



**Planning Statement**

**50 Gatehill Road,  
Northwood,  
HA6 3QP**

**October 2022**

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## **1.0 Introduction**

### **Background**

1.1 JMP (North West) Ltd have been instructed by Mr and Mrs Kotecha to prepare and submit a planning application for the following development, namely:

"Erection of first floor rear extension and small ground floor front extension to study at 50 Gatehill Road, Northwood."

1.2 This statement will address the relevant national and local planning policies that deal with the principle of the proposed development, and the pertinent planning matters associated with the scheme. This will be addressed as set out below:

Section 2 - Application Site Context

Section 3 - Planning History

Section 4 - Relevant Planning Policy – National Planning Policy Framework

Section 5 - Relevant Planning Policy – Hillingdon Development Plan

Section 6 - Supporting Technical Reports

Section 7 - Other Material Considerations

Section 8 - Conclusions

### **Principle of Development**

1.3 The National Planning Policy Framework is supportive as a matter of principle of development within built up areas, particularly on sites which are sustainably located and well designed.

1.4 It is therefore our view that the development subject of this application is compliant with the provisions and principles of local and national planning policy, and the feedback received from the local planning authority during pre-application discussions. Further, that there are other material considerations which also weigh in favour of the grant of consent, and we would therefore kindly request that this application be approved without delay.

### **Submitted Documentation**

1.5 This planning application is supported by the following documents and drawings:

- Existing and Proposed Elevations, and Floor Plans;
- Location Plan;
- Planning Statement; and
- Arboricultural Method Statement.

## **2.0 Application Site Context**

- 2.1 The application site is approximately 0.13 hectares in area and is within the built up development area of Northwood, in the London Borough of Hillingdon.
- 2.2 The site currently comprises of a 4-bedroom, two-storey, detached, family home with attached two bedroom annex. The property benefits from a large plot with garden areas to the front and rear, with pedestrian and vehicular access provided on the site frontage off Gatehill Road. The property is situated within a residential area and an Area of Special Local Character. The site is located in an area with an eclectic mix of build styles, plot sizes, designs and use of materials.
- 2.3 The property is well related to the main highway network with good access to the A4125. The site is also well served by public transport, with bus stops located within walking distance of the site on Watford Road and Green Lane. Northwood underground station is also within walking distance of the site within the town centre, which also provides good access to key local services and facilities, including shops, bars, restaurants, banks, education establishments, places of worship etc. The site is therefore understood to be sustainably located.
- 2.4 From a review of the Historic England mapping service, the site subject of this application is not listed, and there are no listed buildings or structures within close proximity of the application site. There are also no locally listed buildings within the vicinity of the site. The site is also not located within a defined Conservation Area but is located within an Area of Special Local Character (ASLC). The impact of the minor alterations subject of this application on the ASLC is therefore addressed within this report, but it is important to acknowledge that this designation is defined as a non-designated local heritage asset.
- 2.5 From a review of the Environment Agency Flood Map it is noted that the application site is not located within an area at risk from flooding, although it is sited within a critical drainage area. Given the minor nature of proposals set out within this application, the scheme as submitted is not deemed to result in any greater impact on the critical drainage area than the current arrangements. The fact that the previous application was not refused on the grounds of impact on drainage would appear to further support the case that drainage is not an issue in the assessment of this further scheme.
- 2.6 It is noted that there is one existing tree within the application boundary that is subject of a Tree Preservation Order ('TPO'). This tree is unaffected by the development proposals, with details of arboricultural protection set out, in detail, within the supporting Arboricultural Method Statement.
- 2.7 The form and context of the existing property is shown within the photographs included below.



*Figure 1: Existing front elevation*



*Figure 2: Existing Rear Elevation showing area of infill to accommodate first floor rear extension*

### **Proposed Development**

- 2.8 As set out in further detail at section 3 of this report, this application is being submitted following an earlier refusal (and associated dismissal of an appeal) to extend the property, and following detailed pre-application engagement with the local planning authority in relation to the scheme as now submitted.
- 2.9 In light of the previous concerns raised by the local authority in the determination of earlier applications on site, the development now being proposed has been significantly reduced in scale, and now simply relates to the development of a first-floor extension to the rear of the property to increase internal ceiling height, maximize floor area within the upstairs bedrooms and to secure a direct link at first floor level between the main dwelling and the existing annex. In addition, the Applicants propose a small front extension at ground floor level to increase the footprint of the proposed study.

