



## PLANNING STATEMENT

SITE ADDRESS: 288-306 High Street, Harlington, Hayes UB3 5DU  
DATE: MAY 2026



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## Executive Summary

Total Planning has prepared this Planning Statement on behalf of the applicant in support of a full planning application for the erection of a part three-storey, part two-storey and part single-storey residential building comprising 5 self-contained flats with associated parking, cycle storage, refuse storage, landscaping and access alterations on land to the rear of Nos. 288–306 High Street, Harlington, Hayes UB3 5DU.

The application site comprises a sustainably located and previously developed parcel of land within the Harlington Local Centre currently occupied by garages, ancillary outbuildings and extensive hardstanding areas. The site represents an underutilised brownfield opportunity which currently makes a limited contribution to the appearance, functionality or vitality of the area.

The principle of residential redevelopment is strongly supported by national, regional and local planning policy which seeks to optimise the use of brownfield land and significantly boost the supply of housing within sustainable urban locations. The proposal would deliver five high-quality homes within an established settlement that benefits from access to local services, employment opportunities and public transport infrastructure.

Importantly, the application follows a formal pre-application process undertaken with the London Borough of Hillingdon. Whilst the Council recognised the site's redevelopment potential, concerns were raised regarding the scale and intensity of the original proposal which sought nine residential units.

The current scheme has been comprehensively redesigned in direct response to the Council's advice. The number of units has been reduced from nine to five, representing a reduction of approximately 44% in residential density. This significant revision has enabled substantial improvements to the design, layout and overall quality of the development. The revised scheme provides a more appropriate built form, improved relationships with neighbouring properties, increased private and communal amenity space, dedicated on-site parking, enhanced landscaping and significantly improved residential accommodation.

The proposals have been informed by a comprehensive suite of supporting technical assessments, including a Daylight and Sunlight Assessment, Transport Statement and Fire Safety Statement. These documents demonstrate that the development can be accommodated without giving rise to any unacceptable impacts.

The submitted Daylight and Sunlight Assessment confirms that neighbouring occupiers will continue to receive acceptable levels of daylight and sunlight and that the development will not result in any significant adverse effects upon residential amenity. The building has been carefully designed to minimise overlooking, preserve privacy and avoid any unacceptable overbearing impacts through the use of stepped building heights and a significantly reduced scale compared to the original pre-application proposal.

The development will provide a high standard of accommodation for future occupiers. All dwellings meet or exceed the Nationally Described Space Standards, benefit from good levels of natural daylight and outlook, and are served by private and communal amenity spaces. The proposal therefore fully accords with the residential quality requirements of the London Plan and Hillingdon Local Plan.

From a transport perspective, the accompanying Transport Statement demonstrates that the development will generate only a negligible increase in traffic movements and will not adversely affect highway safety or the operation of the surrounding road network. The scheme provides dedicated parking spaces together with secure cycle storage and responds positively to concerns raised during the pre-application process.

The site contains no trees, habitats or areas of ecological value and the development would not result in the loss of any biodiversity resource. Furthermore, the site lies within Flood Zone 1 and is therefore at the lowest risk of flooding. Appropriate drainage arrangements can be secured, and there are no technical constraints that would prevent the development from proceeding.

The proposal would deliver a range of significant public benefits. These include the redevelopment of an underutilised brownfield site, the provision of five much-needed new homes, improvements to the visual appearance of the site, enhanced landscaping, more efficient use of land and a positive contribution towards local and London-wide housing delivery objectives.

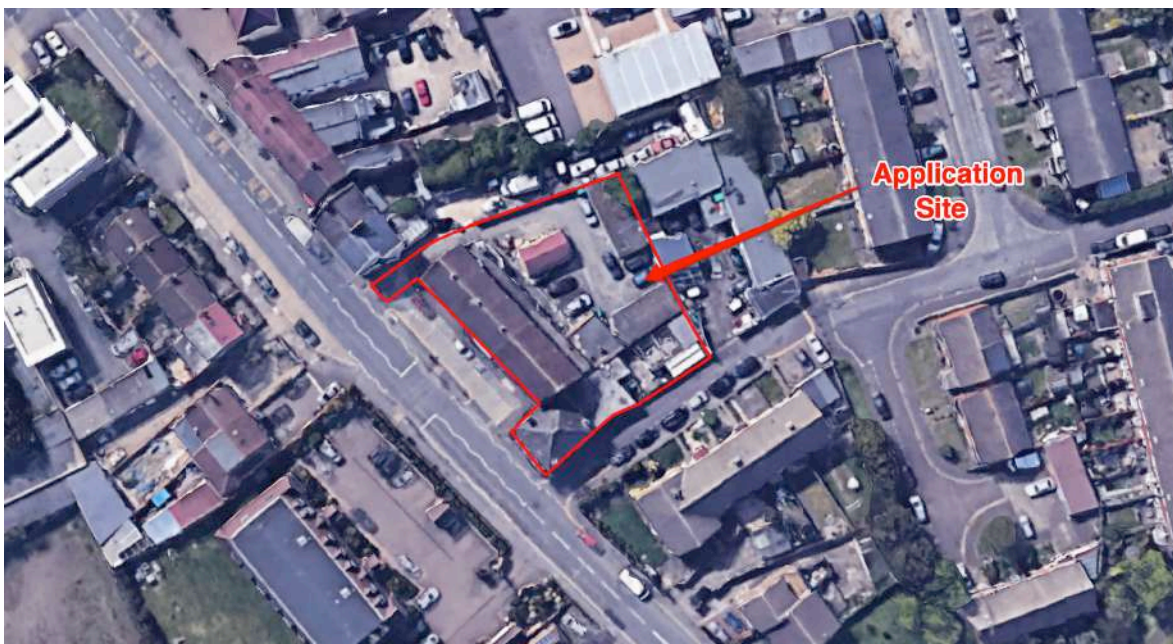
When assessed against the Development Plan as a whole, the proposal represents a highly sustainable form of development that fully accords with the objectives of the National Planning Policy Framework, the London Plan and the Hillingdon Local Plan. The scheme has evolved significantly through constructive engagement with the Council and now represents a well-designed, policy-compliant and contextually appropriate form of development.

There are no material planning considerations that indicate planning permission should be withheld. Accordingly, it is respectfully concluded that planning permission should be granted without delay.

## The Site

The application site comprises land to the rear of Nos. 288–306 High Street, Harlington, Hayes, UB3 5DU, within the London Borough of Hillingdon. The site occupies a highly sustainable and previously developed urban location within the established Harlington Local Centre and is situated on the western side of High Street, immediately south of its junction with Providence Lane.

The wider property frontage to High Street comprises a three-storey mixed-use terrace containing five ground floor commercial units with residential maisonette accommodation at first and second floor levels. The existing commercial and residential uses fronting High Street are retained in their entirety and do not form part of the redevelopment proposals. The application site relates specifically to the land to the rear of these buildings, which is currently occupied by a collection of single-storey garages, outbuildings, hardstanding areas, informal parking spaces and service yard areas associated with the existing development.



*Application Site*

The site is irregular in shape and is enclosed by a varied urban grain comprising commercial, residential and ancillary development. Residential properties are located to the north, south and west, whilst the mixed-use High Street frontage forms the eastern boundary. The surrounding area is characterised by a combination of two-storey and three-storey residential and mixed-use buildings, reflecting the established suburban character of Harlington and the transitional nature of development surrounding the local centre.

Access to the site is currently obtained via Providence Lane to the north and through the existing service yard arrangements associated with the High Street frontage. The site is predominantly hard surfaced and contains limited landscaping or ecological value. The existing garages and ancillary structures make a limited positive contribution to the character or appearance of the area and represent an inefficient use of a sustainably located brownfield site.

The site benefits from excellent accessibility to local services, facilities and public transport infrastructure. High Street provides a range of shops, services and community facilities within easy walking distance, whilst Hayes Town Centre lies

approximately 1.5 miles to the east. Hayes & Harlington Station, served by the Elizabeth Line and National Rail services, is located approximately 1.5 miles from the site, providing direct connections to Central London, Reading and Heathrow Airport. The site is also well served by local bus services operating along High Street and nearby strategic routes.

In planning policy terms, the site is located within the Harlington Local Centre and lies within the Hillingdon Air Quality Management Area and Harlington Air Quality Focus Area. The site is also located within Flood Zone 1, representing the lowest probability of flooding, and benefits from a Public Transport Accessibility Level (PTAL) of 3, reflecting a moderate level of accessibility by public transport.

