

Planning Statement

5-6 Firs Walk, Northwood

Relating to site at
5-6 Firs Walk, Northwood, London, HA6 2BZ
June 2020



hghconsulting.com

Contents

1.0 Introduction	3
2.0 Site and Surroundings	5
3.0 Planning History	7
4.0 Proposed Development	10
5.0 Relevant Planning Policy	11
6.0 Planning Assessment	12
7.0 Design and Access	16
8.0 Conclusions	18
Appendix 1: List of Relevant Planning Policy	19

1.0 Introduction

- 1.1 This Planning, Design and Access Statement has been prepared by hgh Consulting on behalf of Gavacan Homes ("the Applicant"). It accompanies an outline planning application for a residential development at No. 5-6 Firs Walk, Northwood, NW6 2BZ.
- 1.2 The development proposal concerns the:
- "Replacement of existing building (No.5 Firs Walk) with x3 2 storey houses and associated access and parking and installation of vehicular crossover"***
- 1.3 The application is made in outline, with approval sought for means of access only. Matters relating to layout, scale, appearance and landscaping are reserved.
- 1.4 The application follows a recent outline planning application (ref: 30837/APP/2019/3096) made for a similar scheme comprising the same number of houses but with two separate access points (from Firs Walk and Foxdell, respectively). This planning application has yet to be determined by the London Borough of Hillingdon ('the Council'). It also follows an appeal (ref: APP/R5510/W/19/3222609) on a larger site which also included No.6 Firs Walk and land to the rear of 25 Dene Road. The appeal scheme was for 6 detached houses, following the demolition of Nos. 5 & 6 Firs Walk. It was dismissed in July 2019.
- 1.5 The proposal has been informed by the dismissed appeal and by comments received by the Council's officers on planning application ref: 30837/APP/2019/3096. The details of this are set out in Chapter 6 where it is explained how this revised submission has dealt with the comments raised by the Inspector and the Council's officers. Importantly, the appeal Inspector did not raise any objections to the principle of redeveloping the site.
- 1.6 This statement will set out how the proposal is consistent with local and national planning policy. In particular, it will demonstrate that the proposal fully respects the character and appearance of the surrounding area and would not result in harm to the living conditions of future or existing occupants.

Structure of Planning Statement

- 1.7 The remaining sections of this Statement are set out as follows:
- **Section 2** describes the site and the surrounding area;
 - **Section 3** identifies the relevant planning history of the site and surrounding area;
 - **Section 4** describes the proposed development;
 - **Section 5** identifies the Development Plan and other material planning considerations;
 - **Section 6** contains a planning assessment against the relevant adopted planning policy and other material planning considerations;
 - **Section 7** forms the Design and Access component of the statement and sets out the design approach; and
 - **Section 8** provides a summary of the assessment and concludes on the appropriateness of the proposal.

