

CDS Planning and Development Consultancy

Pure Offices
Midshires Business Park
Aylesbury
HP19 8HL

T: 01296 761 508
DD: 07855 790 688

Planning Department
Hillingdon Council
Civic Centre
High Street
Uxbridge
UB8 1UW

11th March 2026

Dear Ms Bateman

Planning Application
44 Murray Road, Northwood, HA6 2YL
Planning Application 1787/APP/2025/1849

Firstly, we would like to thank both Mr Concannon and yourself for the time and advice you have provided to date. It is greatly appreciated.

I have the pleasure of attaching a formal amendment package which responds comprehensively to the points raised during our discussions. This letter summarises the key amendments and provides additional clarification where further information was requested.

Please find attached the Formal Amendments for Planning Application 1787/APP/2025/1849, prepared following extensive and positive discussions with the Council across two meetings.

Appendix 1 to this letter provides a detailed response to Policy DMH4. We have undertaken a thorough review of the site context against this policy and can confirm that the proposal fully complies with its requirements.

Front Landscape and Character

Concerns were raised regarding the reduction in soft landscaping to the site frontage.

The revised retains the existing hedge, and the parking arrangement has been rationalised to allow for increased soft landscaping. Ancillary structures have been relocated away from the primary landscaping areas, enabling the introduction of more substantial and visible planting that will enhance the site when viewed both from Rickmansworth Road and on approach to the site.

Design

Concerns were raised that the architecture appeared overly complex within the context of the street.

In response, the design has been simplified while retaining an appropriate level of architectural interest, ensuring that the building does not appear overly plain within the streetscape. Amendments include a simplified front porch and the removal of front balconies, which the Council considered lead to a somewhat cluttered appearance. The arrangement of windows at ground and first floor level has also been refined so that the building reads more clearly as a single dwelling, helping it sit comfortably within the established character of the area. The overall design now presents a more restrained and classic façade, with fewer projections and recesses.

Officers also raised concerns regarding the projecting bay features. These have now been omitted entirely. The revised design adopts more traditional window and door arrangements, with improved vertical alignment across floors and a clear and respectful window hierarchy.

Further details were requested regarding the recessed balconies and the dormer to the rear.

Sections have now been provided as part of the submission to clarify these elements.

Floor-to-Ceiling Heights

Confirmation was requested regarding internal floor-to-ceiling heights.

A building cross-section has now been included within the submitted drawings, demonstrating that all units would achieve an internal ceiling height of 2.5 metres, thereby complying with London Plan Policy D6.

Amenity and Layout

Officers requested clarification regarding the amenity of the ground floor flats, particularly those with bedrooms facing the communal rear garden.

In response, low-level fencing is now proposed, as shown on the site plan, to define and secure private amenity areas to the rear of Bedrooms 1 and 3 of the ground floor units. In addition, defensible planting and hedging can be introduced to the rear of the bedroom windows to further safeguard privacy. These measures will ensure a high-quality and policy-compliant level of residential amenity for future occupiers and could be secured via planning condition if considered necessary.

New CGI views have also been prepared showing outlook from the ground floor units towards the rear amenity area. These demonstrate that the development would not be unduly affected by the neighbouring property to the rear and that outlook and usability of the amenity areas would remain high quality. Internal living standards across all units would be excellent.

Back-to-flank distances within the surrounding area are typically below 12.5 metres, and the proposal reflects this established local context. It is also relevant that the flank elevation of the neighbouring property to the rear is not a full-height wall and is considerably lower than would typically be expected for a standard dwelling. When considered alongside the neighbour's

asymmetrical roof form, the proposed relationship is considered entirely acceptable and would not result in any unacceptable harm.

Cycle Storage and Refuse

Clarification was also sought regarding the positioning of the cycle store and refuse areas adjacent to the amenity space.

Further details are now shown on the revised site plan illustrating how residents would access these facilities, together with details of the cycle store itself. Access routes would be hard landscaped to ensure usability in all weather conditions.

We have also reviewed the rear amenity space and removed the washing dryer and some of the paving as to increase the level of soft landscape.

A landscaping plan has been prepared to demonstrate the quality, functionality and long-term viability of the external spaces. As part of this submission, a Landscape Master Plan prepared by ACD Landscape Architects has been provided which illustrates the significant enhancement to the site's external environment.

Viability

We were asked to consider the viability implications of reducing the scheme from five units to four.

This option has been reviewed and would present significant viability concerns. Reducing the scheme from five units to four would remove only the roof accommodation while retaining the roof structure itself. Due to the need to maintain London Plan minimum flat sizes, such a reduction would not meaningfully reduce the footprint, mass or scale of the building.

Both national and local policy encourage the efficient use of development sites. We draw attention to paragraph 125 (part c) of the NPPF, which states, "Planning policies and decisions should, give substantial weight to the value of using suitable brownfield land within settlements for homes."

For the reasons set out above, the proposed five-unit scheme fully accords with these policy objectives while delivering high-quality residential accommodation. Reducing the scheme to four units, without any policy requirement to do so, would risk underdevelopment of a highly sustainable site.

It is considered far more appropriate to bring forward the site comprehensively. The fifth unit allows, greater investment in high-quality materials and landscaping to ensure the development represents an exemplary redevelopment in this sustainable location.

