

# DESIGN STATEMENT

November 2022



Land to the Front of 170 Harefield Rd,  
Uxbridge UB8 1PP

## INTRODUCTION

A revised full planning application is being made to build a new dwelling on land to the front of 170 Harefield Road, in Uxbridge in the London Borough of Hillingdon. The existing house is a semi-detached double storey private dwelling with accommodation laid out over ground and first floors only. The plot is neither listed, nor located in a Conservation Area. Application Ref 23469/APP/2022/144 for a related proposal was appealed to the Planning Inspectorate for non-determination in June of this year and dismissed last month. The inspector's detailed consideration of the proposal found merits in some aspects of the scheme and defaults in others. This Design Statement is appended to the application to explain the relevant planning considerations in its support and the amendments which have been made to address the defaults of the previous proposal.



## SITE APPRAISAL

*Aerial photo with plot outlined*

No.'s 170-172 Harefield Road form a pair of self-contained private dwellings set within the residential outskirts of Uxbridge town centre, west of London in the Borough of Hillingdon. Harefield Road runs north-easterly from the retail and commercial heart of Uxbridge with its rail station and extensive services including the Borough's administrative offices. The site is located approximately 1.4km from the station with a junction of the A40 lying approximately 0.5km further along the road. Bus service connecting to central Uxbridge is provided with stops a short walk away in front of the Clare House BUPA Care Home at 176 Harefield Road. The vicinity is a popular residential neighbourhood and although the earliest properties date from earlier periods the vicinity is characterised mostly by 20<sup>th</sup> C developments. Uxbridge Common, a 6ha village green lies to the South of the proposal bounded by North Common Road. An ornate 1907 water tower provides a local landmark to the East of the plot; both it and its surroundings have been subdivided and developed with individual and terraced dwellings. Across Park Road from the Common are the extensive facilities of the Hillingdon Sports & Leisure Complex. A number of schools including Uxbridge College and Hermitage Primary School as well as a large Sainsbury's are within easy reach.



The local housing covers all types and formats from large detached and semi-detached dwellings, terraced townhouses and detached bungalows, many with dormers providing loft accommodation. The houses in the context are of mixed architectural design and age, featuring a variety of different bricks as well as rendered finish and hanging clay tile. Roofs are mostly of tile or slate and pitched with both hipped and gabled forms. A significant number of existing dwellings have been altered in more recent decades, often very substantially. Common alterations include both side and rear extensions as well as loft conversions. Plot sizes vary enormously depending in part on historical development of the local road network. The largely ad-hoc development of Harefield Road in the latter 20<sup>th</sup> C has resulted in an established pattern of subdivision of larger plots creating new residential cul-de-sacs as well as insertion of new individual dwellings beside and behind older ones. The plots of No.'s 170-172 themselves have been historically subdivided with the erection of bungalows to the rear of both properties 170a and 172a accessed off of shared driveways. More recently, a further bungalow dwelling was granted consent to be built on a plot to rear of No. 170 (Ref 23469/APP/2020/3612).

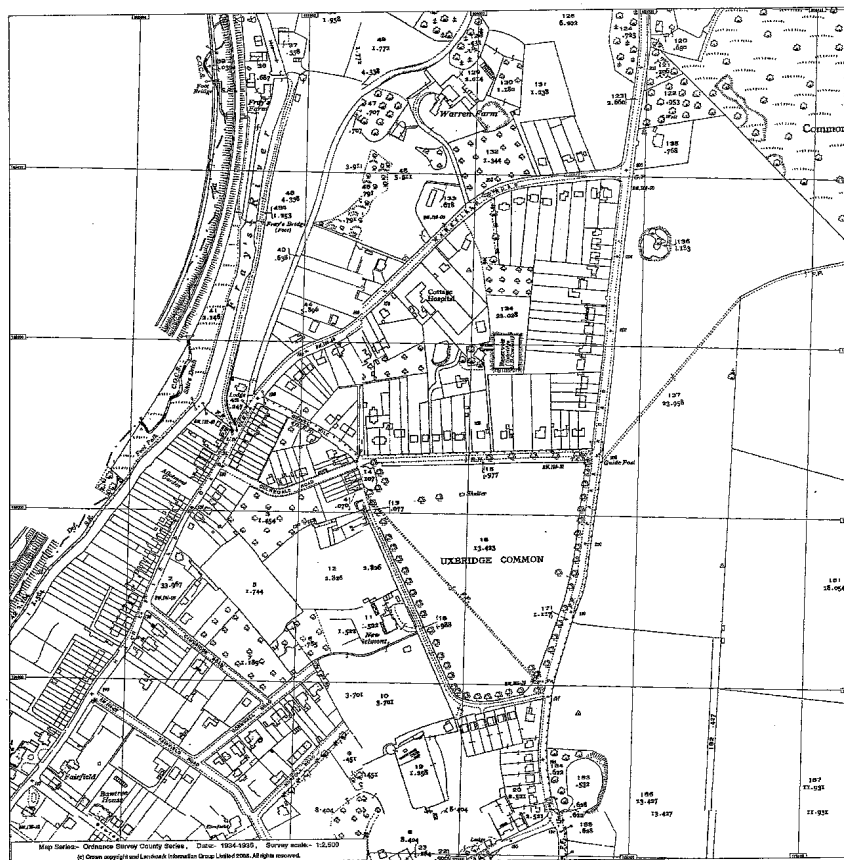


*Views of context on Harefield Road*



**LANDMARK**  
Information Group

Landmark Historical Map  
Published Date(s): 1899  
Originally plotted at: 1:2,500



**LANDMARK**  
Information Group

Landmark Historical Map  
Published Date(s): 1934-1935  
Originally plotted at: 1:2,500

OS Maps from 1899 & 1934-35 showing development of local context



No.'s 170 & 172 Harefield Road are a typical example of suburban semi-detached dwellings from the first half of the 20C. The 'L' shaped, bay fronted properties are sited well back from the main road and accessed by separate long driveways along their side boundaries to the adjoining plots. The plot of No. 170 was the larger of the original pair and included a substantial rear garden extending behind several other properties. A detached bungalow (No. 170a) has been erected on the rear dog-leg portion of this garden with access provided by extending the original driveway the full length of the side boundary and along the rear boundary. The remaining front garden of No. 170 measures approximately 31M in depth and up to 15M in width. Bounded by close boarded fencing to the front boundary adjoining Harefield Road, the garden slopes gently upward 2.3M from the pavement to the front of the existing house. A shared access driveway runs along the western side boundary providing access. The original plot of No.172 provided a much narrower frontage onto Harefield Road of approximately 8M width. This plot has also been subdivided with a substantial area of side garden subdivided to erect another bungalow at No. 172a. A shared drive dominates the front of the plot before splitting at the rear boundary of No. 174 Harefield approximately 24M back from the front boundary.



