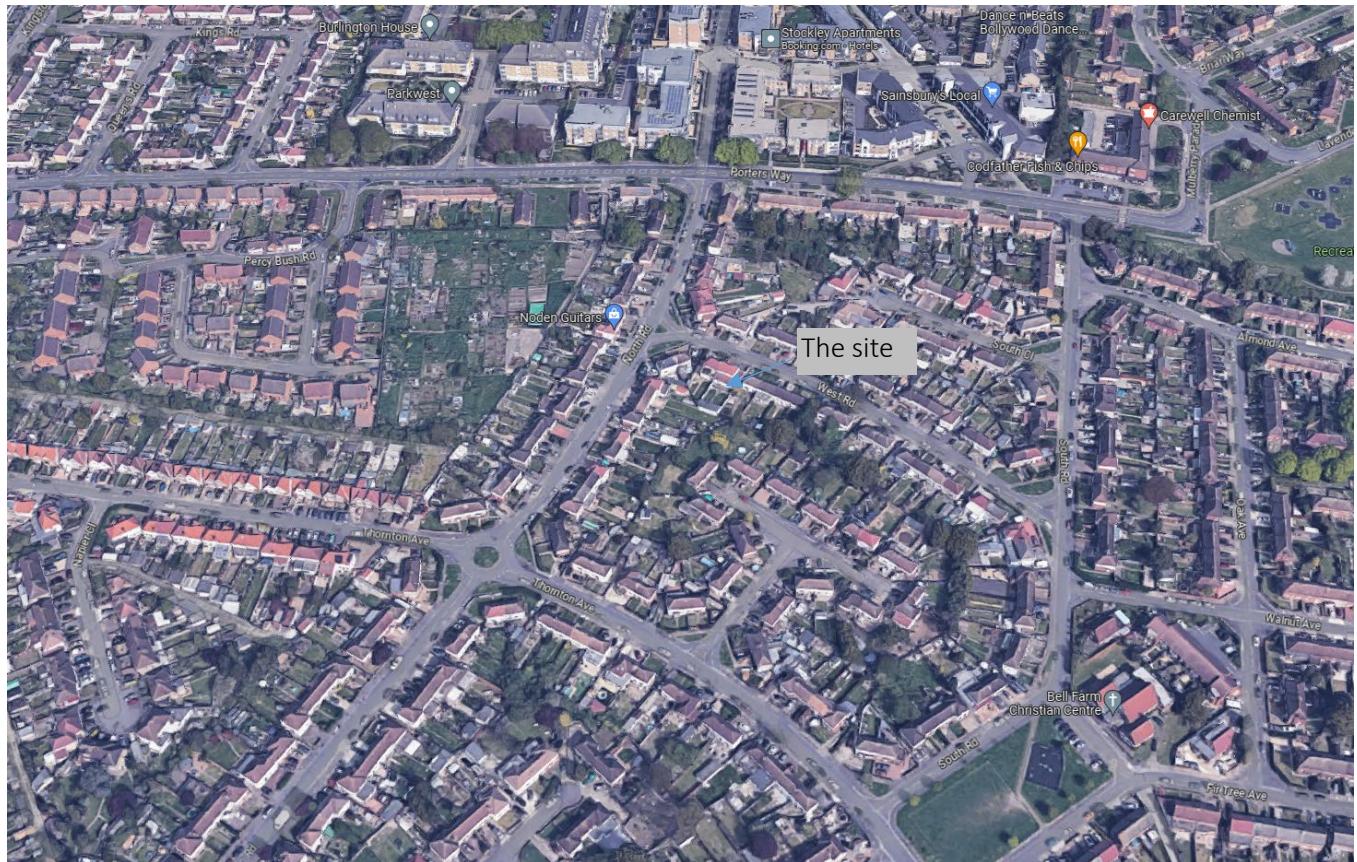


Design and Access Statement

Site address: 6 West Rd, West Drayton UB7 9LG

Proposal: Retrospective Planning Application: Change of use from C3 dwelling house to C2 supported living accommodation for 2 children



1.0 Site characteristics and relevant planning history

1.1 The application site comprises a two storey semi detached former dwellinghouse located close to the corner of West Road and North Road. The driveway to the property slopes down towards the highway and is accessed from West Road to the northeast of the dwelling. The property has already been converted in C2 use, though this has only involved internal alterations.

1.2 The site lies within close proximity to a range of facilities including schools, shops, access to public transport and open space.

1.3 It is also worthy of note that the application site itself is not Listed, nor locally listed, and the site is not within a designated Conservation Area or other form of designation that would require a more stringent approach to be taken. It is wholly within low risk Flood Zone 1, as indicated below.

