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## **Planning Statement**

**151 Station Road**

**West Drayton**

**UB7 7NG**

Prepared by:  
Kearns Development Ltd  
127 High Street  
Ruislip  
HA4 8JN

T: 01895 200 400  
E: [info@kearns.ltd](mailto:info@kearns.ltd)

## **1. Introduction**

This Planning Statement has been prepared in support of a full planning application for the demolition of the existing bungalow and ancillary buildings at 151 Station Road, West Drayton, and the redevelopment of the site to provide 5 two-storey, three-bedroom dwellings, together with associated landscaping, car parking and cycle storage.

The proposals seek to make efficient use of a previously developed residential site within an established urban area, delivering high-quality family housing in a sustainable location. The application has been assessed against the Development Plan for the London Borough of Hillingdon, the Greater London Authority London Plan (2021), and the National Planning Policy Framework (2024).

## **2. Site Location**

The application site comprises a single-storey detached bungalow and associated outbuildings set within a relatively generous plot along Station Road. The surrounding area is characterised by predominantly two-storey residential properties with a mix of detached, semi-detached and small clusters of housing. There is a variety of designs and varied plot widths and building forms.

A very small section of the site is located within the West Drayton Conservation Area but this is restricted to the rear of properties fronting Station Road. The vast majority of the site abuts the Conservation Area.

The site is located in a highly sustainable location, with good access to public transport, including West Drayton railway station, local shops and services, schools and community facilities.

## **3. Proposal**

The application proposes the demolition of the existing bungalow and ancillary structures. Construction of 5 x two-storey, 3-bedroom dwellings, each property would be served by 1 car parking space and secured and covered cycle parking. Each property would have adequate internal and external space to meet the national and local requirements and there is wider landscaping enhancements proposed across the site.

## **4. Policy Context**

The development proposals have been assessed against the statutory Development Plan and national planning policy, comprising:

- The London Borough of Hillingdon Local Plan: Part 1 (Strategic Policies)

- The Hillingdon Local Plan: Part 2 (Development Management Policies)
- The Greater London Authority London Plan (2021)
- The National Planning Policy Framework (NPPF) (2024)

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

### Design and Character

- DMHB 11 - Design of New Development
- DMHB 12 - Streets and Public Realm

### Residential Development

- DMHD 1 - Alterations and Extensions to Residential Dwellings
- DMHD 2 - New Residential Development

### Residential Amenity

- DMHB 16 - Residential Density
- DMHB 18 - Private Outdoor Amenity Space
- DMHB 19 - Daylight and Sunlight Considerations
- DMHB 20 - Overlooking and Loss of Privacy
- DMHB 21 - Noise and Vibration

### Transport and Parking

- DMT 1 - Managing Transport Impacts
- DMT 2 - Highways Impacts
- DMT 6 - Vehicle Parking
- DMT 5 - Pedestrians and Cyclists

### Environmental / Sustainability

- DMEI 1 - Living Walls and Roofs / Biodiversity
- DMEI 9 - Management of Flood Risk
- DMEI 14 - Air Quality

## London Plan (2021)

### Good Growth and Design

- D1 - London's Form, Character and Capacity for Growth
- D3 - Optimising Site Capacity through the Design-Led Approach
- D4 - Delivering Good Design
- D6 - Housing Quality and Standards

## Housing

- H1 - Increasing Housing Supply
- H2 - Small Sites
- H6 - Housing Size Mix

## Amenity and Environment

- D13 - Noise
- SI 1 - Improving Air Quality
- SI 13 - Sustainable Drainage

## Transport

- T6 - Car Parking
- T5 - Cycling

## National Planning Policy Framework (NPPF) (2025) Presumption in

### Favour of Sustainable Development

- Paragraph 11 - Decision-making and tilted balance

### Housing Supply

- Paragraph 60 - 62 - Delivering sufficient homes
- Paragraph 70 - Small and medium sites

### Design

- Paragraph 126 - Achieving well-designed places
- Paragraph 130 - Design quality and character
- Paragraph 131 - Effective use of land

### Amenity

- Paragraph 135(f) - High standard of amenity for users

### Transport

- Paragraph 114-115 - Transport impacts and safe access Flood

### Risk

- Paragraph 165-175 - Flood risk and drainage

### Tilted Balance

- Paragraph 11(d) - Tilted Balance

## **5. Principle of Development**

The site is located within a residential area where the principle of redevelopment for housing is supported, subject to compliance with detailed policies.

At a strategic level, national policy places significant weight on boosting housing supply. Paragraph 60 of the NPPF (2025) confirms the Government's objective to significantly increase the delivery of homes, while Paragraph 70 highlights the importance of small and medium-sized sites in achieving this objective.

This is reinforced by Policy H2 (Small Sites) of the London Plan (2021), which requires boroughs to proactively support the delivery of housing on small sites within residential areas. The proposal, comprising 5 dwellings, falls squarely within this category and contributes positively to this objective.

