



# Planning Statement

2 Sandy Lodge Way, Northwood

August 2024



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## 1.0 INTRODUCTION

- 1.1 This Planning Statement has been prepared by hgh Consulting on behalf of Gavacan Homes ('the applicant') in support of a Full Planning Application for development at 2 Sandy Lodge Way, Northwood, HA6 2AJ ('the site'). The site is identified in Figure 1 below.

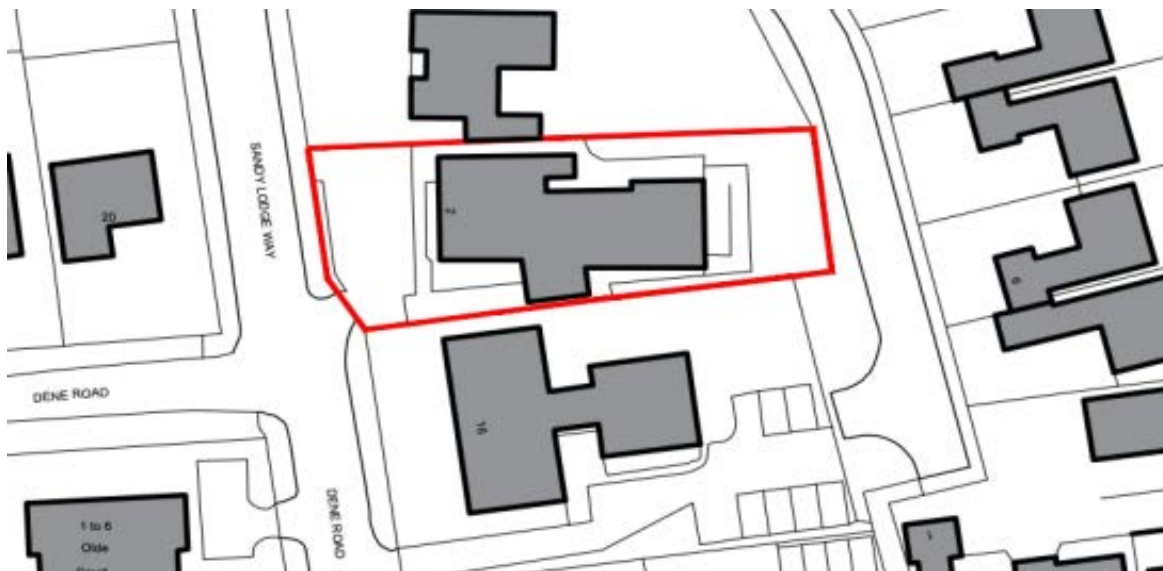


Figure 1: Site Location Plan

- 1.2 The proposed development comprises the demolition and replacement of the existing building with a two-storey building with accommodation in the roof space, comprising six high quality self-contained flats, six car parking spaces, associated bin and cycle stores and landscaping.
- 1.3 This planning application follows the refusal of a previous application (ref. 34035/APP/2023/3544) at the site, for the same number of units, under the following description of development:

*“Demolition of the existing building. Erection of a 2.5 storey building comprising six flats with associated parking, cycle and bin storage, and landscaping.”*

- 1.4 The original application was refused for the following reasons:
- (a) The development by reason of its depth, size, bulk, design, crown roof, massing, materials, bin store location, balconies and roof terrace would be harmful to the character and appearance of the area and visual amenities of the street scene.
  - (b) The development would result in visual intrusion and an unacceptable real and perceived loss of privacy and overlooking of neighbouring occupiers by way of the rear terrace and balconies.
  - (c) The development by virtue of its failure to provide an adequate provision of private external amenity space, outlook, daylight/sunlight would have a harmful effect on the living conditions of future occupants.

- 1.5 Within the revised proposals, the external appearance of the scheme has been amended to address the reasons for refusal that relate to design and the impact of the proposal on the character of the area, as well as alterations to the internal floorplans to improve the residential amenity of neighbouring and future occupiers, and the living conditions of the future occupiers.
- 1.6 This Planning Statement provides an assessment of how the revised scheme has addressed the reasons for refusal of the original scheme, as well as how the current scheme complies with the Development Plan and other material planning considerations. The submission is accompanied by the following documents:
- Existing and Proposed Floor Plans and Elevations (Ascot Design);
  - Applications Forms (hgh Consulting);
  - Design and Access Statement (Ascot Design);
  - Daylight and Sunlight Assessment (Love Design Studio);
  - Arboricultural Impact Assessment and Plans (Arbol EuroConsulting);
  - Surface Water Management Report (Flo Consulting);
  - Preliminary Ecology Survey and Bat Potential Roosting Assessment (Three Shires Ecology); and
  - Biodiversity Net Gain Metric (Three Shires Ecology).

#### **Structure of Statement**

- Section 2 details the site and surroundings;
- Section 3 provides details of the sites planning history and how the revised scheme has addressed the reasons for refusal / officer comments;
- Section 4 summarises the main details of the proposed development;
- Section 5 outlines the relevant planning policy context to assess the proposed development;
- Section 6 provides an assessment of the proposed development against the refused scheme, Development Plan and Other Material Planning Considerations; and
- Section 7 concludes with the merits of the proposed scheme.

## 2.0 SITE AND SURROUNDINGS

### The Site

- 2.1 The total area of the site is c. 0.11 ha and is located within the London Borough of Hillingdon ('LBH') (Figure 2)



*Figure 2: Aerial view of the site indicated in red*

- 2.2 The site is located on Sandy Lodge Way, which is an established residential area in Northwood. It is currently occupied by a 2.5 storey vacant, former care home and includes a rear extension. The property contains parking to the front and a garden to the rear. The site has two existing vehicular and pedestrian points, provided via Sandy Lodge Way to the north and Dene Road to the south, to allow vehicles to enter and exit the site.

### Surrounding Area

- 2.3 The surrounding area is not defined by a single type of architecture or typology; it has a mixed vernacular comprising detached and semi-detached dwellinghouses and blocks of flatted development. Of note, is the nearby flatted developments to the south which is 2.5 storeys in height and to the west which is 3 storeys in height. The dwellinghouses in the vicinity are typically 2.5 storeys in height.



*Figure 3: Example flatted developments to the south and west of the site*

- 2.4 The site is also in proximity to Green Lane District Centre (0.3 miles south), which has a number of shops and services. Northwood Underground Station is also located here. Local health facilities are available nearby and Mount Vernon Hospital lies approximately 1 mile to the west.