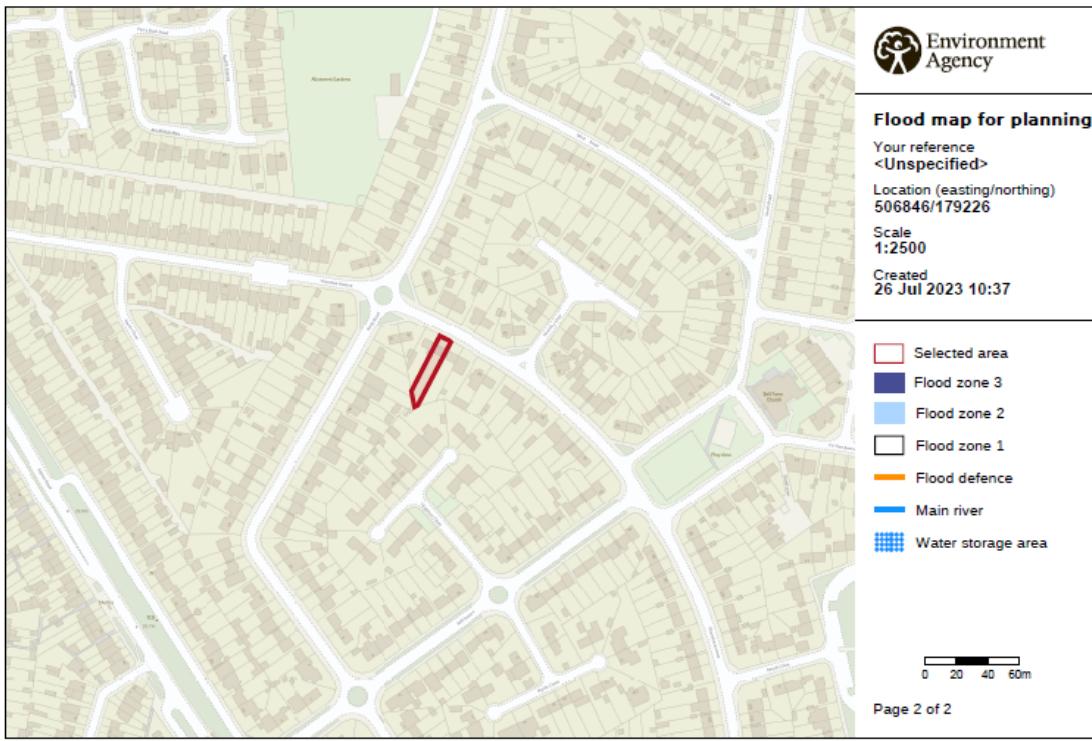


Image 1 – EA Flood Map (July 2023)

Planning History

1.4 The site has the following planning history:

- 54324/APP/2003/1241 - RETENTION OF SINGLE-STOREY REAR EXTENSION AND GARAGE CONVERSION, FRONT PORCH, AND 1.5M HIGH BOUNDARY WALL (RETROSPECTIVE APPLICATION) – No Further Action(P)
- 54324/APP/2000/355 - ERECTION OF A SINGLE STOREY SIDE AND REAR EXTENSION -Approval
- 54324/99/1984 - Erection of single storey side and rear extension - Refusal

2.0 Policy framework and design guidance

2.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires local planning authorities to determine planning applications in accordance with an up to date Development Plan unless material planning considerations outweigh it.

2.2 The Development Plan in this instance comprises the London Plan ("LP") (2021), the Local Plan Part 1 (Strategic Policies)(2012), the Local Plan Part 2 (Development Management Policies)(2020), the Local Plan Part 2 (Site Allocations)(2020) and various Supplementary Planning Documents.

2.3 The relevant policies from the London Plan are as follows:

- Policy GG1 (Building strong and inclusive communities)
- Policy GG4 (Delivering the homes Londoners need)
- Policy D4 (Deliverin good design)
- Policy D5 (Inclusive design)
- Policy S1 (Developing London's social infrastructure)
- Policy S2 (Health and social care facilities)
- Policy T5 (Cycling)
- Policy T6 (Car parking)

2.4 The relevant policies from within the Local Plan Part 1 are as follows:

- Policy NPP1 (Presumption in Favour of Sustainable Development)
- Policy BE1 (Built Environment)

2.5 The relevant policies from within the Local Plan Part 2 (DM Policies) are as follows:

- Policy DMH1 (Safeguarding Existing Housing)
- Policy DMH2 (Housing Mix)
- Policy DMH8 (Sheltered Housing and Care Homes)
- Policy DMHB11 (Design of New Development)
- DMHB 12 (Streets and Public Realm)
- DMHB 15 (Planning for Safer Places)
- DMHB 18 (Private Outdoor Amenity Space)