Importantly, the site constitutes previously developed land within an established urban area and represents a sustainable opportunity to optimise the use of an underutilised brownfield parcel without affecting the operation of the existing commercial units or residential accommodation fronting High Street. The redevelopment of the site therefore presents an opportunity to deliver additional high-quality housing in accordance with national, regional and local planning objectives whilst making more efficient use of land within a highly sustainable location.

## Planning History

The application site has been the subject of formal pre-application discussions with the London Borough of Hillingdon under reference **11952/PRC/2022/267**.



*Pre-Application Proposed Site Plan*

The pre-application submission sought advice in relation to the erection of a three-storey residential building comprising **9 residential units** on the land to the rear of Nos. 288–306 High Street, Harlington, together with associated cycle storage, refuse storage and communal amenity space. The scheme was proposed as a car-free development and involved the redevelopment of the existing garages, ancillary structures and hardstanding areas occupying the rear portion of the site.



*Pre-Application Proposed Front Elevation*

The Council issued its written pre-application response on 20 March 2023. Whilst officers acknowledged the site's sustainable location, brownfield status and potential to contribute towards housing delivery objectives, a number of concerns were identified relating principally to the scale and intensity of development proposed, the relationship of the building to neighbouring properties, residential quality considerations, amenity space provision, parking arrangements and the overall optimisation of the site.

Following receipt of the Council's advice, the applicant undertook a comprehensive review of the scheme and commissioned further design, transport and technical assessments to address the issues raised. As a result, the current planning application represents a significantly revised and improved proposal.

Most notably, the quantum of development has been substantially reduced from the previously proposed 9 residential units to 5 residential flats. This reduction has enabled a more appropriate building footprint, improved separation distances, enhanced outlook and daylight conditions, increased private and communal amenity provision, improved landscaping opportunities and the inclusion of dedicated on-site parking spaces. The revised design also provides a more balanced and sympathetic response to the character of the surrounding area whilst making efficient use of this previously developed urban site.

The current application has therefore been informed directly by the Council's pre-application feedback and reflects a collaborative and iterative design process aimed at addressing officer concerns whilst continuing to deliver much-needed additional housing in a sustainable location. It is considered that the revisions made have resulted in a materially improved form of development which responds positively to the guidance provided by the Local Planning Authority.

## Proposed Development

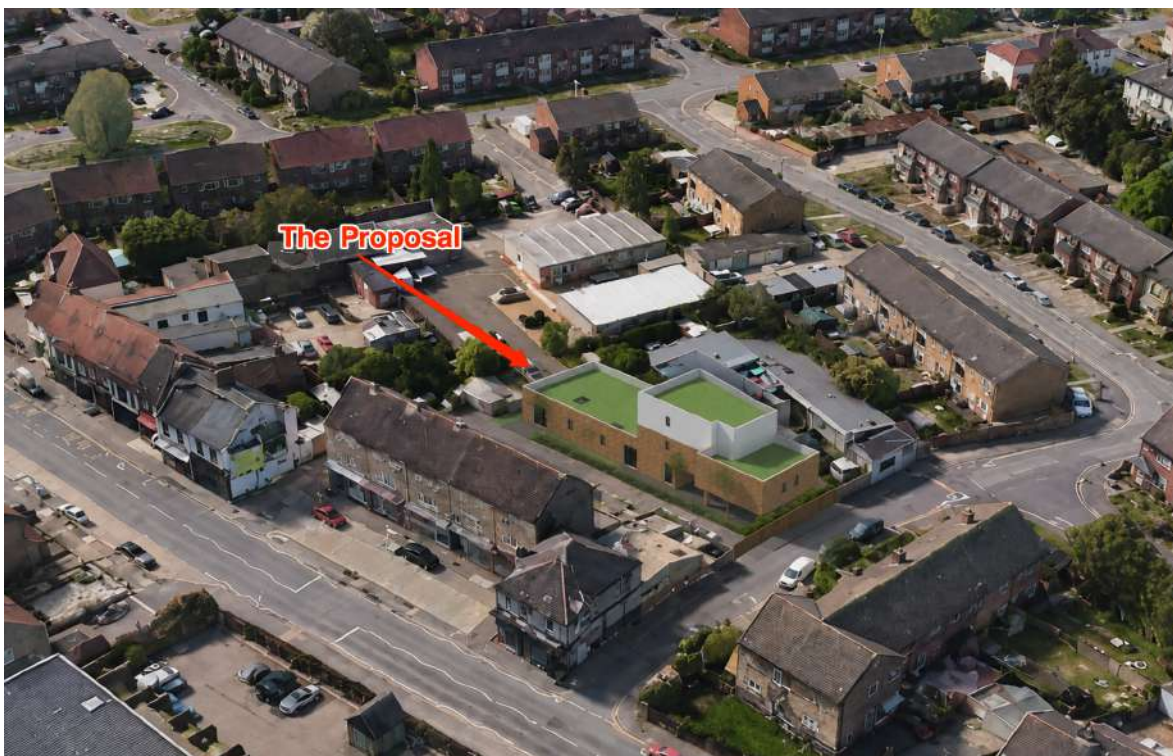
This application seeks full planning permission for the redevelopment of the underutilised land to the rear of Nos. 288–306 High Street, Harlington, through the demolition of the existing garages, outbuildings and associated hardstanding areas and the erection of a purpose-built residential building comprising a mix of part three-storey, part two-storey and part single-storey elements to provide 5 self-contained residential flats, together with associated parking, cycle storage, refuse storage, landscaping and access improvements.

The proposed development has been carefully designed following detailed consideration of the site's physical constraints, surrounding context and the feedback received through the Council's formal pre-application process. The resulting scheme represents a significant reduction in scale and density when compared to the previous pre-application proposal and delivers a more balanced and contextually responsive form of development.

The proposed residential accommodation would comprise:

- 1 x one-bedroom, two-person flat;
- 4 x two-bedroom, three-person flats.

The development would therefore deliver five high-quality residential units contributing towards the Borough's housing supply objectives whilst providing a mix of dwelling types suitable for a range of occupiers.



*Aerial Application*

The building has been arranged around a central communal entrance core and has been designed to step appropriately across the site, with single-storey, two-storey and three-storey elements reducing perceived massing and allowing the development to integrate comfortably within its surroundings. Private balconies are provided to upper floor units, whilst ground floor residents benefit from direct

access to private outdoor amenity space. Additional communal landscaping and amenity areas are incorporated throughout the site to enhance residential living conditions and contribute positively to the site's appearance.

The proposal includes the provision of secure and covered cycle storage, dedicated refuse and recycling facilities, and two off-street car parking spaces accessed via Providence Lane. The development has been designed to promote sustainable travel choices whilst ensuring that practical servicing, maintenance and refuse collection requirements can be accommodated safely and efficiently.

The architectural approach adopts a contemporary yet respectful design language that reflects the character of the surrounding area. The building has been carefully articulated through changes in height, roof form, fenestration and material treatment in order to create visual interest and break up the overall mass of the development. The proposed form responds positively to neighbouring development whilst creating a distinct and attractive residential environment.

The development has been designed to achieve high standards of residential quality. All dwellings meet or exceed the nationally prescribed space standards, benefit from good levels of natural daylight and outlook, and are provided with dedicated private amenity space. Supporting technical assessments submitted with the application demonstrate that the proposal can be accommodated without giving rise to unacceptable impacts in respect of daylight and sunlight, transport, waste management, fire safety, servicing or other material planning considerations.

Overall, the proposal represents the sensitive redevelopment of a previously developed and underutilised brownfield site, delivering five high-quality homes within a sustainable urban location whilst enhancing the appearance, functionality and efficiency of the site.

## Planning Policy

### Introduction

Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning applications are determined in accordance with the Development Plan unless material considerations indicate otherwise.

The Development Plan for the London Borough of Hillingdon comprises:

- The London Plan (2021);
- Hillingdon Local Plan Part 1: Strategic Policies (2012);
- Hillingdon Local Plan Part 2: Development Management Policies (2020);
- Hillingdon Local Plan Part 2: Site Allocations and Designations (2020); and
- The West London Waste Plan (2015).

In addition, the National Planning Policy Framework (NPPF) represents an important material consideration in the determination of planning applications and establishes a presumption in favour of sustainable development.

The Council's formal pre-application response identified a number of key planning policies relevant to the consideration of this proposal. These policies are summarised below and form the principal policy framework against which the application should be assessed.

### National Planning Policy Framework (NPPF)

The NPPF places significant emphasis on the efficient use of land and the delivery of new homes in sustainable locations. Paragraph 11 establishes a presumption in favour of sustainable development, whilst Chapter 5 seeks to significantly boost the supply of homes.

Paragraph 129 requires planning decisions to support development that makes efficient use of land, taking into account the identified need for housing, local market conditions, site accessibility and the desirability of maintaining an area's prevailing character and setting.