Planning Documents

1.8 This Statement draws from and should be read in conjunction with the accompanying plans:

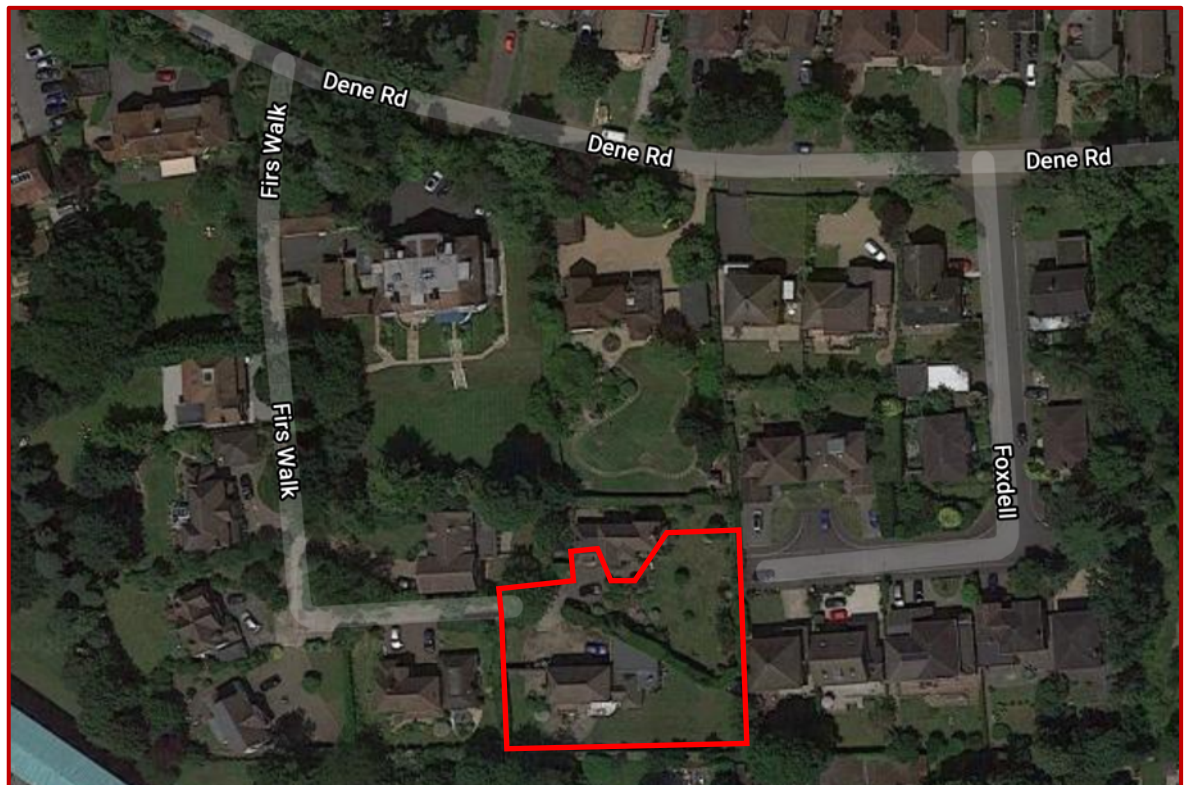
- Site Location Plan (ref: 19-2752-LP);
- Indicative Site Layout Plan (ref:19-2752-100_RevE) (non-coloured and coloured); and
- Details and measurements of vehicle crossover (ref: 19-2752-03_RevA).

2.0 Site and Surroundings

The Appeal Site

- 2.1 The site comprises No.5 and the driveway and part of the garden of No.6 Firs Walk. Combined, the two plots form a large, broadly regular shape, which is 0.175 hectares (ha) in area. The plots are separated by a hedgerow boundary running diagonally from south east to north west. No.6 is situated to the north of the site with No. 5 located to the south.

Figure 1: Site edged in red



- 2.2 The site is currently accessed from Firs Walk which is a cul-de-sac that slopes down from Dene Road, before turning sharply to access No. 5 and No. 6 via a shared entrance. The properties occupy the two largest plots between the two sub-character areas of Firs Walk and Foxdell. They are by far much greater in size and layout than any of the others on the two cul-de-sacs. They are, therefore, something of an anomaly that do not belong to either sub-area. Other than the No. 5 Firs Walk building, the site itself is relatively open with few natural features of note.
- 2.3 The surrounding area is characterised by detached residential dwellings of varying plot size. To the west, the properties in Firs Walk are generally larger and set within relatively generous plots. To the east, dwellings are accessed from Foxdell, which is also a cul-de-sac, comprising newer houses. The plots here are more regularly sited and smaller with tighter spatial relationships. The two cul-de-sacs, which are both accessed from Dene Road, therefore create separate residential enclaves within defined sub-character areas.
- 2.4 In its wider context, the appeal site is located within a defined urban area. The site falls outside of the Dene Road Area of Special Local Character (ASLC) which lies immediately to the north of No. 6 Firs Walk and includes the properties on Dene Road.