- Policy DMT1 (Managing Transport Impacts)
- DMT2 (Highways Impacts)
- DMT5 (Pedestrians and Cyclists)
- DMT6 (Vehicle Parking)

2.6 Given its obvious relevance, it is worth setting out what Policy DMH8 of the Local Plan Part 2 states:

"Policy DMH 8: Sheltered Housing and Care Homes

A) The development of residential care homes and other types of supported housing will be permitted provided that:

- i) it would not lead to an over concentration of similar uses detrimental to residential character or amenity and complies with Policy DMH 4: Residential Conversions;*
- ii) it caters for need identified in the Council's Housing Market Assessment, in a needs assessment of a recognised public body, or within an appropriate needs assessment and is deemed to be responding to the needs identified by the Council or other recognised public body such as the Mental Health Trust;*
- iii) the accommodation is fully integrated into the residential surroundings; and*
- iv) in the case of sheltered housing, it is located near to shops and community facilities and is easily accessible by public transport.*

B) Proposals for residential care establishments which fall under Use Class C2 must demonstrate that they would provide levels of care as defined in Article 2 of the Town and Country Planning (Use Classes) Order 1987 (as amended)."

2.7 With respect to the criteria within Policy DMH8, as set out in the accompanying plans and in the following sections; the scheme meets the requirements in full. With respect to Article 2 of the Town and Country Planning (Use Classes) Order 1987 (as amended), the definition of "care" is "*personal care for people in need of such care by reason of old age, disablement, past or present dependence on alcohol or drugs or past or present mental disorder, and in class C2 also includes the personal care of children and medical care and treatment*" [our emphasis]. That is precisely what is being proposed on the site.

2.8 Also of relevance is the London Borough of Hillingdon Strategic Housing Market Assessment Update (2018). This document forms the basis of the housing-related policies referred to above; objectively identifying the need for different types of housing, as well as the needs of different groups in the community, ensuring that housing delivery caters for all types of housing demand. It specifically references the fact that the housing stock will need to adapt to ensure that it delivers sufficient space to enable care and support for those in need to be provided on site. This is true for older people, but also for children.

2.9 The Government published a revised National Planning Policy Framework (NPPF) in July 2021. As per the previous iterations, this document sets out the Government's planning policies for England and how these are expected to be applied. It provides a framework within which local people and local planning authorities

can produce their own distinctive local and neighbourhood plans, which reflect the needs and priorities of their communities. Given the age of the adopted Development Plan documents, where there are discrepancies between it and the new NPPF it is appropriate to consider only the NPPF.

2.10 At the heart of the Framework is a presumption in favour of sustainable development – Local Planning Authorities should approve proposals that accord with an up-to- date Development Plan and, alongside saved local plan policies and to which the relevant Strategic Policies will align, it too seeks to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings, as well as taking account of the character of different areas.

2.11 The provision of health care and community facilities to meet the needs of the public is woven throughout the NPPF, as it identifies the key role that these types of development play in creating sustainable communities. Paragraph 20 of the NPPF states that: *"Strategic policies should set out an overall strategy for the pattern, scale and design quality of places, and make sufficient provision for...c) community facilities (such as health, education and cultural infrastructure)"*

2.12 Paragraph 62 of the NPPF states that: "

2.13 Paragraph 93 states: *"To provide the social, recreational and cultural facilities and services the community needs, planning policies and decisions should:*

a) plan positively for the provision and use of shared spaces, community facilities (such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments;

b) take into account and support the delivery of local strategies to improve"

2.14 It is clear that the national and local policy landscapes both promote the delivery of schemes such as that hereby proposed, subject to the consideration of material factors.

3.0 Proposal

3.1 The proposal relates to the continued use of the existing property as a C2 (Supported Living Accommodation) unit for 2 children, as set out in the accompanying plans.

3.2 The proposals will not alter the external appearance of the property in any way, with only some very minor alterations internally having been required to facilitate the change. The most up to date version of the Strategic Housing Market Area Assessment identifies a need for the sort of use proposed – which is also supported by national guidance within the NPPF and the Development Plan as a whole, as identified above.