*Views from Harefield Rd to 170, 168, 164 & 164a*





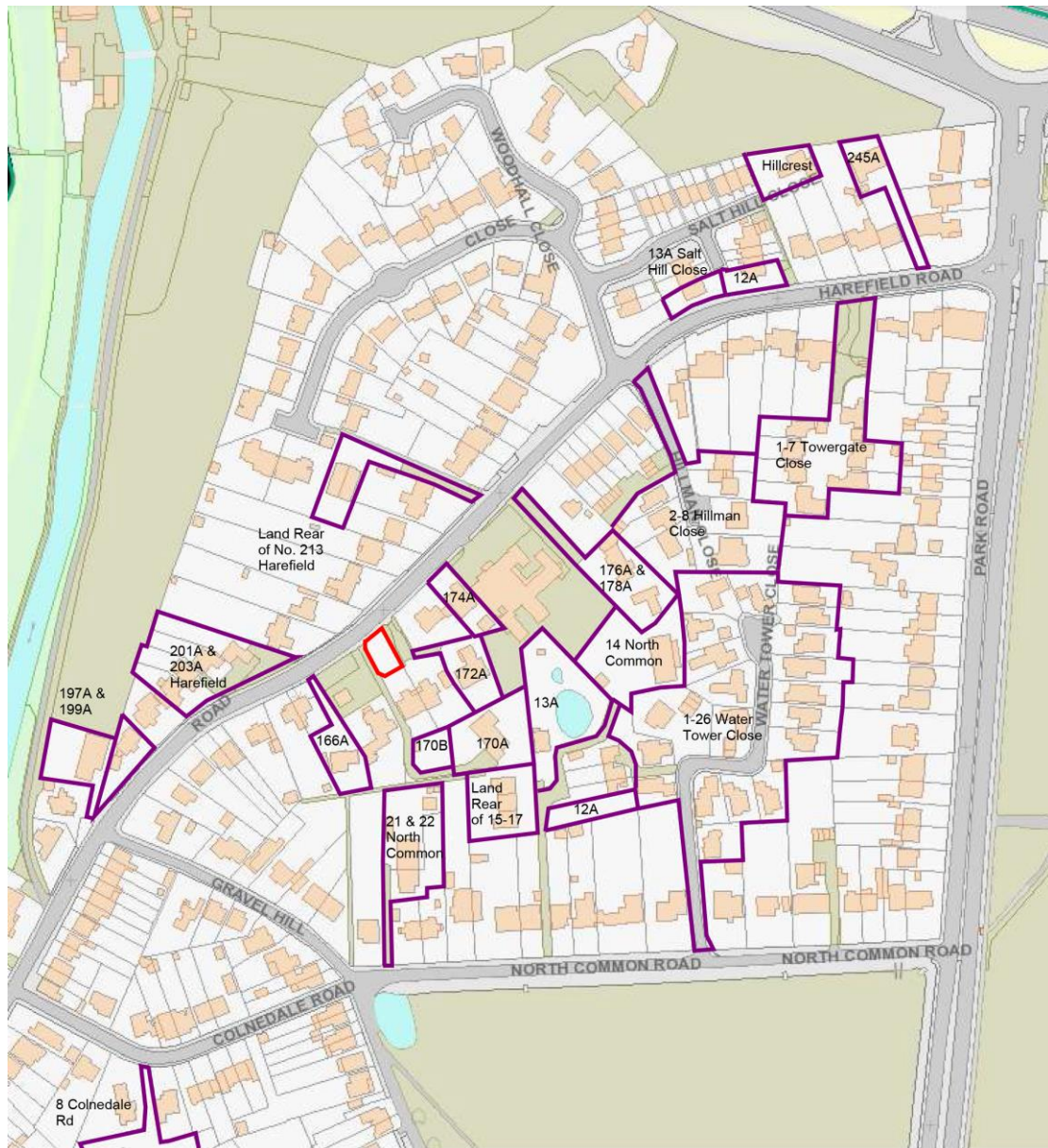
*Bird's eye view of No.'s 170 & 172 with view of shared driveway*





*Views of front garden to No. 170*





*Plan indicating dwellings in local context subdivided from original plots*

## PRECEDENTS

The patchwork residential development of the local context has left a number of unique shaped plots of widely varying size and shape, the large number of which have been subdivided and developed with infill dwellings. This process has run continuously throughout the historical development of the area. Several of the precedents are relatively large scale with the development of cul-de-sac roadways to access multiple dwellings including Towergate Close, Hillman Close and Water Tower Close. The dwellings on these closes are typically much more densely packed with separation distances and garden sizes on the lower scale of the context. The 1934-35 OS Map shows that Hillman Close and Water Tower Close were open land. However, the 7 dwellings on Towergate Close were created through amalgamation of portions of a number of large adjoining house plots. This process of subdivision has frequently been carried out on parcels with generous frontage providing additional dwellings fronting onto the existing road network. Examples of this include:

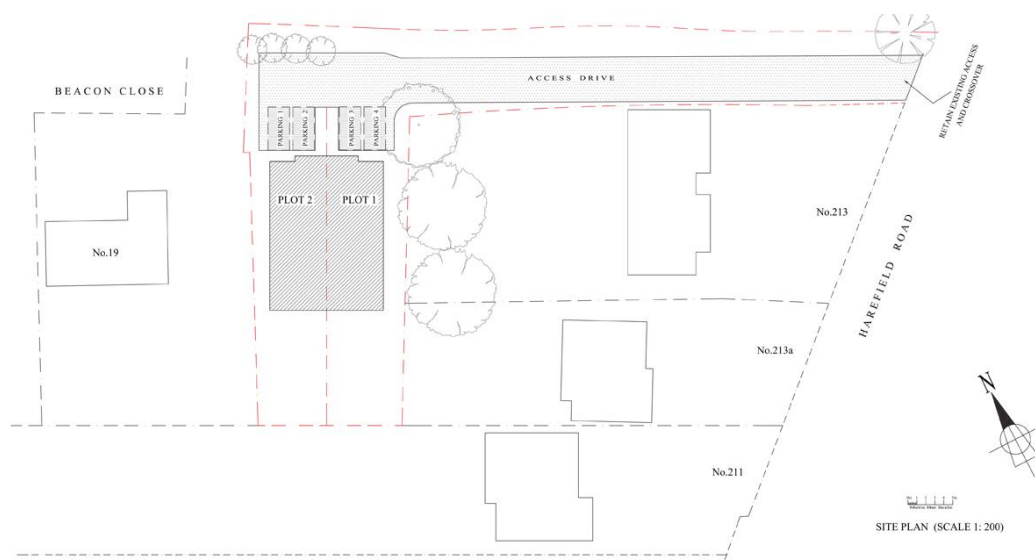


- 174-174a Harefield Rd
- 178a-e Harefield Rd
- 180a-b Harefield Rd
- 199-199a Harefield Rd
- 213-213a Harefield Rd
- 201-201a Harefield Rd
- 203-203a Harefield Rd
- 12A North Common Rd built to the side of a terrace of backland cottages

Equally prevalent is the subdivision of deep plots with new dwellings provided to the rear of existing ones. Examples here include:

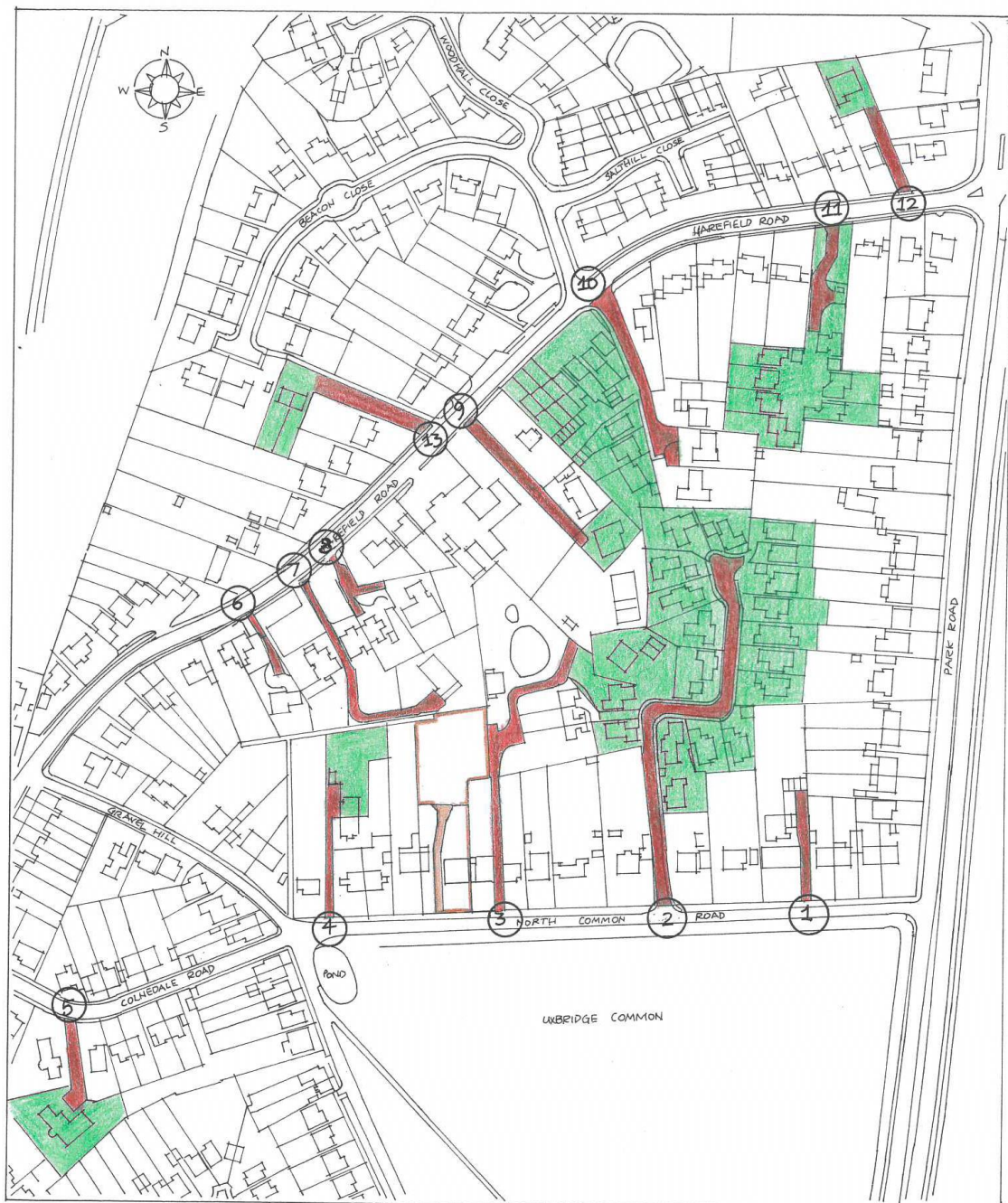
- 166a Harefield Rd
- 170a & 170b Harefield Rd
- 172a Harefield Rd
- 176a & 178a Harefield Rd
- 197a Harefield Rd
- 12a & 13a Salt Hill Cl – new end of terrace dwellings presenting side elevations onto Harefield Rd
- Hillcrest – accessed off Salt Hill Cl and subdividing land from 239 & 241 Harefield Rd
- 245a Harefield Rd
- land to the rear of 213 & 213a Harefield providing 2 semi-detached dwellings
- 4 Water Tower Close (on the rear plot of No. 7 North Common Rd)
- 13a North Common Rd
- 14 North Common Rd
- land to the rear of 15-17 North Common Rd recently completed providing 3 new dwellings
- 21 & 22 North Common Rd
- land to the rear of 8 Colnedale Rd providing the dwelling Verena

Although some of these subdivisions are relatively historical a significant number are recent precedents. Consent was granted and amended in 2011 for the pair of 3 bed dwellings to the rear of 213-213a Harefield Rd. This proposal required formation of a new driveway from the main road to access the new dwellings which also abutted No.'s 17 & 19 Beacon Close, an earlier subdivision to the rear.



*Site plan for new dwellings to the rear of 213-213a Harefield Road*

The development of land to the rear of 15, 16 & 17 North Common Road with 3 new 3 bed dwellings was allowed under Appeal to the Planning Inspectorate in 2016. That particular development provided quite comprehensive assessment of the local context with respect to 'backland development'. A map was prepared (see figure below) illustrating the scope of historical developments and the applicants argued successfully that this formed part of the character and appearance of the surrounding area. The Inspector considered that "irrespective of when they were built, backland development is an integral element of this part of the designation area" and that "the existing layout of buildings to the rear has something of an 'ad hoc' character rather than an orderly one where development in backland locations is absent." He concluded: "therefore there would not be harm to the character and appearance of the surrounding area" resulting from the proposal and overturned Hillingdon's refusal of the application.



*Site context plan prepared for application for new dwellings to the rear of 15,16 & 17 North Common Rd showing backland development with sites development since 1972 highlighted*



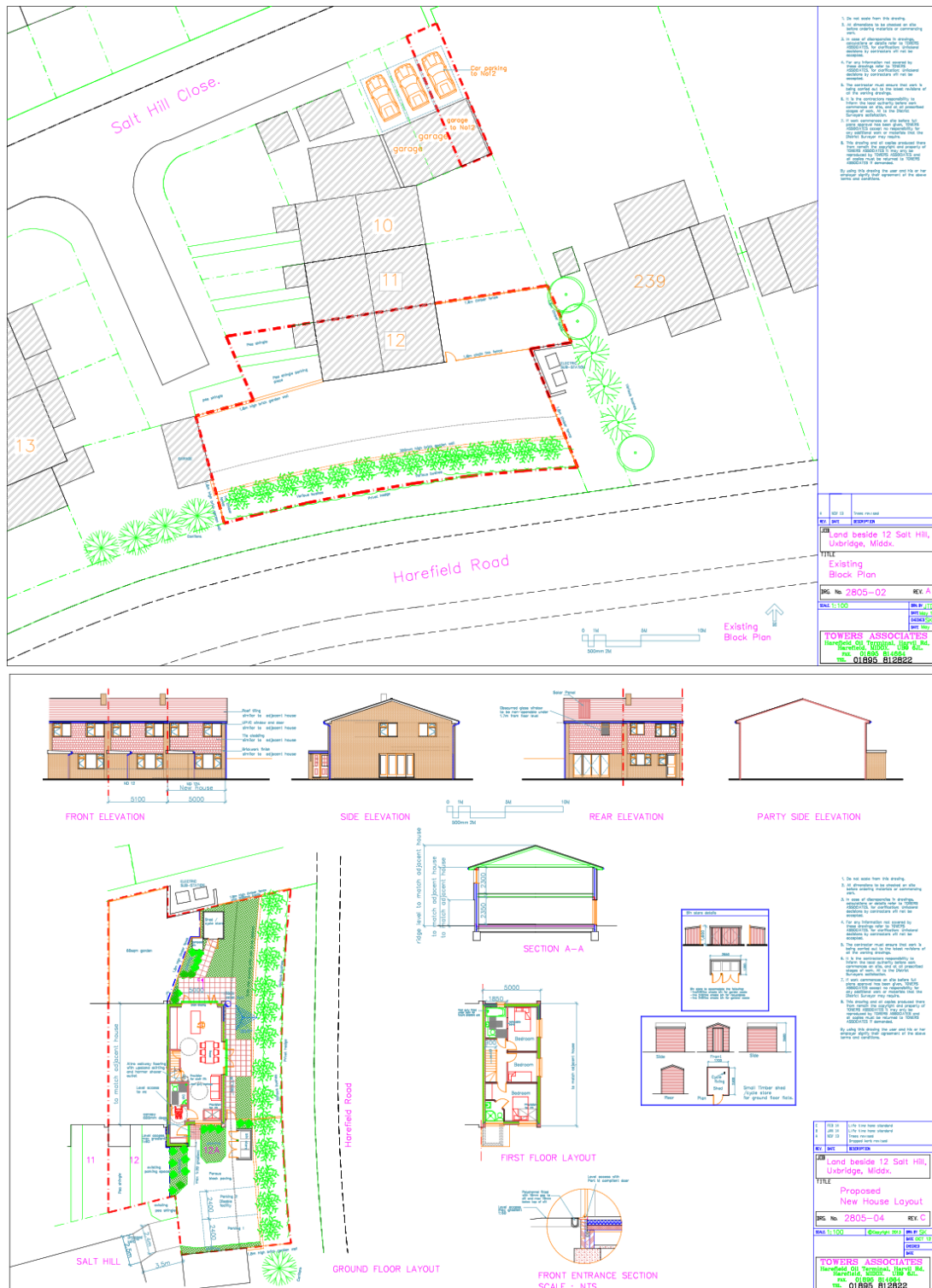


*Aerial photo showing 3 No. new dwellings to the rear of 15,16 & 17 North Common Rd*

Although the appeal site is listed under a North Common Road address, it very nearly backs onto the plot under consideration under this current application. Therefore, the decision relates very closely to this application and the newly consented dwellings form part of the immediate context in which the proposal will be considered.