Chapter 12 promotes well-designed places and confirms that good design is a key aspect of sustainable development. Development should be visually attractive, sympathetic to local character and establish a strong sense of place whilst optimising the potential of sites.

Chapter 9 seeks to promote sustainable transport and confirms that development should only be prevented or refused on highways grounds where there would be an unacceptable impact on highway safety or where the residual cumulative impacts on the road network would be severe.

The NPPF therefore provides strong support for the redevelopment of previously developed land within sustainable urban locations where development can be accommodated without unacceptable environmental or amenity impacts.

## The London Plan (2021)

The London Plan establishes the strategic framework for growth across Greater London and places significant emphasis on increasing housing delivery, optimising site capacity through a design-led approach and making the best use of brownfield land.

Of particular relevance to the proposals are:

### Policy GG2 – Making the Best Use of Land

This policy seeks to optimise the capacity of sites through a design-led approach and supports the redevelopment of previously developed land in sustainable locations. The policy encourages higher density development where supported by good design, accessibility and local context.

### Policy GG4 – Delivering the Homes Londoners Need

This policy seeks to increase housing delivery across London and requires boroughs to support proposals that contribute towards meeting identified housing needs.

### Policy H1 – Increasing Housing Supply

Policy H1 requires boroughs to optimise housing delivery through the development of suitable sites and supports proposals that contribute towards London's significant housing needs.

### Policy D3 – Optimising Site Capacity Through the Design-Led Approach

Policy D3 requires development proposals to make the most effective use of land whilst ensuring that site capacity is determined through an assessment of design quality, local context, accessibility, residential quality and environmental impacts.

### Policy D5 – Inclusive Design

Development should be designed to achieve the highest standards of accessibility and inclusivity and ensure that buildings can be used safely and conveniently by all members of society.

### Policy D6 – Housing Quality and Standards

Policy D6 requires all new residential development to provide high-quality accommodation with adequate internal space, outlook, privacy, daylight, ventilation and amenity provision.

### Policy D7 – Accessible Housing

New residential development should provide accessible and adaptable homes capable of meeting changing needs throughout occupants' lifetimes.

### Policy D8 – Public Realm

Development should contribute positively to the quality, accessibility and functionality of the public realm.

#### Policy T4 – Assessing and Mitigating Transport Impacts

Development proposals should ensure that any transport impacts are appropriately assessed and mitigated whilst promoting sustainable travel choices.

#### Policy T5 – Cycling

Development should provide appropriate levels of secure cycle parking and support sustainable travel objectives.

Collectively, these policies support the redevelopment of sustainably located brownfield sites for residential purposes where high-quality design and living conditions can be achieved.

#### Hillingdon Local Plan Part 1 (2012)

The strategic policies of the Local Plan establish the Council's overarching objectives for growth and development across the Borough.

#### Policy PT1.H1 – Housing Growth

Seeks to increase housing delivery across the Borough and supports the provision of new homes within sustainable locations.

#### Policy PT1.BE1 – Built Environment

Requires development to achieve high standards of urban design and contribute positively to local character and distinctiveness.

#### Policy PT1.EM8 – Land, Water, Air and Noise

Seeks to ensure that development appropriately addresses environmental considerations including air quality, contamination, flooding and noise.

#### Hillingdon Local Plan Part 2 – Development Management Policies (2020)

The Development Management Policies provide the primary basis for assessing the acceptability of the proposed development.

#### Policy DMTC1 – Town Centre Development

Supports development that contributes positively to the vitality and viability of designated centres whilst ensuring that proposals are compatible with surrounding uses.

#### Policy DMHB11 – Design of New Development

Requires development to be designed to a high standard and to respond positively to local context, character, scale, massing and appearance.

#### Policy DMHB12 – Streets and Public Realm

Seeks to ensure that development contributes positively to the quality and functionality of the public realm.

#### Policy DMHB16 – Housing Standards

Requires all residential development to provide high-quality accommodation and comply with nationally prescribed space standards and relevant London Plan requirements.

#### Policy DMHB18 – Private Outdoor Amenity Space

Requires residential development to provide appropriate levels of private and communal outdoor amenity space for future occupants.

#### Policy DMH2 – Housing Mix

Seeks to ensure that residential developments provide an appropriate mix of dwelling types to meet local housing needs.

#### Policy DMT2 – Highways Impacts

Requires development to ensure that impacts on the highway network are acceptable and appropriately mitigated.

#### Policy DMT5 – Pedestrians and Cyclists

Supports development that promotes walking and cycling and provides appropriate facilities for sustainable travel.

#### Policy DMT6 – Vehicle Parking

Requires parking provision to be appropriate having regard to site accessibility, local circumstances and London Plan standards.

#### Policy DMEI2 – Reducing Carbon Emissions

Requires development to minimise carbon emissions and support sustainable development objectives.

#### Policy DMEI12 – Development of Land Affected by Contamination

Requires appropriate assessment and mitigation of any contamination risks associated with previously developed sites.

#### Policy DMEI14 – Air Quality

Requires development to minimise impacts on local air quality and ensure appropriate mitigation where necessary.

#### Summary

The Development Plan establishes a strong policy presumption in favour of the redevelopment of sustainably located brownfield sites to deliver additional housing. National, regional and local planning policies collectively seek to optimise land use, increase housing supply, promote sustainable patterns of development and secure high-quality design.

The application site represents an underutilised previously developed site within a sustainable urban location. The proposed development has been designed in response to site-specific constraints, local character and the Council's pre-application advice and seeks to deliver high-quality residential accommodation whilst complying with the relevant requirements of the Development Plan. The detailed assessment set out in the following sections demonstrates that the proposal accords with the objectives of national, London-wide and local planning policy and should therefore be supported.

## Principle of Development

The principal issue in respect of this application is whether the redevelopment of the site for residential purposes represents an acceptable and sustainable form of development having regard to national, regional and local planning policy.

It is considered that the principle of residential development on the site is firmly established and supported by the Development Plan.

The application site comprises previously developed land located within the urban area of Harlington and within the designated Harlington Local Centre. The site is currently occupied by a collection of garages, ancillary structures, hardstanding and service yard areas situated to the rear of an existing mixed-use parade. The proposals therefore seek to optimise the use of an underutilised brownfield site within a sustainable location whilst retaining the existing commercial uses fronting High Street.

At the national level, the National Planning Policy Framework places significant emphasis on making effective use of land and boosting the supply of homes. Paragraph 129 confirms that planning decisions should support development that makes efficient use of land, whilst Chapter 5 seeks to significantly increase the supply of housing. The redevelopment of this previously developed urban site directly accords with these objectives by providing additional housing within an established settlement that is well served by local services, facilities and public transport.

Similarly, London Plan Policies GG2, GG4 and H1 actively encourage the optimisation of brownfield land and support proposals that contribute towards meeting London's acute housing needs. Policy D3 further requires site capacity to be assessed through a design-led approach that balances housing delivery with considerations relating to character, residential quality, accessibility and environmental impacts. The proposals have been developed in accordance with this approach and demonstrate how the site can accommodate additional housing whilst maintaining a high standard of design and residential amenity.

At the local level, Policy PT1.H1 of the Hillingdon Local Plan seeks to increase housing delivery across the Borough, whilst Policy DMTC1 supports appropriate development within designated centres. The site's location within the Harlington Local Centre, together with its sustainable accessibility credentials and brownfield status, makes it particularly suitable for residential redevelopment.

The Council's formal pre-application response under reference 11952/PRC/2022/267 is also a significant material consideration. Importantly, officers did not raise any fundamental objection to the principle of residential development on the site. Rather, the pre-application advice acknowledged the site's potential to accommodate residential redevelopment and focused primarily on matters relating to the scale, density, design, residential quality, amenity provision and parking arrangements associated with the original scheme.

The pre-application proposal sought the erection of a three-storey building comprising nine residential units in a car-free format. In response to the concerns identified by officers, the scheme has been fundamentally reassessed and redesigned. The current proposal now comprises only five residential units, representing a reduction of approximately 44% in the number of dwellings proposed. This substantial reduction in density has enabled significant improvements across all aspects of the development.

The revised scheme provides a more generous layout, improved relationships with neighbouring properties, enhanced private and communal amenity space, better outlook and daylight conditions for future occupiers, dedicated cycle and refuse storage facilities, landscaping enhancements and the provision of on-site parking accessed from Providence Lane. The proposed built form has also been carefully articulated through a combination of single-storey, two-storey and three-storey elements to reduce visual bulk and create a development that responds more appropriately to its surroundings.

