

Planning, Design and Access Statement

for:

Application for a replacement dwelling

at:

62 Broadwood Avenue
Ruislip
HA4 7XR

December 2024

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Site:

62 Broadwood Avenue, Ruislip, HA4 7XR

Applicant:

Mr P Reynolds

Document revisions

No:

DH/62BA/2B

Details:

Planning Submission

Date:

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1.0 Introduction

- 1.1 This Statement accompanies a Planning Application for a replacement dwelling.
- 1.2 The application site has the following planning history, although the following planning applications have been determined at the site:
 - i. 22799/A/80/0005 - residential extension - Approved 15.02.1980
 - ii. 22799/APP/2024/1396 - Erection of an outbuilding to the rear garden - Approved 08.08.2024
 - iii. 22799/APP/2024/2051 - Erection of outbuilding to rear garden - Approved 16.08.2024
 - iv. 22799/APP/2024/2232 - Erection of 2 No. single storey rear extensions and a single storey side extension (Application for a Certificate of Lawful Development for a Proposed Development) - Approved 24.09.2024
- 1.3 A replacement dwelling application was approved at 17 Broadwood Avenue in 2022 under reference 14578/APP/2022/1838.
- 1.4 The application site is located on the north side of Broadwood Avenue and currently comprises a detached two storey dwelling, with a two storey flat roof side projection with living accommodation at first floor and a garage at ground floor.
- 1.5 The property benefits from a good sized garden to the rear and due to being set back from the highway benefits from having a driveway and front garden fronting onto Broadwood Avenue.
- 1.6 There are no trees within the red line curtilage of the site that would be affected by the proposed development, although it is noted that an Area Tree Preservation Order exists on this road.

- 1.7 The property is not a Listed Buildings. Although the site is located within a built-up residential area, it has a PTAL rating of 0.
- 1.8 The application site is located within Flood Risk Zone 3.

2.0 Planning Analysis

Nationally

- 2.1 The National Planning Policy Framework (NPPF) was published in March 2012 and revised in July 2018, February 2019, July 2021 and again in September 2023, with the latest revisions issued in December 2023.
- 2.2 The NPPF provides the Government's framework for delivering sustainable development and facilitating economic growth through the planning process. Planning applications must be determined in accordance with the development plan, unless material considerations indicate otherwise. The NPPF is a material consideration in planning decisions.
- 2.3 Paragraph 8 states that there are 3 dimensions to sustainable development: economic, social and environmental. Development which helps to build a strong, responsive and competitive economy whilst supporting vibrant and healthy communities, providing housing to meet current and future requirements is to be achieved in a manner which protects the natural, built and historic environment.
- 2.4 The NPPF states at Paragraph 11 that at the heart of the document is a presumption in favour of sustainable development. For decision taking this means approving development proposals which accord with the development plan without delay and local planning authorities should positively seek opportunities to meet the development needs of the area. The presumption in favour of sustainable development is reiterated at Paragraph 49.
- 2.5 Paragraph 38 sets out that the Local Planning Authority should approach applications in a "positive and creative way" and should work collectively with the applicant to ensure that development is delivered to benefit the area socially, economically and environmentally.

- 2.6 Paragraph 47 states that applications should be determined in accordance with the Development Plan, unless material considerations indicate otherwise.
- 2.7 Paragraph 108 of the NPPF sets out that transport issues should be considered from the earliest stages of development proposals, so that, inter alia, opportunities to promote walking, cycling and public transport use are pursued.
- 2.8 Supporting paragraph 109 then goes on to state in addition that development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes.
- 2.9 Paragraph 111 gives consideration to parking standards which are set for residential development and that these, amongst other things, should take the following into account:
- a) The accessibility of the development;
 - b) The type, mix and use of the development;
 - c) The availability of and opportunities for public transport;
- 2.10 With regard to transport implications paragraph 115 is very clear in stating that development should only be prevented or 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.
- 2.11 Paragraph 123 of the NPPF sets out that planning policies and decisions should promote an effective use of land in meeting the need for homes.

- 2.12 Paragraph 128 requires policies and decisions to support development which makes “efficient use of land”. This considers the identified needs for a variety of housing mix and type and the availability of land to support it. The criteria also includes market conditions and viability, availability and capacity of infrastructure, maintaining the area’s prevailing character and setting and the importance of well-designed, attractive and healthy places.
- 2.13 Section 12 of the NPPF highlights the need for achieving well designed places.
- 2.14 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 is discussed in paragraph 131.
- 2.15 Paragraph 135 points to the fact that development should be sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change.
- 2.16 The key points from Paragraph 135 where it sets out that 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;
 - d) establish or maintain a strong sense of place, using the arrangement of spaces, 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.

2.17 Section 14 of the NPPF considered how development should meet the challenge of climate change and flooding, although there is no specific reference to groundwater flooding, matters relating to drainage are referenced.