In 2014 consent was granted for a new dwelling to adjoin the side of 12 Salt Hill Close, effectively filling in an area of side garden adjoining Harefield Road (Ref 15962/2013/3425). The existing terrace of 3 double storey dwellings are sited perpendicularly to Harefield Road and accessed via a cul-de-sac. The side elevation of No. 12 roughly aligned with the face of No. 239 Harefield Rd which is situated directed to the East of the property's rear boundary. The Officer's Report for this application reported that objection was raised regarding impact on the street scene the "building is over the Harefield Road building line" however, Section 7.2 of that report assessed that the remaining 5M spacing to the side boundary would ensure "the proposal would harmonise in appearance with the general street scene. The result would be a dwelling which does not appear either cramped or out of character with the terraced dwellings of its immediate surroundings."

Following on from this development consent was granted in 2017 for erection of a corresponding new double storey terraced dwelling to adjoin No. 12 Salt Hill Close (Ref 72568/APP/2017/406). Consent was granted despite a number of objections based on an assessment that quoted that from the earlier consent at No. 11 Salt Hill Close. These 2 consents provide precedents directly relatable to the proposal contained in this application to erect new dwellings on land subdivided from existing dwellings which have frontage onto Harefield Road.



Site plan & approved design for new dwelling to side of 12 Salt Hill Close





## Street Setbacks & Subdivisions

The heterogenous character of Harefield Road results in a wide diversity of house types and relationships however a street wall can still be discerned with most dwellings presenting a similar setback of approximately 7M behind the pavement. The site plan diagram above illustrates this relationship in the immediate context of No. 170 and demonstrates that the depth of the existing front garden space is atypical to the context. In fact this garden space is not even duplicated at the adjoining No. 172 whose 'L' shaped original plot extended behind No. 174 and was subsequently subdivided to form No. 172a. The street wall along this southern stretch of Harefield Road presents a generally consistent street wall from 152-166 Harefield Road. No.'s 168, 170 & 172 share a similar deeper setback but the former enjoys a much wider frontage and includes a detached, pitched roof garage block which is situated along the more typical street wall. This then continues with No.'s 174, 174a and the Clare Nursing Home block. Insertion of a new dwelling to front of No. 172 would help reinforce the continuity of the street wall along Harefield Road.



A new dwelling inserted to front of No. 170 would reinforce a regular pattern of development which is typical to the local context and resulting from the subdivision and intensification of original, larger plot sizes over time. The later dwelling at 166a can be glimpsed behind the original dwelling No. 166 to the front. Similarly, No. 172a is located directly behind No. 174. The depth of the original plots, however has also in some circumstances resulted in a tiered arrangement of 3 dwellings such as with No.'s 174, 172a & 170a. The proposed dwelling erected to the front of No. 170 would form a similar relationship with No. 170b which is currently under construction.



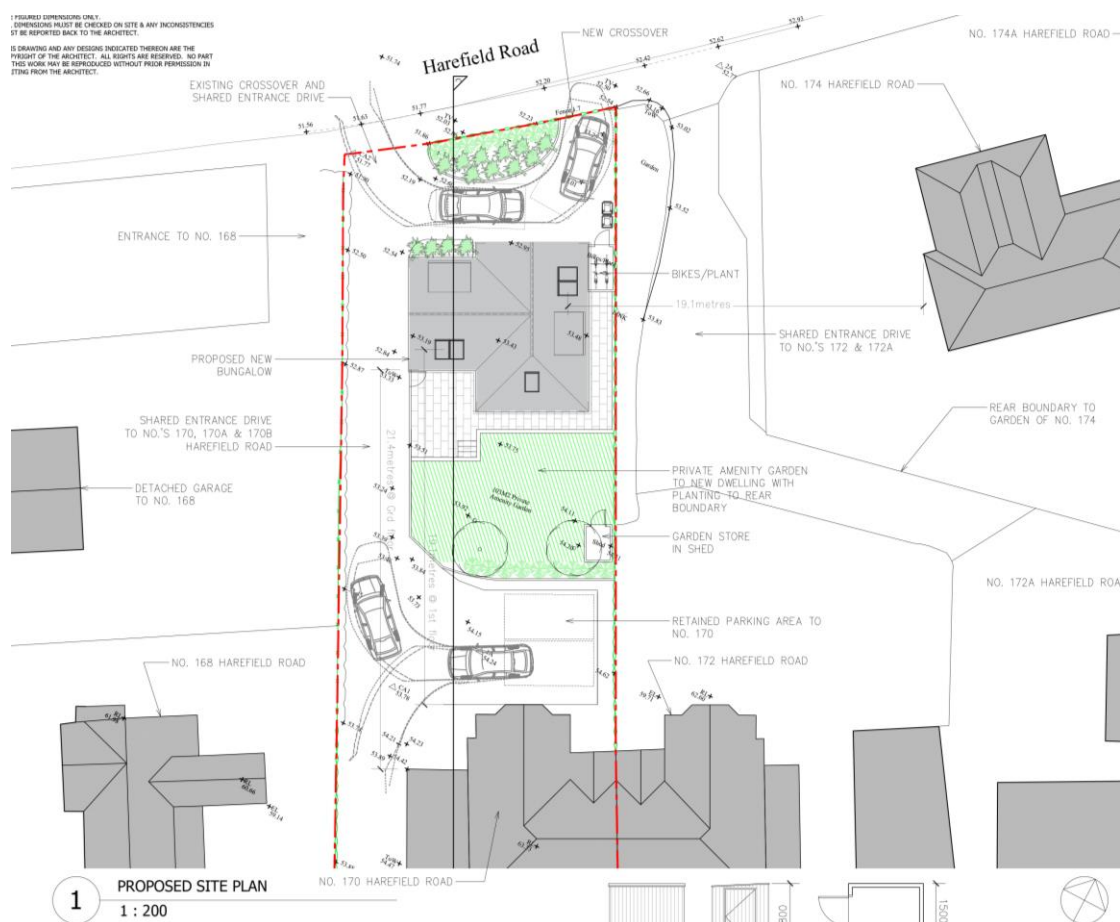


## PROPOSAL

### Site Density

This application proposes the erection of a new bungalow dwelling with accommodation in the roof to the front of the existing dwelling at 170 Harefield Road. The existing 670m<sup>2</sup> plot would be divided to provide a plot of 267m<sup>2</sup> for the new dwelling retaining 403m<sup>2</sup> for the existing dwelling. The new 3 bed house would provide a total of 103m<sup>2</sup> of accommodation on 2 levels. The residential density with the existing 4 bed dwelling is 15units/Ha. This is considerably below Hillingdon's current Residential Density Matrix for sites such as this one ("other non-town centre areas") which provides for a range of 35-50units/Ha. With the new dwelling the density would increase to 30units/Ha. The stand-alone density of the proposal site assessed on its own would provide 37units/Ha, toward the bottom end of the guideline. This density would also be consistent with the numerous recent and more historical developments in the local context which have been discussed above.

The 103m<sup>2</sup> GIA for the dwelling would meet and exceed the guidelines provided by the National Space Standards of 102m<sup>2</sup> for a 2 storey, 3 bed dwelling for 6 persons. The rooms provided are all of reasonable proportion and size and include 2 separate living spaces as required under current Hillingdon housing design standards. These are shown open plan but could readily be subdivided. The retained private rear garden of No. 170 which measures 145m<sup>2</sup> is well in excess of the 100m<sup>2</sup> required for a 4+ bedroom house. The new dwelling would be provided with its own private rear garden measuring 103m<sup>2</sup>, itself well in excess of the 60m<sup>2</sup> standard for a 3 bedroom house, and also larger than the 101m<sup>2</sup> amenity garden provided for the consented dwelling behind No. 170.