2.10 The front extension at ground floor level is minor in nature and remains set back one metre from the property frontage in line with Council guidance and policy. The proposed first floor rear extension and associated overall reconfiguration of the property further ensures that the scheme enhances the functionality of the property. This is an imperative change on site for the Applicants given their need to create a suitable family home to meet their personal multigenerational requirements, as well as their specific traditional and cultural needs. The current relationship between the main house and annex is not fit for purpose given the lack of linkage at first floor level. The current arrangement will necessitate our clients having to go through the whole of the ground floor of the property to enter the upstairs of the adjoining annex in the case of an emergency, or should care be required during the night for the Applicants elderly mother. This is clearly unsuitable and inconvenient, and as such the creation of a linkage at first floor level is vital for this home to function as a single, family dwelling.

2.11 In order to secure the required width at first floor level to create the linkage, whilst retaining usable floorspace in the bedrooms and bathrooms, the Applicants have determined to apply for a first-floor rear extension. This secures the creation of a link at first floor level and limits any physical alteration to the property to the rear only. This secures the retention of the existing front façade and has now secured the removal of the previously proposed increase in height of the ridgeline. All proposed alterations are now focused on the rear of the property, and are not visible from the property frontage or wider ASLC.

2.12 It can be confirmed that the significant changes to the scheme from that previously proposed are as follows:

- Removal of proposed garage extension to property frontage;
- Retention of front façade at first floor level;
- Retention of existing ridge lines;
- Reduction in scale of first floor rear extensions;
- Introduction of hipped roofs to rear gables (as requested by the local authority at pre-application stage);
- Amended fenestration to the rear of the property to amend window positioning (to seek to meet the requirements set out by the Council during pre-application discussions); and
- Chimney and the bay window in the study will be retained

2.13 Given the nature of the proposed development, the fact it will secure a more sensible connection between the main house and the former annex, the high quality of the design, the significant reduction in development from that previously proposed, and the lack of impact on neighbour amenity and the character of the wider ASLC, the scheme as now submitted is deemed to be acceptable as a matter of principle. The fact that the front façade is retained in its existing form, other than the minor extension at ground floor level (which retains the 1m set back from the property frontage), further ensures that the scheme as now submitted is respectful of the original building, the visual amenities of the streetscene and the character of the ASLC.

### **3.0 Planning History**

3.1 Having reviewed the site planning history on the Council website it is noted that the annex as now in situ was approved under application reference 18347/B/86/0533 on the 16<sup>th</sup> May 1986, along with other proposed extensions and alterations to the property. Whilst a further application was made in December 2020 to seek to vary the condition on the 1986 approval associated with the use of the annex, it is noted that this application was subsequently withdrawn, and is not therefore of relevance to the determination of the application as now submitted.

3.2 As set out in earlier sections of this report there has been a previous application and associated appeal relating to proposed extensions and alterations at 50 Gatehill Road. This previous application, the planning appeal, and the subsequent pre-application dialogue with the local planning authority are addressed in detail below.

#### **Planning Application 18347/APP/2021/3064**

3.3 A planning application for the following development was submitted to the London Borough of Hillingdon and validated in August 2021:

"Front extension; part single; part two-storey front extension; first floor rear extension and replacement/new doors and windows."

3.4 The application is noted to have been refused planning permission on 6<sup>th</sup> October 2021 for the following reasons:

1. "The proposed part single; part two storey front infill extension, alterations to front fenestration and first floor rear extension, by reason of its combined siting, design, height, width, depth, bulk and massing, would result in a dominant, overbearing, visually intrusive, incongruous and excessive form of development, enclosing a characteristic and important gap that would fail to harmonise with the architectural composition of the original dwelling, would be detrimental to character, appearance of the Gate Hill Farm Estate Area of Special Local Character and visual amenities of the street scene. The proposal is therefore contrary to Policies BE1 and HE1 of the Hillingdon Local Plan: Part One – Strategic Policies (November 2012), Policies DMHD1, DMHB1, DMHB5, DMHB6, DMHB11 and DMHB12 of the Hillingdon Local Plan Part Two – Development Management Policies (January 2020) and the National Planning Policy Framework (2021)."
2. The proposed front garage extension, by reason of its forward projection, combined height, width, depth, bulk and massing, would result in a dominant, overbearing, incongruous, visually intrusive and bulky addition that would fail to harmonise with the architectural composition of the original dwelling, would be detrimental to the character and appearance of the Gate Hill Estate Area of Special Local Character and visual amenities of the street scene. The proposal is