Furthermore, it is a material consideration that the Council is currently unable to demonstrate a five-year housing land supply, as confirmed in the April 2026 Housing Land Supply Position Statement. As such, the tilted balance under Paragraph 11(d) of the NPPF is engaged, and the delivery of new housing is afforded substantial weight in decision-making.

The proposal represents the efficient redevelopment of a low-density site, replacing a single bungalow with a well-designed scheme delivering 5 family dwellings. This form of intensification is consistent with both national and regional policy objectives and reflects the sustainable location of the site.

Although the site does not resemble the character of the average garden land site, the proposal constitutes both garden land and back land development as the proposal would result in the intensification of residential use of the site which currently accommodates a dwelling, ancillary buildings such as garages and both hard and soft landscaping including a garden. We consider the design of this development to accord with Policy DMH 6 of the Local Plan and the Council's current housing supply position means that in the event that the Council does not agree with this statement significant demonstrable harm would need to be identified in order to refuse the application. An assessment of the proposal's accordance with DMH 6 can be found in the design section.

## **6. Heritage**

A Heritage Assessment has been prepared by GJHP which concludes that the proposed development at 151 Station Road would not result in harm to the West Drayton Conservation Area, which is a designated heritage asset. The site is located on the periphery of the conservation area, with only a small portion of the land falling within its boundary. Importantly, the site currently makes a limited contribution to the significance of the conservation area, being largely screened from public views by

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existing buildings and described as containing an unremarkable bungalow and areas in a rundown condition. As such, its existing contribution is neutral to slightly negative.



Extract from the Council's online heritage asset map showing the heritage context of the Site. The Site is marked with a blue star

While the characteristics of the site would meet the description of backland it is important to remember that the site already accommodates a C3 dwelling and ancillary structure. The assessment of harm is therefore whether the demolition of the existing dwelling and intensification of this residential use would amount to substantial harm.

The assessment finds that the proposed development, comprising five two-storey dwellings, has been carefully designed to minimise visibility and integrate with the surrounding suburban context, resulting in only limited glimpsed views from within the conservation area. It concludes that the overall effect on the conservation area and its setting would be neutral, with no loss of heritage significance. Even if an alternative view were taken, the report states that any impact could only amount to "less than substantial harm" at a very low level, which would be outweighed by the public benefits of delivering new housing and new family sized housing in accordance with the NPPF.

## 7. Design and Amenity

The proposed development has been carefully designed having full regard to the site's backland context, surrounding residential character and relevant policies within the London Borough of Hillingdon Local Plan, including Policies DMHD 1, DMHB 11 and DMHD 6. The scheme delivers a coherent and well-considered residential layout that optimises the use of the site whilst maintaining a high standard of design and residential amenity.

Various design examples were reviewed which have been granted permission on sites which have similar constraints.

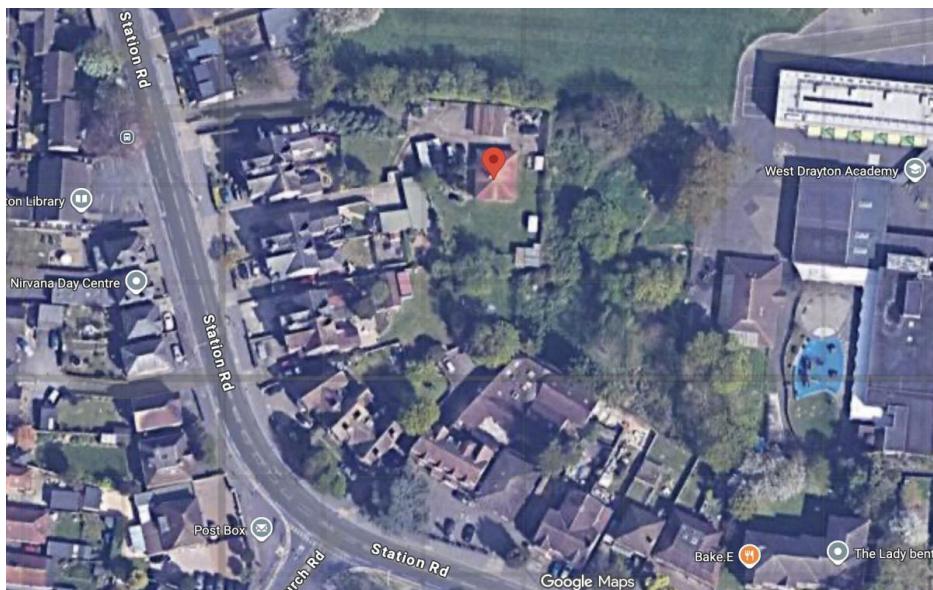


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The design responds positively to the site's constraints, including its position to the rear of existing properties along Station Road, and seeks to create a logical and legible form of development that integrates appropriately with the surrounding urban grain.