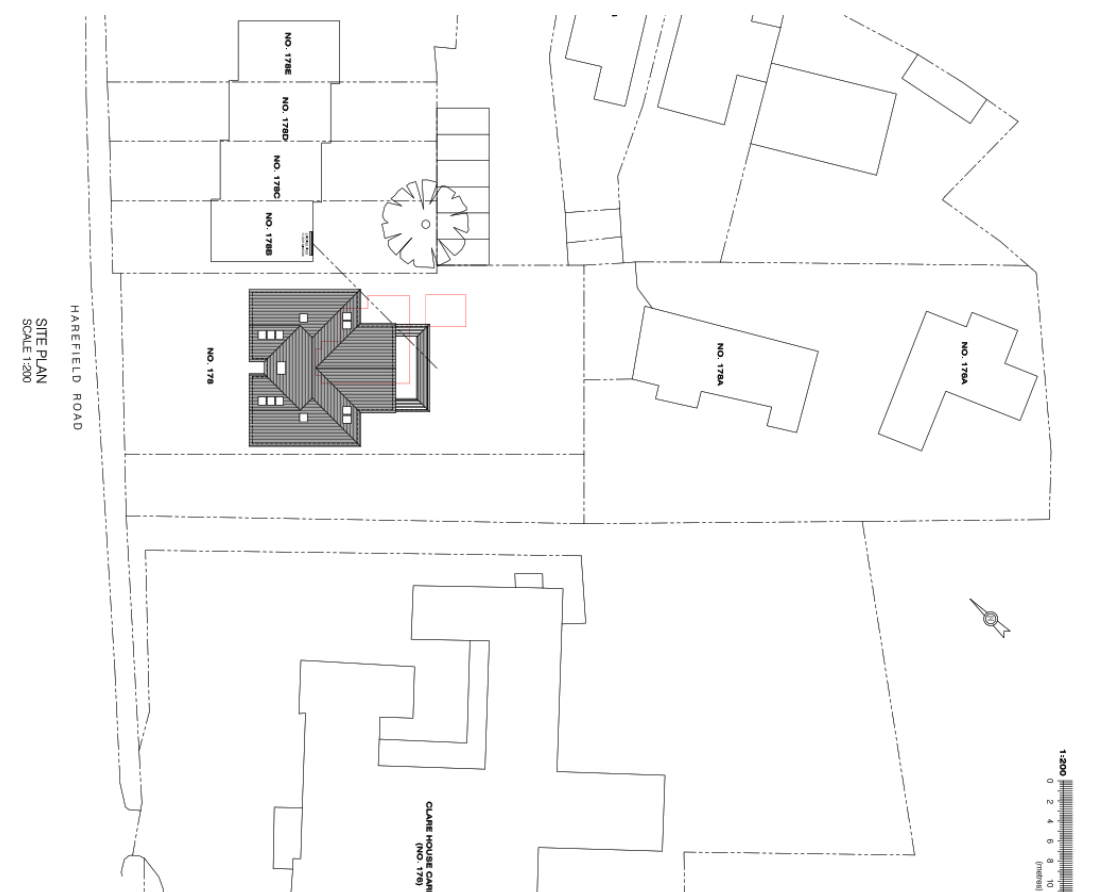


Site plan for proposed new dwelling

## Context

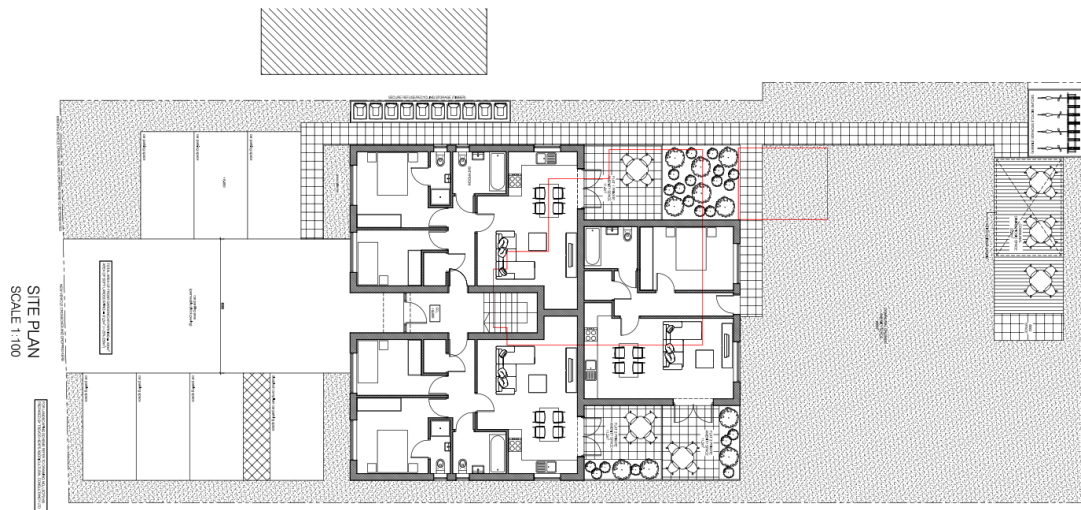
The site of the proposed dwelling would sit in the overlarge and disused front garden of No. 170 Harefield Road, one of a pair of semi-detached dwellings on the southern side of the road. Although the context is most typified by the variety of its layout and subsequent sub-division of plots, most all the existing dwellings which face the road are sited much closer to the front boundary. Of approximately 60 dwellings on both sides of Harefield Road between its junctions with Park Road and Gravel Hill, only 3 or 4 are set back equivalent distances to No. 170 making them the clear outliers of the context. No. 170 however is the only property which incorporates a front garden space while the others are all dominated by driveways and parking. The 1934-35 Ordnance Survey Map shown above provides some evidence of how many precedent properties on larger plots have been replaced and subdivided with denser developments of multiple dwellings.

The recent consent granted at 178 Harefield Road (Ref 46205/APP/2019/3418) will replace a detached dwelling with 7 No. flats. The development will site the new building considerably closer to the road and will replace an existing front garden with off-street parking. The application was refused by LB Hillingdon, but the decision was overturned on Appeal to the Planning Inspectorate (Ref APP/R5510/W/20/3255652). In his report the Inspector noted that “the proposal would be set closer to the road than the existing house. However, the existing house appears rather out of place in this respect due to the considerable distance of its set-back.” The Council also objected to the area of hardstanding replacing landscaping to the front of the proposed building, but the Inspector noted that his close inspection of the context demonstrated that the proposal would “not result in any harm to the surrounding area and would be consistent with the general appearance of the locality, consistent with the aims of the ... policies” cited by the Council.



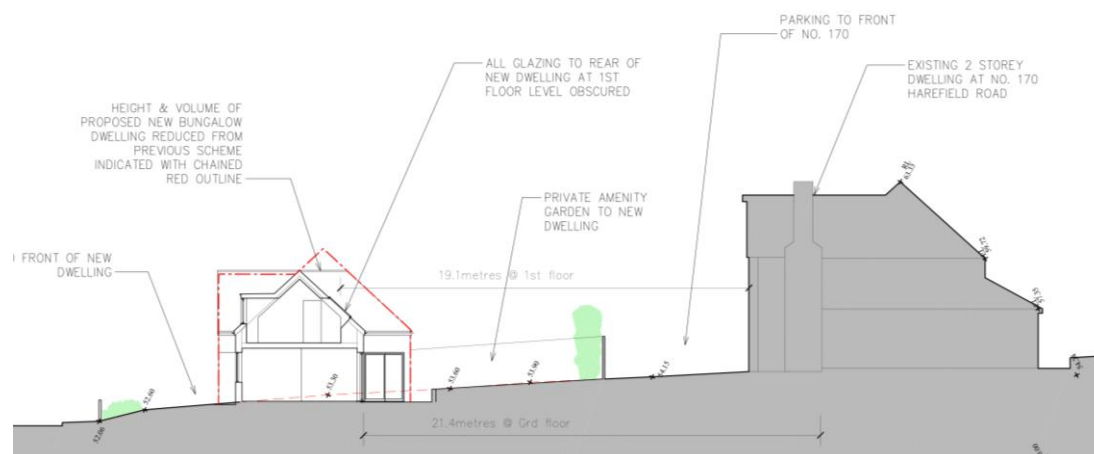
*Location plan for redevelopment of 178 Harefield Road*





*Site plan for 178 Harefield Road showing existing building outlined in red*

The site of the proposed dwelling at 170 Harefield Road would reinforce the street wall established by neighbouring properties at 164, 166, 174 & 174a Harefield and so would not be out of keeping with the context. The existing topography of the site slopes upward from Harefield Road toward the front of No. 170 by 2.3M and the ground floor of the proposed dwelling would be set 1.4M below that of the existing house. The bungalow design would further ensure that the upper floor windows of No. 170 & 172 would retain open views over the roof of the new building. The internal layout has been planned so that upper floor windows from the new dwelling oriented toward the rear can be obscure glazed since they serve a bath/shower room and the secondary opening to Bed 2. The proposed house would be set at a level 0.9M above the pavement with the site excavated and levelled to provide a suitable base such that the new ridge would be 4.2M below that of No.'s 170-172. The stepped frontage of the new house follows the curvature of Harefield Road and is set between 6-7M back from the front boundary and 1.5M away from its side boundary to the East where it adjoins the entrance drive to 172. The eaves would be set just above the fence along this side boundary onto which a sloped side roof would face.