It is therefore evident that the current application has been directly informed by the Council's pre-application feedback and represents a significantly improved proposal when compared to the scheme previously reviewed by officers. The concerns identified through the pre-application process have been positively addressed through meaningful design revisions whilst retaining the key objective of bringing forward much-needed housing on a sustainable brownfield site.

The site occupies a highly accessible location within the urban area of Harlington, benefits from proximity to shops, services, employment opportunities and public transport, and does not comprise protected open space, designated heritage assets or land subject to any strategic policy constraints that would preclude redevelopment. The proposal would make efficient use of previously developed land whilst preserving the existing commercial function of the High Street frontage and enhancing the appearance and functionality of the rear portion of the site.

The delivery of five new high-quality homes would provide a clear social benefit and contribute, albeit modestly, towards the Borough's housing targets and London's wider housing needs. The redevelopment of underutilised brownfield land in sustainable locations remains a central objective of planning policy at all levels and substantial weight should therefore be afforded to the housing benefits arising from the proposal.

Accordingly, it is considered that the principle of redeveloping the site for residential purposes is fully supported by the National Planning Policy Framework, the London Plan, the Hillingdon Local Plan and the Council's previous pre-application advice. Subject to detailed consideration of the design, amenity, transport and technical matters addressed elsewhere within this Planning Statement, there is no policy objection to the principle of the proposed development.

## Impact on the visual amenity of the area

The proposed development has been carefully designed having regard to the physical constraints of the site, the character of the surrounding area and the detailed feedback received through the Council's formal pre-application process. It is considered that the proposals would preserve and enhance the visual amenity of the area and would comply with the objectives of Policy DMHB11 of the Hillingdon Local Plan, Policies D3 and D4 of the London Plan and the design objectives of the National Planning Policy Framework.

The application site occupies a constrained backland parcel situated behind the existing mixed-use parade at Nos. 288–306 High Street. The site is currently occupied by a collection of garages, service yard areas, ancillary structures and extensive areas of hardstanding which make a limited positive contribution to the character or appearance of the area. Whilst largely hidden from public views along High Street, the existing site presents a utilitarian and somewhat fragmented appearance which is not reflective of the site's sustainable location within the Harlington Local Centre.

The proposed redevelopment offers an opportunity to replace these low-quality structures with a purpose-designed residential development that makes a significantly more efficient and visually attractive use of the land. The scheme introduces a coherent architectural composition, improved landscaping and a considerably enhanced residential environment whilst respecting the site's physical limitations and relationship with surrounding development.

Particular weight should be afforded to the extensive revisions made following the Council's pre-application advice. The original pre-application proposal sought the erection of a three-storey building containing nine residential units. Through the pre-application process, concerns were raised regarding the intensity of development proposed, the overall scale and massing of the building and the ability of the scheme to provide an appropriate living environment.



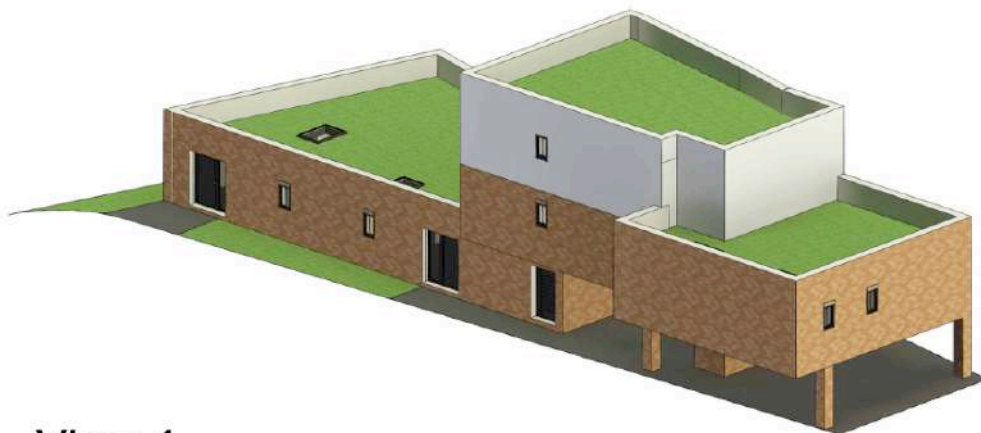
1 View 1



## 6 View 6

In direct response to these concerns, the scheme has been comprehensively redesigned. The number of residential units has been reduced from nine to five, representing a reduction of approximately 44% in residential density. This reduction has enabled a significantly more spacious and better balanced development that responds more appropriately to the site's context and constraints.

The revised building has been broken down into a combination of single-storey, two-storey and three-storey elements, creating a more varied and visually interesting form of development. This approach substantially reduces the perceived bulk and massing of the building when compared to the earlier scheme and assists in integrating the development within its surroundings. The stepping of the building across the site creates a more human scale of development and avoids the appearance of a continuous three-storey structure.



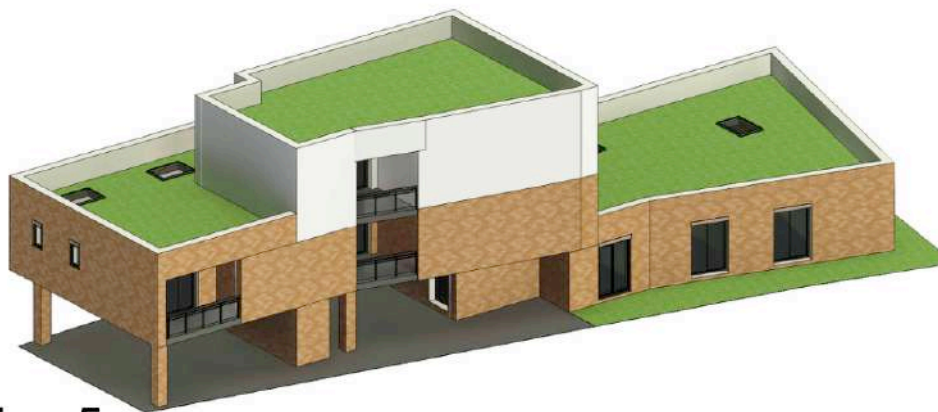
## 4 View 4

The revised layout has also enabled greater separation between built form and site boundaries, increased opportunities for landscaping and improved external amenity provision. As a result, the development achieves a significantly softer and less intensive appearance than the previously proposed scheme. The introduction of private balconies, private amenity areas and communal landscaped spaces further contributes to the overall quality of the development and enhances its visual appearance.

The proposed architecture adopts a contemporary yet restrained design approach which reflects the mixed residential and commercial character of the surrounding area. The building incorporates a clear hierarchy of elevations, carefully proportioned fenestration and variations in roof form which break down the overall mass of the development and create visual interest. The use of high-quality materials and modern detailing will ensure that the completed development presents an attractive and durable appearance.

Importantly, the site is located to the rear of the existing High Street frontage and is therefore not a prominent component of the public street scene. Public views of the development will be limited principally to Providence Lane and the immediate surrounding area. Within these views, the development will be experienced in the context of a varied townscape comprising a mixture of residential buildings, commercial premises, ancillary structures and rear servicing areas. Against this backdrop, the scale and appearance of the proposed building will appear entirely appropriate.

The development also represents a notable visual improvement over the existing situation. The removal of the existing garages, outbuildings and areas of unmanaged hardstanding will eliminate a collection of structures that currently detract from the appearance of the site. Their replacement with a high-quality residential building, associated landscaping and improved boundary treatments will significantly enhance the overall appearance of the land and contribute positively to local townscape character.



5

View 5

The Council's pre-application comments have therefore played a fundamental role in shaping the final design now submitted. The current scheme demonstrates a clear evolution from the original concept and provides a more contextual, less intensive and more visually balanced form of development. The reduction in density, articulation of building form, incorporation of lower elements and enhanced landscaping collectively ensure that the proposal responds appropriately to its

surroundings whilst delivering much-needed housing on a sustainable brownfield site.

Overall, the proposals would result in a substantial enhancement to the visual quality of the site and would make a positive contribution to the character and appearance of the surrounding area. The development accords with the objectives of the National Planning Policy Framework, the London Plan and Policies DMHB11 and DMHB12 of the Hillingdon Local Plan and should therefore be afforded significant weight in the planning balance.

## Quality of the Proposed Accommodation

The proposed development has been designed to provide a high standard of residential accommodation for future occupiers and has been assessed against the requirements of the National Planning Policy Framework (NPPF), the London Plan (2021), the Nationally Described Space Standards (NDSS), and the relevant policies of the Hillingdon Local Plan.

