local context; ensuring the use of high quality building materials and finishes; ensuring that the internal design and layout of development maximises sustainability and is adaptable to different activities; protecting features of positive value; providing landscaping and planting; not adversely impacting on the amenity, daylight and sunlight of adjacent properties and open space; and, providing sufficient space for internal and external storage space for general, recycling and organic waste, with suitable access for collection.

5.58 **Policy DMHB 16** on Housing Standards requires that all housing developments should have an adequate provision of internal space in order to provide an appropriate living environment. To achieve this all residential development should meet or exceed the most up to date internal space standards, as set out in National Guidance.

5.59 **Policy DMHB17** sets out a Residential Density Matrix for the Borough. For non town centre areas with a PTAL of 0 – 2 in a suburban setting for flats with an average of 3 habitable rooms the density range is 105 - 150 hr/ha.

5.60 **Policy DMHB18** regards private outdoor amenity space and requires for new residential development to provide good quality and useable outdoor amenity space. This outdoor space must meet the standards set out in Table 5.2 which requires 2 bedroom flats to have a minimum of 25sqm private outdoor amenity space provision and 3 plus bedroom flats to have a minimum of 30sqm of private outdoor amenity space. Dwellings on upper floors should all have access to a private balcony or terrace. Ground floor flats should have private gardens. Any ground floor unit that is non-street facing should have a defensible space of not less than 3 metres in depth in front of any window to a bedroom or habitable room.

Hillingdon Design and Accessibility Statement SPD (July 2006)

5.61 The Hillingdon Design and Accessibility Statement (HDAS) SPD, albeit over 10 years old as a planning document and out-of-date with the latest government objectives, the document is still used for the determination of planning proposals. HDAS seeks to provide guidance for new development in the borough and expands on the saved policies of the UDP and those of the emerging Local Plan Part 2.

- 5.62 Guidelines for separation distances are provided, this includes that the distance should not be less than 21m, between facing habitable room windows. From windows above ground floor an angle of 45 degrees each side of the normal is assumed in determining facing, overlooking distances.
- 5.63 Table 2 of the document sets out recommended standards relating to residential floorspaces. 2 bed flats are recommended to be 63sqm and 3 bed flats 77sqm.
- 5.64 Paragraph 3.3 is similar to Policy DMH4 of the Hillingdon Local Plan Part 2 and states that *“the redevelopment of more than 10% of properties on a residential street is unlikely to be acceptable, including the houses which have been converted into flats or other forms of housing”*.
- 5.65 Paragraphs 4.17 to 4.22 detail the guidelines for garden amenity space provision for new flats. 2-bed flats should have 25sqm per flat. The requirement for 3-bed flats is 30sqm. Private balconies count towards the amenity space recommendations, as stated in paragraph 4.18 of the SPD.

Accessible Hillingdon Supplementary Planning Document (SPD)

- 5.66 The Accessible Hillingdon SPD provides guidance on the accessibility of both residential and non-residential developments so as to allow an inclusive environment where access and inclusion have been considered as part of the initial design.
- 5.67 With regard to residential developments, the SPD sets out the Lifetime Homes Standards, which are in line with London Plan Policy 3.8. All the units proposed meet these standards and are therefore considered to provide an appropriate unit size, given the site’s accessible location.
- 5.68 The SPD also refers to the minimum floorspace standards required by the London Plan. All 8 proposed units will also meet these standards.

6.0 Planning Justification

- 6.1 This section sets out the planning justification of the application proposal and addresses the proposed development, which will make more effective use of a previously developed site and contribute towards LBH housing need. The proposed scheme is in compliance with planning policy guidance and the relevant material considerations.

Principle of Development - Residential Use

- 6.2 The NPPF and Hillingdon’s Local Development Framework support the provision of residential development in appropriate locations. The NPPF sets a presumption in favour of development proposals that accord with the development plan and places an emphasis on the Government’s ongoing commitment to boosting the housing supply.
- 6.3 The NPPF in paragraph 68 highlights the important contribution of small and medium sites to meeting the housing requirement of an area and requires LPA’s to support the development of windfall sites through decisions, giving great weight to the benefits of using suitable sites within existing settlements for homes.
- 6.4 The proposed redevelopment of an existing residential site within an established suburban area is considered to be fully in accordance with the NPPF, especially paragraph 68. The proposed development would make efficient use of residential land that is fairly well served by public transport and local services in this part of Northwood.

