

MADDOX PLANNING
PLANNING
STATEMENT

Manor Lodge
March 2025

Description of development

Demolition of existing house and garage and construction of three pairs of semi-detached houses and associated alterations to access points, car and cycle parking and proposed hard and soft landscaping.

Type of application

Full planning permission

Applicant

Merchant Land Investments Limited

Contents of this statement

- 1.0 Introduction
- 2.0 Site and surroundings
- 3.0 Planning history
- 4.0 Planning policy framework
- 5.0 Planning considerations
- 6.0 Conclusion

1.0 Introduction

- 1.1 This statement has been prepared in support of an application for planning permission for the demolition of the existing house and garage, and the construction of three pairs of semi-detached houses, alongside associated alterations to access points, car and cycle parking and proposed hard and soft landscaping.
- 1.2 This application follows the refusal of an application in October 2023 for the “*demolition of the existing structures and creation of 6 residential units together with alterations to existing access points, associated parking and landscaping*” (LPA ref. 49436/APP/2023/1149). The application was refused for two reasons, firstly because the Council considered the proposals to be an over development of the site and secondly due to the lack of accessibility of the units. Following the refusal, the client team undertook two rounds of pre-application advice with the Council in order to overcome the reasons for refusal (LPA ref. 49436/PRC/2024/35 and 49436/PRC/2024/169). A collaborative approach has been taken with Hillingdon officers and the scheme has also undergone thorough public consultation. The pre-application feedback and public consultation is discussed in section 3.0 of this statement.
- 1.3 This statement assesses the merits of the proposed development in the context of national, regional and local planning policy objectives and other material planning considerations.
- 1.4 As set out in this statement, the proposed development complies with the relevant policies in the Development Plan and planning permission can, therefore, reasonably be granted.
- 1.5 The proposed dwellings sit comfortably in the site and the development has the potential to deliver the following benefits:
- The redevelopment of an underutilised brownfield site to provide new homes. Paragraph 125 of the NPPF gives substantial weight to the value of using suitable brownfield land within settlements to provide new homes;
 - The provision of 6 new family houses of high-quality design;
 - The ongoing economic benefit of 5 net additional households (Council Tax payments, net spend of residents into the local economy etc.);
 - A new highly sustainable and low carbon development which incorporates ASHPs;
 - Positive gains to local biodiversity through the introduction of green roofs and a comprehensive landscaping scheme;
 - A SuDs strategy which will improve surface water runoff rates at the site;
 - Improvements to local infrastructure through a Community Infrastructure Levy (CIL) contribution; and
 - Creation of construction jobs throughout the construction of the development.
- 1.6 This statement is structured as follows:
- Section 2.0 describes the site and the surrounding context and identifies the relevant planning designations;
 - Section 3.0 provides the site’s relevant planning history, a summary of the pre-application process and public consultation;
 - Section 4.0 provides the planning policy framework;
 - Section 5.0 identifies the relevant planning policies and assesses the proposals against these policies and other material considerations; and
 - Section 6.0 draws our conclusions in respect of the proposals.

2.0 Site and surroundings

- 2.1 The site comprises a two-storey detached house and a detached garage on the northeastern side of Rickmansworth Road. The property is set back from the highway and screened by vegetation along the front boundary. To the rear of the site is Northwood College. To the north of the site is Moray House, a four-storey residential block of flats. To the south of the site is Kiln Farm which is a detached house, and further south is a three-storey residential block of flats. On the opposite side of Rickmansworth Road is Northwood Golf Club.
- 2.2 The area is predominantly residential with some local services. The wider area is characterised by blocks of flats, terraced, semi-detached and detached properties.
- 2.3 The site does not have any statutorily or locally listed buildings but is near the Northwood Conservation Area to the rear of the site. The site is served by and within walking distance of the Northwood District Centre. Existing vehicular access is at the north of the site on Rickmansworth Road.
- 2.4 The site has a PTAL rating of 2 indicating moderate to low public transport links. However, the nearest bus stops are less than 150 metres away and the Northwood underground station is only 650 metres from the site. The site is very accessible to public transport.
- 2.5 The site is in Flood Zone 1 (lowest risk) and is not located within a critical drainage area.



Above: Aerial view of the existing house crudely outlined in red.

3.0 Planning history

3.1 There is one planning history record for the site:

Reference	Description	Status	Decision date
49436/APP/2023/1149	Demolition of the existing structures and creation of 6 residential units together with alterations to existing access points, associated parking and landscaping.	Refused	12/10/2023

3.2 The above application was refused for two reasons:

- The proposed development, by reason of its scale, design, form, layout, siting and the extent of hardstanding to the front, would result in an incongruous form of overdevelopment of the site that would fail to harmonise with the existing local context and prevailing pattern of development on Rickmansworth Road. The proposal is therefore detrimental to the visual amenity and local character of the surrounding area and contrary to Policy BE1 of the Hillingdon Local Plan: Part One - Strategic Policies (2012), Policies DMH 6, DMHB 11 and DMHB 12 of the adopted Hillingdon Local Plan: Part Two - Development Management Policies (2020), Policies D3 and D4 of the London Plan (2021) and the National Planning Policy Framework (2021).*
- The proposed development, by virtue of its constrained site layout, internal design of the buildings, and absence of details to show that the internal layout would comply with Approved Document M of Building Regulation requirement M4(2) and M4(3), fails to demonstrate that adequate provision would be made to meet the needs of people with disabilities. The proposed development therefore conflicts with Policies D5 and D7 of the London Plan (2021) and the National Planning Policy Framework (2021).*

3.3 Following the refusal, the Applicant worked up a revised development seeking to address and overcome the reasons for refusal and requested the Council's pre-application advice. The pre-application advice is summarised below.