therefore contrary to Policies BE1 and HE1 of the Hillingdon Local Plan: Part One – Strategic Policies (November 2012), Policies DMHD1, DMHB1, DMHB5, DMHB6, DMHB11 and DMHB12 of the Hillingdon Local Plan Part Two – Development Management Policies (January 2020) and the National Planning Policy Framework (2021)."

- 3.5 It is noted that the Council accepted that the previous development proposal did not result in detrimental impacts to nearby occupiers in relation to dominance, outlook, sense of enclosure, visual intrusion, overlooking, loss of privacy, overbearing impact and loss of daylight/sunlight. Given that the scheme as now submitted has further reduced the scale and form of development from that previously refused, further demonstrates that there will be no harm to neighbouring amenity resultant from these proposals. The Council are also noted to accept the principle of development in relation to extending the property. However, it was clear that the overall cumulative impacts of the previous scheme were deemed significant enough to warrant refusal of the application. This has been wholly addressed within this revised proposal.
- 3.6 Following the Council's decision to refuse planning permission, the Applicant chose to appeal to the Planning Inspectorate for an independent examination of the scheme. Having reviewed the Inspector's report in detail, it was again clear that the cumulative impact of the proposals in their entirety were deemed sufficient to justify dismissing the appeal.
- 3.7 It's therefore clear from a review of the Officer's Report associated with the previous application, and the subsequent Inspector's Appeal decision, that it was the cumulative impact of the extent of proposals set out within this earlier application, and the associated impact on the front elevation and visual amenities of the street scene that were of most concern to the Council, neighbouring properties, and the local Gatehill Residents Association. The changes proposed from that earlier scheme, and the very limited nature of the proposals as now submitted, show how the concerns of the community and the Council have been duly considered and addressed, with the scheme now being submitted clearly addressing the previous reasons for refusal, and protecting the character and appearance of the ASLC and the existing property.

#### **Pre-Application Discussions**

- 3.8 Following the previous refusal our clients appointed a Planning Consultant to review the earlier scheme and to advise on next steps and the nature of a resubmission. It is understood that the previous consultants advised the Applicants to significantly reduce the scale of development being proposed, and to seek to secure the retention of the bulk of the front façade. Following receipt of this advice a revised scheme was drawn up and submitted to the local planning authority for formal pre-application advice on 7th June 2022.
- 3.9 The Applicant and former Agent held a TEAMS call with Mr James Wells, Planning Officer at the London Borough of Hillingdon on the 27<sup>th</sup> July 2022. Within that pre-application discussion, the case officer is understood to have concluded that the scheme was an

improvement over and above the previously refused scheme, but that further, small changes or justification was required. The scheme subject of pre-application discussions continued to include the provision of an increase in the ridge height of the roof area between the original dwelling and the annex. The Case officer indicated that whilst the Council had concerns with this element, they would be willing to support the planning application if suitable justification could be provided to support the need for this change. Other feedback included an acceptance of the scale of the proposed first floor rear extension, but with a request that the gables be amended to include hipped roofs, and for the first-floor windows to be re-aligned to be better balanced with the rhythm of the proposed rear extension.

- 3.10 Whilst our clients have sought to await the formal written pre-application advice of the local planning authority to confirm the information as set out above, prior to submission of this further application, it is important to outline that the time of submission of this application the written advice remains outstanding. Due to financial pressures, our clients have therefore been left with no option but to progress with the application, with the changes as set out at section 2.
- 3.11 We are of the view that the scheme as now submitted reflects the feedback received during pre-application dialogue with the local planning authority. Further, that the previous reasons for refusal have been wholly addressed and overcome within this revised scheme. These revised proposals are therefore deemed to be compliant with the provisions of the development plan, and there is a legitimate expectation that the Council will work positively and proactively with the Applicant to secure a positive and timely determination of this further application.

#### **4.0 Relevant Planning Policy and Legislation – National Planning Policy Framework**

4.1 The development subject of this application needs to be assessed against the provisions of the development plan which comprises the Revised National Planning Policy Framework, the London Plan and the adopted Hillingdon Development Plan. This section of the report will focus on the national planning policy position, with regional and local policies addressed at Section 5.