- 6.5 The Further Alterations to the London Plan, published in 2015 and now incorporated into the London Plan, increased Hillingdon's housing target from 425 dwellings per year to 559 dwellings per year. The Draft New London Plan seeks to more than double this target to 1,553 homes per annum in LBH. Furthermore, the Draft New London Plan sets a target the 765 of new homes per annum in LBH should be delivered on small sites. This equates to 49% of homes to be delivered in LBH to be provided on small sites.
- 6.6 The Draft New London Plan proposes a significant increase in the contribution of small sites to meet housing need and encourages a diversification of a mixture and types of housing in different locations.
- 6.7 The provision of additional residential units would contribute to meeting the targets in the adopted London Plan and the revised targets in the Draft New London Plan including the fact that nearly half of new homes in the borough are required to be provided on small sites.
- 6.8 The proposal would be a compatible use to the residential developments within the vicinity of the site on Ducks Hill Road and Fringewood Close. Furthermore, officers have indicated that the redevelopment of the application site, with the demolition of No. 137 Ducks Hill Road and its replacement with a flatted development and additional residential units would be acceptable in principle.

Residential Development and the 10% rule

- 6.9 There are no policies in the statutory development plan that seek to limit the percentage of properties in a road being converted to flatted development. It should also be noted that in an appeal decision for the erection of 14 flats at 103, 105 and 107 Ducks Hill Road (ref: APP/R5510/A/11/2153688) (Appendix 1) there was no reference either from LBH or the Inspector to any policy to limit the percentage of properties in a road being converted to flatted development.
- 6.10 Emerging Policy DMH4 sets a limit of 10% on the percentage of properties in a road being converted into flatted developments. On residential streets longer than 1km the proposed redevelopment site should be taken as the midpoint of a 1km length of road.
- 6.11 The supporting text to LBH emerging Local Plan Policy DMH4, in paragraph 4.11 states that the conversion of single dwellings into more dwellings or the redevelopment of dwellings into new blocks of flats can enable more effective use of sites to be achieved. However, this type of development must seek to enhance the local character of the area.
- 6.12 The supporting text identifies that large concentrations of flats can often lead to problems, including increased on-street parking and resultant congestion on roads, the loss of front gardens, reductions in privacy, significant changes to the street scene, and loss of family accommodation in the area. Policy DMH 4: Residential Conversions and Redevelopment aims to address these issues by controlling the number of residential conversions of new residential units from which conversions are achieved.
- 6.13 This same limit is set out in paragraph 3.3 of the Hillingdon Design and Accessibility Statement (HDAS) SPD (July 2006). The guidance does recognise that there is possibility of some redevelopment, however, the redevelopment of large numbers of sites in close proximity to each other is unlikely to be acceptable including large numbers of redevelopments on any one street.

- 6.14 Policy DMH4 is currently an emerging policy, which has not yet been subject to Examination, therefore in accordance with paragraph 216 of the NPPF, only limited weight can be ascribed to this draft policy. The HDAS is now over eleven years old, pre-dates the NPPF, was never transferred into a planning policy in the 2007 Unitary Development Plan or the Local Plan Core Strategy and therefore subject to scrutiny at Examination. Only very limited weight can therefore be given to this part of the HDAS SPD.
- 6.15 This view to set aside the 10% threshold has been taken on several more recent planning application schemes, including Nos 8 – 10 Sandy Lodge Way, Northwood (73233/APP/2017/36838), approved in July 2018, where planning permission was secured by Hillingdon Council for 8 apartments which breached the 10% threshold of flatted development on the road.
- 6.16 Similarly, several Inspectors in recent planning appeal decisions have taken the same approach where they have considered this 10 per cent rule. In a recent appeal decision (9th February 2018) for proposals for 9 x 3 bed flats at 38-40 Ducks Hill Road (refs: APP/R5510/W/17/3177014 and APP/R5510/W/17/3179908), the Inspector considered that the 10 per cent rule as set out in the HDAS does not represent adopted policy and should not be used on its own as a means of determining whether a development proposal is acceptable (see Appendix 1 for decision notice). The Inspector in paragraphs 44 and 45 states:

“It seems to me from the HDAS that it was originally prepared by the Council in 2006 as an interim document in anticipation of more specific policies which would be set out in the LDF Core Strategy. Since the 10 per cent rule was not subsequently included in the subsequently adopted development plan and in the light of the conclusions of my colleague Inspectors in dealing with residential schemes in Hillingdon I conclude that the 10 per cent guideline is guidance only and it does not represent adopted policy.

Furthermore, I cannot find evidence of clear justification for the 10 per cent figure which seems to be to be arbitrary rather than based on clearly evidenced analysis. Neither do I have evidence that the figure has been the subject of independent examination. Consequently, I agree that the 10 per cent should be a material consideration but one which should not be used on its own as a means of determining whether a development proposal is acceptable.”