Pre-application advice

3.4 The Council's pre-application advice was sought for a similar scheme comprising three pairs of semi-detached houses but with design changes to the refused scheme. The pre-application changes included reducing the building footprint and setting back the properties to provide larger front gardens and additional space for planting. The Council issued its written advice on 01 May 2024.

3.5 A second pre-application was then submitted in response to the Council's comments from pre-application 1, which largely related to the design and positioning of the properties within the site, alongside recommendations for the proposed landscaping scheme.

3.6 The Council's written pre-application advice was received on 12 November 2024. The feedback is summarised below, alongside commentary explaining how the revised pre-application proposals have responded to the advice.

Council's pre-application feedback	Our response
Land use/Principle of development	
The revisions to the proposed development seek to address policy DMH6 and the principle of the development is acceptable, considering that the development would not represent a change of	Noted and agreed. The proposals accord with policy DMH6 and the principle of new homes on the site is acceptable.

use and would be purely residential. Additionally, the uplift of residential units within the site is supported, as it would result in an addition to the housing stock within the borough and therefore contribute to meeting the Council's target, which is set by policy H1 of the London Plan (2021).	
Housing mix	
The proposed housing mix comprises: 6no. x 4-bedroom houses. Therefore, it is considered that the proposal would consist of an appropriate housing mix in accordance with Policy DMH 2 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020) and Policy H10 of the London Plan (2021).	Agreed, the proposed family houses are considered acceptable.
Design	
The proposal now incorporates a staggered building line with a reduction in height, which helps address previous concerns regarding bulk, scale and massing, while also creating a transition between the neighbouring buildings.	Noted and agreed, the proposed staggered building line helps to reduce the perceived bulk, scale and massing, whilst also creating a transition between the neighbouring buildings.
The architectural form of the front elevations has improved significantly, with the stepped siting and the visual gaps between the units which alleviate previous concerns about an overbearing frontage. Additionally, the facades include subtle variation in brick coursing and detailing which adds visual interest.	Noted and agreed.
The materials are generally acceptable and take onboard previous comments regarding the tones.	Noted and agreed.
Trees, boundaries and landscaping	
Whilst the existing trees within the application site are not subject to Tree Preservation Orders (TPOs), an Arboricultural Method Statement would be required in any forthcoming application, to assess the acceptability of the removal and replacement of trees further.	The submitted Arboricultural Impact Assessment sets out how 10 trees will be removed on site to enable the development. The report concludes that the submitted landscaping scheme shows an adequate replanting proposal for the site, which replaces the trees on site in a greater quantity than is removed, with species choice including Magnolia, Hornbeam, Apple, Sorbus and Beech. The submitted Arboricultural Method Statement also shows how remaining trees will be protected during construction.
While the changes are generally welcomed, further consideration should be given to the proposal, ensuring that the landscaping complements the reduction in massing and site context. The previous reasoning for refusal had highlighted the extent of hardstanding to the front as an incongruous form of development. Reducing the level of hard surfacing as much as possible with more softer landscaping would go some way in addressing this concern. Presently the balance of soft landscaping does not go far enough to address this matter.	The ASHP and bike stores have been moved to the rear and more planting is now proposed to the front of the properties. The previously proposed seating and hardstanding path to the front of the property have also been removed from the proposals (as requested by the Council below).
The landscape strategy should aim to soften the visual impact of the buildings further,	The submitted Landscaping Scheme includes 96% native tree species and a large understorey

<p>particularly through the introduction of native trees in front of the dwellings. It is recommended to explore siting the cycle parking and ASHP to the rear gardens, allowing for planting between the car parking to break up the hard landscaping.</p>	<p>of native scrub planting, the biodiversity of the site is greatly improved as well as having high ornamental value.</p> <p>As set out above, the ASHP and bike stores have been moved to the rear, allowing for planting between the car parking to break up the hard landscaping.</p>
<p>Furthermore, the inclusion of seating and hard landscaping in the front forecourt raises concerns. These features could potentially degrade the landscaping over time and may not be well-used in this location. It is recommended to omit the seating and hard paths from the design, focusing on soft landscaping that enhances the overall appearance and ecological value of the site.</p>	<p>As set out above, the previously proposed seating and hardstanding path to the front of the property have been removed from the proposals and are replaced by soft landscaping.</p>
<p>It is acknowledged that following previous comments, the semi-circular brick pedestrian entrance has been retained and made a feature of the site, which is positive.</p> <p>Following further discussions with Design and Landscape Officers, it is noted that the existing front wall provides a heritage contribution to the street scene, and its retention or sensitive reinstatement should be prioritised over the proposed new railings. This would preserve the historic context of the site and ensure a more appropriate boundary treatment. The proposed landscaping, along with a varied planting strategy will provide visual interest while maintaining this asset.</p>	<p>Noted and agreed, the semi-circular brick pedestrian entrance has been retained and is a positive feature.</p> <p>The proposals seek to retain the front boundary wall, however it is proposed to be reduced in height following the removal of some of the bank behind. The heritage contribution of the wall is therefore maintained, whilst also providing a varied planting strategy behind, which will provide visual interest.</p>
<p>Additionally, the proposed side boundary fence appears to be relatively high and should be reduced to a maximum height of 1 metre at the front to ensure visual permeability. Fencing beyond the building line could be up to 1.8 metres in height.</p>	<p>The proposed side boundary will have a maximum height of 1 metre and the fencing beyond the building line will be a maximum of 1.8 metres in height.</p>
<p>It appears details regarding the rear garden landscaping are not supplied, as with the front garden, the rear gardens should be designed with careful consideration to ensure they provide quality private amenity space for future residents while contributing to the overall green character of the development and ensuring privacy to the school playground behind.</p>	<p>Rear landscaping details have now been provided, where additional trees are proposed to the rear to provide screening to the school.</p> <p>It is proposed to condition the maintenance of the trees to the rear in order to ensure that the screening between the proposals and the school is maintained in perpetuity.</p>
<p>It is also unclear whether fences and gates are being proposed between the buildings. If gates are proposed, these should be set back by at least half a meter from the front facade and not exceed 1.8m in height.</p>	<p>Timber gates are proposed between buildings, these are set back from the front façade and do not exceed 1.8m in height.</p>
<p>In terms of species of trees and hedges, the proposed is generally acceptable, an additional copper beech tree should be considered along with additional planting given the omission of the seating and pathway. These landscaping</p>	<p>The Landscape Consultant reviewed these comments and advised that the introduction of two copper beech trees is not suitable, as although planted as younger specimens, where the trees can grow up to establish alongside scrub and groundcover planting, in time, the</p>