#### **Revised National Planning Policy (NPPF) July 2021**

4.2 The Revised National Planning Policy Framework was last updated in July 2021, and sets out the Government's planning policies for England, and how these are expected to be applied. Planning law requires that applications for planning permission must be determined in accordance with the Development Plan, unless material considerations indicate otherwise. The NPPF is a material consideration in the decision-making process, and a summary of paragraphs considered material to the determination of this application read as follows:

#### **Section 2 - Achieving Sustainable Development**

**“Paragraph 8:** Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives):

- a) an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;
- b) a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and
- c) an environmental objective – to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.”

**“Paragraph 10:** So that sustainable development is pursued in a positive way, at the heart of the Framework is a presumption in favour of sustainable development.”

**“Paragraph 11:** Plans and decisions should apply a presumption in favour of sustainable development. For decision-taking this means:

- c) approving development proposals that accord with an up-to-date development plan without delay; “

**“Paragraph 12:** The presumption in favour of sustainable development does not change the statutory status of the development plan as the starting point for decision making. Where a planning application conflicts with an up-to-date development plan (including any neighbourhood plans that form part of the development plan), permission should not usually be granted. Local planning authorities may take decisions that depart from an up-to-date development plan, but only if material considerations in a particular case indicate that the plan should not be followed.”

4.3 **Comment:** The application site is sustainably located with good access to key local services and facilities, including public transport links. The proposed development is sited within an area characterised by residential uses, and will ensure that the property can function well and coherently as single multigenerational family home, without resultant harm on visual amenities, neighbour amenity and the character and appearance of the ASLC. In short, the scheme is deemed to be in a suitable and sustainable location, represents the effective use of a previously developed site, and is of a scale and design which is deemed to be both acceptable and appropriate.

#### **Section 4 - Decision Making**

4.4 In relation to decision-making the NPPF states:

**“Paragraph 38:** Local planning authorities should approach decisions on proposed development in a positive and creative way. They should use the full range of planning tools available, including brownfield registers and permission in principle, and work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area. Decision-makers at every level should seek to approve applications for sustainable development where possible.”

**“Paragraph 47:** Planning law requires that applications for planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise. Decisions on applications should be made as quickly as possible, and within statutory timescales unless a longer period has been agreed by the applicant in writing.”

4.5 **Comment:** The proposed development represents an effective use of land within the urban area and is therefore deemed to be acceptable. The application is also supported with the required documentation to demonstrate the suitability of the development in its setting, and in relation to its impact on neighbouring amenity, heritage assets and the street scene. The Applicants have sought to engage positively with the local planning authority in advance of submission of this further application, and to address previous concerns raised by the Council, local residents and the Planning Inspectorate. It is therefore our view that the development proposed is compliant with the provisions of the Development Plan when read as a whole, and we would therefore kindly request that planning consent be granted for the redevelopment of the application site.

## Section 5 – Delivering a Sufficient Supply of Homes

4.6 **“Paragraph 60:** 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.”

4.7 **Comment:** Whilst not resulting in a proposed increase in housing numbers within the Borough, the scheme as submitted will ensure that 50 Gatehill Road can operate as a successful multigenerational family home. The scheme secures the insertion of an internal link between the original dwelling and the annex on site at first floor level, enhancing accessibility and flow through the property. This better meets not only the needs of the Applicant, but also ensures a future proofed home which is more fit for purpose. This ensures that the property will better meet the needs of modern family living, enhancing the residential offer. The scheme as proposed is therefore deemed to be acceptable as a matter of principle and is therefore compliant with the provisions of section 5 of the NPPF.

## Section 8 – Promoting Healthy and Safe Communities

4.8 Attention is drawn to the following provisions:

**“Paragraph 92:** Planning policies and decisions should aim to achieve healthy, inclusive and safe places which:

- a) promote social interaction, including opportunities for meetings between people who might not otherwise come into contact with each other – for example through mixed-use developments, strong neighbourhood centres, street layouts that allow for easy pedestrian and cycle connections within and between neighbourhoods, and active street frontages;
- b) are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion – for example through the use of attractive, well-designed, clear and legible pedestrian and cycle routes, and high quality public space, which encourage the active and continual use of public areas; and
- c) enable and support healthy lifestyles, especially where this would address identified local health and well-being needs – for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling.”