- 6.17 In an earlier appeal for the development of 7 flats at 16 & 18 Kingsend, Ruislip in the LBH (ref: APP/R5510/A/13/2197/430) (Appendix 2) the Inspector also gave very limited weight to the 10% guideline in the HDAS:

“It is clear to me, however, that the 10% guideline is precisely that, it does not represent policy and there is no indication before me as to the reasons why what appears to be a somewhat arbitrary 10% figure was chosen. Moreover, there is no evidence to suggest that it has been independently assessed. Accordingly, whilst a material consideration, the weight I have given to this aspect of the SPD is significantly less than afforded to it by the Council.” (paragraph 9).

- 6.18 The conclusions drawn by both Inspector in these decisions in respect of the weight to be given to paragraph 3.3 in the HDAS concludes that it is a material consideration in the determination of this planning application. However, both Inspectors agree that little weight should be ascribed to this policy guidance and it should not be used solely as a reason to determine whether a development proposal is acceptable.

- 6.19 Furthermore, in addition to the above both the HDAS and even the emerging policy pre-dates the emerging London Plan and 2018 NPPF, both of which encourage development on small sites, and in the case of the Draft New London Plan requires LBH to deliver 49% of its housing requirement on small sites and diversify the mix/type of housing in different locations.
- 6.20 Notwithstanding the above, to provide information for officers, the applicant has undertaken a survey of the flatted developments 500m on either side of the application site. The table below demonstrates the existing and proposed situation.

	Existing	Proposed
No. of plots	67	67
Existing apartment blocks	9	10
% of plots with apartment blocks	13%	15%

Table 1: Comparison of % of flatted development existing and with the proposed development

- 6.21 Currently 13% of the plots within 500m of the application site on Ducks Hill Road comprise flatted development. The redevelopment of the application site would increase this to 15%. This small increment is none discernible and is not considered to change the character of Ducks Hill Road, especially along the part of Ducks Hill Road which comprises the application site.
- 6.22 Ducks Hill Road is not a designated conservation area or an area of very special character. While residential in character, the properties vary in size and design. The Inspector in the appeal decision for the development at 103, 105 and 107 Ducks Hill Road, describes the road in paragraph 10 as:
- “an attractive and predominantly residential thoroughfare with the properties varying considerably in size and design. Generally, but not exclusively, they are substantial detached dwellings interspersed with blocks of flats set behind trees and shrubs. The gaps between the buildings vary as do the width of the frontages”.*
- 6.23 The Inspector also notes in paragraph 11 that *“along the road there are several developments of flats with wide, open frontages which are part of the character of the area.”*
- 6.24 There is currently no flatted development in the immediate vicinity of the application site. The proposed development will result in the loss of one house and the redevelopment will include a new building which will be of a similar style to, and replace an existing large detached property set within a substantial plot (as set out in more detail below). Although the development would add to the total number of flatted developments on Ducks Hill Road, the overall appearance of the area, especially in the vicinity and in views of the application site would remain that of a residential area with detached houses being the more common form of development. Consequently, the proposal would not result in an overall concentration of flatted development in this part of Ducks Hill Road to the detriment of the established character of the area.
- 6.25 Furthermore, as demonstrated below the proposed development is able to accommodate sufficient off-street parking, avoiding congestion on roads, will not result in the loss of the front garden, nor a reduction in privacy, will not significantly change the street scene and does not result in the loss of family accommodation.

- 6.26 In summary, there is no statutory development plan policy that sets out that no more than 10% of development can be flattened development. Two Inspectors have confirmed that the guidance in the HDAS can only be treated as guidance and limited weight should be given to the guidance in respect of the 10% rule and the Council have granted planning permissions recently on Sandy Lodge Way which breach the threshold. While the proposed development would marginally increase the amount of flattened development by 2%, this is a small increment and given there is currently no flattened development in the vicinity of the application site the proposed development would not alter the overall character of the surrounding area.