elements of the proposals should be reviewed in any forthcoming planning application.	space would not be large enough to support two mature copper beech trees, without ultimately hindering the surrounding smaller trees and understorey of growth. The two large trees would be in competition.
The proposal has improved, particularly with the introduction of a staggered building line, which addresses earlier concerns about bulk and massing. The front gardens are now more generous, and the overall design appears more integrated with the suburban context of Rickmansworth Road.	Noted and agreed.
Quality of accommodation	
The quality of the living environment for the proposed six dwelling houses is acceptable as the proposed residential units would meet the minimum spatial requirements in terms of floor area and the habitable rooms within each dwelling house would also exceed the spatial requirements in terms of internal height. The quality of the residential accommodation is therefore considered acceptable in terms of size and layout.	Noted and agreed, the proposals provide a good quality of accommodation.
The proposed drawings submitted with any forthcoming planning application should : i) state the gross internal area of the proposed dwellings; ii) include the floor area of each of the bedrooms; iii) include section drawings and demonstrate that the minimum floor to ceiling height would be 2.5 metres for at least 75% of the GIA of each dwelling (as required by Policy D6 of the London Plan); and iv) indicate the headroom height above 1.5 metres on the proposed loft plans.	The proposed drawings demonstrate compliance with the National Space Standards and minimum head heights set out in the London Plan.
It is noted that the staggered building line has further reduced the private amenity space to between approx. 66 to 77sqm. Although the quantum of external amenity space per each dwelling would have a shortfall of the 100 sqm requirement under policy DMHB18 of the Hillingdon Local Plan: Part Two (2020) for 4 bedroom dwellings, the size and design of the private gardens at the rear would likely be acceptable, considering that the front garden of the development has been enlarged with additional high quality landscaping works - this would likely form part of the planning balance.	Noted and agreed, the proposals provide a good level of external amenity space and high-quality landscaping.
No concerns with regards to daylight/sunlight, visual outlook or privacy are also noted, as the proposed windows serving habitable rooms would retain an acceptable separation distance that exceeds 21 metres from neighbouring residential windows.	Noted and agreed. The submitted Daylight and Sunlight Report demonstrates that the scheme is in accordance with BRE guidelines.
Residential amenity	
It is requested that 45 degree sight lines from neighbouring dwellings are shown on the proposed site plan of any formal application	The 45-degree site line from Moray House is provided on the proposed planning drawings.

It is noted that the dwellings would face towards a play area associated with the school behind. Screening such as hedges and trees should be considered to the rear boundary as part of the landscaping scheme to mitigate overlooking. It is noted screening was previously proposed outside of the red line boundary, which is not acceptable.	<p>Rear landscaping details have now been provided, where additional trees are proposed to provide screening to the school, limiting any potential overlooking.</p> <p>It is proposed to condition the maintenance of the trees to the rear in order to ensure that the screening between the proposals and the school is maintained in perpetuity.</p>
There would be sufficient separation distance between the closest dwelling proposed and Kiln Farm, it is not considered that the proposed development would have a detrimental impact on loss of sunlight/daylight, loss of privacy or would appear visually overbearing to this neighbour.	Noted and agreed.
The previous changes to the layout were welcomed in respect to the impact on Moray House. It is noted that the layout of Moray House appears to demonstrate that the kitchen could be a habitable kitchen room (space for dining table). It would be beneficial to provide supporting information to demonstrate there would not be any impacts to these windows. The side facing windows of the development would be conditioned to be obscured glazing and non-opening below 1.8m to ensure no overlooking.	<p>The submitted Daylight and Sunlight Report demonstrates that the scheme is in accordance with BRE guidelines.</p> <p>The side facing windows of the development can be conditioned to be obscured glazing and non-opening below 1.8m to ensure no overlooking.</p>
Subject to landscaping and supporting information the development would not appear to represent an un-neighbourly form of development, in line with policy D6 of the London Plan and policy DMHB 11 of the Hillingdon Local Plan: Part 2 (2020).	Agreed, the proposals will preserve neighbouring amenity.
Highways	
A comparable scheme was refused late last year (49436/APP/2023/1149) but not on transport/Highway related grounds. As the refusal reasons pertained to visual impact and internal layout, the transport/highway comments made at the time of termination are still broadly valid and are therefore reprised as follows.	Noted.
The proposal would require an on-plot provision of up to 2 spaces for each of the dwellings to fully comply with Hillingdon's adopted parking standard. This would equate to 12 spaces in total and 2 spaces per unit are proposed which indicates conformity. However, the overriding regional plan requires a lesser maximum quantum of 1 space per unit. Although the level of proposed provision exceeds the regional parking standard, it is considered acceptable in this case as it reduces the potential for untoward on-street parking displacement onto the neighbouring unrestricted areas of Rickmansworth Road resulting from a higher dependency on private motor transport due to the 'poor' PTAL rating.	Noted and agreed, the proposed car parking provision is acceptable and will reduce the potential for on-street parking displacement.