At the national level, Paragraph 135 of the NPPF confirms that planning decisions should ensure developments create places with a high standard of amenity for existing and future users. Similarly, Policy D6 of the London Plan requires all new residential development to provide high-quality living environments that are safe, accessible, adequately sized and capable of meeting the day-to-day needs of occupants. Policy DMHB16 of the Hillingdon Local Plan reinforces these objectives and seeks to ensure that all new housing provides a satisfactory standard of accommodation in terms of internal space, layout, outlook, privacy, daylight, sunlight and external amenity provision.

The proposed development has been specifically designed with residential quality as a primary consideration and represents a significant improvement over the pre-application scheme previously reviewed by the Council. The reduction in the number of units from nine to five has enabled a more generous and spacious layout, resulting in significantly improved living conditions for future residents.

### Internal Space Standards

All proposed dwellings have been designed to meet or exceed the requirements of the Nationally Described Space Standards and Policy D6 of the London Plan.

The proposed accommodation comprises:

- Flat 1 – 2-bedroom, 3-person dwelling – 61.38 sqm
- Flat 2 – 2-bedroom, 3-person dwelling – 61.26 sqm
- Flat 3 – 1-bedroom, 2-person dwelling – 50.37 sqm
- Flat 4 – 2-bedroom, 3-person dwelling – 61.66 sqm
- Flat 5 – 2-bedroom, 3-person dwelling – 66.71 sqm

The Nationally Described Space Standards require a minimum floor area of 61 sqm for a 2-bedroom, 3-person dwelling and 50 sqm for a 1-bedroom, 2-person dwelling. All proposed units therefore comply with or exceed the relevant standards, ensuring that future residents will benefit from appropriately sized living accommodation capable of supporting modern living requirements.

The layouts have been carefully planned to provide functional and efficient living environments, incorporating well-proportioned bedrooms, appropriately sized living, dining and kitchen areas, adequate circulation space and dedicated storage provision.

### Daylight, Sunlight and Outlook

A fundamental component of residential quality is access to natural light and outlook. The proposed development has been designed to maximise opportunities for daylight and sunlight penetration through the careful positioning of windows, balconies and habitable rooms.

All dwellings benefit from direct access to natural daylight and outlook through appropriately sized windows serving principal habitable rooms. Living areas and bedrooms are provided with good levels of natural illumination and ventilation, ensuring healthy and comfortable internal environments.

A Daylight and Sunlight Assessment has been prepared in support of the application in accordance with BRE guidance. The assessment confirms that the development can be accommodated without causing unacceptable impacts to neighbouring properties and demonstrates that the proposed arrangement provides suitable living conditions for future occupants.

The reduction in the scale and density of the scheme since the pre-application stage has also enabled greater separation between buildings and boundaries, further improving daylight access, outlook and the overall quality of accommodation.

### Privacy and Residential Amenity

The layout has been designed to ensure appropriate levels of privacy for future occupiers. Window positions and building relationships have been carefully considered to minimise opportunities for direct overlooking whilst maintaining good levels of outlook and natural surveillance.

The development provides a balanced relationship between private and communal spaces and creates a safe and attractive residential environment. The modest scale of the development further assists in maintaining a comfortable living environment free from undue activity, noise or disturbance.

### Private and Communal Amenity Space

Policy D6 of the London Plan and Policy DMHB18 of the Hillingdon Local Plan seek to ensure that residents have access to adequate outdoor amenity space.

The proposed development provides a combination of private balconies and private ground floor amenity areas together with communal landscaped space. Upper floor residents benefit from dedicated private balconies, whilst ground floor residents have direct access to private external areas. These spaces provide opportunities for recreation, relaxation and outdoor living and contribute positively to the overall residential experience.

The reduction in development intensity from the previous nine-unit scheme has enabled a significant increase in the quality and usability of external amenity space available to residents.

### Accessibility and Inclusive Design

The development has been designed in accordance with the principles of inclusive design and seeks to provide accommodation capable of meeting the needs of a wide range of future occupants.

Access arrangements, circulation spaces and building design have been considered from the outset to ensure compliance with relevant accessibility requirements and the objectives of Policies D5 and D7 of the London Plan.

## Safety and Security

The layout promotes a safe and secure residential environment through active frontages, natural surveillance of communal areas and clearly defined private and communal spaces. Secure cycle storage and refuse facilities are provided, whilst the development also benefits from a clear and legible access arrangement.

The submitted Fire Safety Statement demonstrates that the development can achieve appropriate standards of fire safety and emergency access in accordance with London Plan Policy D12 and Building Regulations requirements.

## Overall Assessment

The proposed development will provide a high-quality residential environment that fully accords with the objectives of the NPPF, Policies D5, D6, D7 and D12 of the London Plan and Policy DMHB16 of the Hillingdon Local Plan.

All dwellings meet or exceed nationally prescribed space standards, benefit from good levels of daylight, sunlight and outlook, provide appropriate privacy, enjoy access to private and communal amenity space and are designed to meet modern standards of accessibility and residential comfort.

Particularly important is the fact that the current proposal has evolved significantly through the pre-application process, with the reduction from nine units to five units enabling a substantial enhancement in residential quality across all aspects of the scheme. The resulting development will therefore provide future residents with an attractive, sustainable and high-quality place to live and represents a clear improvement over the previous scheme considered by the Council.

## Impact on neighbouring properties

A key consideration in the assessment of the application is whether the proposed development would result in any unacceptable impacts upon the living conditions currently enjoyed by neighbouring occupiers. In this regard, the proposal has been carefully designed having regard to the requirements of the National Planning Policy Framework (NPPF), Policies D3 and D6 of the London Plan (2021), and Policies DMHB11 and DMHB18 of the Hillingdon Local Plan.

The Council's pre-application response identified concerns regarding the scale and intensity of the original nine-unit proposal and its potential implications for residential amenity. The current application has been fundamentally redesigned in direct response to that feedback. The number of units has been reduced from nine to five, resulting in a significant reduction in the scale, footprint and intensity of development. The revised scheme therefore represents a materially improved proposal in terms of its relationship with neighbouring properties and the protection of residential amenity.

### Daylight and Sunlight

A detailed Daylight and Sunlight Assessment has been prepared by EAL Consult in accordance with the Building Research Establishment (BRE) publication Site Layout Planning for Daylight and Sunlight: A Guide to Good Practice (2022), which is widely accepted as the industry standard methodology for assessing daylight and sunlight impacts arising from new development.

The assessment specifically considered the potential effects of the development on neighbouring residential properties through the use of Vertical Sky Component (VSC) and Annual Probable Sunlight Hours (APSH) analysis. The report concludes that the proposed development would not result in any significant or unacceptable loss of daylight or sunlight to surrounding residential properties and that the vast majority of neighbouring windows would continue to receive satisfactory levels of natural light following completion of the development.

Importantly, the report confirms that:

*"The assessment of daylight and sunlight to the surrounding residential properties indicates that the proposed residential development will not cause a noticeable change in light levels to most existing occupants."*

The report further confirms that a detailed three-dimensional model of the site and surrounding area was used to assess the relationship between the proposed development and neighbouring buildings in accordance with BRE guidance. Having undertaken this assessment, no unacceptable impacts were identified. The findings therefore provide robust technical evidence that the proposal will preserve acceptable levels of daylight and sunlight to neighbouring occupiers.

The reduction in development density and the introduction of a more articulated building form incorporating single-storey, two-storey and three-storey elements has played a significant role in reducing potential daylight and sunlight impacts when compared to the earlier pre-application proposal.

## Outlook and Overbearing Impact

The proposed development has been designed with careful regard to the site's constrained backland context and the proximity of neighbouring residential properties.

Whilst any new building will inevitably alter existing views from surrounding properties, planning policy does not seek to preserve private views. The relevant consideration is whether the development would appear unduly dominant, overbearing or oppressive when viewed from neighbouring homes and gardens.

The proposed building has been deliberately broken down into a series of stepped elements of varying heights. This approach reduces the perception of scale and bulk and creates a more sympathetic relationship with adjoining development. The inclusion of lower single-storey and two-storey elements adjacent to site boundaries assists in softening the visual presence of the development and reducing any sense of enclosure.

The proposal replaces an assortment of garages, outbuildings and hardstanding with a carefully designed residential building of significantly reduced density compared to the earlier scheme. Given the scale of surrounding development and the urban context of the site, it is considered that the proposal would not result in any unacceptable overbearing effects or material loss of outlook to neighbouring occupiers.

## Privacy and Overlooking

The development has been designed to maintain appropriate levels of privacy between existing and proposed residential properties.

The positioning of windows, balconies and habitable rooms has been carefully considered throughout the design process. The relationship between facing elevations and surrounding properties has been assessed to ensure that opportunities for direct overlooking are minimised. The relatively modest scale of the development, combined with its backland location and separation from surrounding dwellings, assists in preserving privacy for neighbouring occupiers.