### Planning Designations

- 2.5 The site is designated as ‘white land’ within the LBH policies map, which means that the site has no designations within the local plan. It is located to the east of the Area of Special Local Character. As illustrated in Figure 4, it is considered that the boundary of the site is outside of the ASLC designation. This was confirmed in the officer’s assessment of the original / refused scheme.





*Figure 4: Extract from LBH's Planning Policy Map*

- 2.6 The site has a PTAL rating of 2 (with 6b being 'best') and is located within Flood Zone 1 with a 'very low' chance of yearly surface water flood risk.
- 2.7 The site is not located in a Conservation Area or located near any listed or locally listed buildings.

### 3.0 PLANNING HISTORY

- 3.1 The site’s planning history relates to two principal applications (i) an application for a new front porch and disabled access which was refused in April 2000, and (ii) more notably, the refusal of the previous residential scheme for 6 homes (ref. 34035/APP/2023/3544) on 28 March 2024.
- 3.2 The refused residential redevelopment scheme was for:

Demolition of the existing building. Erection of a 2.5 storey building comprising six flats with associated parking, cycle and bin storage, and landscaping.
- 3.3 The refused development had three reasons for refusal, which include:
  - The development, by reason of its depth, size, bulk, design, crown roof, massing, materials, bin store location, balconies and roof terrace, would be harmful to the character and appearance of the area and the visual amenities of the street scene which is located on the edge of the Dene Road Area of Special Local Character.
  - The development, by reason of the siting and close proximity of the rear terrace and balconies to neighbouring properties would result in visual intrusion and an unacceptable real and perceived loss of privacy and overlooking of neighbouring occupiers.
  - The development, by virtue of its failure to provide an adequate provision of private external amenity space, outlook and daylight/sunlight would have a harmful effect on the living conditions of the future occupants.
- 3.4 Following a review of the officer’s delegated report, the scheme has been amended to respond to the officer’s comments and the reasons for refusal. Each comment has been outlined below, alongside a response stating how the comments have been addressed in the current application.

LB Hillingdon comment	How scheme has addressed LB Hillingdon Comments
Residential amenity	
The glass screens enclosing the balconies on the rear elevation measure 1.1 m in height and given the elevated position of the balconies at first floor and roof level, future occupiers of these flats would be provided with outward views towards adjacent neighbours, resulting in overlooking and loss of privacy.	<p>The revised scheme has significantly reduced the depth of the balconies, as well as proposing additional planting on the side elevations.</p> <p>The Officer’s report stated that the proposed screening provided by the landscaping could not be relied upon to provide all year-round screening however, within the report the design officer commented:</p>



<p>The proposed screening from the landscaping cannot be relied upon to provide all year-round screening.</p>	<p><i>‘Incorporating planter depth at sensitive balcony edges and introducing dense vegetation along the plot boundaries is encouraged and can help somewhat mitigate some of the overlooking issues’.</i></p> <p>Both of these design features have been implemented into the scheme.</p> <p>Additionally, it is noted that the Council did not consider that the 1.1 m height screens to the front of the balcony would mitigate against any overlooking due to them being made of glass.</p> <p>In response, the design / materials of the balcony have been amended to comprise brick and metal railings which will limit the ability for overlooking, combined with the increased height and opaque 1.8 m high screens to each side of the balcony. The combination of these design amendments and planters will safeguard residential amenities of neighbouring properties.</p>
<b>Character and appearance</b>	
<p>Proposed crown roof would be out of character with the property types that exist in the area.</p>	<p>A crown roof study has been undertaken on page 10 of the Design and Access Statement which indicates that crown roofs are a common feature for flatted development in the surrounding area. Further detail is provided in the ‘Character and Appearance’ section of this Planning Statement.</p>
<p>The dormers proposed on the side and rear elevations are not considered to be modest in scale and appear incongruous and bulky and detract from the design and appearance of the building.</p>	<p>The dormers have been removed from the side elevations in response to officer’s comments.</p> <p>The dormer window to the rear remain, however, the window will have minimal visibility from the street scene when viewed from Woodridge Way.</p>

The bulk and massing of the flat roof two storey rear wing appears disjointed and awkwardly sited to the corner of the rear elevation. The first floor rear element would occupy the majority of the rear elevation and appears bulky and at odds against the rear proportions of the new building.	The first floor rear element follows the broad footprint of the existing rear extension however, it is much improved in appearance and has been reduced in depth when compared to the existing.
The two storey rear element would be covered by a crown flat roof which would relate poorly to the character of the proposed building and the surroundings. The harm is exacerbated by the unsympathetic and visually incongruous balconies and terraces which are considered to detract from the design and appearance of the building and the visual amenity of the wider area including Woodridge Way.	As stated previously, crown roofs are not uncommon in the near vicinity of the site.  The design of the balconies has been amended and the glass element has now been removed. Instead, the balconies consist of metal railings and solid brick walls which is more complementary to the materials used on the main building, as well as the surrounding area.
It creates a rear elevation that is dominated by poorly designed fenestration that is rather busy with the level of glazing disproportionate and not in keeping with the established character.	In response to the officer's comments, the glass element of the balconies has been removed, and the balconies have been replaced with a mixture of brick and metal railings, which are more in keeping with the area. This design feature was suggested by the Council's design officer at page 7 of the officer's report.
Use of modern red brick is considered to be an unacceptable choice of exterior material	In response to the officer's comments, the red brick has been replaced with brown brick which is more in keeping and tone with the typology and colour of the wider character of the area.
<b>Quality of accommodation for future occupiers</b>	
Query the outlook afforded to the primary living accommodation of Unit 6 and bedroom 2 in unit 1 of the lower ground floor flat.	The internal layout of the building has been amended to provide unit 6 as a duplex apartment, with the second floor being occupied by a bedroom, dressing room and bathroom.