In line with the London Plan (2021), within the final parking quantum there is a requirement for a minimum 20% 'active' EVCP provision with all remaining spaces being designated as 'passive' provisions. In this case, it is recommended that 1 'active' and 1 'passive' space is provided for each of the new units to future proof for anticipated demand.	1 'active' and 1 'passive' space is provided for each of the new units, in line with the Council's advice.
In line with the more onerous regional London Plan requirements, the applicant is to provide 12 long stay (2 per unit) and 2 short stay spaces in total. These are to be positioned in a relatively secure and accessible location on the property frontages which is considered to standard. Notwithstanding this, elsewhere in the report identifies some concerns regarding the siting.	Cycle parking has been provided in accordance with policy requirements and the long stay cycle parking has been moved to the rear in line with the Council's advice.
The anticipated potential uplift in trip generation related to the new dwelling units does not raise any immediate highway concerns. This is due to the fact that traffic movement into and out of the site is not expected to exceed 2-3 vehicle movements during the most sensitive and therefore crucial peak morning and late afternoon/evening hours. Hence such an uplift is considered marginal in generation terms and therefore can be absorbed within the local road network without notable detriment to traffic congestion and general road safety.	Noted and agreed. The submitted Transport Statement concludes that the development proposals would not result in any material impact on the operation of the local highway network.
There is no objection in principle to the utilisation of the existing northern carriageway crossing (cc) for the purposes of an 'exit only' aperture together with a new cc located at the southern extent of the envelope facilitating 'entry only'. At this juncture, an effective electronic gated control is recommended as it helps to ensure a more rapid discharge of a vehicle entering the site from the public highway which promotes traffic fluidity and mutual safety for all road users. It is noted that the proposed location of the new crossing respects an established and distinct front boundary wall feature with the public highway.	Noted and agreed, the site access gates have been set into the site in order to ensure a more rapid discharge of a vehicle entering the site from the public highway.
In terms of scale, the new cc should conform to the council's 'Domestic Vehicle Footway Crossover' (DVFC) 2022 Policy i.e. with a maximum width of 5m at the back of footway and 6.2m at the edge of kerb. Although precise dimensions have not been presented, in terms of scale, the indicated design broadly conforms to the above policy. Final designs for the new crossing and any necessary alteration to the established crossing would be arranged post-permission, and it should be noted that all provisions would need to be constructed to an appropriate council standard executed under S184 of the Highways Act 1980 (or suitable alternative arrangement) at the applicant's/developer's expense.	The new carriageway crossing conforms with this criteria.

The design of the new internal road layout is again broadly acceptable as it conforms to nationally recognised road layout/ junction standards - Manual for Streets (MfS) circa 2007 for new developments. This allows for passenger (and smaller delivery) vehicles using the site to travel without undue hindrance and allow entry and departure in a forward gear which is the recommended practice on highway safety grounds.	Noted and agreed.
Satisfactory highway visibility splays at both access points are also considered crucial given the status/heavily trafficked nature of Rickmansworth Road and the pre-applicant should demonstrate broad conformity to this requirement in-line with the aforementioned MfS best practice document. It is suggested that, with particular reference to the existing access, it would be beneficial to stagger the height of any final highway boundary walling design with a maximum height of 0.6 metres immediately adjacent to and on both sides of the aperture for a distance of 1-2 metres.	The Transport Statement includes a visibility splay in Appendix E to demonstrate the visibility for the exit. The drawing demonstrates that visibility splays of 2.4m x 43m can be achieved at the site access junction, in accordance with Manual for Streets (MfS) guidance for a 30mph speed limit.
Refuse collection would be conducted via Rickmansworth Road. A bin storage location for each unit should be located in proximity of the public highway in order to conform to the council's 'waste collection' maximum distance parameter of 10m i.e. distance from a refuse vehicle to the point of collection. A specific communal bin store location has been indicated on plan which is located on the site frontage in proximity to the new access point thereby conforming to this requirement. There are no further observations.	Noted and agreed, the proposed refuse storage complies with the Council's requirements.
A Construction Management Plan will be a requirement given the constraints and sensitivities of the local road network to avoid/minimise potential detriment to the public realm with particular focus on safeguarding daily activities associated with the nearby local school.	A draft Construction Management Plan has been submitted accordingly.
Contaminated land	
Given the former land use and that the site may be potentially contaminated and that the development involves demolition works, an asbestos survey is recommended, which should be assessed with an Environmental Risk Assessment, to assess any risk associated with land contamination and protect pollution of groundwater.	The submitted ground investigations letter and report confirms that the land does not require remediation following the outcome of ground investigation works.
Flood risk and drainage	
The application site is in Flood Zone 1 where the risk of flooding from rivers or seas is low. As such, all forms of development, including 'more vulnerable' uses such as replacement dwellings, are acceptable in terms of fluvial and tidal flood risk in this location.	Noted and agreed.