- 2.5 The appeal site does not fall within any planning designation. Its flood risk level is low probability (Flood Zone 1).

Figure 2: Extract from LBH Policy Map (2020)



3.0 Planning History

Site Planning History

3.1 The site's planning history relevant to this planning application is summarised below.

Application Ref: 30837/APP/2019/3096

3.2 *'Erection of 3, detached, 4-bed dwellings with associated parking and amenity space and installation of vehicular crossover (involving demolition of 5 Firs Walk'*

3.3 The outline planning application with all matters reserved except for access was submitted in October 2019 and has yet to be determined. The proposal is different to this application in that two separate accesses (from Firs Walk and Foxdell respectively) are proposed (see layout below). Otherwise, the quantum and indicative plot layout is the same.

3.4 Comments received from officers during its determination have related to the 'development rhythm' not being consistent with Firs Walk and objection to the status of the development; interpreting it as either backland development or residential garden development. The Applicant contests this latter point.

Figure 3: Indicative Site Layout under Ref: 30837/APP/2019/3096



Application Ref: 73874/APP/2018/2107 & Appeal Ref: APP/R5510/W/19/3222609

- 3.5 *'Demolition of 5 & 6 Firs Walk, 6 No. new dwellinghouses with associated car parking, new access arrangements from Foxdell and removal of existing access from Firs Walk at No's 5 & 6 Firs Walk and land to the rear of No. 25 Dene Road (Outline application with some matters reserved).'*
- 3.6 The outline planning application with all matters reserved except for access and layout was appealed for non-determination reasons and the appeal dismissed on 22 July 2019. The proposal was different to that under this application in that both No. 5 and No. 6 were proposed for demolition and replaced with 6 new dwellings. A single point of access, via Foxdell, was proposed, however, as with that of the current proposal.

Figure 4: Site Layout under Ref: 73874/APP/2018/2107



- 3.7 The Inspector dismissed the appeal on two grounds:
1. Impact on the character and appearance of the area; and
 2. The effect of the proposal on the quality of life of future occupants.

- 3.8 On ground 1, the Inspector found that the *“proposed new houses would be more cramped on their plots than their neighbours, especially in terms of their appearance in the street scene. That factor would be reinforced by the regularity and uniform spacing of the plot frontages as proposed, especially along the southern frontage of the new road.”* (Paragraph 12).
- 3.9 At paragraph 13, the Inspector also commented: *“It is recognised that the planning application was made only in outline but the illustrative drawings show that the development would introduce a significant building bulk into the locality and that the streetscene would have a much more built up appearance. The numbers proposed and the likely building bulk overall would create an overpowering element in the streetscene and would detract from the character and appearance of the locality.”*
- 3.10 In relation to ground 2, the Inspector’s concerns related to the relationship between the proposed new road and turning head to habitable windows in one of the new houses (plot 1). He concluded: *“The cramped and overly developed nature of the scheme in its setting also generates an unsatisfactory relationship between the proposed new road and future residents. The access road and turning head that are shown to be required to serve a development of the size proposed would be of a significant scale. In consequence, the new turning head would be close to windows of habitable rooms in one of the new houses (Plot 1), causing undue disturbance to the occupants.”*
- 3.11 The manner by which the current proposal meets these comments is set out within Chapter 6 of this statement.
- 3.12 Importantly, the Inspector accepted the principle of the site’s redevelopment for housing whilst he did not interpret the proposal to be either backland or residential garden development.