Layout and Siting

- 6.27 The existing building is located centrally on the plot and the footprint of the existing building to the north extends to the boundary with Fringewood Close. The proposed development would maintain the existing building line with the dwellings to the north and south and the existing relationship to the frontage onto Ducks Hill Road. The northern vehicular access is to be removed and the southern vehicular access point will be retained and widened. With the exception of a small section of existing hedgerow to be removed to enable the widening of the vehicular access, the existing hedgerow at the front of the site will be retained and enhanced. Additional soft landscape is proposed to the front of the site in the car parking area. This will ensure that the strong existing suburban and landscaped character of the street is retained and improved.
- 6.28 The site is currently well-screened by dense vegetation to the rear and sides. There are no adjoining properties to the rear of the site. To the rear, the nearest properties are situated on the opposite side of Fringewood Close (over 22m away) and are separated from the application site by the close boarded fence and an area of grass/dense vegetation. The site is to be extended to the rear with a new planted site boundary, to maintain the screening to the rear and provide a larger amenity space to the rear for future occupants.
- 6.29 The nearest property to the north of the site is separated from the application site by Fringewood Close. To the south the proposed development would be sited approximately 4.8 metres from the boundary of the adjoining property at No. 141 Ducks Hill Road (this is an increased distance from the previous scheme). The northern flank wall of No. 141 Ducks Hill Road is over two metres from the boundary with the application site and is separated by a large hedgerow. The proposed development is set back so not to breach the 45 degree lines at the rear of the property. The Velux windows in the southern roof slope will have a cill over 1700mm from finished floor level. A high quality privacy screen will be provided to the balcony at first floor level. The siting of the proposed development would therefore at be a sufficient distance from adjoining properties to limit any potential loss of amenity for the adjacent properties.
- 6.30 The scheme provides an appropriate balance of built form, car parking and garden amenity to ensure that the scheme is not overdevelopment and in keeping with the pattern of development in the area which comprises of large detached dwellings with large frontages and rear gardens. Amenity space (666.9sqm) will be provided to the rear.

- 6.31 The residential properties to the west of the appeal site are on the opposite side of Ducks Hill Road and set back considerably from the road. The existing driveway of 137 Ducks Hill Road has space to accommodate the 14 proposed car parking spaces. The front driveway is not visible from the properties directly opposite and therefore the proposed car parking area at the front of the proposed development will result in no adverse visual appearance on neighbouring residents of Ducks Hill Road.
- 6.32 Furthermore, frontage parking is a common feature in Ducks Hill Road as is evidence to the majority of residential dwellings to the north, the adjoining property No. 141 Ducks Hill Road and properties further to the south on the west side of Ducks Hill Road. Notwithstanding this, the parking area is well screened already, and the boundary will be maintained by the proposed wall and vegetation as well as additional soft landscape within the car parking area (which has been increased and enhanced from the previous scheme). The boundary treatment will additionally provide definition between the private and public space, help reduce the occurrence of crime in accordance with Local Plan Part 1 Policy BE1, enhance road-side amenity and contribute to the visual quality of the streetscene and environment in accordance with paragraph 4.26 of the HDAS.
- 6.33 It is therefore considered that the proposed layout of the development and its form is wholly appropriate and justified for this accessible and sustainable site, reflecting the guidance contained within the NPPF, Policy 7.6 of the London Plan, Policy D1 of the Draft New London Plan, UDP Saved Policies BE21 and 24 and Local Plan Part 2 Policy DMHB11 and the Hillingdon Design and Accessibility Statement.

Density

- 6.34 The NPPF in paragraph 118 emphasises the commitment to promoting sustainable development by maximising the reuse of previously developed and underutilised land. Substantial weight should be given to the value of using suitable brownfield land within settlements for homes. To achieve appropriate densities, paragraph 122 of the NPPF requires planning decisions to support development that makes efficient use of land.
- 6.35 The site is located in a residential area. The buildings in the vicinity are predominately large detached dwellings of two to three storeys. Further north of 137 Ducks Hill Road there are some flatted blocks in the style of large dwellings. Given the definitions in the notes to Table 3.2 of the London Plan, the site is considered to have a suburban setting.
- 6.36 The proposal is for the demolition of one existing dwelling and the erection of a single building comprising eight flats. In suburban areas with a PTAL rating of 0 to 1 (the application site is PTAL 1a), it is suggested that the density range should be between 150–200 hr/ha (London Plan Table 3.2). For a scheme comprising 3.8–4.6 habitable rooms per dwelling should show a density of between 35-55 units per hectare and for those comprising 3.1-3.8 habitable rooms per dwelling the density range is between 40-80 u/ha as set out in London Plan Policy 3.4 (Table 3.2).
- 6.37 The application scheme represents a density of 41u/ha, which is well within the identified ranges of these target densities and therefore wholly appropriate for this site. The scheme makes most efficient use of this brownfield site whilst allowing for the sufficient amenity space to the rear maintaining the areas character of large detached buildings with large gardens to the rear.

- 6.38 As such the scheme is fully compliant with policy 3.4 of the London Plan and DMHB11 of the emerging local plan, the NPPF and Draft New London Plan which requires residential development to make the most efficient use of land and requires sites to be developed at the optimum density.