It is also important to recognise that the site is located within an established urban environment where a degree of mutual overlooking is characteristic of the surrounding pattern of development. The proposal does not introduce any relationships that would be materially different from those commonly experienced within suburban residential areas.

Accordingly, it is considered that neighbouring occupiers would continue to enjoy acceptable levels of privacy following completion of the development.

## Noise and Disturbance

The proposed use of the site for residential purposes is entirely compatible with the surrounding character of the area, which comprises a mix of residential and commercial uses.

The development introduces only five residential units and therefore represents a relatively modest level of activity. Residential use is generally regarded as one of the least intensive forms of development in planning terms and is unlikely to

generate significant noise, disturbance or activity beyond that ordinarily associated with residential occupation.

Furthermore, the current proposal represents a substantial reduction in density when compared to the nine-unit scheme considered through the pre-application process. As a consequence, the level of activity generated by the development will be significantly lower than previously proposed.

Vehicle movements associated with the development will also be extremely limited. The accompanying Transport Statement concludes that the development would generate only a negligible number of additional vehicle trips and would have no material impact on the local highway network. The modest scale of development therefore ensures that neighbouring occupiers will not experience any unacceptable disturbance arising from traffic movements, servicing activity or day-to-day residential occupation.

### Sense of Place and Residential Environment

The proposal has been designed to create a high-quality residential environment whilst respecting the amenity of existing residents. The removal of the existing garages, ancillary structures and areas of hardstanding will improve the appearance and functionality of the site and remove a number of visually poor quality structures that currently occupy the land.

The introduction of landscaping, defined private amenity areas and improved boundary treatments will enhance the overall character of the site and contribute positively to the residential environment experienced by neighbouring occupiers.

### Overall Assessment

The proposal has evolved significantly since the pre-application stage and directly addresses the concerns raised by officers regarding the scale and intensity of the original scheme. Through a substantial reduction in density, the introduction of a more articulated building form and careful consideration of neighbouring relationships, the current proposal achieves a significantly improved relationship with surrounding properties.

The submitted Daylight and Sunlight Assessment confirms that the development would not result in any unacceptable loss of daylight or sunlight to neighbouring occupiers, whilst the design and layout ensure that issues of outlook, privacy, overlooking, noise and disturbance have been appropriately addressed.

For these reasons, it is concluded that the proposed development would preserve the living conditions of neighbouring occupiers and would comply with the requirements of the NPPF, Policies D3 and D6 of the London Plan and Policies DMHB11 and DMHB18 of the Hillingdon Local Plan.

## Transport

The transport implications of the proposed development have been assessed within the accompanying Transport Statement prepared by Lanmor Consulting Ltd. The assessment considers the accessibility of the site, existing and proposed access arrangements, parking provision, sustainable transport opportunities and the likely impacts of the development upon the surrounding highway network.

The proposed development has been designed in accordance with the requirements of the National Planning Policy Framework (NPPF), London Plan Policies T4 and T5, and Policies DMT2, DMT5 and DMT6 of the Hillingdon Local Plan.

### Site Accessibility and Sustainable Location

The application site occupies a highly sustainable urban location within the Harlington Local Centre and benefits from convenient access to a range of services, facilities and public transport options. The site is situated on High Street, Harlington, where a variety of local shops, services and community facilities are available within easy walking distance. The site also benefits from proximity to employment opportunities, educational facilities and healthcare services, reducing the need for residents to undertake journeys by private car.

The Transport Statement confirms that the site has a Public Transport Accessibility Level (PTAL) of 3, indicating a moderate level of accessibility by public transport. Whilst not located within one of London's highest PTAL areas, the site nonetheless benefits from a range of sustainable transport opportunities and is capable of supporting residential development with a reduced reliance upon private vehicle use.

Hayes & Harlington Station is located approximately 1.5 miles from the site and provides direct access to the Elizabeth Line and National Rail services, offering excellent connectivity to Central London, Heathrow Airport and the wider region. In addition, a number of bus routes operate within close proximity to the site, providing regular connections to Hayes, Heathrow, Southall, Hounslow and surrounding areas.

The Transport Statement demonstrates that the site is accessible by walking and cycling, with continuous footway provision and established cycling routes linking the site to local facilities and transport interchanges. The location is therefore consistent with the objectives of the NPPF and London Plan which seek to direct housing growth towards sustainable locations with access to a range of transport options.

### Access Arrangements

Vehicular access to the proposed development will be provided via Providence Lane, utilising existing access arrangements serving the rear of the site. The proposal does not require any significant alterations to the surrounding highway network and no changes are proposed to the existing High Street frontage.

The Transport Statement confirms that the proposed access arrangements are suitable for the scale of development proposed and can safely accommodate residential traffic, servicing requirements and emergency vehicle access. Refuse collection arrangements have also been designed to ensure that waste can be

collected efficiently without creating obstruction or adverse impacts on the operation of the local highway network.

Pedestrian access will be available via existing routes connecting the development to High Street and the wider area, ensuring convenient and legible access for future residents.

### Parking Provision

The Council's pre-application response identified concerns regarding the original proposal, which sought nine residential units with no on-site parking provision. In direct response to those concerns, the current application has been substantially revised.

The revised scheme provides two dedicated off-street car parking spaces for residents together with secure cycle parking facilities. The provision of parking has been carefully balanced against the site's sustainable location, accessibility to public transport and the need to make efficient use of a constrained brownfield site.

The reduction in the number of dwellings from nine units to five units has significantly reduced parking demand and has enabled an improved site layout that accommodates parking whilst maintaining high standards of residential amenity and landscaping.

The proposed parking provision is therefore considered appropriate for the scale of development and reflects both the site's accessibility characteristics and the objectives of London Plan Policy T6 and Local Plan Policy DMT6.

### Cycle Parking and Sustainable Travel

The proposal includes secure and covered cycle parking facilities for future residents in accordance with London Plan Policy T5 and the London Cycling Design Standards.

The provision of secure cycle storage will encourage cycling as a realistic alternative to private car use and supports wider objectives relating to sustainable travel, health and environmental sustainability.

Given the site's accessibility to local services and public transport, the development is particularly well placed to support sustainable travel patterns and reduce dependence upon private vehicles.

### Highway Impact and Traffic Generation

The Transport Statement assesses the likely traffic generation associated with the proposed development and concludes that the scheme will result in only a negligible increase in traffic movements on the surrounding highway network.

The development comprises only five residential units and therefore represents a modest addition to the local housing stock. The anticipated vehicle trip generation associated with the proposal is extremely low and will not place any material pressure upon local roads or junctions.

Importantly, the Transport Statement concludes that the development will have no significant adverse impact upon highway capacity, highway safety or the efficient

operation of the surrounding transport network. The development is therefore entirely consistent with paragraph 116 of the NPPF, which confirms that development should only be refused on transport grounds where there would be an unacceptable impact on highway safety or where the residual cumulative impacts on the road network would be severe.

No such impacts arise in this case.

#### Response to Pre-Application Advice

The transport strategy has evolved significantly since the pre-application submission. The original proposal sought nine residential units in a car-free format, resulting in concerns regarding parking provision and the overall intensity of development.

The current proposal directly addresses those concerns through a substantial reduction in the scale of development and the introduction of dedicated on-site parking spaces. The reduction from nine units to five units has significantly reduced the transport demand generated by the development and has enabled a more balanced and policy-compliant approach to parking provision.

The revised scheme therefore responds positively to the issues identified by officers during the pre-application process whilst continuing to promote sustainable travel choices in accordance with local and strategic planning policy.

#### Conclusion

The application site occupies a sustainable and accessible location within the Harlington Local Centre and benefits from convenient access to public transport, local services and active travel opportunities.

The proposed access arrangements, parking provision and cycle storage facilities are appropriate for the scale and nature of the development. The accompanying Transport Statement demonstrates that the proposal will generate only a modest level of additional travel demand and will not result in any unacceptable impacts on highway safety or the operation of the local transport network.

The scheme has been significantly improved since the pre-application stage through the reduction in dwelling numbers and the provision of on-site parking, directly addressing the concerns previously raised by the Council.

Accordingly, the proposal accords with the requirements of the National Planning Policy Framework, London Plan Policies T4 and T5, and Hillingdon Local Plan Policies DMT2, DMT5 and DMT6 and should therefore be supported from a transport and highways perspective.

## Trees and Biodiversity

The proposed development has been assessed against the biodiversity and green infrastructure objectives of the National Planning Policy Framework (NPPF), the London Plan (2021) and the Hillingdon Local Plan.