	<p>Bedroom 1 of unit 6 looks out towards the terrace and the living room looks out to the balcony. Therefore, the primary living space of unit 6 will receive an improved outlook.</p> <p>While both bedrooms in units 1 and 2, and one bedroom in unit 6 will look out onto lightwells, the design of the lightwells has been considered by the applicant and it is proposed that they will be landscaped to improve the outlook of the bedrooms (see page 15 of the DAS).</p> <p>This approach has been considered acceptable by the Council in an application at Tormead, 27 Dene Road (ref. 9043/APP/2022/2490) whereby two bedrooms looked out onto a lightwell as the only window serving the bedrooms.</p> <p>The lightwell also featured landscaping to improve the outlook for future occupiers which was considered to be an acceptable mitigation measure. A consistent approach should be applied to this revised scheme by the Council and in the context of §129(c) of the NPPF (flexibility regarding DLSL in making best use of land)</p>
<p>Due to the extensive depth and footprint of the building and the poorly conceived design, it is apparent that future occupiers would not be provided with satisfactory daylight/sunlight and the development would not accord with BRE guidance.</p>	<p>The internal layout of the building has been amended, as well as other design features, which include increasing window size and maximising the distances between the lightwell wall and the building façade, which in turn has improved the internal daylight/sunlight results of each unit, compared with the refused scheme, and now meet the requirements of the BRE guidelines. Further details are provided in the 'Internal Amenity' section of this report and the accompanying Daylight &amp; Sunlight Assessment prepared by Love Design.</p>

<p>The location of the bin stores is not considered to be suitably sited and does not appear discreet in the street scene. The current location of the bin stores is considered to detract from the visual amenity of the street scene.</p>	<p>The location of the bin store is unable to move due to the fact that it would exceed the recommended distances for residents and drag distances to move their bins to the street to be collected by refuse operators. The design of the bin store has been improved, as a means of design mitigation, whereby it now proposes a green roof to blend into the surrounding verdant character of the area. Additional screening has also been proposed to the front of the property to assist in screening the store in the street scene.</p>
<b>Private amenity space</b>	
<p>The 3-bed flat would have very limited amenity space for a family sized unit. Access to the amenity garden area to the rear of the site would appear impractical for the majority of occupiers of the development as there is no direct access. Access to the rear garden area is worsened by the fact that the rear amenity garden reads as being part of the lower ground floor flat.</p>	<p>The three-bedroom flat would contain a private balcony measuring 11 sqm, which is in accordance with the amenity space requirements of the London Plan.</p> <p>The rear garden area is proposed to be a communal amenity space for all six flats. It is proposed that the lower ground floor flats will be able to access the communal garden via a gated entrance from each of the private sunken terraces at the rear of units 1 and 2.</p> <p>The remainder of the flats will access the communal garden area via a pathway at the side of the property, which also provides access to the shared cycle store.</p>

#### 4.0 PROPOSED DEVELOPMENT

4.1 This Planning Application concerns the demolition of the existing property with a replacement building of up to 2.5 storeys, comprising six self-contained flats with associated parking, cycle and bin storage, and landscaping.

4.2 A summary of the proposed development is provided below.

##### **Proposed Development**

- Redevelopment of property to provide 6 self-contained flats to provide 5 x 2 beds (4 person) and 1 x 3 bed (5 person) unit; and
- The units will all be M4(2) compliant.

##### **Design and Appearance**

- 2.5 storeys in height; and
- Design and materials to reflect the surrounding context.

##### **Amenity**

- All units will exceed minimum floorspace requirements and private and communal amenity space; and
- All units will be dual aspect.

##### **Access, Parking and Servicing**

- Retain the single vehicular access point from the south and removal of the access point to the north;
- Provision of six car parking spaces;
- Provision two bikes per unit, and a total of 12 cycle parking spaces; and
- Provision of waste storage.

## 5.0 PLANNING POLICY CONTEXT

5.1 The statutory Development Plan for LBH comprises:

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

5.2 For the purposes of this statement, the Hillingdon Local Plan Parts 1 and 2 are collectively known as the 'Local Plan' unless otherwise stated.

### Material Planning Considerations

5.3 Other material considerations include:

- The Mayor's Housing Design Standards LPG (2023);
- National Planning Policy Framework (2023) (NPPF); and
- National Planning Practice Guidance (2019) (NPPG).

5.4 The policies relevant to this application are summarised below:

- Policy DMH 2 (Housing Mix);
- Policy DMHB 5 (Areas of Special Local Character);
- Policy DMHB 11 (Design of New Development);
- Policy DMHB 14 (Trees and Landscaping);
- Policy DMHB 16 (Housing Standards);
- Policy DMHB 17 (Residential Density);
- Policy DMHB 18 (Private Outdoor Amenity Space);
- Policy DMCI 1 (Retention of Existing Community Facilities);
- London Plan Policy GG2 (Making the best use of land);
- London Plan Policy GG4 (Delivering the homes Londoners need);
- London Plan Policy H1 (Increasing housing supply); and
- London Plan Policy H2 (Small sites).

## 6.0 PLANNING JUSTIFICATION

6.1 This section considers the extent to which the proposed development accords with the relevant development plan policies and other material considerations. The key matters for assessment are:

1. The Principle of Development;
2. Housing Delivery;
3. Design and Layout;
4. Amenity for Future Occupiers;
5. Neighbouring Amenity;
6. Access, Servicing and Parking;
7. Trees and Ecology; and
8. Drainage.

### The Principle of Development

- 6.2 The principle of residential redevelopment on this site is well established. The NPPF, London Plan and LBH's Local Plan support the redevelopment of brownfield land for residential use in appropriate locations.
- 6.3 Section 5 of the NPPF sets out that the Government is committed to increase the overall level of supply and mix of housing in order to meet local needs. Paragraph 124 supports the development of brownfield and under-utilised land and buildings. Furthermore, Chapter 11 promotes effective use of the land whilst improving the environment. Planning decisions should give substantial weight to the value of using suitable brownfield land.

### Loss of Care Home

- 6.4 The Development Plan does not contain any policies that safeguard existing care homes therefore, the principle of development is considered acceptable.
- 6.5 The latest Annual Monitoring Report (2015-2019) notes that out of conventional housing and non-conventional housing provision, housing for older people has been the most significant contributor to the local housing market. There has been a provision of 257 units between 2015-2018 (latest information available). In addition, Hillingdon's Housing Strategy (2021) states that majority of older people live in general needs as opposed to specialist housing, and most people do not plan to move as they intend to stay in their current home for as long as possible.
- 6.6 It is clear that care home provision is being satisfied in the borough. Therefore, it is not considered that the loss of the care home would be significant or detrimental to the existing supply in the Borough, nor would the loss of the care home lead to a shortfall.



- 6.7 This conclusion is underpinned by the fact that the existing care home being currently vacant and has been since 2020. The latest assessment report by the care quality commission stated that the care home required improvement, which would require significant funding to bring it back into use.
- 6.8 The property is no longer suitable for the provision of a care home and there is no policy safeguarding its exiting use. When considered against other policies in the Plan, its redevelopment for much-needed housing is considered an appropriate replacement.
- 6.9 In the previous application, Officer's also confirmed that the proposed scheme would be acceptable in land use terms. It is also noted that the loss of the existing use as a care home was not a reason for refusal in the previous application and the council consider the loss to be acceptable in this instance. As such the proposal in line with policies DMH1 and DMH4 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020).