Yours sincerely,

CDS Planning and Development

Appendix 1

Response to Policy

DMH 4 – Residential Conversions and Redevelopment

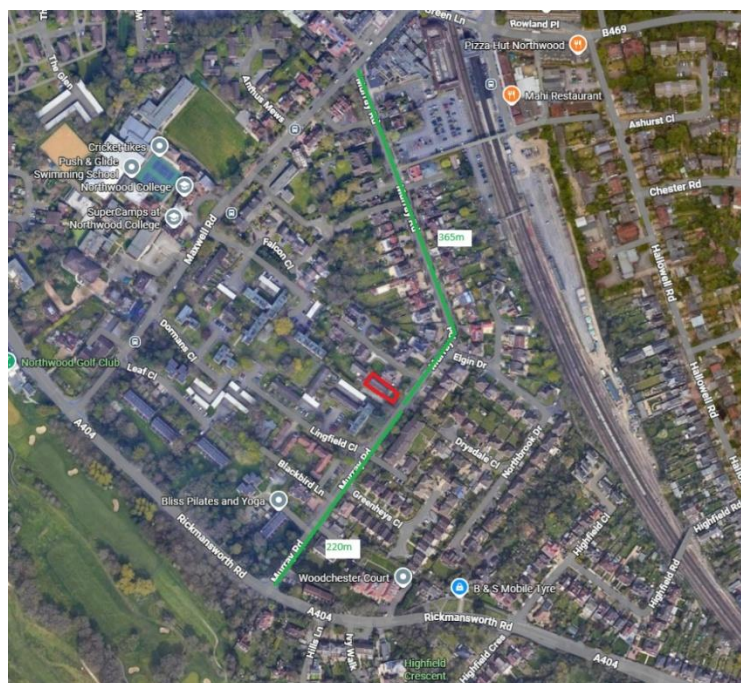
Policy DMH 4: Residential Conversions and Redevelopment

Residential conversions and the redevelopment of dwellings into new blocks of flats will only be permitted where:

- i) it is on a residential street where the proposal will not result in more than 10% of properties being redeveloped into flats;
- ii) On residential streets longer than 1km the proposed redevelopment site should be taken as the midpoint of a 1km length of road for assessment purposes;
- iii) the internal floor area of the original building to be converted is at least 120 sqm; and
- iv) units are limited to one unit per floor for residential conversions.

The policy justification sets out 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. In recent years, large concentrations of flats have resulted in a range of 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.

Properties Impacted



Murray Road has a total length of circa 574m.

For the purposes of assessing compliance with Policy DMH4, the entirety of Murray Road should be considered. The road has a total length of less than 1km and therefore falls within the scope of criterion (ii) of the policy.

It is also important to note that the policy specifically seeks to control the redevelopment or conversion of houses into flats, conversions into other uses i.e. dentist or synagogue fall outside the jurisdiction of the policy and can therefore be ignored.

The Hillingdon Local Plan was adopted in January 2020, within which Policy DMH4 was formally introduced. The same limitation has, however, been applied historically, appearing as far back as 2006 within the Council’s Design and Accessibility guidance.

The justification behind the policy is critical to understanding how it should be applied. For clarity, the supporting text states at paragraph 4.11:

“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. In recent years, large concentrations of flats have resulted in a range of 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.”

The policy does not define what the Council considers to constitute “recent years” within this context. It would reasonably follow, however, that the policy is primarily concerned with more modern patterns of development, rather than historic redevelopment which has long since become part of the established character of the area.

On this basis, it would not be reasonable for the Council to consider developments dating back to the 1970s (approximately 50–60 years ago) when applying this policy. In the view of CDS Planning, the prevalence of flat development became more notable from the 1990s onwards. However, to ensure a robust and cautious approach, this assessment has considered development dating back 40 years from the date of submission, to 1985.

Murray Road contains 46 residential dwellings today (including houses that have been granted, often as infill development in recent decades). There are also several non-residential uses along the road, including a synagogue, a dentist and a police station; however, for the purposes of this assessment these uses have been excluded, as the policy is unconcerned with them.

Based on this total, the policy threshold would suggest that no more than 10% of houses (i.e. five dwellings) should be lost to flat conversions or redevelopments.

A review of the Council’s planning records, together with a site survey of the area, indicates that since 1985 the following permissions have been approved and implemented to create C3 residential flats.

Year	Planning Reference	Address	Proposal
2004	43038/APP/2004/1778	48A MURRAY ROAD	ERECTION OF PART TWO, PART THREE STOREY BLOCK OF 5, TWO-BEDROOM FLATS WITH ASSOCIATED PARKING

1987	9499/A/87/0926	FLATS 1-6 BEECH COURT, 14 MURRAY ROAD NORTHWOOD	EREC OF 3- STOREY BLOCK OF 6 FLATS & PARKING
1984 (NB: OUTSIDE OF DATE RANGE BUT CONSIDERED CLOSE)	18456/D/84/0723	1-16(CONS) CRAIGEMORE COURT, 46 MURRAY ROAD NORTHWOOD	RESERVED MATS. OF OUTLINE 18456/831049(P) – 16 X 2 BEDROOM FLATS

12C Murray Road (Ref: APP/2022/1099). While does represent a planning permission that has been granted, it was not implemented, no conditions have been discharged. The permission has therefore lapsed. – this is mentioned for openness and clarity.

CONCLUSION

Since 1984, only three properties along Murray Road have been converted or redeveloped from single dwellings into flats: Nos. 46, 14 and 48A. While planning permission was granted for No. 12C in 2022, that permission has since lapsed and therefore should not be included within the assessment.

This equates to approximately 2.2% of properties along Murray Road having been converted to flats since 1984, which is comfortably below the 10% threshold set out in Policy DMH4.

Furthermore, the current proposal would represent the first redevelopment to flats on Murray Road for over 20 years.

The supporting text to the policy refers to concerns that concentrations of flatted development in “*recent years*” may have altered the character of certain areas. In this case, however, there is no reasonable basis to conclude that the limited number of flatted developments along Murray Road has resulted in any harmful concentration or has adversely affected the character of the locality.

Accordingly, the proposed development is considered to fully comply with the requirements of Policy DMH4.