In terms of the character of the area and wider Conservation Area as explained above there is an existing dwelling on site therefore the proposal is not introducing new back land development. In fact, the existing property is located in an awkward position and does not permit the optimisation of the site residential potential which is supported by the London Plan and is given further weight in the assessment due to Hillingdon's inability to demonstrate a 5-year housing land supply. The dwelling also contributes poorly to the character of the area and holds no architectural merit. The proposal therefore offers an opportunity for the urban repair of this back land character site with a new sustainable development.



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The frontage of the site is characterised by two storey dwellings within double gabled front features which also provided additional accommodation in the roof space. As you can see from the above image the access to the site is taken from Station Road via the existing access point, which is to be retained and enhanced through the removal of the existing gate. The access arrangement ensures safe and efficient vehicular and pedestrian movement into and out of the site.

There are clusters of uniformity in the design of properties, you can see from the above image that there is a group of distinctly designed properties which line the front of the site. However slightly further to the west are some more 2.5 and 3 storey buildings some of which are residential others are commercial and these are of little architectural merit.



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Further north of the site are smaller streets which are characterised mainly by two storey terraced dwellings and flats.



Here is an example of the transition of different building designs between two rows of terraced dwellings immediately adjacent to one another.



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Turning to the proposed design, we have drawn inspiration from the character study undertaken alongside the Heritage Appraisal and this has informed our design. We have combined this with the need to demonstrate an optimisation of the site which doesn't overintensity this back land location.

In terms of the layout clearly the location of the existing property would not allow for the optimisation of the site as it is centrally located, there is then the awkward angle of the site boundary to contend with. We have attempted to use soft landscaping to repair the awkward boundary line and create good sized gardens and external soft landscaping to provide a soft setting to each of the buildings.



The internal layout incorporates a shared access road which serves all five dwellings and has been designed to accommodate turning movements for emergency and refuse vehicles, including a dedicated turning head, ensuring that vehicles can enter and exit the site in a forward gear. The levels of hardstanding have been minimised to ensure that the maximum amount of soft landscaping is provided. Beyond the eastern boundary is a section of land which sits in between the land owned by our client and the school further west. The land is soft landscaped and left unkept. We felt placing rear gardens against the eastern boundary would create the impression of a wider separation distance between the proposed new properties and the buildings within the school site and would help break up the level of hardstanding required.

The layout has been carefully structured to create a clear and logical arrangement of development, avoiding a piecemeal or cramped form of back land development. The siting of the dwellings responds to the pattern of development along Station Road, aligning appropriately with adjacent plots and ensuring that the development reads as a natural extension of the residential environment.

Soft landscaping forms a key component of the scheme and contributes positively to the character and appearance of the development. The proposal has sought to retain landscaping where possible, introduce new planting and landscaped areas along the access road and site boundaries. Green buffers which soften the relationship between built form and surrounding development

The landscaped areas adjacent to the access and within the turning head provide visual relief and contribute to a more attractive and verdant residential environment, particularly important in a backland context.

We have opted to use the local examples by provided a set of terraced dwellings and a set of semi-detached dwellings. As per the example images above we have also opted to distinguish between the two by using a different elevation and roof design between the terraced dwellings and the semi-detached.

The 3 terraced properties have been designed with a more modern roof form drawing from the gable fronted features of the properties to the front of the site. This also allows for a separation distance to be created at roof level significantly reducing the bulk and massing of the front elevation.

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The stepped arrangement of the terrace and the separation between built forms reduces the perception of bulk and avoids a continuous or monolithic appearance. The development therefore reads as a series of appropriately scaled residential units rather than a single overbearing structure. Alternating materials will be used between the lower and upper ground floor levels to add further articulation to the front elevations.

The two storey dwellings would create a modest backdrop when viewed from the road, a modest built form gross external area which is set without generous and well-designed landscaping. This results in a back land development which is more intimate in scale than the surrounding buildings.



We have adopted a different roof design for the two semi-detached properties in order to create some articulation and differentiation between the two different areas of the site. This area of the site cannot be viewed from the road.

Cycle storage is provided for each unit in accordance with policy requirements, and bin collection points are clearly integrated within the layout to ensure functionality without detracting from the overall design.

Each dwelling benefits from clearly defined private rear garden spaces, ranging from approximately 64sqm to 76sqm, providing a high standard of amenity for future occupiers.

### Back land Development:

Importantly Policy DMHD 6 does not impose a blanket restriction on development within residential gardens. Instead, it requires proposals to be assessed on their individual merits, having regard to design, layout, character and amenity considerations.

In this instance, the proposal represents the redevelopment of a large residential plot to provide a modest number of dwellings (5 units), which is proportionate to the size and capacity of the site. The development therefore constitutes an efficient and sustainable use of land within an established urban area.

Furthermore, the delivery of housing on small sites is strongly supported by:

- Policy H2 of the London Plan (Small Sites)
- Paragraph 70 of the NPPF (2024)

This policy support carries significant weight, particularly in the context of the Council's inability to demonstrate a five-year housing land supply (April 2026 Position Statement).