### Housing Delivery

- 6.10 London Plan policy H1 states that developments should optimise the potential for housing delivery on all suitable and available brownfield sites. The 10-year housing target for Hillingdon is to provide 10,830 dwellings in a ten-year period (2019/20-2028/29), totalling 1,083 dwellings per year.
- 6.11 The area of land which is the subject of the proposed development is approximately 0.11 ha. It is considered a 'small site' in London Plan policy terms meaning policy H2 applies. 295 homes per annum are required for delivery on small sites in LBH. Policy H2 also seeks LBH to proactively support well designed new homes.
- 6.12 The provision of 5 x 2 beds (4 person) and 1 x 3 bed (5 person) would make a positive contribution towards meeting local housing targets and would be appropriate in this predominantly residential location.
- 6.13 Local Plan policy DMH2 states that the Council require a provision of a mix of housing units of different sizes in schemes of residential development to reflect the Council's latest information on housing need. Hillingdon's latest Strategic Housing Market Assessment (SHMA) identifies a significant need for larger 3+ bed dwellings, particularly in the affordable tenures. In order to address this need, one of the units is family sized and provides three bedrooms.
- 6.14 It is also noted that Officer's found the proposed housing mix (which remains unchanged) acceptable in the previous application. The Officer's report states:

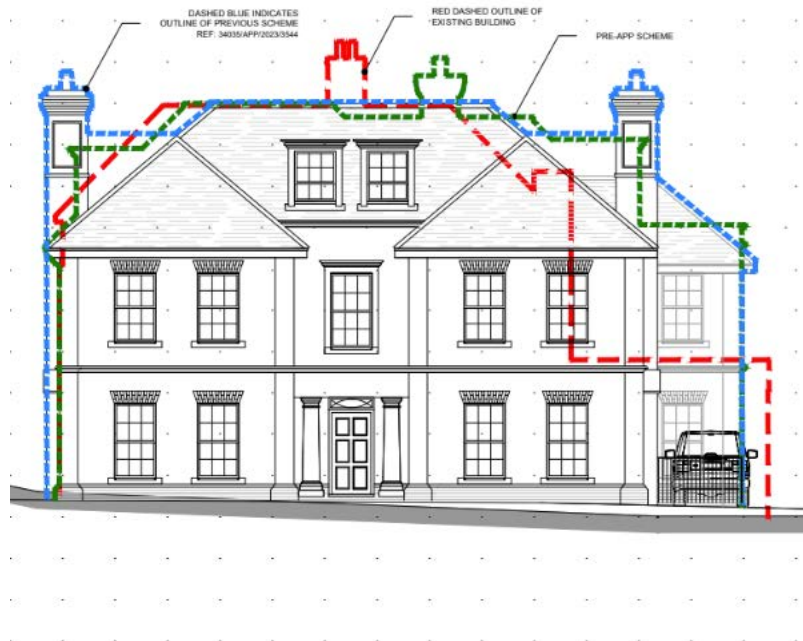
*'The proposal would involve the redevelopment of property to provide 6 self-contained flats to provide a mix of 4 x 2 bedroom, 4 person units, 1 x 2 bedroom, 3 person unit and 1 x 3 bedroom, 5 person unit.'*

*Accordingly, the proposal would be of an appropriate housing mix in accordance with Policies DMH 2 and DMHB 17 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020) and Policy H10 of the London Plan (2021).'*

- 6.15 Additionally, the residential flatted development is appropriate with reference to the site and surrounding context. As outlined in Section 2, the site's context includes notable flatted development to the south and north of the site and dwellinghouse heights of 2.5 storeys. The context therefore sets the precedent in which the proposal reflects.
- 6.16 Furthermore, the development is situated in a sustainable location and makes best use of land, which has the capacity to provide much needed residential development, as opposed to the existing vacant care home.
- 6.17 Overall, the principle of development is supported in this location and in accordance with London Plan policies GG2 and H2 and Local Plan policies H1 and H2.

#### **Design and Layout**

- 6.18 The NPPF notes that good design is a key component of sustainable development and should contribute to making places better for people. It particularly establishes that the Government gives great importance to the design of the built environment and recognises that it is a key aspect of sustainable development and is indivisible from good planning.
- 6.19 These principles are reflected in London Plan policies D4 and D6 and Local Plan policy BE1 and DMHB 11 which seek high quality design in development and require new development to enhance the built environment of local places by considering their physical context, local character, density, tenure, and land mix. Developments should make a positive contribution to streetscape and should incorporate high quality materials and landscaping appropriate to its context.
- 6.20 The design of the proposed development is based on principles of good design. The design has resulted from a detailed review of the site and surrounding context, noting the opportunities and constraints as well as detailed comments within the Officer's report.
- 6.21 The proposal reflects notable and attractive characteristics of the flats at no. 10A in respect of the roof shape, form, and materials, including brown brick walls and white timber windows.
- 6.22 The proposed height is 2.5 storeys which reflects the surrounding built form, and the building will be orientated in a similar location to the original. There is little difference in the bulk and mass of the proposed building when compared to the existing, particularly as the building has a stepped approach at the rear. Similarly, the width of the main 2.5 storey element to the front is broadly similar to the existing (Figure 5).



*Figure 5: Illustration of existing & proposed front elevation width*

- 6.23 The design of the proposed front elevation (Figure 7) has taken positive design features from the existing building (Figure 6), despite the existing building generally not being designed to a high quality.
- 6.24 The proposed development has two front gables which is reflective of the exiting building and neighbouring properties. The proposed development, however, is more elegant in its design approach. Traditional features have been introduced to the building including, sash windows, a feature entrance way and the use of high-quality materials reflective of neighbouring properties, including brown brick walls as recommended by officers in the previously refused applications delegated report.



*Figure 6: Existing image of site*



*Figure 7: Front elevation of proposed development*



6.25 During pre-application engagement and the determination of the previous application, officers raised concerns over the proposed crown roof form. The roof form was reduced in bulk and scale after receiving the pre-application response and was amended to show a hipped roof design with two front gables when viewing the frontage of the building. The roof form is reflective of other existing buildings in the locale including notable properties at nos. 10, 14, 21, and 31 Sandy Lodge Way, to name a few (Figure 8).