<p>A sustainable water management scheme, with the incorporation of Sustainable Urban Drainage Systems (SUDS), should be provided with any forthcoming planning application. This would prevent the need to discharge pre-commencement conditions, in the event that planning permission were to be granted.</p>	<p>Permeable paving will be utilised on the driveway and car parking areas to provide storage within the sub-base stone blanket. A Controflow chamber will also be utilised to restrict the discharge from the site to 1.0 l/s for all storms up to and including the critical 100 year return period plus 40% climate change allowance. The cycle and bin store roofs will be green roofs and water butts will be positioned to the rear of the dwellings for irrigation purposes.</p>
<p>Accessibility</p>	
<p>The development would be subject to compliance with the London Plan policy D7. Any future planning application would need to provide plans detailing compliance with the prescribed standards set out in Approved Document M to the Building Regulations 2010 (2015 edition), clearly detailing the required dimensions and clear access zones within entrance lobbies, passageways, living areas, bathrooms and bedrooms. Level access would need to be shown to and into all external entrance doors. To this end, a scaled drawing no less than 1:100 should be submitted. The plans should include a detailed section drawing showing a level access threshold with a chamfered or bullnose profile not exceeding a height of 15mm.</p>	<p>The proposed dwellings are all M4(2) compliant in line with policy.</p>
<p>Ecology</p>	
<p>The site lies approx. 80m from multiple water courses and near established woodland and the proposal involves the demolition of the existing building, which may contain features suitable for roosting bats, which are a protected species. Also, the site itself includes mature trees, landscaping and vegetation, therefore there is also potential for harm to be posed to reptiles and birds. A Preliminary Ecology Report has not been included with the pre-application submission. In the absence of such report, there is insufficient information to demonstrate that the proposed development would not cause any harm to protected species (which includes bats). A Preliminary Ecology Report should be submitted if the applicant decides to proceed with a formal planning application submission. If the report recommends that additional ecology surveys should be carried out, the reports for these additional surveys will also need to be submitted with any forthcoming planning application.</p>	<p>The Preliminary Ecology Report concludes that the site has low ecological importance but includes recommendations for ecological enhancements to the site. These are further discussed in section 5.0 of this statement.</p>
<p>Sustainability</p>	
<p>The new dwelling should achieve an energy efficiency standard of a minimum 10% CO2 improvement over Building Regulations requirements Part L 2013 (TER Baseline). This could be submitted as part of a full application</p>	<p>The proposed energy strategy has been set out within the submitted Energy and Sustainability Report and the proposed development is currently demonstrating a combined on-site regulated CO2 reduction of 61% (Part L 2021 Baseline).</p>

as a sustainability statement or it could be conditioned.	
Any future scheme should include measures to reduce water usage and promote water reuse in accordance with Policy DMEI 10 Parts G and H) of the Hillingdon Local Plan: Part 2 (2020).	<p>The water consumption criteria for the dwellings will be in line with 105 l/p/day in compliance with Policy EM8 'Land, Water, Air and Noise' of Hillingdon's Local Plan (Part 1) and DMEI 10 Part H.</p> <p>The Energy and Sustainability Statement also sets out that space should be made available for the provision of water butts in private amenity spaces to promote the recycling of rainwater and reduce the number of mains potable water used for external water uses.</p>
BNG	
Any application brought forward to planning stage would need to provide a comprehensive statement confirming how the site would meet the Biodiversity Gain criteria or meet the exemptions.	The Submitted BNG Statement sets out that the proposed development will result in a net gain of 0.04 hedgerow units (+35.10%) and a net loss of 0.11 habitat units (-25.12%), with the Trading Rules not met due to the overall loss of habitat units. Therefore, the Proposed Development will meet current policy requirements in relation to Biodiversity Net Gain via the Biodiversity Offsetting process. An offset comprising 0.15 habitat units, including 0.02 tree units, will be required and the measures within the BNG Statement can be secured by a condition for a Habitat Maintenance and Monitoring Plan.

Consultation

- 3.7 A public consultation event was held on 09 December 2024 to allow the development team to discuss the proposals with members of the public.
- 3.8 5 people attended the public consultation event, where members of the public were given the opportunity to discuss the proposals with members of the design team. The responses to the public consultation event were largely positive.
- 3.9 Separate discussions have also taken place with Northwood College to agree a suitable planting scheme to the rear of the site. In accordance with the conversations held with the school, it is proposed to condition the maintenance of the trees to the rear in order to ensure that the screening between the proposals and the school is maintained in perpetuity.

4.0 Planning policy framework

- 4.1 Section 38(6) of the Planning and Compulsory Purchase Act and Section 70(2) of the Town and Country Planning Act 1990 (as amended) outline the requirement for planning applications to be determined in accordance with the development plan for an area unless material considerations indicate otherwise. This legal requirement is reiterated within the introduction of the National Planning Policy Framework (NPPF).
- 4.2 The adopted development plan for the site comprises of the following documents:
- Hillingdon Local Plan: Part 1 – Strategic Policies (2012)
 - Hillingdon Local Plan: Part 2 – Development Management Policies (2020)
 - Hillingdon Local Plan: Part 2 – Site Allocations and Designations (2020)
 - London Plan (March 2021)
- 4.3 The Council has been working on a review of the Local Plan. Statutory public consultation under regulation 18 was completed on 24 June 2024. The Council currently anticipates the new Local Plan being adopted in 2026/2027. The weight which should be attributed to draft policies is guided by paragraph 48 of the NPPF and paragraph 049 of the Planning Practice Guidance (PPG). As the Local Plan review is still in early stages, in our view it should not currently be afforded any weight.
- 4.4 The below documents are material considerations:
- NPPF (February 2025)
 - London Plan Housing Design Standards LPG (June 2023)

5.0 Planning considerations

5.1 The main planning considerations for the proposed development include:

1. Principle of development;
2. Scale, massing, design and landscaping;
3. Quality of accommodation;
4. Dwelling mix;
5. Amenity considerations;
6. Transport;
7. Energy and sustainability;
8. Trees, ecology and BNG; and
9. Flooding and SuDS.