4.0 Proposed Development

The Proposed Development

- 4.1 This outline planning application is for:
- “Replacement of existing building (No. 5 Firs Walk) with x3 2 storey houses and associated access and parking and installation of vehicular crossover”*
- 4.2 The application is for all matters reserved except for access.
- 4.3 The proposal requires the demolition of No. 5 Firs Walk to make way for the proposed three plots. Part of the existing garden of No. 6 Firs Walk is required to enable the access and delivery of Plot 3. The loss of this part of the garden will be compensated by the provision of new garden space to the rear of No. 6. This will be achieved by altering the rear boundary to utilise some garden space currently in the ownership of No. 25 Dene Road. Therefore, a good level of private amenity space will be maintained for No. 6 Firs Walk.
- 4.4 The proposed access comprises an extension of the Foxdell cul-de-sac into the site. A vehicle turning head is proposed just to the east of No. 6 Firs Walk. The proposed plots comprise private driveways to accommodate parking to the front. A reconfigured driveway and parking area are also incorporated into the scheme for benefit of No.6 Firs Walk.
- 4.5 Although the matter of layout is reserved, an indicative site layout plan (ref: 19-2752-100_RevE) is submitted (in coloured and non-coloured format). This demonstrates that the site has sufficient capacity to accommodate the proposed 3 units without the amenity of the retained No. 6 Firs Walk or existing neighbouring properties being compromised. It also shows that the proposed access is workable.

5.0 Relevant Planning Policy

Development Plan

- 5.1 Section 38(6) of the Planning and Compulsory Purchase Act (2004) as amended requires planning applications to be determined in accordance with the Statutory Development Plan unless material considerations indicate otherwise.
- 5.2 The Statutory Development for the site comprises:
- a) The London Plan (2016);
 - b) The Hillingdon Local Plan: Part 1- Strategic Policies (2012);
 - c) The Hillingdon Local Plan: Part 2- Development Management Policies (2020); and
 - d) The Hillingdon Local Plan: Part 2- Site Allocations & Designations (2020).
- 5.3 For the purposes of this Statement, the Hillingdon Local Plan Parts 1 and 2 are collectively known as the 'Local Plan' unless otherwise stated.
- 5.4 A table summarising the relevant planning policies is attached at **Appendix 1**.

Other Material Planning Considerations

- 5.5 The following are also important material planning considerations:
- National Planning Policy Framework (2019) (NPPF); and
 - The draft New London Plan (DNLP) – Intend to Publish Version (December 2019) (and inclusive of SoS Direction March 2020).

National Planning Policy Framework (2019)

- 5.6 The NPPF sets out the Government's overarching national strategic planning objectives and forms a material consideration in the planning process.
- 5.7 At the centre of the adopted NPPF is a presumption in favour of sustainable development which involved seeking positive improvements in the quality of the built, natural and historic environment, as well as people's quality of life including:
- Making effective use of land;
 - Achieving well designed places; and
 - Widening the choice of high-quality homes.

6.0 Planning Assessment

6.1 This section sets out the justification and assessment of the proposed scheme within the context of the relevant planning policy and guidance and other material considerations. The key planning considerations relevant to the proposed development are:

- Principle of development;
- The impact of the proposal on the character and appearance of the surrounding area;
- Impact on living conditions of existing and future residents; and
- Access and parking provision.

Principle of development

6.2 Policy 3.4 of the London Plan requires that residential developments achieve the maximum possible density commensurate with the character and context of the local area. The application site falls within a defined urban area where there are no objections to the principle of additional residential dwellings. It is a suitable site for the development proposal.

6.3 The site is sustainably located and its redevelopment to provide additional dwellings (net increase of two) receives strong support from local and national policy guidance. This is demonstrated as follows:

- NPPF paragraph 68 recognises that small sites can make an important contribution to meeting the housing requirement of an area and that LPAs should support the development of windfall sites by “...*giving great weight to the benefits of using suitable sites within existing settlements for homes.*”
- NPPF paragraph 118(c) states that planning decisions should give substantial weight to the value of using suitable brownfield land within settlements for homes.
- NPPF paragraph 122(c) states that planning decisions should support development that makes efficient use of land by taking account of the identified need for different types of housing and the availability of land suitable for accommodating it.
- Draft New London Plan Policy GG2 (Making the best use of land) requires the enablement of brownfield land and utilisation of small sites and applying a design-led approach to establish optimum capacity, inter alia, to create successful sustainable places.
- Draft New London Plan Policy H1 (Increasing housing supply) requires LBH to deliver 10,830 new homes over a ten year period from 2018/19 and to optimise potential delivery on suitable and available brownfield sites through sources such as small sites.
- Draft New London Plan Policy H2 (Small sites) requires LBH to pro-actively support well-designed homes on small sites in order to, inter alia:
 - significantly increase the contribution of small sites to meeting London’s housing needs;
 - support small housebuilders; and
 - achieve the minimum ten-year targets for small sites set out in Table 4.2 (for LBH this is 2,950 or 295 per annum).