4.9 **Comment:** The development seeks to enhance the connectivity between the original dwelling and the previous approved annex in order to allow a modern functional multigenerational home. This not only allows the Applicants mother to continue to live a semi-independent lifestyle, but will also ensure that the wider family have good and timely accessibility to her living quarters, particularly overnight should there be a need for care and support. This results in an enhancement in social interaction, a reduction in loneliness and

better meets the health and wellbeing needs of the family. The scheme as submitted also ensures that the property is safe and accessible for all. The scheme is therefore deemed to comply with the provisions of the NPPF in that regard.

### **Section 11 - Making Effective Use of Land**

4.10 Attention is drawn to paragraphs 119 of the Framework which reads as follows:

**“Paragraph 119:** Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or ‘brownfield’ land.”

4.11 **Comment:** The proposal represents an effective use of a previously developed site and an existing building within the built-up area of Northwood. The proposals ensure a more coherent use of the property and represents an effective and efficient use of the site. The scheme allows a multigenerational family to live together as single household, whilst retaining independence and avoiding the need for the construction of additional development on site. In view of the comments laid out above, the scheme as submitted does not result in detrimental impacts to neighbouring properties, nor impact on the character of the local area, or the ASLC. The NPPF is clear therefore in its support for developments which represent an effective and efficient use of land such as that proposed, and in this regard we would kindly request that planning permission be granted for this scheme.

### **Section 12 - Achieving Well-Designed Places**

4.12 The importance of good design is addressed at section 12 of the Framework and includes the following guidance:

**“Paragraph 126:** Advises that the creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. 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. Being clear about design expectations, and how these will be tested, is essential for achieving this. So too is effective engagement between applicants, communities, local planning authorities and other interests throughout the process.”

**“Paragraph 130:** Planning policies and decisions should ensure that developments:

- a) 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;
- b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;

c) 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);  
d) 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;  
e) 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  
f) 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. “

4.13 **Comment:** The development comprises the re-configuration of an existing property within the defined settlement boundary, and within a sustainable location. The existing property layout is incoherent and non-sensical and does not allow occupiers of the property to engage and interact. The site simply does not work for modern family living and limits the successful operation of the site. The proposed development has been designed being mindful of the provisions of earlier decisions on site, and the historic comments of the local planning authority. The scheme is now deemed to represent a well thought out and sensible conversion and re-configuration of the application site, with a design and form of upper floor extension which is deemed to be acceptable in this location, respectful of the existing property, neighbouring properties and the wider local historic environment. The scheme will not result in detrimental harm to neighbour amenity, nor on the visual amenities of the street scene or the ASLC. The proposals will enhance the functionality of the application property, and better meet the needs of modern family living. The proposal is therefore deemed to be acceptable in design terms.

#### **Section 14 – Meeting the Challenge of Climate Change, Flooding and Coastal Change**

4.14 Whilst the site is not in an area at risk from flooding, the environmental improvements to be achieved through the grant of consent are deemed to be material, and in that regard, attention is drawn to the following paragraph:

**“Paragraph 152:** The planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.”

4.15 **Comment:** The proposed development offers the opportunity to enhance the energy performance of the existing building to meet modern building regulations. It will further secure the reuse of a currently vacant property. The provision of the development subject of

this application offers the opportunity to significantly enhance and improve the environmental performance of the site which will have a positive impact on climate change. Given the declaration of a climate emergency, the weight and importance to be placed on such benefits and gains are significant and weigh heavily in favour of the grant of consent.

### **Section 15 – Conserving and Enhancing the Natural Environment**

4.16 The impact of the development subject of this proposal on the natural environment has been addressed in detail within the relevant supporting reports submitted with this application and summarised at section 6 of this report. However, it can be confirmed that in the preparation of this application due regard has been paid to the following paragraphs:

**“Paragraph 174:** Planning policies and decisions should contribute to and enhance the natural and local environment by:

- a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);
- b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;
- c) maintaining the character of the undeveloped coast, while improving public access to it where appropriate;
- d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;
- e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans; and
- f) remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.