2.18 Paragraph 166 identifies the need to take advice from relevant flood risk management authorities such as lead local flood authorities and internal drainage boards.

2.19 Whilst the wording of paragraph 173 states that when determining any planning applications, local planning authorities should ensure that flood risk is not increased elsewhere. It also states that development should only be allowed in areas at risk of flooding where, in the light of this assessment it can be demonstrated that:

- b) the development is appropriately flood resistant and resilient such that, in the event of a flood, it could be quickly brought back into use without significant refurbishment
- c) it incorporates sustainable drainage systems
- d) any residual risk can be safely managed

2.20 Paragraph 174 highlights that applications for some minor development and changes of use should not be subject to the sequential or exception tests.

The London Plan

- 2.21 Applicable London Plan Policies include, but not limited to, D3, D4, D5, D6, H1, H2, SI 2, SI 12, SI 13, T6 and T6.1.
- 2.22 Design and optimising site capacity is assessed within London Plan Policy D3, where there should be a design led approach to make the best use of land after an evaluation of the sites attributes. Policy D4 moves on to highlight the need of delivering good design and that it should be of high quality. The standard of design is further clarified within Policy D5 as does Policy D6 which considers housing quality and standards.
- 2.23 Optimising the potential for housing development on all suitable and available sites especially where the site is within existing public transport access levels 3-6 or which are located within 800m distance of a station or town centre boundary and on small sites is covered by the wording of Policy H1.
- 2.24 Policy H2 identifies that Boroughs should pro-actively support well-designed new homes on small sites (below 0.25 hectares in size) through both planning decisions and plan-making in order to significantly increase the contribution of small sites to meeting London's housing needs, diversify the sources, locations, type and mix of housing supply, and support small and medium-sized housebuilders.
- 2.25 Dealing with Greenhouse Gas Emissions is covered by Policy SI 2 and the wording refers to residential (non major) development seeking a 10% reduction beyond building regulations and non-residential seeking a 15% reduction.
- 2.26 Flood Risk Management is addressed in Policy SI 12 and states that development proposals should ensure that flood risk is minimised and mitigated, and that residual risk is addressed.

- 2.27 Sustainable Drainage measures are covered by the wording of Policy SI 13 where development proposals should aim to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible.
- 2.28 London Plan Policy T6 and Policy T6.1 also highlight the need to provide appropriate parking standards for the development in line with a sites setting within the PTAL rating system

Locally

- 2.29 The London Borough of Hillingdon assess applications against the Policies found within the Hillingdon Local Plan Part 1 (adopted 2012) and Part 2 (adopted 2020) set out below, including Supplementary Planning Guidance, and to all relevant material considerations, including The London Plan (adopted 2021).
- 2.30 The policies that are considered of relevance from the Local Plan (parts 1 and 2) include DMEI 2, DMEI 7, DMEI 9, DMH 7, DMHB 11, DMHB 14, DMHB 15, DMHB 16, DMHB 18, DMT 1, DMT 2, DMT 5, and DMT 6.
- 2.31 Policy DMEI 2 considers reducing carbon emissions where developments should look to achieve an appropriate reduction in carbon emissions as part of the proposal and should be read in conjunction with Policy LPP SI 2 of the London Plan.
- 2.32 Policy DMEI 7 addresses the need to ensure that biodiversity and ecological features should be protected and if there is potential for the development to have an impact on such features that the application is supported with appropriate surveys.
- 2.33 Management of Flood Risk is addressed within the wording of Policy DMEI 9 and states that a flood risk assessment should accompanying a submission to demonstrate that the development is resilient to all sources of flooding.

- 2.34 Affordable Housing requirements are covered by Policy DMH 7 where the trigger for affordable housing to be provided is confirmed as being 10 or more dwellings.
- 2.35 Design is covered within Policy DMHB 11 and seeks to ensure that all developments are designed to the highest standards and incorporates principles of good design, where it should be of an appropriate scale, height and mass to adjoining structures and also not result in adversely impact on amenities of adjacent properties. Additionally, schemes should also pick up on design vernaculars of the surrounding area.
- 2.36 Retaining or enhancing landscaping and trees is considered under Policy DMHB 14.
- 2.37 Policy DMHB 15 considers the requirements of new development having appropriate and safe access arrangements. Policy DMHB 16 requires new dwellings to meet with the latest national space standards, whilst Policy DMHB 18 considers outdoor space requirements.
- 2.38 Managing transport impacts is covered by Policy DMT 1 and considers how developments can be sustainable and can be accessible by public transport, walking and cycling and have no significant adverse transport or air quality impacts.
- 2.39 This is then continued into Policies DMT 2, DMT 5 and DMT 6 which highlight the need for developments to provide safe and efficient vehicular access to the highway network, appropriate provisions for parking of both cars and cycles and ensure that there is no impact on local amenities and congestion.