*Site section elevations showing the relationship of the new dwelling to adjoining houses*

Parking for 2 cars would be provided to the front of the new dwelling with access provided by the existing shared entrance drive and egress via a new crossover adjacent to that of No. 172. As such vehicle movements on the shared driveway

would not be increased. A parking area would be retained to the front of No. 172 with ample space for turning into the drive to those vehicles to enter and leave the property forward facing; the turning space would also enable passing for vehicles from the other existing dwellings.

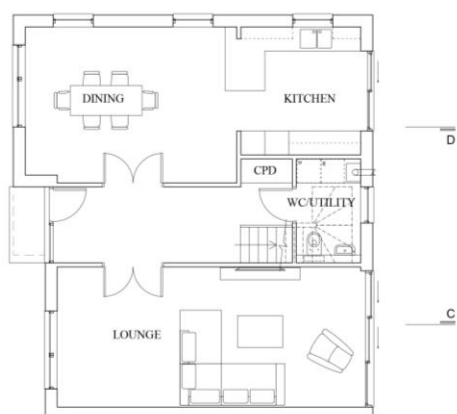
The new proposal is a significantly smaller form than the previous version. The width of the dwelling has been reduced by 0.5M to increase the setback to the northerly side boundary ensuring the building would sit comfortably on its plot. The footprint of the building has been reduced by 14% with a now staggered rear elevation increasing the separation distance to the existing dwellings by up to 3.2M. The internal floor area has been reduced by 24% from 136m<sup>2</sup> to 103m<sup>2</sup> but still provides ample and well-planned accommodation for the 3-bed dwelling. The main roof ridge has been lowered by 1.0M and the shape and volume have also been significantly reduced ensuring that the visual impact of the dwelling both on the street scene and on views to and from surrounding properties would have less impact.



1 PROPOSED GROUND FLOOR PLAN  
1 : 100



2 PROPOSED FIRST FLOOR PLAN  
1 : 100



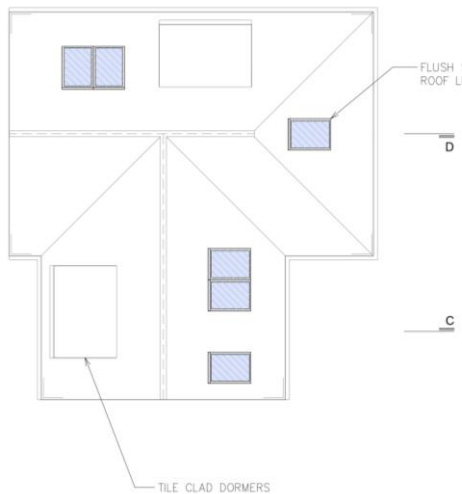
1 PROPOSED GROUND FLOOR PLAN  
1 : 100



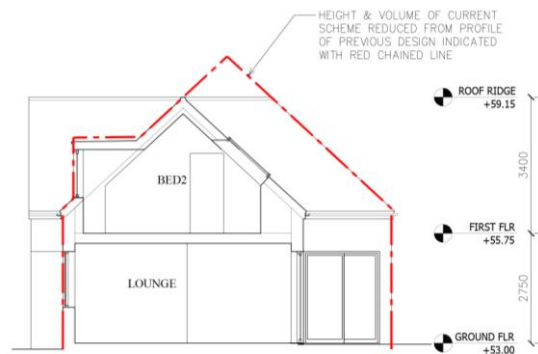
2 PROPOSED FIRST FLOOR PLAN  
1 : 100

*Comparison of new proposed plans (above) with last proposal (below)*

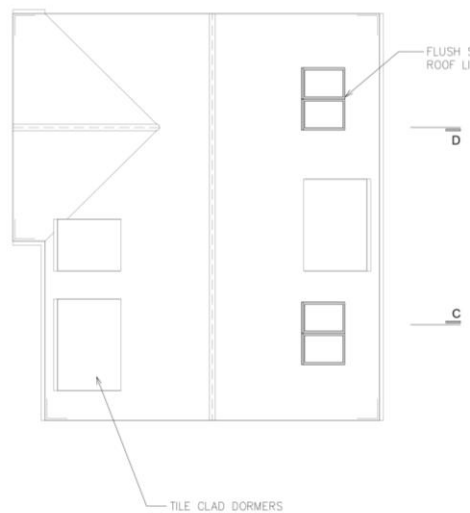




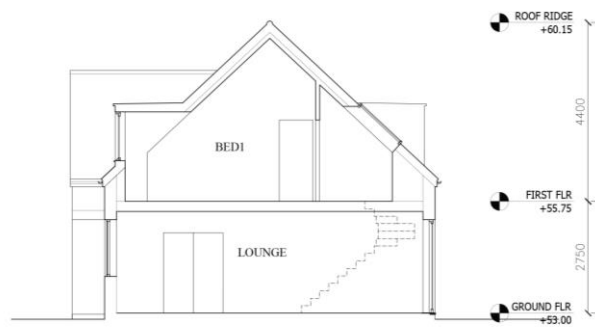
1 PROPOSED ROOF PLAN  
1 : 100



2 PROPOSED SECTION C-C  
1 : 100



1 PROPOSED ROOF PLAN  
1 : 100



2 PROPOSED SECTION C-C  
1 : 100

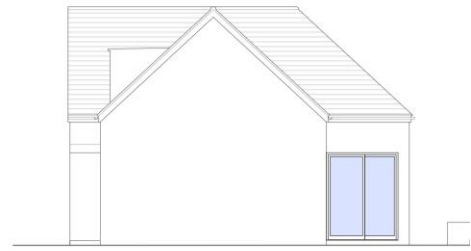
*Comparison of new proposed roof plans & sections (above) with last proposal (below)*

## Architectural Detailing

The design of the proposed new dwelling responds to the varied context with traditional materials and massing in a contemporary idiom. The simple plan form is articulated with a modest gable and dormer window to the front facing Harefield Road providing visual richness. A second dormer on the sloped side roof facing East towards No 174 reduces the mass of the dwelling and enhances the open character of the context in which it sits. The reduced depth of the form along the west elevation ensures the dwelling would not appear cramped on its site; the 6M length of this flank would be comparable to the 6.5M depth of the existing garage block located to the front of No. 168. The architectural detailing has been developed with a palette derived from neighbouring properties including painted render walls, painted fascias and soffits and a clay tiled, pitched roof. The main entrance is sheltered by an overhanging gable roof. Modest scaled window openings and dormers are oriented to respond to the immediate context and ensure privacy is maintained. The lounge space opens up with a large sliding glass opening onto the private rear garden allowing it to provide integral amenity to the dwelling.