Policy DMHD 6 requires that development respects the prevailing character and does not result in a cramped or incongruous form of development.

The proposed scheme has been designed to reflect the two-storey scale of surrounding residential properties and maintain appropriate spacing between buildings. It would also appear more intimate in scale when compared to the 2.5 and 3 storey buildings which front the site facing Station Road. Furthermore, it provides a clear and legible layout, avoiding overdevelopment and respects the established urban grain and plot structure

Whilst the development is located to the rear of the site, it is not isolated or incongruous. Instead, it forms a logical extension of the residential pattern and is read as a continuation of built form within a sustainable location.

The proposal avoids a tandem or piecemeal form of development, instead delivering a cohesive and well-planned residential layout.

The proposal results in the subdivision of an existing residential garden; however: the remaining garden for the host dwelling remains sufficient and policy compliant and each proposed dwelling is provided with adequate private amenity space. In addition, the development does not result in the loss of a visually important open space within the street scene

It is important to note that appeal decisions within the Borough have consistently found that garden land development is acceptable where schemes are well-designed and policy compliant, and that refusal based solely on the loss of garden land is not justified.

APP/R5510/W/21/3269311 - Allowed

*Land adjacent to 22 Chestnut Close, Hayes*

Proposal: New 2-storey dwelling with parking and amenity space

The appeal decision relates to the erection of a new dwelling on land forming part of a residential plot, which the Council had refused on the basis that it would result in a cramped form of development and the loss of an important gap within the street scene. The Inspector rejected this position, finding no substantive evidence that the gap formed a defining characteristic of the area, and noted that similar developments had already been approved and constructed on comparable plots nearby. The decision emphasised that the surrounding area had evolved over time, with infill and garden developments forming part of the established pattern, thereby reducing the weight that could be given to arguments seeking to preserve openness within residential plots.

The Inspector concluded that the proposal would not appear cramped or incongruous, and would instead integrate with the prevailing character, particularly given its comparable scale, massing and relationship to boundaries when assessed alongside nearby developments. Importantly, the decision confirms that development within garden or side plots is not unacceptable in principle, and that each proposal should be assessed on its design merits rather than a presumption against such development. The appeal was therefore allowed, with the Inspector determining that the scheme complied with local policy, including those relating to garden land, and would not harm the character or appearance of the area.

APP/R5510/W/20/3244256 - Allowed

*Land rear of 43 The Drive / Knoll Crescent (Northwood)*

Proposal: Backland development (pair of dwellings)

The appeal decision relates to the redevelopment of land forming part of a residential garden to provide two semi-detached dwellings, which the Council had refused under Planning Statement - 151 Station Road

Policy DMHD 6 due to its presumption against garden and backland development. The Inspector confirmed that the site should be treated as garden land, but clarified that Policy DMHD 6 does not act as an absolute prohibition. Instead, the policy requires an assessment of whether a proposal constitutes an “exceptional case”, noting that this is not formally defined and must be determined on a case-by-case basis. Importantly, the Inspector identified that the key purpose of the policy is to protect character, amenity space and biodiversity, rather than prevent all development on garden land.

In applying this approach, the Inspector found that although the proposal conflicted with the initial presumption against garden development, it did not undermine the underlying objectives of the policy, as it preserved the verdant character of the area, retained significant tree cover, and maintained acceptable residential amenity. The development was considered to represent a limited scale of back land development, with an appropriately modest design that complied with all criteria of Policy DMHD 6, including scale, access and landscape retention. As such, the scheme was deemed to meet the “exceptionality” test and was allowed, establishing that well-designed back land development on garden land can be acceptable where it satisfies the policy criteria and does not result in harm.

*APP/R5510/W/24/3353718 - Allowed*

*Land adjacent to 110 Apple Tree Avenue West Drayton*

Proposal: Erection of a new dwelling in the garden of 110 Apple Tree Avenue

The appeal relates to the erection of a new dwelling within the side garden of an existing property, which the Council had resisted on the basis that it would erode an important open area and conflict with Policy DMH6 relating to garden land. The Inspector disagreed with this position, finding that the side garden did not make a particularly significant contribution to the openness or character of the street scene, and that sufficient space would remain following development to avoid a cramped or overdeveloped appearance. The decision highlights that the presence of side gardens and open gaps does not automatically justify their protection where the overall character of the area can accommodate change.

In considering Policy DMH6, the Inspector confirmed that although there is a presumption against the loss of garden land, this can be overcome where the proposal maintains the underlying objectives of the policy, namely the protection of character, amenity space and biodiversity. In this case, the development retained adequate private amenity space, preserved the sense of openness within the street, and offered opportunities for enhanced landscaping. As such, the proposal was found to successfully overcome the policy presumption, demonstrating that garden land development can be acceptable where it is well-designed, proportionate, and does not harm the character or function of the surrounding area.