- Local Plan Part 1 Policy H1 (Housing Growth) commits the Council to meeting and exceeding its minimum strategic dwelling requirement which is 425 dwellings per annum up to 2021 (which is rolled forward up to 2026).
- Local Plan Part 2 Policy DMH1 (Safeguarding Existing Housing) resists the loss of existing self-contained housing unless the housing is replaced with at least equivalent residential floorspace.
- Local Plan Part 2 Policy DMH2 (Housing Mix) requires the provision of a mix of housing units of different sizes to reflect the Council's latest information on housing need. This currently indicates a high need for larger, family sized units.

6.4 The proposal does not amount to either backland development or residential garden development. The site is currently occupied by a detached building, which will be demolished in order to open up its development capacity. Therefore, Policy DMHB 6 does not apply.

The impact of the proposal on the character and appearance of the area

6.5 The revised layout seeks to overcome the concerns raised by the appeal Inspector relating to the impact on the character and appearance of the area as well as comments made by the Council's officers over the 'development rhythm' of planning application (Ref: 30837/APP/2019/3096).

6.6 The principal policy concerning this matter is Local Plan Policy DMHB11: Design of New Development. The part relevant to the application is:

"A) All development, including extensions, alterations and new buildings will be required to be designed to the highest standards and, incorporate principles of good design including:

i) harmonising with the local context by taking into account the surrounding:

- *scale of development, considering the height, mass and bulk of adjacent structures;*
- *building plot sizes and widths, plot coverage and established street patterns;*
- *building lines and setbacks, rooflines, streetscape rhythm, for example, gaps between structures and other streetscape elements, such as degree of enclosure;..."*

6.7 The proposal successfully overcomes concerns by:

- Relating to a smaller site area. No. 6 Firs Walk now will be retained and the development proposal no longer takes in part of the rear garden of No. 25 Dene Road. Accordingly, no part of the site falls within the ASLC which lies to the north of the site, beyond No.6 Firs Walk.
- The number of dwellings on the part of the site currently occupied by No.5 (i.e. to the south of the access) has been reduced from 4 to 3 dwellings. This significant reduction in built form enables a far more spacious layout to be provided which closely reflects the character and spacing of adjoining dwellings. The proposed 3 dwellings would be spaciouly located within their plots, with generous separation distances between the dwellings themselves and to side boundaries. As such, the proposal would introduce less building bulk into the locality and the dwellings would not be an overpowering element in the street scene. The proposed new dwellings would assimilate into the street scene and would fully respect the character and

appearance of the surrounding area. In addition, the proposal would introduce less hard surfacing within the site layout.

- The single access point from Foxdell extends the sub-character area of the cul-de-sac, which is dominated by smaller, uniformed plots, than those along Firs Walk. The building line has also been aligned with that of the Foxdell properties to the east. This addresses officers' comments regarding 'development rhythm' by making the scheme consistent with the Foxdell character.