*Figure 8: example crown roof forms in the local context of the site*

6.26 The local context is one of mixed architectural styles that reflect their respective construction periods. As such, neighbouring properties demonstrate a range of roof shapes, styles and materials. The proposal has been designed with consideration of the concern raised by council officers. However, the applicant upholds that the crown roof design is not unusual for the area as set out in page 10 of the Design and Access Statement and Figure 8. The crown roof examples listed with the Design and Access Statement are considerably larger than the proposed which is considered to be modest in comparison.



*Figure 9: Proposed Site Plan*

- 6.27 It is noted in the Officer's report that there were concerns regarding the bulk and massing of the flat roof two storey rear wing, with it appearing 'disjointed and awkwardly sited to the corner of the rear elevation'. It was considered that the harm was exacerbated by the 'unsympathetic and visually incongruous balconies and terraces'.
- 6.28 It is considered that the scale and form of the proposed building, including the second-floor extension, is roughly in the same location and orientation as the existing building and complements the existing settlement pattern of development. The design of the extension reflects the character of the main building as opposed to the existing extension, which appears disjointed and out of character when compared to the host building. The proposed extension will also be reduced in length compared to the existing (not including the terraces to the rear) and slightly increased in width at certain parts of the building.

- 6.29 The two-storey element is set back from the main building which ensures that the scale and form of the building is not too overbearing in the context of the street scene. While the building is slightly wider than the existing in some areas, it does not adversely affect the amenity of neighbouring occupiers.
- 6.30 While Officer's noted that properties in the vicinity benefit from two storey rear extensions, they considered that these additions were modest in scale and sit comfortably against the background when viewed along Sandy Lodge Way and Dene Road. However, it is considered that the proposed development does in fact have similar proportions to neighbouring buildings on Sandy Lodge Way and Dene Road, including no. 16 Dene Road as shown in Figure 10 below.



*Figure 10: Proposed development adjacent to no. 16 Dene Road*

- 6.31 Additionally, the majority of the rear extension would not be visible from Sandy Lodge Way or Dene Road due to the fact the width is reduced as the building steps back. The extension would also be largely hidden from view when viewed from Woodridge Way as a result of additional planting proposed to the rear elevation.



6.32 Additionally, the balconies have been redesigned as seen in figures 11 & 12 to comprise a mix of metal railings and brick (as well as removing glass elements) as advised by the design officer within the committee report. The amended balcony design, which is more in keeping with the character of the area, helps to soften the appearance of the rear elevation when viewed from Woodridge Way, although it is considered visibility will be minimal due to planting.



*Figure 11: Illustration of newly proposed balconies*



*Figure 12: Illustration of previously proposed balconies*

- 6.33 The previous iteration and design of the proposal also included two side dormers on either side of the roof and a single dormer to the rear of the property. Officers stated that the roof dormers were overbearing in size and would detract from the design and appearance of the building. In response, the side dormers have been omitted from the updated proposals and the rear dormer has been reduced in width which is considered to address the incongruous and bulky nature of the roof form with a more sympathetic design approach.
- 6.34 The front facing dormers proposed in the previous application have been maintained in this proposal as the Council agreed that these would be suitable additions to the roof given the sites surrounding context:

*“Whilst noting that front facing dormers are not supported by policies within the local plan, there are properties within the vicinity that have undertaken similar works or have original dormers on the front elevations. Therefore, on balance, the proposed front dormers are considered to be acceptable in this instance.”*

- 6.35 In terms of materials, the proposed red roof tiles are considered to be in keeping and compatible with the area as the surrounding area is characterised by red and brown colour tiles. This was accepted by the Council in the refusal scheme (34035/APP/2023/3544) and the roof tiles are therefore maintained in the revised application. The Council raised an objection to the proposed red brick finish of the most recently refused application. Whilst the design of the front elevation remains largely the same, the brick colour has been amended to comprise of brown brick which provides an attractive contrast to the red roof and creates visual interest. This is also considered to be in keeping with the traditional brown brick that is characterised in the local area.



Figure 13: Newly proposed brown brick



*Figure 14: Previously proposed red brick*

6.36 As such, the proposal is in line with the new sustainable development ideals set out in the NPPF, London Plan Policies D4 and D6 as well as Local Plan Policies BE1 and DMHB11

#### Sustainable Design

6.37 The proposed building will also be constructed to reflect a sustainable design approach. To minimise heat loss from the proposed dwelling and to maximise the efficiency, the proposal will incorporate the following:

- (a) Insulated roofs, walls and floors;
- (b) Double glazed windows;
- (c) Ventilation incorporated onto the design to avoid condensation;
- (d) Energy efficient lighting; and
- (e) Good natural daylight to habitable room.

#### **Amenity of Future Occupiers**

##### Internal Layout

6.38 The proposed development has been designed to be of a high quality and the layout has been well designed to ensure an attractive living environment for new residents.

6.39 The development seeks to provide a total of c. 743 sqm of floorspace across the six flats. The proposed units are all in excess of the minimum standards for a 2-bed 4-person unit (70 sqm) and a 3-bed 5-person unit (86 sqm).

- 6.40 All units contain well-sized habitable rooms, providing excellent living accommodation. All units are proposed to be dual aspect, which will have a positive effect on passive ventilation and the daylight and sunlight levels. All units will be M4(2) compliant.
- 6.41 It is also noted that since the refusal of the previously submitted application, two new additional lightwells have been added to the scheme. These are located on the east and west elevation of the building and will allow further light into bedrooms 1 & 2 of units 1 and 2, which are located on the lower ground floor level. These areas are also accessible from the bedrooms and will include landscaped features to improve the outlook of the bedrooms at this level. This will be discussed further from a daylight and sunlight perspective in the 'Neighbouring Amenity' section.