Standard of Accommodation for future occupiers

Internal Standards

- 6.39 Policy 3.5 of the London Plan sets out the minimum space standards for new residential development, with a two bed flat for four persons standard being 70sqm and three bed flats for between four and six persons between 74sqm and 95sqm. All units would be in accordance with the internal floor area standards of Policy 3.5 and the MHCLG Technical Housing Standards – National Space Standards.
- 6.40 All units have been designed so that all habitable rooms have at least one openable clear glazed window or door and have west or east facing windows. The development seeks to maximise the provision of dual aspect dwellings. All units with the exception of the two proposed rear units at ground and first floor levels are dual aspect. However, the two units to the rear of the proposed development are east facing and have openable clear glazed windows or a door in each habitable room and are therefore considered to have an acceptable standard of living for future occupiers.

External Amenity Areas

- 6.41 The HDAS Supplementary Planning Document sets out a minimum of 25sqm per two bedroom flat and the minimum standard for a three bed flat is 30sqm. Private space such as balconies and patios can be included in this total. Taking into account that the proposed mix is seven two bed units and one three bed units, the requirement for the proposed development would therefore be 205sqm of amenity space.
- 6.42 The Mayor's Housing SPG and Draft London Plan Policy D4 require a minimum of 5sqm of private outdoor space should be provided for two bedroom dwellings and an extra 1 sqm provided for each additional occupant.
- 6.43 Three of the units would benefit from private amenity space in the form of balconies with a total floorspace of 39.98sqm and the three units at ground floor will have private patios (30sqm in total). A total of 666.9sqm of communal amenity space consisting of a soft landscaped area will be provided to the rear of the proposed building (approximately 35% of the site). The proposal would therefore exceed the relevant standards contained in the HDAS and the London Plan and supplementary guidance in terms of private and communal amenity space.
- 6.44 This reinforces that the proposal would not result in the overdevelopment of the site as it can comfortably accommodate in excess of the amenity space (both private and communal) provision required.

Design

- 6.45 The existing building has a Georgian style but is undistinguished in appearance and is an underuse of this sustainably located suburban site. The proposal therefore includes the demolition of the existing building.
- 6.46 The opportunity exists to achieve a high quality development. The scheme is fully in accordance with NPPF Part 12 , London Plan Policies 3.5, 7.4 and 7.6, Draft New London Plan Policy D1, the Local

Plan Part 1 Policies H1 and BE1 and Policy DMHB11 of the Local Plan Part 2 which require development to produce a good standard of design that contributes positively to making places better for people.

- 6.47 In terms of the design, Ducks Hill Road predominantly consists of large detached properties on large plots, adjacent to the site is a cul-de-sac of detached 1960's style properties. A number of the larger plots further along Ducks Hill Road have been developed into large apartment schemes with a mixture of architectural styles which is taken from the varied range of properties along the road. As noted by the Inspector in the appeal decision for 103, 105 and 107 Ducks Hill Road the residential properties on Ducks Hill Road vary considerably in size and design (paragraph 10). The Inspector also notes that several developments on Ducks Hill Road have deep footprints and crown roofs (paragraph 13).
- 6.48 No. 137 Ducks Hill Road is a very symmetrical, classical Georgian detached house with large single storey additions along each flank which current house garages. The house is brick with a tiled roof. The property currently has an in and out driveway which a large area of hardstanding on the frontage. The existing dwelling is fairly dominant in the street scene on this part of Ducks Hill Road. The immediately surrounding properties on Ducks Hill Road while all large detached properties in substantial plots, vary in style and there is not one prevailing style of dwelling on this part of Ducks Hill Road.
- 6.49 The proposed development has been designed to reflect the character and symmetry of the existing property and retain the stand alone character of this house along the road. The proposed style and design has allowed for a scheme that keeps the height of the building generally in line with the surrounding properties. The proposal has been set in on both boundaries to respect the existing surroundings and privacy of neighbours and there are substantial separation gaps (which have been increased from the previous proposals) between the proposed building and neighbouring dwellings as demonstrated in Figures 19 and 20. The existing property has large deep windows across the front and this has been replicated in the proposals along with the use of high quality materials including bricks and tiles similar to the existing building (see Appendix 3) to create a well proportioned property which site comfortably within its settings.



Figure 19: Withdrawn scheme – proposed development in the context of existing neighbouring buildings



Figure 20: Application scheme – proposed development in the context of existing neighbouring buildings

- 6.50 As set out above, the proposed building will be sited on the existing building line, set back from the pavement on Ducks Hill Road by a generous frontage. It will retain a generous amount of amenity space to the rear (which is to be increased) maintaining the character of this part of Ducks Hill Road, typified by large detached houses and generous frontages and large rear gardens.
- 6.51 The proposed design of the scheme reflects the existing character and appearance of the surrounding area in the design principles of the scheme is therefore in accordance with the NPPF, London Plan Policy 3.5, 7.1, 7.4, 7.6, Draft New London Plan Policy D1, Local Plan Part 1 Policy BE1 and UDP Saved Policies BE13 and BE19.