## Impact to neighbours

To the west of the site are the residential properties which front Station Road and to the east is a school. The school buildings are a significant distance from the site and the eastern edge and north eastern edge is separated by a considerable distance from the boundary of the school due to the presence of a large piece of open soft landscaping heavily dominated by trees and other forms of planting. This would provide natural screening as would the additional planting proposed as part of the comprehensive landscaping enhancements the proposal would bring forward.

In terms of the relationship with the residential properties to the east, units 1-2 would be located 26 metres from the boundary line to the rear of these properties and there would be separation distance of approximately 40 metres between the existing and proposed habitable room windows. This is well in excess of the minimum separation distance in the Local Plan (21 metres) and it is unsurprising that the Daylight and Sunlight Assessment which is discussed below found there to be no impact in terms of overshadowing or loss of light.

The front elevation of Unit 3 is located 8 metres from the rear boundary of 157 Station Road. Although this is a smaller distance from the boundary the side elevations of unit 5 would face the rear garden and rear facing windows which would be located in excess of 27 metres from away therefore there would be no reduction in privacy. Although the side elevation is located approximately 9 metres from the rear boundary of 157 there is a large outbuilding structure in the rear garden which would diminish a proportion of the views of the side elevation of Unit 5 and the separation distance would reduce this view even further. The properties fronting Station Road have large and deep rear gardens which would not be significantly impact by the development.

A Daylight and Sunlight Assessment has been compiled by KS DT and considers the effects of the proposed development on neighbouring properties at 153-163 Station Road, using BRE 209 (2022) guidance. The analysis tests daylight (Vertical Sky Component), sunlight (Annual Probable Sunlight Hours), and sunlight to gardens (Sun on Ground). The results demonstrate that all assessed windows to neighbouring dwellings retain levels of daylight and sunlight within BRE recommended thresholds, with no material reductions identified. In particular, the VSC results confirm that retained daylight levels remain above target values and exceed 80% of their former levels, indicating no noticeable loss of daylight to neighbouring habitable rooms.

In terms of sunlight and outdoor amenity, the assessment finds that neighbouring windows continue to receive acceptable sunlight levels, and that all surrounding gardens retain sufficient areas receiving at least two hours of sunlight on 21 March, in line with BRE guidance. The report concludes that the proposed development would not give rise to any noticeable reduction in daylight or sunlight, nor would it result in an overbearing relationship or unacceptable loss of residential amenity. As such, the scheme is considered fully compliant with BRE guidance, with no adverse impacts on neighbouring properties identified.

## **8. Living Space Standards**

The proposed development has been designed to ensure that all dwellings provide a high standard of internal accommodation in full accordance with the Nationally Described Space Standards (NDSS).

Each of the proposed dwellings comprises a three-bedroom, two-storey house designed to accommodate up to 5-6 persons. The internal layouts have been carefully configured to ensure compliance with minimum gross internal floor areas as set out within the NDSS. Adequate bedroom sizes, including principal bedrooms capable of accommodating double beds are provided as well as sufficient floor-to-ceiling heights and circulation space.

The layouts provide clear separation between living and sleeping areas, with well-lit and usable internal spaces that support a high quality of residential living. As such, all units meet or exceed the minimum requirements of the NDSS and are consistent with the objectives of Policy DMHB 11 of the London Borough of Hillingdon Local Plan.

In addition to high-quality internal accommodation, each dwelling benefits from private rear garden space, ensuring compliance with local planning policy requirements. The minimum garden space standards between the London Plan and Local Plan differ. However we recognise the importance of providing good quality outdoor amenity space for family sized properties therefore we have adopted the higher standard (Local Plan) in our design. The gardens as shown on the proposed site plan would range between 64sqm to 76sqm per dwelling.

These garden sizes are considered to represent a good level of private amenity space for family dwellings and are consistent with the expectations of the London Borough of Hillingdon Local Plan, which seeks to ensure that new residential development provides usable and functional outdoor space. The gardens are sufficiently private and well designed as well as spacious.