Key Planning Considerations

2.40 The key planning considerations are the following:

- i. Design Quality and Principle of Development
- ii. Amenity Provisions
- iii. Relationship with Neighbouring Properties
- iv. Other Planning Matters

i) Design Quality and Principle of Development

2.41 As highlighted in section 1 of this Statement, planning permission has been granted for a replacement dwelling at another site within this road, and it is noted that several properties with Broadwood Avenue have had substantial sized extensions granted planning permission.

2.42 Therefore, in light of this, and the fact that the application site is located within a built up area, the principle of development is considered acceptable subject to the development complying with other policies within the Development Plan.

2.43 The development on this occasion proposes the demolition of the existing the dwelling with a replacement dwelling.

2.44 The replacement dwelling would extend across the plot but, unlike the existing dwelling which on the western side abuts the boundary at two storey height, the replacement dwelling would leave an appropriate separation distance to the western flank boundary.

2.45 Although the replacement dwelling would extend slightly closer to the eastern flank boundary by about 230mm, it would, like the distance to the western boundary, have a separation distance of 1.1m. This would ensure that gaps are maintained, or in this case reintroduced, between dwellings which is a characteristic of the street scene in Broadwood Avenue.

- 2.46 The dwelling would remain two storey, although there would be the addition of a small dormer window on the front elevation, two on the rear elevation, and a side dormer window to allow for the stairs to access the rooms in the loft and therefore meet with Building Regulations.
- 2.47 The dwelling would be a four bedroom dwelling, with the master bedroom being located at the rear of the property with a balcony area accessed from the bedroom.
- 2.48 The balcony would be enclosed with privacy screens to each flank.
- 2.49 The property would be slightly increased in depth at ground floor level, but would be in keeping with the neighbouring properties and would not affect the established relationship between them, whilst the first floor and roof, would only have a depth of 14m.
- 2.50 However, the replacement dwelling is of an appropriate scale for its plot and would provide a family sized dwelling with four bedrooms. It would not result in the overdevelopment of the site. It is not a dwelling that would appear as being cramped or contrived within the plot, as it has considered how it relates to its setting and the overall layout of the site, with the aim to provide a new dwelling that would still benefit from appropriate forms of landscaping within the plot.
- 2.51 The replacement dwelling has drawn upon the design vernacular of the area so as to respect the immediate setting and result in a development that would function well with the immediate surroundings without causing harm to the character or historic interests of the road. It is a design that would be of benefit for the lifetime of the development and the area as whole, and not just the short term.

2.52 In light of the above, especially acknowledging that the development would take into consideration key design aspects of the area, to preserve the character of it, the development can therefore be considered to comply with Policies DMHB 11, DMHB 15, DMHB 16 and DMHB 18 of the Local Plan Part 2 and also Policies D3, D4, D5 and D6 of the London Plan.

2.53 The replacement dwelling would therefore accord with the wording of paragraphs 131 and 135 of the NPPF as well.

ii) Amenity Provisions

2.54 In terms of internal and external amenities, these have not been affected in a negative way by the proposed replacement dwelling. The dwelling would still benefit from a large garden to the rear to be used by the future occupants. Whilst the provision of a balcony would also provide additional amenity space to the future occupiers.

2.55 All of the bedrooms, and habitable rooms, are of an appropriate size, and therefore it is considered that the amenities for the replacement dwelling would accord with the Policy requirements of meeting national space standards and the Councils own amenity provisions.

2.56 In light of the above, especially acknowledging that the development would take into consideration key design aspects of the approved fallback scheme, the development can therefore be considered to comply with Policies DMHB 11, DMHB 15, DMHB 16 and DMHB 18 of the Local Plan Part 2 and also Policies D3, D4, D5 and D6 of the London Plan.

iii) Relationship with Neighbouring Properties

2.57 It has been mentioned already that the replacement dwelling will extend slight further into the garden at ground floor level than the existing dwelling, however, consideration has gone into the overall design and layout to ensure that the neighbouring properties will still benefit from appropriate levels of sunlight and daylight to their amenity areas.

2.58 In addition to this, as can be seen from the site plan, the replacement dwelling would still ensure that both the neighbouring properties would not feel that their amenities would be impacted on through a sense of enclosure or visual intrusiveness, as the replacement dwelling would not exceed a 45 degree line taken from the midpoint of the window of the nearest habitable room and would therefore not appear as being overbearing.

2.59 Although a balcony is being introduced at first floor level, as already stated, it is being proposed with privacy screens on each flank so as to ensure that there is no unacceptable levels of overlooking being created.

2.60 In addition to that, whilst dormer windows are proposed in the roof space at the rear of the property, these are for a study and a storage room within the roof space.

2.61 The flank dormer window, which is for the stairs up to the loft space, would not provide any overlooking due to the fact that the window is not associated with a habitable space.