Access, Parking and Servicing

- 6.52 Sterling Maynard has been appointed as the transport consultant for this scheme and has provided an assessment of the proposed development in a Transport note that is submitted in support of this application.

Access

- 6.53 The existing dwelling has a carriage drive with the southern and northern access. The Transport note acknowledges that the northern access is directly onto the kerb radius of the junction with Fringewood Close and that this arrangement is not good practice. The proposals include the removal of this northern access which should be seen as a highway benefit.

- 6.54 The proposal involves the widening of the existing southern access. The Transport Note identifies that the access will be 25m from the junction with Fringewood Close and close to the junction with Drakes Drive. The proposed access to the development is not considered to constitute a junction but is simply a private access serving a block of 8 flats and a dropped kerb and a crossover should be sufficient to serve the proposed development.
- 6.55 The note advises that although the access is close to Drake Drive, the number of vehicles turning in and out of each will be modest so the potential for any vehicle conflict is small. Furthermore, given the width of the verge and the footway on the nearside, the level of visibility at the proposed access point is more than adequate.
- 6.56 While the number of vehicle movements to and from the site will increase, the number involved are considered to be relatively small and unlikely to result in a material impact on the safe operation of the immediate road network.

Car Parking

- 6.57 The relevant car parking standards are those set out in Policy 6.13 and the Parking Addendum to the London Plan 2016 and Policy DMT6 of the Local Plan Part 2. Table 6.2 of the London Plan identifies that 2 bed units should have less than 1 parking space per unit and 3 bed units should have up to 1.5 parking spaces per unit. However, in outer London areas with low PTAL (generally PTALs 0-1), boroughs should consider higher levels of provision, especially to address 'overspill' parking pressures.
- 6.58 Appendix C to the emerging Local Plan Part 2 sets out Hillingdon's parking standards. The standards for 2 bed units are 1 to 1.5 parking spaces per unit and for 3 bed units 2 spaces. Proposals are also required to incorporate visitor car parking.
- 6.59 The proposed development comprises 7 x 2 bed units and 1 x 3 bed units. In accordance with the adopted car parking standards in the London Plan, the proposed scheme will require 8.5 car parking spaces, however it is noted that outer London boroughs with low PTAL levels should consider higher provision. In accordance with the emerging LBH maximum car parking standards the application scheme will require 12.5 (13) car parking spaces. The proposed scheme includes the provision of 14 car parking spaces at the front of the site. This includes two disabled spaces and two visitor spaces.
- 6.60 The proposed level of provision therefore complies with the Council's standards. Two spaces, approximately 13% of the provision will be suitable for use by a disabled driver in accordance with Requirement 9 of Appendix C of the emerging Local Plan Part 2. As required by the London Plan, five spaces will be serviced by 'active' electric charging points and five spaces will be 'passive' electric charging points for future connectivity. The two visitor parking spaces will ensure that there is no risk of extraneous parking taking place on Ducks Hill Road or Fringewood Close.

Cycle Parking

- 6.61 The London Plan requires 2 cycle parking spaces to be provided for all flats with 2 or more bedrooms. Appendix C of the emerging Local Plan Part 2 requires 1 cycle space per 2 bed flat and 2 spaces for 3 bed units.

- 6.62 Provision for 16 cycle spaces, the equivalent of 2 spaces per 2 bed flat in accordance with the more stringent London Plan standards will also be provided in the car park at the southern boundary of the site, in a stacked storage solution allowing for 2 cycles per stand.

Refuse and Recycling

- 6.63 Following concerns from officers regarding the location of the refuse and recycling storage facility in the north west corner of the site in the withdrawn scheme, the site layout has been amended. The site layout for this application scheme proposes that the refuse and recycling storage facility will be located in the car parking area along the northern boundary of the site with Fringewood Close. The facility will accommodate 4 x 770l refuse bins. Collection will take place either in accordance with the existing roadside arrangements for residential properties along Ducks Hill Road or from Fringewood Close.

Summary

- 6.64 The proposed access, car parking and servicing arrangements are compliant with London Plan and LBH policies and guidance. There was no objection from the Council's Highways Department to the previous scheme proposals in relation to access, car parking and servicing arrangements.