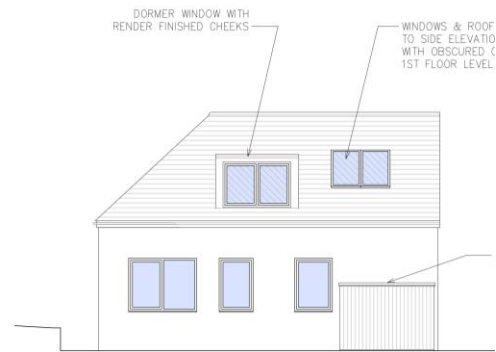
1 PROPOSED NORTH ELEVATION  
1 : 100



2 PROPOSED WEST ELEVATION  
1 : 100



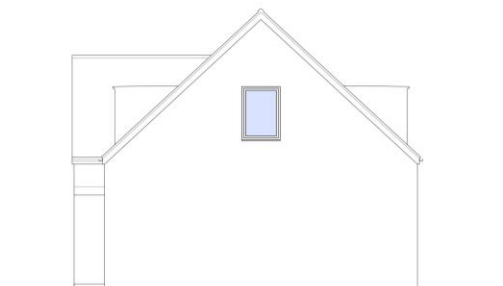
3 PROPOSED SOUTH ELEVATION  
1 : 100



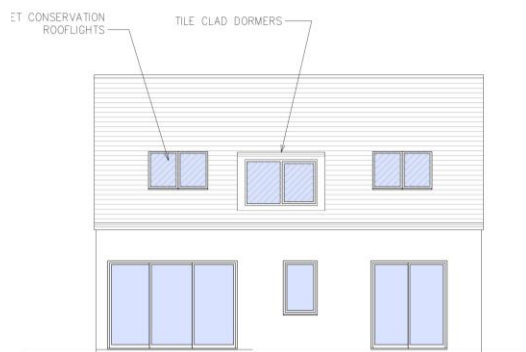
4 PROPOSED EAST ELEVATION  
1 : 100



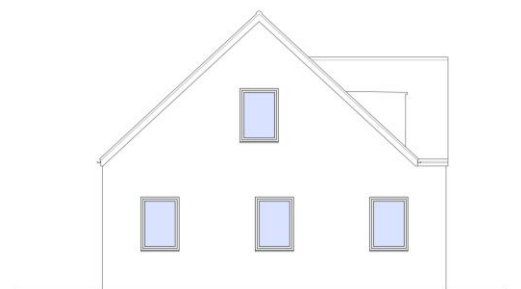
1 PROPOSED NORTH ELEVATION  
1 : 100



2 PROPOSED WEST ELEVATION  
1 : 100



3 PROPOSED SOUTH ELEVATION  
1 : 100



4 PROPOSED EAST ELEVATION  
1 : 100

*Comparison of new proposed elevations (above) with last proposal (below)*



## Overlooking & Privacy

The potential impact of the development on existing window/door openings on adjoining properties has been carefully considered and the design has been developed to address these. The dwelling would be sited at substantial distance from all neighbours so that there would be no material impact on daylight and sunlight reaching those properties. The ground level of the bungalow will be excavated to provide level access from the front and onto the amenity garden to the rear. This will also ensure that the ridge level is set substantially below those of all adjoining properties including No.'s 168, 170-172. As both the proposed dwelling and No. 174 are bungalows, these would be more similar in height but the rising level of Harefield Road toward the North would ensure the proposal would not be overbearing.

The siting of the dwelling and incorporation of a staggered rear elevation has materially increased the separation distance to No. 170. The increased separation distance to the western portion ensures that the primary south facing ground floor opening to the lounge would now measure 21.4M exceeding the Hillingdon standard. This opening would not face directly toward No. 170 but rather toward its side garage with the corner of the kitchen effectively screening oblique views from the bay windows. The amply daylit kitchen has been provided triple aspect openings with side facing doors to the garden terrace, a large window to the widened side alley and only a high-level linear window facing directly toward the garden. Therefore, there would be no remaining concern of direct overlooking into neighbouring dwellings. The primary remaining concern would be potential for overlooking at 1<sup>st</sup> floor level, however the new proposal includes only 2 openings here, both of which would be fixed shut and fitted with obscured glass. The closest proximity would measure 19.1M between the bay window of No. 170 and the skylights to the rear of Bed 2 which is marginally below the threshold. Landscaping along the intended boundary has been incorporated on the property which would contribute to securing the privacy of the amenity garden of the proposed dwelling. Although not fundamentally permanent in form, the ample size of the amenity space – 2/3 larger than the Hillingdon standard requires – provides ample opportunities to enhance the landscaping to the requirements of future residents.



*Views of planting screen along proposed shared boundary*

The dwelling would be separated by over 25M to existing dwellings across Harefield Rd and by over 22M to No. 168 and 19M to No. 174, sufficiently distant to secure their mutual privacy. No windows would face directly toward No. 168 while a dormer window to the stairwell and rooflights to Bed 3 on the East side elevation would be fixed shut and fitted with obscured glass to eliminate any overlooking to the garden of No. 174. The 2 habitable bedrooms at the upper level of the proposed dwelling both enjoy abundant light and views toward the north across Harefield Road.

## **Planning & Appeal Decisions**

Because the previously submitted planning application had not proceeded to Committee 2 months after its target date for determination, the applicant was forced to file an appeal to the Planning Inspectorate on the grounds of non-determination. As part of that procedure Hillingdon completed their assessment of the proposal which was considered by the Hillingdon Planning Committee which indicated 4 reasons for refusal which can be summarised as follows:

- the proposal was out of character and represented overdevelopment;
- the dwelling would be subject to unacceptable overlooking;
- the proposed design would not meet requirements of Part M4(2);
- the formation of a new crossover to the highway would be contrary to policy and detrimental to public safety.

A decision from Planning Inspector J Bowyer was issued on 18 October 2022 which dismissed the appeal. The detailed assessment of the proposal in light of the reasons for refusal provides an important and professional assessment of the scheme in light of Hillingdon policies which the applicant has closely followed in revising the scheme submitted under this new application. The Inspector's analysis of the particular nature of the local context confirmed that he was "satisfied that the siting of the dwelling and its position in front of No 170 would not in itself be uncharacteristic or discordant." With regard to the claim of overdevelopment of the plot, he considered that there was "little firm reason to conclude that further subdivision of the site would inevitably be uncharacteristic or harmful to the appearance of the area." Limited separation from side and rear boundaries, however, would in his view "cause the dwelling to appear somewhat cramped and squeezed onto the site." The large set back of No.'s 170-172 from Harefield Rd "reduces their prominence, and I did not find their position to be unduly conspicuous..." While the siting of the new dwelling "would detract from the spacious quality of its surroundings" and would "obscure significant proportions" of the No. 170-172 pair "diminishing the contribution that they make to the street scene", the Inspector concluded on balance: "the harm arising on this count would accordingly also be modest." Finally, the Inspector considered that the insertion of a new dwelling forward of No.'s 168-174 would "result in some harm to the character and appearance of the area ... although I consider the degree of harm would be modest..."

In response to the critical aspects of the Inspector's analysis, the new proposal has been reduced in width, depth and height to materially reduce its impact on the local context. Separation distances to the east boundary has been increased to 1.5M, to the rear boundary from 7.6M to vary between 9-11M due to the newly staggered rear elevation, and the height of the ridge has been reduced by 1M and the roof reconfigured to eliminate the east side gable. Taken together, these alterations to the proposal represent material changes in scale and massing which warrant new assessment of the potential impact of the revised design, particularly given the "modest" impact of its predecessor scheme.



Turning to the question of unacceptable overlooking and lack of privacy, the Inspector noted that the separation distance between the proposed dwelling and the neighbouring No.'s 170 & 172 would fall below the Hillingdon standard. He concluded that "given the close proximity at which these views would occur, I find that they would result in an impression of being overlooked and a loss of privacy for the neighbouring occupiers." He noted the applicant's proposal for planted screening to mitigate against the potential mutual overlooking, but remained unconvinced that this could fully obscure views and noted that "vegetation may die or become diseased..." The Inspector acknowledged the analysis the Appellant had provided in his Final Comments of local precedents in the context for reduced proximities and overlooking between properties but considered that insufficient detail had been provided to properly assess these. In any event he concluded that the examples would not "offer a compelling justification to allow further development which would not achieve separation distances sought within the development plan."