4.17 **Comment:** The technical reports submitted in support of this application clearly demonstrate the acceptability of the proposed development, and where relevant any associated mitigation. As detailed at paragraph 4.16 above, the technical reports have been assessed and summarised in more detail at section 6 of this submission and any mitigation proposals can now be addressed by way of condition. The scheme is therefore deemed to be compliant with the relevant provisions of section 15 of the NPPF.

## Section 16 – Conserving and Enhancing the Historic Environment

4.18 As set out within section 2 of this report, whilst the application site is not listed, it is identified as a being located within an Area of Special Local Character, a non-designated heritage asset. The impact of the proposals on the historic environment is clearly therefore of importance, and attention is drawn to the following paragraphs:

**“Paragraph 194:** In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary. Where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.”

**“Paragraph 197:** In determining applications, local planning authorities should take account of:

- a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
- b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and
- c) the desirability of new development making a positive contribution to local character and distinctiveness.”

**“Paragraph 203:** The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.”

**“Paragraph 208:** Local planning authorities should assess whether the benefits of a proposal for enabling development, which would otherwise conflict with planning policies but which would secure the future conservation of a heritage asset, outweigh the disbenefits of departing from those policies.”

4.19 **Comment:** The impact of the proposed development on the heritage environment has been assessed and addressed in detail within this submission and has been shown to be acceptable and compliant with the provisions of section 16 of the NPPF, particularly given that development is now focussed on the rear of the site, with the property frontage being retained and protected. It is however important to stress that the benefits to be achieved through the redevelopment of this site in relation reinvigorating a currently vacant property, securing a modern fit for purpose family home, and the potential to enhance the energy

performance of the application site, all clearly outweigh any perceived less than substantial harm to the non-designated heritage asset from the scheme as submitted. As such, in relation to the issue of planning balance and public benefit, the positives significantly outweigh any minor harm resultant from change and weigh heavily in favour of the grant of consent.

4.20 **Summary:** It is clear for the reasons set out above that the development proposed is in accordance with the paragraphs and requirements of the National Planning Policy Framework. Therefore, in line with the provisions of paragraph 11 of the Framework, we would kindly request that the Council grant consent for this proposed change of use without delay.

## 5.0 Relevant Planning Policy – Hillingdon Development Plan

5.1 The Development Plan for Hillingdon comprises of the London Plan adopted in 2021, the London Borough of Hillingdon Local Plan Part One adopted in 2012, the Hillingdon Local Plan Part Two adopted in 2020, and Appendix A of the Development Management Policies – Householder Development Policies. The key policies and extracts of the aforementioned documents are addressed in detail below.

### Adopted London Plan (2021)

5.2 The London Plan was adopted in March 2021 and sets out the Mayor's approach to development across the City. The document sets out a number of policies relating to a plethora of developments and environmental issues within London. However, given the small scale of the development subject of this further application, specific attention is drawn to the provisions of the following policies:

- Policy D1 – London's Form, Character and Capacity for Growth
- Policy D4 – Delivering Good Design;
- Policy D5 – Inclusive Design; and
- Policy D6 – Housing Quality and Standards

5.3 **Comment:** It is noted that Officer's had previously drawn attention to the provisions of policies SI12 (Flood Risk Management) and SI13 (Sustainable Drainage). However, given the very limited scale of development now being proposed, and lack of a previous reason for refusal associated with drainage and flood risk these policies are relevant, but not deemed to be determinative.

5.4 It is our view given the very limited scale of change now being proposed at 50 Gatehill Road, and the well-considered design, form and use of materials that the scheme is fully compliant with the provisions of the adopted London Plan. Furthermore, the enhanced connectivity between the main house and the annex, and specifically the improved linkage at first floor level will enhance the provision of inclusive design and future proof the property for both the Applicants and future occupiers.

5.5 Given the form and nature of development being proposed specific attention is being drawn to the following adopted Local Plan policies:

### Hillingdon Local Plan Part One – Strategic Policies (2012)

- Policy HE1 - Heritage;
- Policy BE1 – Built Environment; and
- Policy EM1 – Climate Change Adaption and Mitigation

5.6 **Comment:** The development proposed given its reduced scale and form will not result in harm to the non-designated heritage asset of the ASLC. This revised scheme represents a high quality of design and will maintain the quality of the built environment. The alternative layout of the site and the integration of the annex into the main property will allow the property to support the provisions of 'Lifetime Homes' and support the ability of the Applicants mother to live independently, but as part of the wider family, with care and support on site. The reduced scale of development protects the existing garden of the

property and will not erode the quantity or quality of the existing outdoor amenity space. The scheme will also clearly not result in an increase in risk of flooding.