Trees and Landscaping

- 6.65 A Phase II Arboricultural Impact Assessment (AIA) which includes a Tree Survey, Tree Constraints Plan and Tree Protection Plan has been prepared by Arbol Euro Consulting and is submitted to accompany this planning application. The AIA confirms that the application site is covered by LBH TPO No. 156. More specifically Trees T1, T4 and T8 as shown on the Tree Constraints Plan (Extract below in Figure 21) are those protected by TPO No. 156.

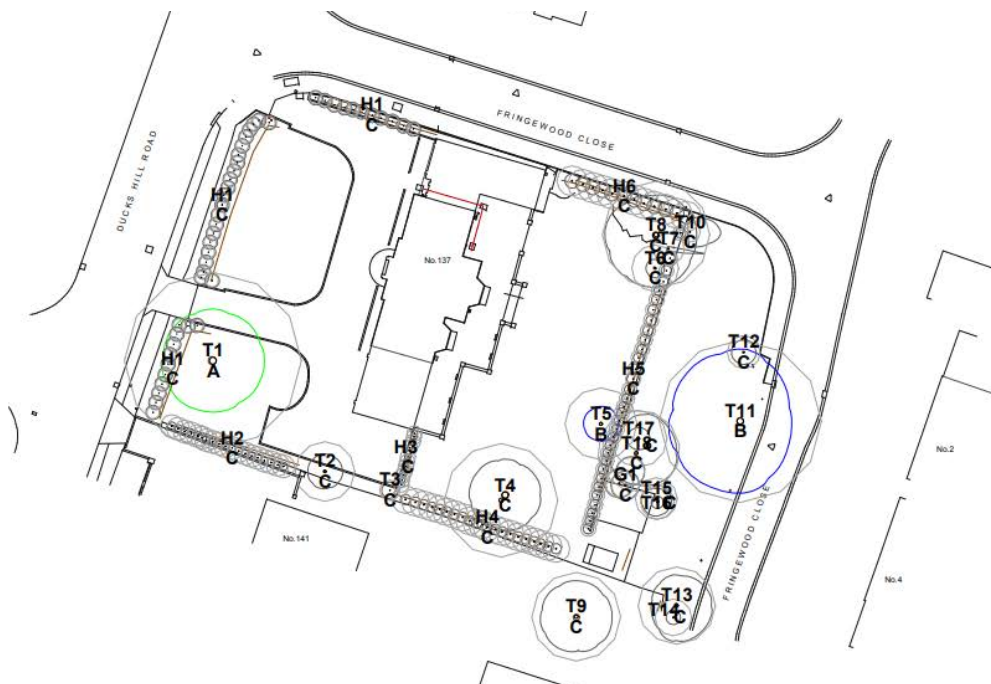


Figure 21: Extract from Tree Constraints Plan

- 6.66 The majority of the existing trees and hedgerows will be retained and enhanced. All of the trees covered by the TPO will be retained, this includes T4, where the revised footprint of the proposed building has been pulled away from the tree to allow for its retention. The removal of two trees (T2 and T5), hedgerow to the rear and a small proportion of hedgerow at the front of the site to enable the widening of the access point from Ducks Hill Road is proposed.
- 6.67 The proposals include the introduction of replacement and new soft landscape to include a new rear boundary tree planted area comprising a mix of silver birch, hornbeam and yew. This will enhance the biodiversity value of the site. An indicative Landscape Plan is submitted with the application and further landscape details can be secured by a planning condition.
- 6.68 The AIA and Tree Protection Plan demonstrates that the remaining trees, including those subject to the TPO can be adequately protected during the construction works. The AIA notes that part of the construction of the widened access will incur into the root protection area of T1, however this is insignificant at only 2.83%. Furthermore, when the build is complete the brick edge and paving adjacent to the proposed cycle storage would be removed and planted up as a lawn area: a RPA gain for T1.
- 6.69 A new brick boundary wall with metal railing and gates is proposed to the front. This boundary type is characteristic of others on Ducks Hill Road. A new 1.8 high close board fence is proposed to the side and rear boundaries.
- 6.70 Overall, the proposed scheme will increase and enhance the existing landscape on site, increasing the biodiversity value of the site.

Flood Risk and Drainage

- 6.71 The Environment Agency Flood Maps (see Figure 12) show that the entire site is within Flood Zone 1. The site is therefore deemed to be at a low risk of fluvial flooding. The site is under 1ha in size and therefore under NPPF guidance the proposal is not required to be accompanied by a Flood Risk Assessment.

7.0 Community Infrastructure Levy

- 7.1 On 6th April 2010, the Community Infrastructure Levy (CIL) Regulations came into force which made it unlawful for a planning obligation to be taken into account as a reason for granting planning permission for a development, or any part of a development, whether there is a local CIL in operation or not, if the obligation does not meet all the following tests set out in Regulation 122(2):
- i. necessary to make the development acceptable in planning terms;
 - ii. directly related to the development;
 - iii. fairly and reasonably related in scale and kind to the development.