- 6.8 In terms of density, Policy DMHB17: Residential Density of the Local Plan requires all new residential development to take account of the Residential Density Matrix contained in Table 5.2, with supplementary text caveating that the standards can be applied flexibly. The appeal site falls within PTAL 2 and is located in a suburban area. Regardless of the matrix category that it might fall in (other non-town centre area or residential areas with suburban character within 800m of a town centre), the corresponding density range for detached houses is 35-50 per hectare (ha).
- 6.9 The site area is 0.175ha per the redline. The proposed three properties within this area equates to 17 units per hectare. When taking account of the extended rear boundary to No. 6 Firs Walk and bringing this property into the equation, the site area is approximately 0.25 ha. Four plots located within this area equates to 16 units per hectare. Either density is nearly half of the lower end of the density range promoted by the Local Plan's density matrix. Taking account of the policy's caveat that flexibility should be applied by reflecting the character context, the scheme's density is appropriate for the site.
- 6.10 The revised proposal would therefore respect the character and appearance of the surrounding area in terms of its layout. Matters relating to the layout, scale, appearance and landscaping would be for future determination at the reserved matters stage. The proposal would comply with Policy BE1, DMHB11 and DMHB17 of the Local Plan as well as Policies 3.4, 3.5, 7.1 and 7.4 of The London Plan 2016, insofar as they require development to be of a high quality and to respect local context and the character and appearance of the surrounding area.

Living conditions

- 6.11 The indicative site layout shows that the living conditions of the future occupiers of the dwellings will not be harmed.
- 6.12 Policy DMHB11: Design of New Development Part B states:
- "Development proposals should not adversely impact on the amenity, daylight and sunlight of adjacent properties and open space."*
- 6.13 In relation to the dismissed appeal scheme, the Inspector identified a conflict between the access road and turning head in relation to habitable room windows on plot 1. No new dwellings are now proposed on the northern side of the access, with No.6 Firs Walk retained. A new turning head is proposed, which will run near to the eastern elevation of No. 6 Firs Walk. This part of the property is not occupied by living space and is of sufficient distance from the vehicle turning head such that adverse amenity impacts will not occur.
- 6.14 The Inspector did not raise any concerns relating to the living conditions of the occupiers of existing dwellings in relation to the appeal proposal. This has also been accepted by the Council's officers

under planning application 30837/APP/2019/3096. The scheme in that instance shows the building line of integral garages to be slightly further forward and marginally breaching the 45 degree line rule for the neighbouring property at Foxdell. In this proposal, the front and rear elevations of the proposed dwellings would be in line with the adjacent dwellings to the west and east. The 45 degree rule thus will be fully respected by the layout of the proposed buildings and would not give rise to any material harm with regard to light or outlook.

- 6.15 The proposed development would not result in harm to the living conditions of existing residents or the future occupants of the houses and complies with Policies DMHB11 of the Local Plan, which seeks to protect amenity.

Access and parking provision

- 6.16 All plots will be served off a single access off Foxdell. This is an established formal and adopted road layout, more appropriate to the proposed scheme and is a direct extension to Foxdell. It should be noted that the neither the Council nor the appeal Inspector raised any concerns with the previous scheme where 6no. dwellings were proposed to be accessed from Foxdell.
- 6.17 Each dwelling will be provided with garaging and driveway parking for 2 vehicles. This accords with the adopted standards of the Local Plan in Table 1 of Annex C per Policy DMT6: Vehicle Parking, which requires 2 spaces per dwelling.

7.0 Design and Access

- 7.1 **Use:** The use of the site remains unchanged (i.e. Use Class C3 - residential).
- 7.2 **Amount:** The application site currently comprises 1 dwelling. This proposal provides for 3 dwellings (net increase of two) making effective use of urban land. Based on the site area of 0.175ha, the proposed 3 dwellings amount to 17 units per hectare.
- 7.3 **Layout:** The site has a broadly rectangular shape. The proposed new dwellings would be sited so that their main two storey front and rear elevations are broadly level with the adjoining houses to the west (in Firs Walk) and to the east (in Foxdell). The proposal fully respects the street scene in this regard. The forward projecting garages would be single storey and would not be unduly prominent or harmful to the street scene. Generous spacing between the proposed dwellings and to the side boundaries of the site is proposed. The spatial separation and the plot sizes reflect other properties in the immediate vicinity, particularly along Foxdell. It can therefore be said the proposed scheme also reflects the development rhythm of Foxdell

Proposed Site Layout

Figure 5: Proposed Indicative Site Layout



- 7.4 Each dwelling would be provided with a private rear garden area, commensurate with the size of the dwellings proposed and those existing properties along Foxdell. The indicative garden sizes are; 171 sqm for Plot 1, 183 sqm for Plot 2 and 199 sqm for Plot 3.