2.62 Considering the above, the development can therefore be considered to comply with Policies DMHB 11, DMHB 15, DMHB 16 and DMHB 18 of the Local Plan Part 2 and also Policies D3, D4, D5 and D6 of the London Plan, and paragraph 135 of the NPPF, as it is a scheme that is of good design and would not cause harm to the amenities of the neighbouring properties.

iv) Other Planning Matters

Biodiversity, Ecology and Landscaping

- 2.63 The application is for a replacement dwelling and would not trigger the requirements to submit any biodiversity net gain calculations with the application as the development would be for a self-build.
- 2.64 However, the scheme would look to incorporate into the development biodiversity enhancements such as new landscaping within the rear garden.
- 2.65 A preliminary roost assessment and bat survey have been carried out, and the reports recommend appropriate mitigation measures as a result of the findings and surveys carried out. The precise details are listed within the accompanying reports.
- 2.66 An accompanying arboricultural impact assessment has been prepared for the application and concludes that the development would not require the removal of pruning of any trees. This is because there are no trees on the site.
- 2.67 Tree protection measures are proposed within the accompanying report. Protective fencing will be located towards the rear of the site due to trees being located within Ruislip Woods located on land beyond the rear boundary of the site.
- 2.68 In light of the above, the application is considered to be compliant with Policy DMEI 7 of the Local Plan.

Affordable Housing

- 2.69 There are no affordable housing matters to be considered as this is an application for the creation of replacement dwelling, which does not result in their being a requirement to provide on-site or off-site contributions.
- 2.70 As such the application complies with Policies and DMH 7 and DMCI 7 of the Local Plan.

Sustainability

- 2.71 The application proposes the redevelopment of the site with a replacement dwelling.
- 2.72 It has been noted that on minor applications the Council has advised that the development, if approved, can be conditioned to ensure that the scheme would adhere to the carbon emission reduction requirements beyond the current Building Regulation requirements. The applicant will adhere to these requirements should a condition be attached to the decision.
- 2.73 However, it should be noted that the development through using up-to-date materials and construction processes will ensure that the new build will provide a development that is more suited to reducing carbon emissions than the existing dwelling.
- 2.74 The proposal can therefore be deemed to meet with the requirements of Policy DMEI 2 of the Local Plan.

Flood Risk

- 2.75 The application site is located within Flood Risk Zone 3 and a critical drainage area.
- 2.76 An assessment has been carried out by Lanmor Consulting that identifies that the replacement dwelling would not put future users at risk or put neighbouring properties at risk through causing the displacement of flood waters into other areas.
- 2.77 As can be seen from the planning history of the property, the Council have deemed a set of extensions to the dwelling as being acceptable and this is a material consideration when assessing how a replacement dwelling would relate to the site and the flood risk implications.
- 2.78 The replacement dwelling would have a footprint no bigger than that of the existing dwelling when combined with the permitted extensions. The supporting report confirms that as the property is no bigger than the current approved property so the proposals will not restrict the flow of flood waters or result in the loss of flood storage on site. The proposed dwelling will be set above the estimate flood level for a 1.0% probability event with allowance for climate change.
- 2.79 The report sets out that a suitable drainage strategy for both foul and surface water can be provided without increasing the risk of flooding in the area. There will also be SuDS provided for the collection and disposal of runoff from the roof and hard standing.
- 2.80 The FRA concludes that the proposal will therefore not have any impact on the current flooding in the area and that a suitable drainage strategy can be provided without increasing the risk of flooding.
- 2.81 The scheme would accord with the wording in Policies SI 12 and SI 13 of the London Plan, DMEI 9 of the Local Plan, and Section 14 of the NPPF.

Highways/Transport

- 2.82 With regard to the access and parking arrangements, the existing access would remain with parking to be located to the front of the dwelling.
- 2.83 This is a layout that is characteristic of the area and would not have a detrimental impact on the street scene.
- 2.84 There would be no adverse or severe impacts on the highways network and therefore the application should not be refused, as it is in accordance with the wording of paragraph 115 of the NPPF.
- 2.85 The development would therefore comply with Policies DMT 1, DMT 5 and DMT6 of the Local Plan, as well as Policies T6 and T6.1 of the London Plan..

3.0 Conclusion

- 3.1 The development complies with the Policies of the Local Plan, the London Plan, as well as the wording of the NPPF.
- 3.2 Of particular note is that the proposed replacement dwelling, due to being of a high quality of design and one that replicates the style and scale of the surrounding properties and character of the area, is considered to accord with the wording of paragraphs 131 and 135 of the NPPF and demonstrating the schemes compliance with Policies DMHB 11 of the Local Plan and D3, D4, D5 and D6 of the London Plan.
- 3.3 Taking the above into account, this Planning Application should be granted permission.