7.2 With regard to the Mayoral and Hillingdon CIL payment, the application would attract the following payments to contribute to local infrastructure as set out in the relevant Mayoral CIL schedule and Hillingdon's Local CIL schedule:

- Existing dwellings (GIA): 275sqm
- Proposed development overall floorspace (GIA): 1,132.85sqm
- Total net increase: 857.85sqm

858 x £35 = £30,030 Mayoral CIL contribution (plus indexation)

858 x £96 = £82,368 Hillingdon CIL contribution (plus indexation)

Total CIL contribution =£112,398 (plus indexation)

7.3 The CIL form submitted with this application confirms the Mayoral and Hillingdon CIL payment applicable for this application scheme payable on implementation of the development.

8.0 Conclusion

8.1 The application scheme for the demolition of the existing dwelling and erection of a building to provide eight flats fully accords with the latest sustainable development, design and housing objectives within the NPPF, the London Plan, Draft New London Plan, Mayoral Housing Strategy, as well as adopted and emerging LBH Policies. The proposed development will make efficient and positive use of an underutilised suburban site, optimising density in this suburban area with a residential character.

8.2 The design of the proposed scheme has been through several iterations following discussion and comments made by officers at LBH. This has resulted in an overall smaller building with increased distances from the site boundary to the north and neighbouring property to the south. The revised design has also enabled the retention of the TPO Oak Tree in the rear garden and additional landscape to the front of the site. The applicant considers that the application scheme responds positively to officers comments and overcomes any previous concerns.

8.3 The new residential units, albeit modest in number, will make an important contribution towards Hillingdon's housing land supply demand of 559 dwellings per annum as detailed in the London Plan and Hillingdon's Local Development Framework and the significantly increased target of 1,553 dwellings per annum in the Draft New London Plan, 765 of which are required to be provided on small sites. The NPPF, adopted and emerging London Plan and LDF recognises the importance of previously developed sites in delivering housing land supply. Furthermore, the NPPF and London Plan both advise that substantial weight should be given to the delivery of housing on small and windfall sites to meet housing need, diversifying the mix and types of housing.

8.4 The NPPF seeks to support small and medium sized builders and recognises that small sites can be built out quickly. The proposed development would be constructed by a small local housebuilder and could be build out quickly, as supported by the revised NPPF.

- 8.5 Although the development would add to the total number of flatted developments on Ducks Hill Road (a non discernible increase from 13% to 15%), the overall appearance of the area, especially in the vicinity and in views of the application site would remain that of a residential area with detached houses being the more common form of development. Consequently, the proposal would not result in an overall concentration of flatted development in this part of Ducks Hill Road to the detriment of the established character of the area.
- 8.6 The proposed Georgian style design and proposed high quality materials is reflective of the character and symmetry of the existing property and would retain the stand-alone character of this house along the road. In terms of height, design and scale the proposed building is considered appropriate in this location and the overall character of the area would remain that of a residential area with detached houses being the more common form of development. The retention of existing trees and landscape and the introduction of new trees and landscape will enhance the site and streetscene along Ducks Hill Road and Fringewood Close.
- 8.7 The proposals include the removal of the northern vehicular access to the site and widens the southern access which is seen as a benefit to the scheme. The proposed scheme is compliant with parking and cycle standards as set out in the Hillingdon Local Plan. The accessible location of the site, within walking distance of shops, services and public transport links reinforces the sustainable development credentials of the proposed scheme which should encourage non-vehicular trips by public transport, walking and cycling.
- 8.8 The proposed siting, high quality appearance and retention of trees surrounding the development will ensure that existing and future residential amenity will be enhanced and fully protected, whilst comfortably meeting amenity standards onsite in accordance with the aims of Hillingdon's Saved Unitary Development Plan Policies, the Design and Accessibility Statement SPD as well as the London Plan standards. All of the flats will exceed minimum internal space standards and Lifetime Homes Standards. The proposed block respects the 45° code to ensure that there is no adverse loss of privacy or overbearing effect. The proposed layout will not have a detrimental impact on the occupants of adjacent residential property's living conditions.
- 8.9 Through Mayoral and Hillingdon CIL contributions, the proposed scheme will support the provision of important local infrastructure.
- 8.10 Based upon the detailed planning and design assessment presented in support of this scheme, the applicant contends that the case in support of the redevelopment of this previously developed site is compelling and that the scheme should be supported by the Council and planning permission granted.



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