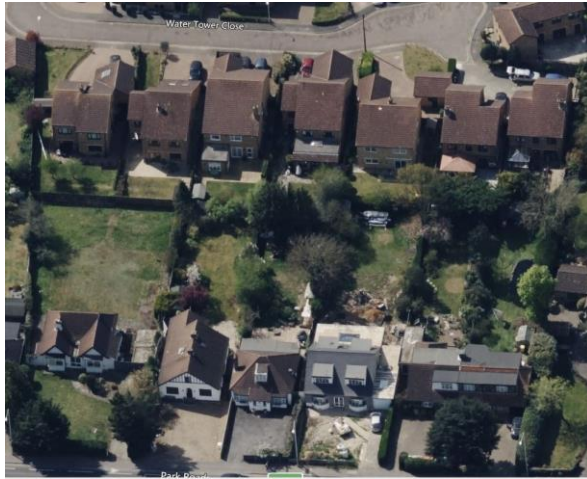
With direct photographic evidence below we offer multiple examples of precedents which establish that closer proximities particularly between new consented dwellings and adjoining gardens have previously been considered acceptable. The relationships between neighbouring dwellings in a closely built up context invariably require a degree of potential overlooking, the nature and extent of which cannot be excluded but should be properly balanced. Adjoining amenity gardens naturally provide only a degree of privacy since they are both 'en plein air' and boundary heights are rightly restricted. Planting therefore always provides an individual owner with a set of appropriate tools which can be utilised to enhance privacy and restrict potential overlooking. The planting already undertaken by the applicant was not intended to complete this project but rather to highlight the potential aim which could be achieved. With respect to the amended scheme, we would contend that 2 critical aims have been achieved: the distance between windows both at ground & 1<sup>st</sup> floor of the adjoining properties has been increased to meet the minimum standard with no directly facing openings; the amenity garden to the proposed dwelling has been increased in size by 27% and now provides 43m<sup>2</sup> in excess of the Hillingdon standard of 60m<sup>2</sup>, offering greatly enhanced opportunities for using landscaping to secure mutual privacy. Together these features of the new proposal offer significant mitigations to meet the particular parameters of the site.



*Mutual overlooking between properties & gardens at 15-19 Water Tower Cl*



*Overlooking from 1 Hillman Close 1<sup>st</sup> floor windows onto garden of 186 Harefield Rd*



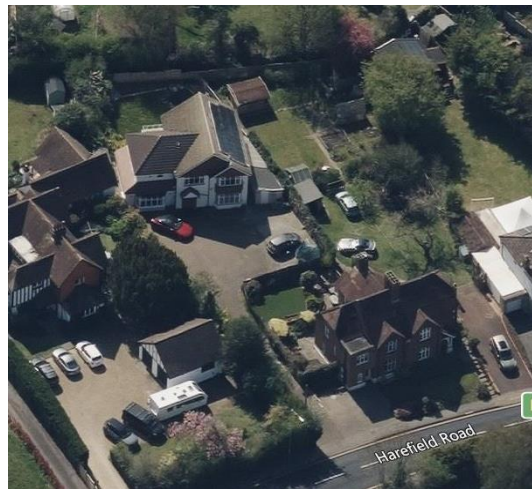
*Overlooking from 1<sup>st</sup> floor of 12-24 Water Tower Cl properties onto rear gardens of 225-235 Park Rd*



*Overlooking from 1<sup>st</sup> floor of 8&10 Water Tower Cl onto gardens of 6 North Common Rd & 4 Water Tower Cl*



*Overlooking from 1<sup>st</sup> floor dormers of 14 North Common Rd onto 19 & 21 Water Tower Cl*



*Overlooking from 166A Harefield Rd onto 166 Harefield Rd*

The 3<sup>rd</sup> reason for refusal drafted by Hillingdon alleged that the proposed dwelling would be unable to meet the requirements of Part M4(2) for provision of ‘accessible and adaptable dwellings’. The Inspector confirmed that details submitted with the appeal would leave “no reason that compliance could not be achieved.” All required amendments were judged “very minor” with the conclusion that “the development would make adequate provision to meet the requirements for accessible housing.” Similar details submitted with this new application for the amended scheme should confirm compliance here as well.

With regard to the proposed access and parking arrangements to the new dwelling, the Inspector was categorical in confirming their acceptability under Hillingdon policies, particularly the Domestic Vehicle Footway Crossover Policy 2019. There would be “no unacceptable loss of on-street parking or amenity” and “visibility from the additional access would be reasonable... and would be likely to minimise risk of meaningful detriment to safety”. The Council’s Highways consultee’s original support for the scheme which was subsequently contradicted was noted and the original more detailed consideration upheld. The amended scheme incorporates the same details for access and parking as the previous application.



## LOCAL PLAN POLICIES

With the withdrawal of the Hillingdon residential SPG's, the relevant policies are contained in the Local Plan Part 2 adopted on 16 January 2020. The proposal has been designed with particular reference to the following Policies:

- DMH6 – Garden and Backland Development
- DMHB11 – Design of New Development
- DMHB16 – Housing Standards
- DMHB17 – Residential Density
- DMHB18 – Private Outdoor Amenity Space
- DMT6 – Vehicle Parking
- Appendix C – Parking Standards

DMH6 states that there will be a presumption against loss of gardens except in exceptional cases subject to: protection of residential amenity & privacy of adjoining homes; vehicle access not having an adverse impact; development should be more intimate in scale than frontage properties; retention of existing environmental features. The proposal scheme meets all of these criteria. The proposed dwelling is more modest in scale and height than both the frontage properties and the predecessor backland properties at 170a Harefield Rd. The smaller scale and height of the proposed dwelling as well as its careful siting and orientation ensure that it would not compromise the amenity and privacy of the adjoining properties. The existing shared entrance drive and new access point through the front boundary would ensure that traffic movements will not be materially different from the existing situation. Finally, there are no existing environmental features in the form of planting or habitat which require protection from the proposal.

DMHB11 calls for proposals to respect and harmonise with the local context. In demonstrating that the local context is actually characterised by backland development, we contend that the proposal is not actually “exceptional” but typical. The design of the proposed dwelling is of high architectural quality both externally and internally. As such it would both enhance its surroundings and provide accommodation of the highest standard meeting demonstrated local need. With respect to DMHB 16, 17 & 18 the proposal would exceed the standards outlined in the Local Plan.

DMT6 sets out the applicable Parking Standards to support new residential developments at Appendix C. The standard provides for 2 car parking spaces for a dwelling of 3 bedrooms or more. The other provisions for sustainable drainage, suitable wheelchair access, electric charging points and minimal hardstanding can all be achieved by the proposed layout shown on the site plan submitted. Provision has also been made and illustrated on the site plan for cycle storage and bin storage to the side of the new dwelling.

The London Plan (2016) provides housing targets for greater London in an effort to meet demonstrated housing need. For Hillingdon the London Plan set a minimum target of 5,593 completions between 2015-25, with an annual target of 559 dwellings. The London Plan further recognises the need for local authorities to seek to bring forward ‘small sites’ of 0.25ha/2500m<sup>2</sup> or less. It states: “Boroughs should proactively enable and fully realise the potential for small sites to make a substantial contribution to housing delivery in London.” Such sites “play a crucial role in housing delivery in London.” The proposal submitted under this application would meet these criteria and provide critically needed new housing in a sustainable location.

## **ACCESS STATEMENT**

Off-street car parking will provide easy access in close proximity to the main entrance complying with standards. The development's internal and external spaces will be planned and detailed to take into account the needs of all users in a fashion consistent with the constraints of the site topography. The existing slope to the site will be regraded to enable level access to the main entrance and also to patio in the private amenity garden to the rear of the property. Staircases, internal space standards, lighting, fittings and sanitary accommodation will comply with Part M4(2) of the Building Regulations & relevant environmental standards. An accessible and adaptable WC with shower will be incorporated on the entry level of the house. Suitable complying lighting and electrics will be provided. Windows will be cleanable from inside.

## **CONCLUSIONS**

- The local context of the proposal is significantly characterised by backland development and subdivision to a degree which justifies proposals for new developments where impact can be successfully mitigated
- The excessively deep setback of the existing dwelling is atypical to the context and contributes little to the quality of the streetscape
- The proposal represents a design of high quality which would enhance the context
- The building to plot ratio after redevelopment would represent an intensity of development of the site which is typical for the context as well as well within local policy standards
- The proposal would not result in loss of amenity to adjoining properties because the scheme has been designed with particular response to the relationships with adjoining existing buildings to prevent overlooking or overbearance
- Redevelopment would provide the opportunity to provide an additional sustainable, low energy, modern family home which will benefit both the occupants and the neighbouring context