5.7 The proposed enhancements and general improvements in the property resultant from these proposals and the wider renovation of the existing property will inevitably result in an increase in the energy performance of the application site to the benefit of the Council's targets on climate change and carbon reduction. The proposed development is therefore deemed to be fully compliant with the provisions of the relevant policies contained within the adopted Local Plan Part 1 – Strategic Policies, and specifically policies HE1, BE1 and EM1.

#### **Hillingdon Local Plan Part Two – Development Management Policies (2020)**

- Policy DMH1 – Safeguarding Existing Housing
- Policy DMHB1 – Heritage Assets;
- Policy DMHB5 – Areas of Special Local Character;
- Policy DMHB6 – Gatehill Farm Estate and Copse Wood Estate Areas of Special Local Character;
- Policy DMHB11 – Design of New Development;
- Policy DMHB12 – Streets and Public Realm;
- Policy DMHB14 – Trees and Landscaping;
- Policy DMHB18 – Private Outdoor Amenity Space;
- Policy DMEI9 – Management of Flood Risk;
- Policy DMHD1 – Alterations and Extensions to Residential Dwellings;
- Policy DMT6 – Vehicle Parking; and
- Appendix A – Householder Development Policies

5.8 **Comment:** The scheme will secure and protect the viable long term use of the application site as a single family dwelling in line with the provisions of policy DMH1. In addition, and in line with the provisions of policies DMHB1 and DMHB5, given the sites location within the Gatehill Estate ASLC, it is accepted that any extension or alteration to the existing property will need to respect, protect and enhance the character and appearance of the wider local area. In this instance the scheme as now being proposed secures the retention of the existing front façade, the original building lines of the property and street scene, and other than the introduction of a small addition at ground floor level (which remains 1m behind the existing property frontage), only seeks to secure consent for a first floor rear extension. The scheme is now deemed to be in keeping with the original property and the wider ASLC in terms of scale, form, character, mass and use of materials, in line with policies DMHB11 and DMHD1.

5.9 The proposed additions to the property remain subservient to the main dwelling, retain set backs on the property frontage and retain sufficient space on site for landscaping and outdoor amenity space (which is in fact untouched by the scheme as now being proposed). Whilst not resulting in the creation of a new dwelling in the ASLC, the provisions of policy DMHB6 have also been taken into account in the evolution of this revised scheme, and the proposals respect the overall aspirations of policy DMHB6. There is therefore no harm to the non-designated heritage asset from the proposed subordinate additions, and no impact on car parking provision within the site.

5.10 The scheme secures the retention of the existing trees in the rear garden (and the existing rear garden in its entirety) and as shown within the arboricultural method statement submitted with the application, this environmental asset can be protected throughout works

being undertaken on site, with the Applicant content to accept a condition requiring the imposition of the protection measures laid out within the report. The fact that there were no previous reasons for refusal associated with the impact of development on trees from the previous larger proposal, and the fact that Officer's previously indicated in their report on the refused application that 'This should pose no direct threat to the protected trees', that the matter of trees has also been addressed in full. It is noted that reference was made in the previous application to the need for submission of a Construction Management Plan prior to commencement of works. Given the very limited nature of development now being proposed this is clearly no longer deemed to be required.

- 5.11 The scheme as submitted will not result in any harm to visual amenities nor the amenity of neighbouring residents and will ensure the enhancement of the amenities of the proposed residents of the application property. The scheme will ensure the enhanced connectivity and interrelationship between the original dwelling and the previously approved annex, allowing the Applicants' Mum to live an independent life, but with care and support on hand and accessible throughout the day and night. The scheme ensures that the dwelling will now function as a single multigenerational family home, fit for modern living and will breathe new life into a property which has been untouched for some time. The scheme is therefore compliant with the provisions of adopted policy DMHBD1.
- 5.12 In relation to the provisions of Appendix A of the adopted Local Plan, it is noted that the guidance indicates that rear extensions should not protrude too far out from the rear wall of the original house and that in ASLC's extensions will be expected to have regard to the plan and architectural style of the original building. In this instance the rear extension does not protrude at all beyond the original rear façade of the property and is wholly retained within the existing roof slope and does not therefore impact on the levels of existing garden provision, nor on existing landscaping within the site. The development has been designed and amended to reflect the character and style of the original property, the ASLC, and is in accordance with the feedback previously received from the local planning authority at pre-application stage.