### Existing Site Conditions

The application site comprises previously developed land situated to the rear of the existing mixed-use parade at Nos. 288–306 High Street. The site is currently occupied by garages, ancillary outbuildings, hardstanding and associated service areas. There are no trees located within the application site and there are no areas of soft landscaping, natural habitat or ecological features that would be affected by the proposals.

The site therefore possesses very limited ecological value and does not provide habitat of any significance for protected species or biodiversity interest. The development does not involve the removal of any trees, hedgerows, grassland, scrub, watercourses or other habitat features.

### Biodiversity Considerations

Chapter 15 of the NPPF seeks to minimise impacts on biodiversity and secure opportunities for biodiversity enhancement wherever appropriate. Similarly, London Plan Policies G5 and G6 encourage urban greening and the protection and enhancement of biodiversity across London.

In this instance, the proposals would not result in the loss of any existing biodiversity resource. The development relates exclusively to previously developed hardstanding and built structures which offer negligible ecological value. As such, there is no loss of habitat and no adverse impact upon biodiversity arising from the development.

The statutory Biodiversity Net Gain provisions introduced through the Environment Act 2021 include exemptions for certain categories of development. Given that the site contains no existing areas of habitat or soft landscaping and the proposal would not result in any measurable loss of biodiversity value, the development falls within the category of development where a detailed Biodiversity Gain Plan and formal Biodiversity Net Gain assessment are not required.

Similarly, having regard to the characteristics of the site and the absence of any existing ecological features, it is considered that a detailed ecological or biodiversity assessment would not be proportionate in this case. The development does not involve the loss of habitats, trees or ecological assets and therefore does not give rise to any biodiversity impacts requiring detailed assessment.

### Trees

There are no trees located within the application site and the development would not require the removal, pruning or alteration of any trees either on-site or adjoining the site boundaries.

Accordingly, the proposal raises no arboricultural concerns and fully accords with the objectives of Policy DMHB14 of the Hillingdon Local Plan, which seeks to protect trees and other landscape features of amenity value.

## Biodiversity Enhancements

Whilst there is no requirement for a formal Biodiversity Net Gain assessment, the proposed development nevertheless provides opportunities for environmental enhancement when compared to the existing situation.

The redevelopment of the site will remove a collection of redundant garages, outbuildings and areas of unmanaged hardstanding and replace them with a higher quality residential environment incorporating landscaping and planting opportunities. The introduction of soft landscaping, ornamental planting and associated green infrastructure will improve the appearance of the site and provide a modest enhancement in ecological value relative to the existing baseline condition.

The development therefore accords with the wider objectives of the NPPF and London Plan by ensuring that the site is developed in an environmentally responsible manner and that opportunities for biodiversity enhancement are incorporated wherever reasonably practicable.

## Conclusion

The application site comprises previously developed land containing no trees, soft landscaping or habitats of ecological significance. The proposal would not result in the loss of any biodiversity resource, protected habitat or arboricultural feature and would therefore have no adverse impact upon biodiversity interests.

Given the absence of habitat loss and the negligible ecological value of the existing site, the proposal is exempt from the requirement for a formal Biodiversity Net Gain assessment and a detailed biodiversity appraisal is not considered necessary or proportionate.

The development fully accords with the biodiversity and landscape objectives of the National Planning Policy Framework, the London Plan and the Hillingdon Local Plan and raises no concerns in respect of trees, ecology or biodiversity.

## Flood and Drainage

The proposed development has been assessed against the requirements of the National Planning Policy Framework (NPPF), London Plan Policies SI12 and SI13, and Policies DMEI9, DMEI10 and DMEI11 of the Hillingdon Local Plan.

The principal considerations are whether the site is at risk of flooding, whether the development would increase flood risk elsewhere and whether appropriate surface water drainage arrangements can be secured.

### Flood Risk

The application site is located within Flood Zone 1, as identified by the Environment Agency Flood Map for Planning. Flood Zone 1 represents land having a low probability of flooding from rivers or the sea, with an annual probability of flooding of less than 0.1%.

The proposed residential development is classified as a "More Vulnerable" land use under the Planning Practice Guidance Flood Risk Vulnerability Classification. Residential development is fully compatible with Flood Zone 1 and is directed towards such locations through the sequential approach established by the NPPF.

As the site is located within Flood Zone 1 and the proposed development comprises a minor residential development on previously developed land, there are no in-principle flood risk constraints affecting the suitability of the site for residential use.

The Council's pre-application response also confirmed that the site lies within Flood Zone 1 and raised no objection to the principle of residential development on flood risk grounds.

### Surface Water Flood Risk

The site is currently occupied by garages, ancillary structures and extensive areas of hardstanding. Consequently, the existing site is already substantially impermeable in nature and does not provide any meaningful natural infiltration function.

The proposed development will replace these existing built structures and hard surfaced areas with a carefully designed residential development incorporating landscaping and modern drainage infrastructure. As a result, the redevelopment provides an opportunity to improve the management of surface water runoff when compared to the existing situation.

The development will be designed in accordance with the principles of sustainable drainage and current drainage design standards. Surface water generated by the development will be appropriately managed and attenuated before discharge, ensuring that runoff rates are controlled and that the proposal does not increase flood risk either on-site or elsewhere within the catchment.

### Sustainable Drainage

National and local planning policy encourages the incorporation of Sustainable Drainage Systems (SuDS) into all new development wherever practicable.

The redevelopment of the site provides an opportunity to incorporate modern drainage measures which are considerably more effective than the arrangements associated with the existing garages and hardstanding. Detailed drainage design will be secured through the development process and will ensure that surface water is managed in accordance with the requirements of the Lead Local Flood Authority and relevant drainage standards.

The proposals will therefore comply with the objectives of London Plan Policy SI13, which seeks to minimise runoff, reduce flood risk and promote the use of sustainable drainage techniques.

### Foul Water Drainage

The proposed residential units will connect to the existing public foul drainage infrastructure serving the surrounding urban area.

Given the modest scale of the development, comprising only five residential units, it is not anticipated that the proposal will place any undue pressure on the existing foul drainage network. The development is therefore capable of being satisfactorily served by existing drainage infrastructure.

### Sequential and Exception Tests

Paragraphs 170 to 175 of the NPPF require a risk-based approach to flood risk through the application of the Sequential Test and, where necessary, the Exception Test.

The site is located within Flood Zone 1, which represents the lowest category of flood risk and is the preferred location for all forms of development, including residential development. As a consequence, the proposal is entirely consistent with the aims of the Sequential Test.

Furthermore, as the site lies within Flood Zone 1, there is no requirement for the Exception Test to be applied.

### Planning Balance

The proposed development represents the redevelopment of an underutilised brownfield site within an established urban area. The site is located within an area of very low flood risk and the development will not expose future occupants to unacceptable flooding hazards.

The proposal will not increase flood risk elsewhere and provides an opportunity to improve the management of surface water runoff through the introduction of modern drainage infrastructure and sustainable drainage principles.

The redevelopment of the site therefore accords with the objectives of the National Planning Policy Framework, London Plan Policies SI12 and SI13 and Policies DMEI9, DMEI10 and DMEI11 of the Hillingdon Local Plan.

### Conclusion

The application site is located within Flood Zone 1 and is therefore at the lowest risk of flooding. The proposed residential use is entirely appropriate in flood risk

terms and complies with national policy objectives directing vulnerable development towards areas of lowest flood risk.

The development will not increase flood risk either on-site or elsewhere and will be served by appropriate foul and surface water drainage infrastructure. Sustainable drainage principles will be incorporated into the detailed design of the development to ensure effective management of runoff and compliance with current drainage standards.

Accordingly, there are no flood risk or drainage constraints that would justify withholding planning permission and the proposal fully accords with the relevant national, regional and local planning policies.

## Carbon Reduction and Sustainability

The proposed development has been designed having regard to the objectives of the National Planning Policy Framework (NPPF), the London Plan (2021) and the Hillingdon Local Plan, all of which seek to support sustainable patterns of development, improve energy efficiency and contribute towards the reduction of carbon emissions.

At the national level, the NPPF recognises that the planning system has a key role in supporting the transition to a low-carbon future and encourages developments to minimise energy consumption, reduce greenhouse gas emissions and utilise resources efficiently. Similarly, London Plan Policies SI2 and SI3 establish a clear framework for improving energy performance and reducing carbon emissions from new development, whilst Hillingdon Local Plan Policy DMEI2 seeks to ensure that developments contribute towards carbon reduction objectives and sustainable construction principles.