#### External Amenity Space

- 6.42 Policy DMHB 17 outlines that the minimum outdoor amenity provision for 2 bed flats is 25 sqm and for 3+ bedrooms it is 30 sqm. The supplementary note attached to policy DMHB 17 states that dwellings on upper floors should all have access to a private balcony or terrace; communal provision of outdoor space is generally not supported unless the proposed scheme is of high quality with clear planning merits.
- 6.43 London Plan Policy D6 states that a minimum of 5 sqm of private outdoor amenity space should be provided for 1-2 person dwellings and an extra 1 sqm for each additional occupant.
- 6.44 Recognising London Plan Policy D6, every flat will benefit from a balcony or terrace. Balconies will be between 8-11 sqm in size with the terrace at second floor level being 11 sqm and the sunken terraces consisting of 15 sqm. This is acceptable and is in line with Policy D6.
- 6.45 While Policy DMHB 17 states that 20 sqm should be provided per 2-bedroom flat, outdoor communal amenity space will be provided to the rear of the building in addition to the private balconies. The communal amenity space can be accessed via the pathway to the side of the property. While, for units 1 and 2 on the lower ground floor, the garden area can be accessed directly from the private terraces. The garden area is 300 sqm and the balconies comprise a total area of 79 sqm. Therefore, the total amount of combined outdoor amenity space per flat would be 379 sqm, equating to c. 63 sqm per unit.
- 6.46 Within the pre-application response for the original application, Officer's stated that:
- 'The proposed dwelling achieves an acceptable garden area far in excess of 290sqm (including balconies and terraces) for 6 self-contained flats and is there compliant in this respect'*
- 6.47 Additionally, while communal amenity space is generally not supported by LBH, the proposal is of a high design quality with clear planning merits, which include bringing back a vacant site into use and the provision of family sized homes which respond positively to the local context in design terms. The mixed provision of amenity space is clearly satisfactory as it would provide ample outdoor space to benefit future occupiers' health and well-being, which on balance is acceptable.

- 6.48 This approach was considered acceptable by the Council at two nearby consented schemes at Tormead, 27 Dene Road (ref. 9043/APP/2022/2490) and 25 Dene Road (ref. 46479/APP/2021/2039), whereby a mix of private and shared space was provided totalling to over 20 sqm per unit. A consistent approach should be applied to this proposal.

#### Internal Daylight/Sunlight

- 6.49 An assessment of Daylight and Sunlight within the proposed dwellings has been undertaken by Love Design Studio and is submitted in support of this planning application. The study assessed 19 habitable rooms within the proposed development consisting of six living/kitchen/dining rooms and 13 bedrooms.
- 6.50 Noting the reason for refusal in the original scheme (RfR 3), the design of the internal layout has been amended to improve the daylight/sunlight results of the proposed development.
- 6.51 The results from the assessment found that all assessed rooms meet the daylight targets during winter, with only two habitable rooms falling short of daylight targets during the summer. These two habitable rooms are located on the lower ground floor and do achieve more than 40% of the reference plane which is only marginally less than the BRE target of 50%. As these two bedrooms meet the BRE daylight targets during winter, daylight is considered adequate under the BRE guidelines. This approach is in line with paragraph 129(c) of the NPPF 2023 which states:

*“when considering applications for housing, authorities should take a flexible approach in applying policies or guidance relating to daylight and sunlight, where they would otherwise inhibit making efficient use of a site (as long as the resulting scheme would provide acceptable living standards).”*

- 6.52 It should therefore be noted that the BRE is guidance and should be applied flexibly when seeking to make best use of land, particularly on a sustainable, brownfield site.
- 6.53 The assessment also found that all 6 living/kitchen/dining rooms meet the minimum requirement of 1.5 hours of sunlight on March 21, thus meeting sunlight targets.
- 6.54 The development has been designed with future occupiers in mind; the proposals exceed the minimum space requirements, and each unit is provided with private outdoor amenity space that have sufficient levels of daylight and sunlight. The development is therefore considered to be in accordance with paragraph 128(g) of the NPPF (2023) and Local Plan policies DMHB 11, DMHB 17 and BE1.

#### **Neighbouring Amenity**

- 6.55 The NPPF seeks to secure a good standard of amenity for all existing and future occupants of land and buildings. Local Plan Policy DMHB 11 stipulates that development proposals should not have an adverse effect on the amenity, daylight, and sunlight of adjacent properties.



### Daylight and Sunlight

- 6.56 During pre-application engagement with the Council, it was stated that any proposal should be assessed against neighbouring properties to determine whether there would be any adverse effect on the existing levels of daylight and sunlight currently experienced by No. 4 Sandy Lodge Way and No. 16 Dene Road.
- 6.57 The submitted Daylight and Sunlight Assessment in support of this application was prepared by Love Design Studio. This document assesses the neighbouring properties at nos. 16 and 20 Dene Road, 4 Sandy Lodge Way and 7 Woodbridge Way against the BRE Guidelines 2022.
- 6.58 The report confirms that the properties at 20 Dene Road and 7 Woodbridge Road are located at reasonable distances from the application site and were found to meet the BRE's initial 25-degree line test. Therefore, the windows of these properties would not be affected from a daylight and sunlight perspective.
- 6.59 In terms of the neighbouring property at 4 Sandy Lodge Way, all the windows and rooms of the property were found to meet the BRE's Vertical Sky Component (VSC) and Daylight Distribution (DD) tests, therefore a noticeable reduction in daylight would not be experienced by the residents of this property.
- 6.60 With respect to 16 Dene Road, all but two rooms met the BRE guidelines for VSC and DD. The rooms that did not comply are considered to be bathrooms and therefore, are non-habitable rooms which is considered to be acceptable according to the guidelines.
- 6.61 Overall, neither of the two properties assessed would experience a noticeable reduction in daylight or sunlight when assessed in accordance with the BRE guidelines.

### Outlook and Overlooking

#### *Overlooking*

- 6.62 The site is located on broadly the same plot as the existing building; however, the property does not extend as far to the rear, and is slightly increased in width at various points. The proposed development would be slightly closer to no. 16 Dene Road however, the windows on the flank elevation of the proposed development mostly serve non-habitable rooms (i.e. bathrooms) or stairwells. Where they serve a habitable room, this is on the ground floor and will not overlook the neighbouring building due to the existing hedge. Additionally, the proposals would not compromise the 45-degree line of sight from the nearest habitable rooms of the neighbouring properties on either side of the proposed building. This is confirmed and illustrated on the proposed site layout plan. The Officer's report (page 11) for the previous application also confirmed that the nearest first floor rear window to no.4 Sandy Lodge Way would not be impacted by the development as this window serves a shower room and landing.
- 6.63 The two-storey element of the building is also slightly closer to no. 4 Sandy Lodge Way however, this is at the rear of the site and therefore, the area of increased width is not adjacent to the neighbouring building itself. The third storey element of the proposed development would not be any closer to no. 4 to the north. The neighbouring dwelling has an existing garage to the south of the property which prevents the proposed development from overlooking into the side windows of no. 4.

6.64 The proposed balconies have been significantly amended from the previous proposal and are set back further to limit any overlooking and loss privacy concerns to neighbours on either side at No. 4 Sandy Lodge Way and no. 16 Dene Road. Figure 15 provides a side-by-side comparison of the proposed balconies and the balconies in the previously refused scheme (ref: 34035/APP/2023/3544).