#### **Development Plan Summary**

- 5.13 For the reasons laid out above and throughout this supporting statement we are of the view that the scheme as now amended and submitted to the local planning authority is compliant with the provisions of the Development Plan when read as a whole. We would therefore kindly request that the authority now seek to issue a timely approval of this application.

## 6.0 Supporting Technical Reports

6.1 This planning application is supported with a detailed arboricultural assessment and method statement addressing the determinative issues associated with the scheme. The key extracts and conclusions of this report have been addressed in detail below:

6.2 **Arboricultural Assessment:** Trevor Heaps Arboricultural Consultancy Ltd was appointed by the Applicants in August 2022 to draft an Arboricultural Impact Assessment, Method Statement & Tree Protection Plan. This report and attached appendices have been submitted in support of this application.

6.3 It is clear that subject to the implementation of tree protection measures during the construction works on site, that the scheme subject of this application is acceptable in relation to its impact on the protected trees within the rear garden at 50 Gatehill Road. This is supported within the summary of the application within the Arboricultural Report which reads as follows:

“The relationship between the proposal and trees is sustainable and will not result in any unreasonable pressure to carry out inappropriate tree works.

If the proposal is implemented in accordance with the recommendations laid out in this report, neither the trees nor wider landscape will be adversely affected.

This is an arboriculturally defensible scheme and there are no (arboricultural) reasons why planning consent should not be granted.”

6.4 **Comment:** As clearly demonstrated above and with the relevant reports when read in full, the scheme is acceptable in relation to all relevant technical matters.

## 7.0 Material Considerations

7.1 Section 70(2) of the 1990 Act requires that the authority, in dealing with the application, shall have regard to the provisions of the Development Plan, so far as material to the application, and to any other material considerations. It has been demonstrated above that the proposed development is in accordance with the relevant provisions of the Development Plan, including national and local plan policy. In addition to this, material considerations exist that weigh further in favour of the development, including:

- **Sustainable Development:** The scheme as submitted represents a sustainable form of development given its associated with the redevelopment of an existing and currently vacant property within a built-up area. The application site is well located for access to public transport and other key local services and facilities. Furthermore, the proposal has been designed to ensure the protection of the privacy and amenity of neighbouring residents, and the visual amenities of the street scene.
- **Character of the Area:** The application site is located within an area characterised by residential uses and such forms of development are clearly supported within the adopted development plan. Furthermore, as set out above, the proposal is simply seeking to secure the redevelopment of a currently vacant building in order to create a modern home, fit for modern living and to meet the multigenerational requirements of the Applicant. Given the limited changes resultant from the proposed development, the proposal will not undermine or harm the character of the local area, but will in fact enhance it.
- **Climate Change:** The redevelopment proposals set out within this application will secure the upgrade and improvement of the existing building. This will enhance the energy performance of the site and assist the Council in securing development which helps to reduce the impact of climate change.

7.2 As such, whilst we remain of the view that the development is compliant with the policies, provisions and principles of the Development Plan when read as a whole, there are also a number of clear material benefits to the grant of consent which also tip the balance in favour of the development as submitted. We therefore kindly request that this application be approved without delay.

## **8.0 Conclusions**

- 8.1 It has been demonstrated throughout this submission that the development subject of this application, accords with the relevant statutory duties and the Development Plan when read as a whole. The proposed development is acceptable in principle, by virtue of the provisions of the National Planning Policy Framework and the Hillingdon Development Plan. Furthermore, numerous other material considerations weigh in favour of the grant of consent, and these have been dealt with in detail above.
- 8.2 Section 70(2) of the Planning Act 1990 and Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that where an application accords with the relevant Development Plan and material considerations are in favour, applications should be determined positively. As such, based on the above principles, we would therefore kindly request that the Council seek to support this proposal and issue a grant of consent for this application without delay.
- 8.3 Should you require any further information in advance of validation of the application, or during the determination process, please do not hesitate to contact us. Otherwise, we look forward to hearing from you shortly with confirmation of the officer appointed to deal with our application, and details of the application reference number and target determination date.