### Sustainable Location

One of the most significant sustainability credentials of the proposed development is its location. The application site comprises previously developed brownfield land situated within the established urban area of Harlington and within the designated Harlington Local Centre. The site benefits from access to a range of shops, services, employment opportunities and public transport facilities within walking distance, reducing the need for private vehicle use and supporting sustainable travel patterns.

The accompanying Transport Statement confirms that the site benefits from a Public Transport Accessibility Level (PTAL) of 3 and is served by local bus routes, pedestrian connections and cycling infrastructure. Hayes & Harlington Station, served by the Elizabeth Line and National Rail services, is also accessible from the site. The redevelopment of this underutilised brownfield land therefore represents a sustainable form of development in accordance with national and local planning objectives.

### Efficient Use of Previously Developed Land

The proposal makes efficient use of an underutilised urban site currently occupied by garages, outbuildings and hardstanding. The redevelopment of previously developed land is strongly supported by the NPPF and London Plan Policy GG2, which seek to optimise the use of land within existing urban areas and reduce pressure for development on greenfield sites.

By delivering five new homes within a sustainable location, the development contributes towards housing delivery objectives whilst making efficient use of existing infrastructure and services.

### Energy Efficiency

The proposed building will be constructed in accordance with current Building Regulations, including the latest energy efficiency requirements contained within Approved Document L.

The development will incorporate modern methods of construction, high-performance insulation, energy-efficient glazing, low air permeability standards and efficient heating and hot water systems. These measures will significantly

improve energy performance when compared to older building stock and will assist in reducing operational energy demand and associated carbon emissions throughout the lifetime of the development.

The compact form of the building and efficient internal layouts further contribute towards reducing energy consumption and improving overall environmental performance.

### Sustainable Design Measures

The proposals incorporate a range of design principles that contribute towards the sustainability of the development.

The building has been designed to maximise natural daylight to habitable rooms, reducing reliance on artificial lighting during daylight hours. The accompanying Daylight and Sunlight Assessment confirms that the development provides good levels of natural illumination to future occupiers, thereby supporting both residential quality and energy efficiency objectives.

The development also incorporates secure cycle storage facilities, encouraging sustainable travel choices and reducing dependence on private vehicles. The provision of on-site cycle parking aligns with London Plan Policy T5 and supports broader environmental objectives relating to carbon reduction and air quality improvement.

The redevelopment of the site additionally provides opportunities for landscaping enhancements when compared to the existing condition of the site, which is currently dominated by garages and hardstanding.

### Climate Change Resilience

The proposed development has been designed to provide a resilient and adaptable form of development capable of responding to future climate conditions.

Modern construction standards, improved building fabric performance and enhanced thermal efficiency will assist in maintaining comfortable internal temperatures throughout the year whilst reducing energy demand. The development will also benefit from modern drainage infrastructure designed to manage surface water effectively and respond to increasingly variable weather conditions.

These measures contribute towards the wider climate resilience objectives contained within the London Plan and the NPPF.

### Air Quality

The redevelopment of the site for residential purposes represents a low-intensity use that is compatible with the surrounding area. The modest scale of the development, combined with its sustainable location and access to public transport, will help minimise transport-related emissions.

The reduction in development intensity compared to the original pre-application scheme is also relevant in this regard. The current proposal comprises five residential units rather than the previously proposed nine units, resulting in a lower level of activity and associated transport demand.

The development therefore supports the objectives of Policy DME14 of the Hillingdon Local Plan and London Plan Policy SI1 in seeking to improve air quality and reduce environmental impacts.

### Overall Sustainability Benefits

The proposal delivers a number of clear sustainability benefits including:

- The redevelopment of previously developed brownfield land within an established urban area;
- Delivery of five new homes in a highly sustainable location;
- Efficient use of existing infrastructure and services;
- Reduced reliance on private vehicle travel through access to public transport and cycling facilities;
- Compliance with modern energy efficiency standards;
- Reduced operational carbon emissions compared to older building stock;
- Improved site appearance and environmental quality;
- Enhanced climate resilience through modern construction and drainage design.

### Conclusion

The proposed development represents a sustainable form of development that aligns with the environmental, social and economic objectives of sustainable development set out within the NPPF.

The redevelopment of this underutilised brownfield site will deliver high-quality housing within a sustainable location whilst incorporating modern energy-efficient construction standards, supporting sustainable travel patterns and reducing future carbon emissions. The proposal therefore accords with the objectives of the National Planning Policy Framework, London Plan Policies SI1, SI2 and SI3 and Policy DME12 of the Hillingdon Local Plan.

When considered as a whole, the development makes a positive contribution towards sustainable growth within the Borough and should be afforded significant weight in the planning balance.

## Fire Safety

A Fire Safety Statement has been prepared in support of the application in accordance with the requirements of London Plan Policy D12 and accompanies the planning application.

The proposed development has been designed to incorporate appropriate fire safety measures from the outset and will be constructed in accordance with the requirements of Approved Document B of the Building Regulations and relevant fire safety standards. The submitted Fire Safety Statement confirms that suitable access for fire appliances can be achieved via Providence Lane and that the development can be safely serviced by the Fire and Rescue Service.

The building incorporates a protected communal staircase, appropriate compartmentation between residential units, smoke detection systems and suitable means of escape for all occupants. An Automatic Opening Vent (AOV) will be provided to the communal stairwell to assist with smoke ventilation, whilst all dwellings will be fitted with modern fire detection and alarm systems in accordance with current Building Regulations.

Given the modest scale of the development, comprising only five residential units, the fire safety strategy is straightforward and proportionate to the nature of the proposal. The accompanying Fire Safety Statement demonstrates that the development can be safely occupied and managed and that all relevant fire safety requirements can be satisfactorily achieved.

Accordingly, the proposal complies with the objectives of London Plan Policy D12 and relevant Building Regulations requirements and raises no concerns in respect of fire safety.

## Conclusion

This Planning Statement has been prepared in support of a full planning application for the erection of a part three-storey, part two-storey and part single-storey residential building comprising five self-contained flats together with associated parking, cycle storage, refuse storage, landscaping and access arrangements on land to the rear of Nos. 288–306 High Street, Harlington.

The application site comprises previously developed land occupied by garages, ancillary structures and hardstanding areas which currently make a limited contribution to the character, appearance or functionality of the area. The proposals present an opportunity to redevelop this underutilised brownfield site and deliver five high-quality new homes within a sustainable urban location whilst retaining the existing commercial and residential uses fronting High Street.

The principle of residential development on the site is strongly supported by the National Planning Policy Framework, the London Plan and the Hillingdon Local Plan. The site occupies a highly sustainable location within the Harlington Local Centre and benefits from good access to local services, employment opportunities and public transport infrastructure. The redevelopment of previously developed land for residential purposes directly supports national and local objectives relating to housing delivery, urban regeneration and the efficient use of land.

Importantly, the current application has been directly informed by the Council's formal pre-application advice. The original scheme proposed nine residential units and concerns were raised regarding the scale, density and overall intensity of development. In response, the proposals have been fundamentally redesigned and reduced to five residential units, resulting in a significantly improved scheme that addresses the issues identified by officers whilst retaining the benefits associated with bringing forward additional housing on a sustainable brownfield site.

The revised development provides a high standard of design and residential accommodation. All dwellings meet or exceed the Nationally Described Space Standards, benefit from good levels of daylight and outlook, and are provided with private and communal amenity space. The scale and massing of the development have been carefully considered and broken down through a combination of single-storey, two-storey and three-storey elements, ensuring that the building sits comfortably within its surroundings and avoids any undue visual prominence.

The supporting technical assessments demonstrate that the proposal can be accommodated without giving rise to any unacceptable impacts. The submitted Daylight and Sunlight Assessment confirms that neighbouring occupiers will not experience any significant loss of daylight or sunlight. The Transport Statement demonstrates that the development will have no material impact on highway safety or the operation of the local transport network, whilst appropriate parking and cycle storage facilities are provided. There are no arboricultural or biodiversity constraints affecting the site, the development is located within Flood Zone 1 and suitable drainage arrangements can be secured. The submitted Fire Safety Statement further confirms that the development can be designed and operated safely in accordance with London Plan requirements.

The proposal will also deliver wider public benefits through the removal of poor-quality garages and ancillary structures, the enhancement of the site's appearance, the introduction of landscaping and the provision of much-needed housing within an accessible and sustainable location.

When assessed against the Development Plan as a whole, the proposal represents sustainable development that accords with the objectives of the National Planning Policy Framework, the London Plan and the Hillingdon Local Plan. There are no adverse impacts that would significantly or demonstrably outweigh the substantial benefits arising from the redevelopment of this underutilised brownfield site.

For all of the reasons set out within this Planning Statement and the accompanying technical reports, it is respectfully concluded that planning permission should be granted.