*Figure 15: Comparison of proposed and refused balconies (top image: proposed scheme bottom image: refused scheme)*

- 6.65 The balconies will have 1.8m high opaque screens and planter depth which will restrict outlook and access to the end of each side of the balcony respectively. The proposed second floor terrace would benefit from 1.8m high screen and planting around each side of the terrace. The proposals also introduce additional planting along plot boundaries as advised by the design officer within the Officer's report. It is considered that the combination of mitigation measures would address the reason for refusal and eliminate any potential for overlooking to the lower ground floor terrace and private balconies.
- 6.66 A section drawing (Figure 16) has been prepared which illustrates the line of sight from the ground floor balcony. The drawing confirms that the normal level of sight would not intrude upon the private terraces on the lower ground floor. While the maximum line of sight illustrates that the visible element would reach the garden area, this is a communal area and typical of a suburban living environment and natural surveillance.



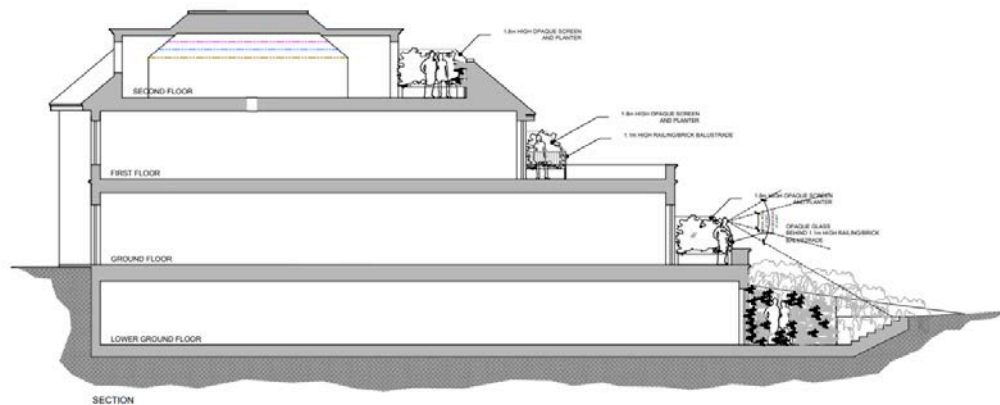


Figure 16: Section drawing

## Outlook

- 6.67 The development is a similar height compared to the existing building therefore, there would be no change in respect of outlook.
- 6.68 As previously mentioned in this Planning Statement, planting has been added to the proposed lightwells to improve the visual amenity at lower ground floor level in response to the previous application, as the council considered the outlook from these units would have substandard outlook for future occupiers. This approach has been found to be acceptable in several recent and local schemes which have been approved, including Tormead, 27 Dene Road (ref. 9043/APP/2022/2490) where two bedrooms looked out onto a lightwell as the only window serving the bedrooms. The lightwell also featured landscaping to improve the outlook for future occupiers which was considered to be an acceptable mitigation measure.
- 6.69 The addition of planting in the lightwells is referenced on page 15 of the Design and Access Statement.
- 6.70 Overall, it is considered that the proposed development would not adversely affect the amenity of neighbours in respect of privacy, overlooking or overshadowing, and in applying a consistent approach to decision making on similar schemes, the proposed development would provide appropriate outlook for future occupiers.

## Access, Parking and Servicing

- 6.71 Local Plan policy DMT 2 states that development proposals must ensure safe and efficient vehicular access to the highways network.
- 6.72 The site is proposed to be accessed via the existing pedestrian and vehicular access on the Dene Road side. The existing car parking spaces will be removed, and replacement parking will be provided to the front of the site.

- 6.73 The existing access point on the Sandy Lodge Way side will be closed off for vehicles however, pedestrian access will remain.
- 6.74 Vehicle tracking plans have been prepared which confirm that vehicles can access the site from the road and are able to park, reverse and turn within the site in a safe and acceptable manner.
- 6.75 It is proposed that small-medium sized delivery vehicles could enter and leave the site in forward gear which is the recommended practice on highway safety grounds. This was supported by the Council's Highways Officer within the pre-app response and was further supported at the application stage, notwithstanding the refusal of the previous scheme.
- 6.76 A bin store will be provided adjacent to the existing vehicle and pedestrian access from Sandy Lodge Way. The bin store will have sufficient capacity for refuse and recycling for the number of units proposed. To improve the design and appearance of the bin store, the store will accommodate a green roof and the addition of planting to the front boundary of the site. Officer's comments which request the relocation of the bin store are noted however, the location of the bin store is optimised in terms of arrangements for drag distance and collection and unable to be accommodated anywhere else on site.

#### Car parking

- 6.77 The relevant car parking standards are those set out in Local Plan policy DMT 6. As per the policy, proposals are to comply with the parking standards set out in Appendix C, Table 1. The maximum parking standards for 1-2 bedrooms is 1-1.5 spaces per unit. The scheme provides six car parking spaces, which is broadly in line with the Hillingdon parking requirements. This same provision was considered acceptable in the Officer's report which stated that the quantum of parking proposed helps to reduce the likelihood for untoward on-street parking displacement resulting from a higher dependency on private cars.
- 6.78 The scheme is also in line with the London Plan requirement for a minimum of 20% of proposed car parking spaces to be 'active' EVCP. The application proposes that 5 of the 6 spaces will be designated as 'active' charging spaces.

#### Cycle Parking

- 6.79 In terms of cycle parking there should be a provision of 1 secure and accessible space per unit for dwellings up to 2-bedrooms in scale as per the Local Plan.
- 6.80 In accordance with the Local Plan and the London Plan, the scheme provides two cycle parking spaces per unit, which is a total of 12 cycle parking spaces.
- 6.81 Overall, it is considered that the proposed access and servicing arrangements are sufficient to accommodate the proposed development. The development proposes sufficient car and cycle spaces in accordance with the London Plan standards, which has been previously accepted by the Council. The development is therefore in accordance with Local Plan policies DMT2, DMT6 and London Plan policies T6.1.