1. Principle of development

5.2 Local Plan Part 1 policy H1 states that the Council will meet and exceed its minimum strategic dwelling requirement, where this can be achieved, in accordance with other Local Plan policies.

5.3 The Council has confirmed under the previous refusal and the more recent pre-applications that the principle of developing the site for new homes is acceptable, noting that there is strong national, regional and local planning policy support for redeveloping this type of site for an increased number of homes.

2. Scale, massing, design and landscaping

5.4 Paragraph 135(c) of the NPPF states that planning policies and decisions should ensure that developments are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities).

5.5 London Plan policy H2 'small sites', says that boroughs should recognise in their Development Plans that local character evolves over time and will need to change in appropriate locations to accommodate additional housing on small sites.

5.6 London Plan policy D1 outlines the importance of understanding the local context and ensuring that new developments respect the established character. London Plan policy D3 seeks to optimise site capacity through a design-led approach. The policy states that development proposals should enhance local context, respond to the existing character of a place and be of high quality.

5.7 Local Plan Part 1 policy BE1 requires all new development to improve and maintain the quality of the built environment to create successful and sustainable neighbourhoods, by achieving a high quality of design that is contextual to the local area and does not erode the character and biodiversity of suburban areas.

5.8 Local Plan Part 2 policy DMHB 11 sets out the policy for the design of new development, including that they should be designed to the highest standards and incorporate principles of good design in relation to the local context, building materials and finishes, protecting features of positive value within or near the site, and green infrastructure.

5.9 Local Plan Part 2 policy DMHB 12 encourages development to be well integrated with the surrounding area and accessible, such as the inclusion of suitable landscape treatment and appropriate and robust hard landscaping.

Scale and massing

- 5.10 This part of Rickmansworth Road is characterised by larger blocks of flats and detached houses of two to four storeys which are set back from the highway.
- 5.11 The proposals comprise three pairs of two storey semi-detached houses with roof level accommodation. They are appropriately set back from the front highway to maintain a consistent building line on this part of the road and have also been staggered in order to address the Council's previous concerns regarding bulk, scale and massing. The staggering of the buildings also creates a transition between the neighbouring buildings and provides visual relief, which is also further enhanced by the new landscaping proposals (discussed below).
- 5.12 The proposed scale of the houses has been reduced following the previous refusal on site and through the pre-application process with the Council and for comparison, the previous refusal scheme is outlined in blue on the elevation below. The proposed houses will sit lower than the adjacent block of flats and the proposals sit comfortably within the plot and with neighbouring plots in terms of scale and massing. There is now a gradual and logical step down in height between the building to the north (Moray House) and the neighbouring building on south side (Kiln Farm) (see below).



*Above: proposed street elevation
(boundary treatment and landscaping not shown)*

Design

- 5.13 In terms of architectural detailing, the elevational treatment includes splitting the front central projection into two smaller gable ends to break up and articulate the front elevations. The fenestration is also broken up to include windows of varying widths at the front and a recessed front door entrance area that matches the proportions of the openings above.
- 5.14 The houses will feature full brick façades with subtle variations in brick coursing, alongside horizontal brick coursing bands and lintels above the openings. The Council agreed in the pre-application advice that this detailing adds visual interest. It is also proposed to vary the colour of the three buildings to provide additional variation and visual interest. The two houses on the sides would feature a lighter-toned brick to match adjacent buildings while the middle one would feature a red shade of brick that is observed in the surrounding area.
- 5.15 The design offers a clean and contemporary interpretation of a traditional semi-detached typology. The buildings are attractive and feature enough variety without appearing fussy or over-articulated.

Landscaping

- 5.16 The existing site has mature trees and vegetation along the front boundary wall which gives a strong visual barrier. Officers advised that the landscape strategy would be key to reducing the sense of massing and encouraged additional trees and vegetation at low levels and a greater amount of soft landscaping in the front areas.
- 5.17 The proposed front landscaping would incorporate a variety of colours and use both evergreen and deciduous planting that varies across the seasons. As seen in the CGI below, the proposed front landscaping will partially screen views of the dwellinghouses to soften their outlines and the denser greenery at the lower levels will support a flowering woodland habitat that will enhance ecology and

biodiversity. The submitted Landscaping Scheme also includes 96% native tree species, in line with Officers comments from the pre-application stage.



Above: CGI showing the street scene with front landscaping.

- 5.18 The proposals seek to retain the front boundary wall; however it is proposed to be reduced in height following the removal of some of the bank behind. The heritage contribution of the wall is therefore maintained, whilst also providing a varied planting strategy which will provide visual interest, as shown in the image above.
- 5.19 The curved brick wall of the pedestrian entrance is identified as a feature of local interest at the site and officers encouraged its retention. A similar feature is also observed near the rear gardens of houses at Myrtleside Close. It is proposed to retain and reopen the curved pedestrian entrance to the site, which would offer an attractive and safe pedestrian access point for future occupiers. This aligns with Local Plan Part 2 policy DMHB 11 in protecting features of positive value.
- 5.20 New trees are also proposed to the rear of the site, to screen the proposed development from the school behind.

Summary

- 5.21 The site will be visually enhanced as a result of the proposals and will respond positively to the local context. The proposals have therefore been designed in accordance with the NPPF, the London Plan, Local Plan policies BE1, DMHB11 and DMHB12, and the Council's pre-application advice.

3. Quality of accommodation

- 5.22 Local Plan Part 2 policy DMHB 16 states that housing development should meet or exceed the latest internal space standards. Policy D6 of the London Plan also sets out that housing development should be of high-quality design and provide adequately sized rooms (as set out in Table 3.1) with comfortable and functional layouts which are fit for purpose. London Plan policy D6 also requires a ceiling height of 2.5m for at least 75% of each dwellings gross internal area (GIA). Housing development should maximise the provision of dual aspect dwellings.