- 7.5 All plots will be accessed from Foxdell. Parking is proposed to be located within integral garages and driveway parking.
- 7.6 Ample space exists within the site layout for additional landscaping to be provided.
- 7.7 **Scale and Appearance:** The application seeks outline planning permission with only means of access to be formally determined at this stage. Scale and appearance are reserved for future determination. However, the dwellings will be designed to be of an appropriate scale and appearance having regard to local context and the prevailing character and appearance of the surrounding area.
- 7.8 **Landscaping:** The landscaping of the site is also reserved for future determination. However, it is evident from the proposed site layout that ample space exists within the site for new landscaping to be provided.
- 7.9 **Access:** All plots will be served off a single access off Foxdell. This is an established formal road layout, more appropriate to the proposed scheme and can be seen as a direct extension to Foxdell.
- 7.10 Each dwelling will be provided with a private driveway with garaging and surface parking spaces.

8.0 Conclusions

- 8.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 (as amended) requires applications for planning permission to be determined in accordance with the development plan, unless material considerations indicate otherwise. This Planning, Design and Access Statement has assessed the proposed development against the Development Plan and other material planning considerations including the Draft New London Plan.
- 8.2 The outline planning application has been submitted with all matters reserved, except for access.
- 8.3 The proposal has been informed by comments from the Inspector of the appeal dismissed in July 2019 (ref: APP/R5510/W/19/3222609) and from the Council officers on the outstanding planning application proposal (ref: 30837/APP/2019/3096). The key matters between those proposals were impact on the character of the area, specifically relating to respecting the street scene and 'development rhythm' of adjacent plots, and protecting the living conditions of the existing and future residents. The proposal successfully addresses these issues and thus is in a position that is acceptable in Planning terms.
- 8.4 The principle of the development was accepted by the appeal Inspector and has been demonstrated in this statement to have robust policy support. By making better use of the site area and optimising the development capacity with a density that is appropriate to the local character, a net addition of two family-sized dwellings will be gained. It is recognised in the Local Plan that larger dwellings are in need in the borough.
- 8.5 The planning application is in accordance with the Development Plan and other material planning consideration and should therefore be supported.

Appendix 1: List of Relevant Planning Policy

Policy	Description
The London Plan (2016)	
Policy 3.3	Increasing Housing Supply
Policy 3.4	Optimising Housing Potential
Policy 3.5	Quality and Design of Housing Developments
Policy 3.8	Housing Choice
Policy 5.3	Sustainable Design and Construction
Policy 6.13	Parking
Policy 7.1	Lifetime Neighbourhoods
Policy 7.4	Local Character
The Draft New London Plan – Intend to Publish (December 2019)	
GG2	Making the Best Use of Land
GG4	Delivering the Home Londoners Need
Policy D1B	Optimising Site Capacity through the design-led approach
Policy D2	Delivering Good Design
Policy D3	Inclusive Design
Policy D4	Housing Quality and Standards
Policy H1	Increasing Housing Supply
Policy H2	Small Sites
Policy H10	Housing Size Mix
Policy T6.1	Residential Parking
The Hillingdon Local Plan Part 1: Strategic Policies	
H1	Housing Growth
BE1	Built Environment
The Hillingdon Local Plan Part 2: Development Management Policies	
DMH1	Safeguarding Existing Housing
DMH2	Housing Mix
DMHB11	Design of New Developments
DMHB12	Streets and Public Realm
DMHB17	Residential Density
DMHB18	Outdoor private amenity space
DMT2	Highways Impacts
DMT6	Vehicle Parking

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