## Trees and Ecology

### Trees

- 6.82 London Plan policy G7 states that development proposals should retain existing trees of value where possible. The policy further states that the planting of additional trees should generally be included within new developments, including large-canopied species.
- 6.83 An Arboricultural Impact Assessment has been prepared by Arbol Euro Consulting which confirms that the proposed development would not require the removal of any trees. However, to allow for the erection of temporary scaffolding, the crown overhang of two trees (T4 and T5) would require some pruning.
- 6.84 Noting the proposals extend to the lower ground floor, the report has assessed the impact of the proposals to the trees on the eastern elevation boundary. The report confirms that due to the fact the proposed lightwell follows the broad footprint of the existing building, it is unlikely that there would be any significant impact on the roots of tree T5.
- 6.85 In addition, new trees and planting are indicatively proposed which are illustrated on the proposed site layout plan. This includes trees and shrubs to the northern and southern boundaries, adjacent to the properties at no. 4 Sandy Lodge Way and no. 16 Dene Road. While providing ecological benefits, the additional planting will also aid in naturally screening the development from neighbouring properties.
- 6.86 The proposed planting will enhance the appearance of the proposed development, which also reflects the verdant nature of the wider area of Northwood, noting the site's location adjacent to the Area of Special Landscape Character.
- 6.87 It is considered that further details of the soft landscaping proposals will be provided and secured by a suitably worded condition.

### Ecology

- 6.88 Local Plan policies EM1 and EM7 state that all development proposals should ensure the protection of biodiversity and aspire to include enhancement measures.
- 6.89 A Preliminary Ecology Report (PEA) and Bat Potential Roost Assessment (BRA) has been prepared by Three Shires Ecology to assess the ecological value of the existing site.
- 6.90 The PEA confirms that the value of the site is limited with negligible habitat value, both alone and in terms of connectivity to the wider landscape. There is limited potential for protected species and therefore the only recommendation in this regard is limited to providing additional planting throughout the site and to provide hedgehog pathways through the fences.
- 6.91 The BRA confirmed that the existing building is considered to be of low potential for roosting bats. The immediate surrounding habitat provides moderate suitability for commuting and foraging, which consists of small urban gardens and some larger trees around 50 m away from the site. A bat emergence survey is currently being undertaken which will be submitted once complete.

### BNG

- 6.92 A Biodiversity Net Gain Assessment has been undertaken by Three Shires. The assessment confirms that the site is considered to have a very low existing biodiversity value. The site would only lose an on-site value of 0.02 mainly consisting of vegetated garden units.
- 6.93 To achieve the required 10% net gain, a total of 0.05 habitat units are required. The applicant proposes to obligate to pay a financial contribution for off-site BNG mitigation via an Environment Bank or local LBH receptor site to ensure that the proposal secures a 10% biodiversity net gain and management for thirty years.

### **Drainage**

- 6.94 London Plan policy SI13 states that development proposals should aim to achieve greenfield run-off and ensure that surface water run-off is managed as close to its source as possible.
- 6.95 Local Plan policy DMEI 10 requires all applications for new build development to include a drainage assessment demonstrating that Sustainable Drainage Systems (SuDS) have been incorporated into the scheme.
- 6.96 A Sustainable Water Management Report has been prepared by Flo Consulting who confirm that the proposed development is located within Flood Zone 1.
- 6.97 The report also assesses all feasible SuDS methods to include within the development. The feasible SuDS methods to be incorporated into the development include living roofs, water butts, permeable paving systems, filter drain systems, a flow control chamber and an attenuation tank in the form of cellular units.
- 6.98 In terms of surface water discharge, surface water will flow towards the eastern boundary and will discharge directly onto Woodridge Way. Flood water will flow away from the development and will not flow into any existing dwellings or buildings prior to discharge to Woodridge Way. Therefore, there will be no increased risk of flooding to areas on or near the site as a result of the proposed development. The development is therefore in accordance with London Plan SI13 and Local Plan DMEI 10.

## 7.0 CONCLUSION

- 7.1 This Planning Statement has been prepared by hgh Consulting and supports the proposed development which comprises the demolition of the existing property to redevelop the site to provide six, high-quality self-contained flats in Northwood.
- 7.2 The proposed scheme has been amended in design terms both internally and externally to address the reasons for refusal of the original application at the site. A summary of the amendments to the scheme to address the reasons for refusal are summarised below:
- (a) Internal changes to the layout have resulted in daylight and sunlight results that meet the BRE Guidelines to habitable rooms.
  - (b) The private amenity space has been clearly marked on the drawings. The scheme provides a mix of private and communal amenity space that is in accordance with the requirements of the London Plan. The provision of six homes, coupled with the high-quality appearance of the communal amenity space is considered to outweigh the marginal under provision of private amenity space.
  - (c) The outlook of the rooms served by lightwells has been improved through the provision of landscaping and planting which taking a consistent approach by the Council has been considered acceptable in other developments in Northwood of a similar nature.
  - (d) The balconies will have 1.8m high obscured glazed screen and have been reduced in depth, size and the materials used will in combination prevent overlooking to neighbouring occupiers. Design features such as planter depth and extensive boundary planting have been used to further mitigate against any overlooking.
  - (e) The design, depth and materials used of the balconies and roof terrace have been amended, as well as the removal of dormer windows to improve the appearance, bulk and scale of the building.
  - (f) Additional planting has been proposed to the front of the property to enhance the visual amenities of the development in the street scene.
- 7.3 The proposed development has been designed to complement the surrounding locale. The many benefits of the proposed development can be summarised as:
- (a) Optimising and makes effective use of a small, brownfield site that is sustainably located in close proximity to Green Lanes District Centre;
  - (b) Provision of six residential units (5x2b4p, 1x3b5p), which will contribute towards the Borough's housing targets;
  - (c) The amended design, layout, built footprint and balcony mitigation measures will ensure that neighbouring amenity in terms of daylight, sunlight and outlook will be safeguarded;
  - (d) Provides a high-quality standard of accommodation, with all dual aspect units, in excess of minimum space standards, and outdoor amenity space, including private balconies and terraces;
  - (e) The new building will be of a higher quality sustainable standard, which includes an increased energy efficient design compared to the existing; and

(f) The access arrangement poses no risk to its safe operation.

- 7.4 To conclude, it is considered that the significant benefits outlined above, notably the provision of six residential units (including one family sized home) on a vacant and redundant brownfield site in close proximity to Green Lanes District Centre is a positive contribution to the Borough's housing targets.
- 7.5 As set out, the scheme has been amended to directly respond to the Council's reasons for refusal and proposes appropriate mitigation measures to address matters of overlooking and privacy of neighbouring occupiers and the outlook of future occupiers. The design of the scheme has been positively amended that will enhance the appearance of the development, which represents a sustainable form of development.
- 7.6 Accordingly, and in the context of the recently published SoS Written Ministerial Statement (July 2024) and draft consultation NPPF (2024) which seeks to positively encourage the delivery of new homes, on previously development 'brownfield' sites that are well designed, which this scheme wholly accords, planning permission should be granted for the proposed development without delay



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