- 5.23 Local Plan Part 2 policy DMHB 17 expects residential development to account for the Residential Density Matrix for habitable rooms and residential units.
- 5.24 Local Plan Part 2 policy DMHB 18 sets out the requirement for minimum private outdoor amenity space provision and the design of any front boundary to be in keeping with the character of the area and street scene.
- 5.25 London Plan policy D7 requires that at least 10 per cent of dwellings meet Building Regulation requirement M4(3) 'wheelchair user dwellings' and that all other dwellings meet Building Regulation requirement M4(2) 'accessible and adaptable dwellings'.
- 5.26 The proposals would provide 6 family homes (4b6p) which all exceed minimum space standards. The dwellings are triple aspect and all habitable rooms are designed to receive good levels of natural light, satisfactory outlook and natural ventilation.
- 5.27 Each property would have access to good quality private outdoor space. Officers considered the modest shortfall against the 100sqm requirement to be acceptable given that it is clear that all dwellings would still have good quality, large functional private gardens. A communal outdoor space is also proposed by opening up the front landscaped area.
- 5.28 Level access to the properties' front entrances is provided and all dwellings have been designed to meet Building Regulation requirement M4(2).
- 5.29 Officers previously assessed that the scheme provides an acceptable quality of living environment in terms of size, layout, internal daylight, visual outlook and privacy. The proposed development provides a high quality of accommodation for future family occupiers in line with the relevant Local and London Plan policies.

4. Dwelling mix

- 5.30 Local Plan Part 2 policy DMH 2 requires the housing mix to reflect the Council's latest information on housing needs and sets out the substantial borough-wide requirement for larger affordable and private market units. Hillingdon's Housing Strategy 2021/22-2025/26 sets out the need to incentivise the release of larger family homes.
- 5.31 The proposal will provide 6 new family homes (4b6p). The site is in an accessible location in terms of public transport and is near local amenities and adjacent to Northwood College. The available private outdoor space offers a desirable opportunity for family living.
- 5.32 The proposal contributes to the Council's housing supply and, in particular, the identified need for family housing which was supported by Officers at the pre-application stage.

5. Amenity considerations

- 5.33 Local Plan Part 2 policy DMHB 11 sets out the design policy for new development. Part C requires that developments do not adversely impact the amenity, daylight and sunlight of adjacent properties and open space.
- 5.34 The proposals are set in from the boundaries in order to limit any impact to neighbouring properties at Moray House and Kiln Farm. The side facing windows of the development could be conditioned to be obscured glazing and non-opening below 1.8m to ensure no overlooking. The proposals also bring the building line forward compared to the existing dwelling, limiting the impact on the school to the rear and new trees are proposed to the rear gardens in order to provide screening and to avoid any overlooking to the school. It is proposed to condition the maintenance of the trees to the rear in order to ensure that the screening between the proposed development and the school is maintained in perpetuity.
- 5.35 Officers concluded in the pre-application advice that the proposals would not represent an un-neighbourly form of development.

Daylight sunlight

- 5.36 The submitted Daylight and Sunlight Report demonstrates that the scheme is in accordance with BRE guidelines.

Noise

- 5.37 The submitted Noise Report assesses the impact of the proposed Air Source Heat Pumps and concludes that the proposed plant will achieve the established noise criterion at all times and is therefore acceptable.

Summary

- 5.38 The proposed development has therefore been carefully planned and designed to preserve the amenities of neighbouring residential properties and complies with Local Plan Part 2 policy DMHB 11.

6. Transport

- 5.39 London Plan policy T5 sets the minimum cycle parking standards for dwellings as 2 spaces per 2-bed or above dwellings.
- 5.40 Local Plan Part 2 policy DMT6 sets out the vehicle parking standards as 2 spaces per 3-bed or more units.
- 5.41 The proposals provide 2 covered cycle parking spaces and 2 car parking spaces per dwelling. An additional space for 2 short stay cycle parking is provided. Officers considered the quantum of car parking to be acceptable as it reduces the potential for on-street parking displacement. The Council's Highways Team also raised no objection on transport or highway-related grounds in the previous planning application.
- 5.42 Retaining the curved brick entrance will provide safe, segregated pedestrian access to the site without prejudicing the one-way entry and exit arrangement and the proposed entrance gates are set back into the site to ensure a more rapid discharge of a vehicle entering the site from the public highway, promoting traffic fluidity and mutual safety for all road users.
- 5.43 A shared bin store is provided to serve each of the residential units all as indicated on the plans in an accessible position for service vehicles directly alongside Rickmansworth Road.
- 5.44 A draft Construction Management Plan has been submitted. A final CTMP can be conditioned as necessary.
- 5.45 The proposals, therefore, would not result in any adverse impact on the public highway in terms of parking capacity and safety. The proposed scheme meets minimum policy requirements for cycle parking facilities and complies with the Council's car parking standards. The proposals therefore comply with the relevant transport policies.

7. Energy and sustainability

- 5.46 London Plan Policy SI2 encourages residential developments to achieve 10% CO2 emissions reduction beyond Building Regulations.
- 5.47 Local Plan Part 2 policy DME1 2 requires all developments to make the fullest contribution to minimising carbon dioxide emissions in accordance with the London Plan.
- 5.48 The submitted energy strategy follows the energy hierarchy; use less energy (Be Lean), supply energy efficiently (Be Clean), use renewable and low carbon energy (Be Green). The overall energy strategy capitalises on passive design measures to maximise the fabric energy efficiency and energy demand.