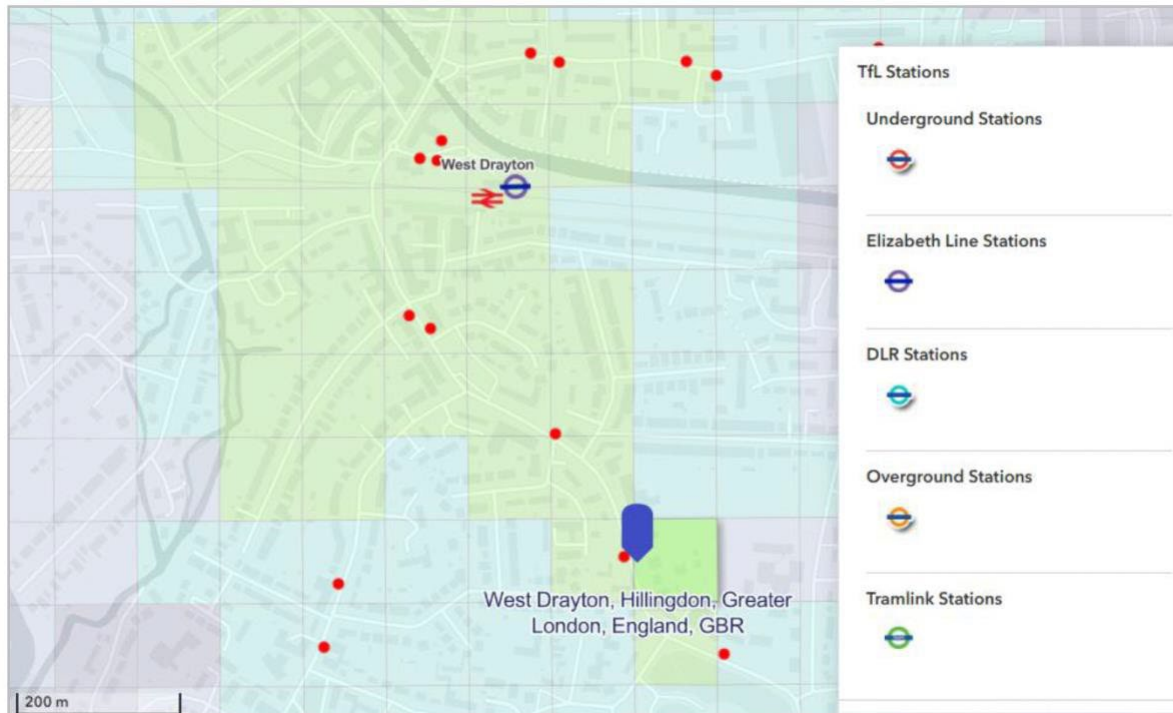
The combination of compliant internal layouts and generous private amenity space ensures that the proposed development will deliver a high standard of living conditions for future occupiers. The daylight and sunlight assessment which has been compiled in support of the application demonstrates that each of the habitable rooms and outdoor amenity areas would have appropriate levels of daylight and sunlight in accordance with the BRE guidance.

## **9. Transport**

The application site is located on Station Road, West Drayton, within a highly sustainable location benefitting from excellent access to a range of services, facilities and public transport options. The site lies approximately 600 metres from West Drayton Station (Elizabeth Line) and is served by multiple high-frequency bus routes operating along Station Road.

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The site achieves a Public Transport Accessibility Level (PTAL) of 3, reflecting a good level of accessibility and supporting a reduced reliance on private vehicles. In accordance with the National Planning Policy Framework 2024 and London Plan policies on sustainable transport, the location is therefore considered appropriate for residential intensification.



## Access

Vehicular and pedestrian access to the site will be taken from Station Road via the existing private drive, which is to be retained and utilised as a shared surface. The access benefits from:

- Adequate width and geometry to accommodate vehicles and pedestrians
- Good levels of inter-visibility along the access
- Visibility splays in excess of 2.4m x 43m, compliant with Manual for Streets guidance

The internal layout has been designed to allow vehicles to safely pass and wait within the site, ensuring that potential conflicts are minimised. The proposals therefore accord with Policy DMT 1 of the London Borough of Hillingdon Local Plan, which seeks to ensure safe and suitable access for all users. While there would be an increase in the number of movements the increase would not be significant. The supporting Transport Assessment provides an assessment of the suitability of the existing access to withstand the intensification of the use of the site. This has also helped inform the number of units proposed demonstrating that we have looked at all the site constraints when designing the proposed development. The Transport Assessment includes swept path drawings which demonstrate that vehicles can enter and exit the site without prejudicing pedestrian safety or the free flow of traffic along the highway network.

We have undertaken a review of recent appeal decisions which we would assume the Council will do also when assessing this planning application. In doing so a recent application at 10 High Road Cowley was identified and is similar in terms of the highway considerations to this proposal. While the appeal scheme proposed a new access to be constructed to upon the demolition of the existing bungalow the new road would provide access to the new properties constructed in a backland site. This proposal is slightly different as the access and road already exist between the two properties fronting Station Road and already provide access to 1 house. Therefore, it is the intensification of the movements in and out of the access which is to be assessed.