The proposed development also makes use of Air Source Heat Pumps (ASHPs) for space heating and domestic hot water to remove the need for on-site combustion.

- 5.49 The proposed development also utilises window reveals where feasible to reduce the requirement for active cooling. Mechanical Ventilation with Heat Recovery (MVHR) will also be included to help reduce the operational energy demand of the dwellings.
- 5.50 The Energy and Sustainability Report concludes that the proposed development is currently demonstrating a combined on-site regulated CO₂ reduction of 61% (Part L 2021 Baseline). The proposals are therefore considered to comply with the Council's energy and sustainability policies.

8. Trees, ecology and BNG

- 5.51 Local Plan Part 2 policy DMHB 14 states that all developments will be expected to retain or enhance existing landscaping, trees, biodiversity or other natural features of merit.
- 5.52 Policy G6(D) of the London Plan states that development proposals should manage impacts on biodiversity and aim to secure net biodiversity gain.
- 5.53 Local Plan Part 2 policy DMEI 7 encourages new development to retain and enhance any existing features of biodiversity value. Part B of the policy states that if development is proposed on or near to a site considered to have features of ecological or geological value, applicants must submit appropriate surveys and assessments to demonstrate that the proposed development will not have unacceptable effects.
- 5.54 The submitted Arboricultural Impact Assessment sets out how 10 trees will be removed on site to enable the development. T1 is in an unsuitable position and will be infringing on a building if retained. T3 and T4 are both low quality and require removal to allow the statutory pedestrian access into the site. T6-T11, whilst larger trees on site, are also of low quality and likely to receive future pressure for severe reduction or removal.
- 5.55 The removal of these trees can be mitigated by planting species which will add longevity and biodiversity to the site. The Arboricultural Impact Assessment concludes that the submitted landscaping scheme shows an adequate replanting proposal for the site, which replaces the trees on site in a greater quantity than is removed, with species choice including Magnolia, Hornbeam, Apple, Sorbus and Beech. The submitted Arboricultural Method Statement also shows how remaining trees will be protected during construction, in line with Local Plan Part 2 policy DMEI 14.
- 5.56 The Submitted BNG Statement sets out that the proposed development will result in a net gain of 0.04 hedgerow units (+35.10%) and a net loss of 0.11 habitat units (-25.12%), with the Trading Rules not met due to the overall loss of habitat units. Therefore, the proposed development will meet current policy requirements in relation to Biodiversity Net Gain via the Biodiversity Offsetting process. An offset comprising 0.15 habitat units, including 0.02 tree units, will be required and the measures within the BNG Statement can be secured by a condition for a Habitat Maintenance and Monitoring Plan.
- 5.57 The submitted Ecological Assessment sets out how the proposals have been designed to inherently avoid impacts on ecology and biodiversity and that the site comprises a previously developed area, comprising buildings, hardstanding, and poor-quality habitats. Based on the results from the survey and context of the site the overall ecological importance of the site is considered to be low however replacement tree planting is proposed to maintain opportunities for wildlife and the following ecological and biodiversity enhancements will also be provided within the Site – schwegler 1FR bat tubes, bird nest boxes and a group of three sparrow nest boxes.
- 5.58 The proposals are therefore considered to be in accordance with the Council's biodiversity and ecological policies.

9. Flooding and SuDs

- 5.59 Local Plan Part 2 policy DMEI 9 sets out the flood risk policies and requires proposals to make appropriate provision for flood risk mitigation.
- 5.60 Local Plan Part 2 policy DMEI 10 states that applications for all new build developments are required to include a drainage assessment demonstrating that appropriate sustainable drainage systems (SuDS) have been incorporated in accordance with the London Plan Hierarchy.
- 5.61 The site is located within Environment Agency Flood Zone 1 (lowest risk) and is not within a Critical Drainage Area. Permeable paving will be utilised on the driveway and car parking areas to provide storage within the sub-base stone blanket. A Controflow chamber will also be utilised to restrict the discharge from the site to 1.0 l/s for all storms up to and including the critical 100 year return period plus 40% climate change allowance. The cycle and bin store roofs will be green roofs and water butts will be positioned to the rear of the dwellings for irrigation purposes.
- 5.62 The proposed development therefore complies with Local Plan policies DMEI 9 and 10 of the Local Plan Part 2.

6. Conclusion

- 6.1 This statement demonstrates that the proposal is in accordance with the relevant policies contained within the Development Plan.
- 6.2 There is potential to create 6 high-quality new homes in a sustainable location, in buildings which will enhance the townscape and the site's natural environment. The design provides dwellings which sit comfortably and spaciouly within the plot and would provide a very good standard of accommodation for future occupiers whilst having no adverse impacts on neighbouring sites.
- 6.3 As set out earlier in this statement, the proposed dwellings sit comfortably in the site and the development has the potential to deliver the following benefits:
- The redevelopment of an underutilised brownfield site to provide new homes. Paragraph 125 of the NPPF gives substantial weight to the value of using suitable brownfield land within settlements to provide new homes;
 - The provision of 6 new family houses of high-quality design;
 - The ongoing economic benefit of 5 net additional households (Council Tax payments, net spend of residents into the local economy etc.);
 - A new highly sustainable and low carbon development which incorporates ASHPs;
 - Positive gains to local biodiversity through the introduction of green roofs and a comprehensive landscaping scheme;
 - A SuDs strategy which will improve surface water runoff rates at the site;
 - Improvements to local infrastructure through a Community Infrastructure Levy (CIL) contribution; and
 - Creation of construction jobs throughout the construction of the development.
- 6.4 The Council is therefore respectfully requested to grant planning permission for the proposed development.