The Council had deemed the frequency of movement and new access to be unsuitable and this formed the basis of a reason for refusal referring to the proposal would result in a significant highway safety concern. However PINS disagreed with this reason for refusal, the inspector concluded:

*“16. The access gate would be set well back from the highway and would allow space for vehicles to wait whilst the gates open. However, there are likely to be occasions arising where the visiting vehicle is not given access, for example in the case of a driver being unfamiliar or mistakenly entering the site, gate malfunction, emergencies or coincident arrivals and departures. In these situations, it is likely that a vehicle would be forced to reverse onto the highway potentially creating an obstruction or risk to vehicles travelling along the highway. The appellant indicates that they would be willing to accept a condition requiring the removal of the gate. Without the gate in place, vehicles would be more likely to enter the site and use the turning head to then be able to leave the site in forward gear. Had the appeal been allowed, the removal of the gate would have been secured by condition.*

*17. Sufficient information has been provided with the appeal with regard to the gradient of the access road which the appellant confirms varies between 1:11 to 1:17. Whilst this would not meet the 1:20 benchmark as referenced in the Manual for Streets, given the topography and relatively constrained environment, I am satisfied that taken as a whole, the proposed road would be capable of providing appropriate vehicular and pedestrian access to the dwellings. Had the appeal been allowed, details including gradients and transitions, surface materials and drainage could reasonably have been secured by condition.*

*18. I note the HLP 2020 policies DMT1, DMT2 and DMT6 and London Plan Policies T2, T4 and T6 do not prescribe the angle of a proposed access where it meets the highway. Similarly, the guidance contained in the Manual for Streets and Manual for Streets 2, does not prescribe dimensions or angles in this respect. The swept path diagrams show that the angle of access would be achievable for domestic and small delivery vehicles, and there is no substantive evidence to suggest that there would be harm to the safety of the highway arising from the proposed access*

19. *With regard to pedestrian visibility, reference is made to a requirement for a visibility splay of 2.4m x 2.4m. This splay is not directly referenced as a requirement in the development plan policies I have been referred to, or in the Manual for Streets. Vehicle movements from the 3 proposed dwellings would be low, the immediate surroundings are residential, and vehicles would necessarily be cautious when egressing onto the High Road. Taking these factors together, I consider that the access would be acceptable in terms of pedestrian visibility.*

21. *I accept that the presence of an existing vehicular access in itself should not establish an acceptable benchmark for new development. Nevertheless, for the reasons given above, the scheme would not cause demonstrable harm to pedestrian or highway safety subject to appropriate conditions. I conclude on this issue therefore that the scheme would be in line with the aims of HLP 2020 Policies DMT1, DMT2 and DMT6, and London Plan Policies T2, T4, T5 and T6 insofar as they require proposals to meet the transport needs of the development, not increase road danger, provide safe and efficient vehicular access to the highway network and provide cycle and car parking to set standards. The absence of harm in this respect holds neutral weight in my consideration of the appeal”*

Based on the similarities between the two proposals we feel this appeal decision should be relevant and given consideration by Officers when assessing the suitability of the access and the uplift in use.

### Trip generation

Trip generation has been assessed using industry-standard TRICS data, which confirms that the proposed development will generate a low level of vehicular movements. The development is expected to result in approximately:

- 16 additional two-way vehicle trips per day
- No more than one additional vehicle movement during peak hours

This level of activity is considered negligible and would not result in any material impact on the operation or safety of the surrounding highway network. In accordance with Paragraph 115 of the National Planning Policy Framework 2024, development should only be refused on highways grounds where the impact would be “severe”. The evidence clearly demonstrates that this threshold is not approached in this instance.

### Car Parking

The proposed development provides one car parking space per dwelling, which represents a proportionate level of provision having regard to the site’s sustainable location.

While this is below the maximum standard set out within the London Borough of Hillingdon Local Plan Part 2, the level of provision is justified by:

- The site's PTAL 3 rating
- Proximity to public transport, including the Elizabeth Line
- Availability of local services within walking distance

All parking spaces are designed to comply with minimum dimensional standards, and the layout enables safe manoeuvring with vehicles entering and exiting in forward gear. Electric vehicle charging infrastructure will also be provided in accordance with the London Plan Policy T6.

### Cycle Parking

The development includes secure and covered cycle parking within each dwelling's curtilage, providing a minimum of two spaces per dwelling.

This provision accords with:

- London Plan Policy T5 (Cycling)
- Hillingdon Local Plan standards

The provision of high-quality cycle storage supports sustainable travel choices and reduces reliance on private car use.

### Servicing and Delivery

The development has been designed to accommodate all servicing and delivery requirements within the site. Typical residential servicing demands, including postal deliveries, supermarket deliveries and refuse collection, will be managed efficiently without adverse impact on the surrounding highway network.

Swept path analysis confirms that delivery vehicles, refuse vehicles and emergency vehicles can safely enter, turn and exit the site in forward gear, ensuring compliance with safety standards and avoiding the need for reversing onto the public highway.

Refuse collection will take place within the site in accordance with the requirements of the London Borough of Hillingdon, ensuring a safe and practical arrangement for waste management.

To conclude the proposed development demonstrates full compliance with local and national transport policy. The scheme benefits from a highly sustainable location, provides safe and suitable access arrangements, and generates only a negligible level of additional traffic.

Appropriate provision is made for car and cycle parking, as well as servicing and refuse collection, all of which can be accommodated within the site without detriment to highway safety or operation.

The development therefore accords with Policies DMT 1 and DMHB 11 of the Hillingdon Local Plan, the London Plan 2021, and the National Planning Policy Framework 2024, and is acceptable in highways and transport terms.

## **10. Ecology and BNG**

The site comprises a residential bungalow, several outbuildings and predominantly urban habitats including modified grassland, hardstanding and scattered vegetation. The desktop study confirms that the site is not subject to any statutory or non-statutory ecological designations, and there are no priority habitats or protected species recorded on-site. While some designated Sites of Importance for Nature Conservation (SINCs) exist within the wider area, these are sufficiently distant such that the development would not result in any adverse effects. Overall, the site is considered to be of low ecological value, typical of a managed residential plot.

The appraisal finds no evidence of protected species on site, including bats, with all buildings assessed as having negligible potential for roosting. The habitats present offer limited ecological function, although boundary vegetation provides some connectivity for wildlife. As such, the proposed development is unlikely to result in significant ecological harm, subject to standard mitigation measures. These include precautionary working methods to protect nesting birds and small mammals, sensitive lighting design to avoid impacts on nocturnal species, and the incorporation of biodiversity enhancements to meet mandatory Biodiversity Net Gain (BNG) requirements. The report concludes that the development can proceed without ecological constraint, provided these recommendations are implemented.

Regarding BNG, the site is currently characterised by low-value urban habitats including buildings, hardstanding, modified grassland and garden areas, with a line of trees along the boundaries. These habitats are generally assessed as being in poor condition and of low strategic significance, reflecting the managed residential nature of the site. The assessment confirms that there are no ecological designations affecting the site and that its baseline biodiversity value is limited.

The proposed development incorporates a range of ecological enhancements, including the retention of boundary trees, creation of modified grassland, introduction of shrub planting, provision of ornamental hedgerows and the planting of nine new trees. The biodiversity metric demonstrates that the scheme will deliver a net gain of approximately 13.82% in habitat units and 43.86% in hedgerow units, thereby exceeding the mandatory 10% requirement. These enhancements will be located outside private gardens and managed through a long-term management plan to ensure their successful establishment. The report concludes that the development is capable of delivering policy-compliant biodiversity net gain on-site and will result in an overall improvement to ecological value.

## **11. Conclusion**

The proposed development at 151 Station Road has been carefully designed to deliver a high-quality residential scheme that is fully compliant with the Development Plan when assessed as a whole. The proposal represents an acceptable form of backland and garden land development, which accords with Policy DMHD 6 in that it is of a limited scale, responds positively to its context and does not result in a cramped or incongruous form of development. The layout, scale and design ensure that the scheme integrates successfully with the surrounding area, preserving the prevailing character and appearance of the locality.

The proposal has been demonstrated, through detailed technical assessments, to result in no harm to the significance or setting of the nearby Conservation Area, and will preserve the character of the wider townscape. Furthermore, the development maintains appropriate separation distances and design measures to ensure that there is no unacceptable impact on neighbouring residential amenity, including matters of privacy, outlook, daylight and sunlight. In highways terms, the Transport Statement confirms that the scheme will generate only a negligible level of additional traffic and that safe and suitable access, parking and servicing arrangements are provided. Accordingly, the proposal would not result in harm to the operation or safety of the local highway network. On this basis, the development is considered acceptable and admissible in planning terms.

The scheme delivers a number of clear and significant public benefits. Principally, it will provide five new residential dwellings, including family-sized housing, which makes a meaningful contribution towards meeting identified housing needs at both a local and regional level. The delivery of family housing is particularly important in sustainable locations such as this, where access to services, public transport and infrastructure is readily available.

In addition, the development achieves a minimum 10% Biodiversity Net Gain, exceeding statutory requirements and resulting in a measurable enhancement to the ecological value of the site. This is secured through the introduction of new planting, trees, hedgerows and managed habitats, representing a clear environmental benefit arising directly from the scheme.

It is a significant material consideration that the Council is currently unable to demonstrate a five-year housing land supply, as confirmed in its most recent position (April 2026). As such, the presumption in favour of sustainable development (the “tilted balance”) is engaged under the National Planning Policy Framework (2024). In this context, the delivery of new housing—particularly on small, sustainable sites—must be afforded substantial weight.

When applying the tilted balance, planning permission should be granted unless any adverse impacts would significantly and demonstrably outweigh the benefits. In this case, no such adverse impacts have been identified. The proposal has been shown to

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be acceptable in terms of design, character, heritage, residential amenity and highways, and therefore does not give rise to any material harm.

The proposal delivers a sustainable and policy-compliant form of development that provides clear and substantial benefits, including the delivery of new family housing and biodiversity enhancements, without resulting in any significant or demonstrable harm. When considered in the context of the tilted balance, these benefits weigh decisively in favour of the scheme.

Accordingly, it is respectfully concluded that planning permission should be granted.

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**127 High Street  
Ruislip  
HA4 8JN  
01895 200 400  
[www.kearns.ltd](http://www.kearns.ltd)**