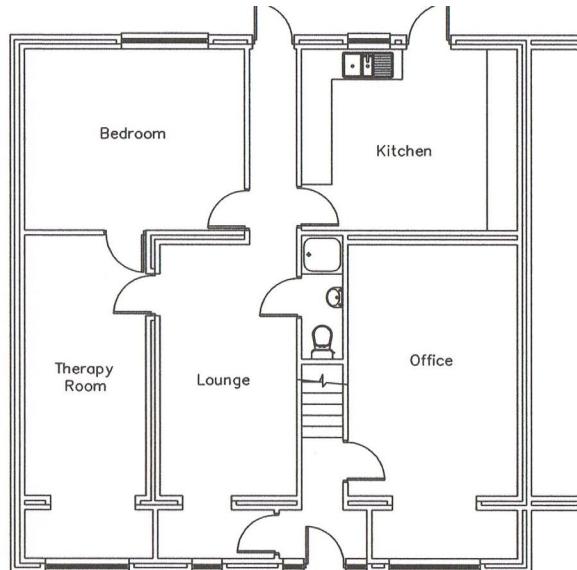
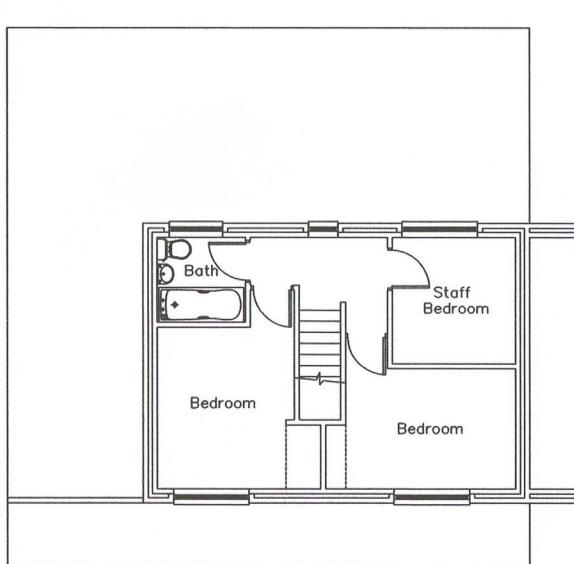


Image 2 –Proposed Floor Plans

3.3 Significantly, the proposals adhere to the Development Plan in full – particularly with respect to Policy DMH8 of the Local Plan Part 2 as referenced above. A thorough consideration of all material considerations continues below.

4.0 Considerations

4.1 The key issues to consider for this application are:

- Principle of Development
- Design and Character;
- Residential Amenity;
- Transport Impact

Principle of Development

4.2 The site is wholly suitable for the form of development proposed. No external alterations were necessary to the existing building – with only minimal internal alterations necessary to facilitate the change in use. The Development Plan is wholly supportive of the use class proposed – meeting as it does an identified need within the 2018 SHMA. Policy DMH8 of the Local Plan Part 2 identifies the importance of delivering this form of housing provision.

- 4.3 As set out above, the NPPF is also supportive of this type of development, so long as no other material considerations outweigh the clear public benefit from its provision.
- 4.4 As such, and in full accordance with the guidance contained within the Development Plan, the proposals are considered to be sustainable development with respect to the NPPF.

Design and Character

- 4.5 The scale, design and detail of the unit was not altered in any meaningful sense. The character of the site will also not change – appearing to all extents and purposes to be a residential dwelling. The hardstanding necessary to accommodate the parking provision is already in place, and the numbers of vehicles accessing the site are unlikely to be noticeably different from an average 4 bed dwellinghouse.
- 4.6 The number of people occupying the property would be no different to a large family occupying it – indeed there would be nothing to stop the site from being occupied by even more people under the status quo, as each of the bedrooms could conceivably house 2 people. As proposed, the site would accommodate 2 children being cared for, with 3 members of staff during the day and 2 at night.
- 4.7 Each child would benefit from their own bedroom, whilst the staff would also have space to sleep when taking care of the children over night. Communal living space is also provided.
- 4.8 Therefore, in accordance with Policy D4 of the London Plan, Policy BE1 Local Plan Part 1 and Policy DMHB11 of the Local Plan Part 2, and Section 16 of the NPPF the proposals are acceptable in terms of their design, character and impact on the surrounding area.

Residential amenity

- 4.9 The applicant has also given careful consideration to the nature of the proposed use in relation to its potential impact on adjoining properties. There would be no loss of light, loss of privacy or overbearing impact as a result of the proposed change of use – as no physical alterations are proposed to the external elevations. Furthermore, the unit would continue to benefit from wholly reasonable gardens suitable in relation to their size and the character of the surrounding area.
- 4.10 Were the Council concerned about the operation of the site, our client would be happy for a condition to be added to any approval requiring the agreement of a Management Plan for the site, with appropriate actions should noise/other disturbances cause concern in the surrounding area.

4.11 As such, it is contended that the proposals are therefore in full accordance with the requirements of the NPPF and Development Plan in so far as they have regard to residential amenity and the importance of protecting it.

Transport Impact

4.12 The site would continue to be accessed from the highway in the existing manner. The access already serves the unit without any issues arising.

4.13 The proposed unit will continue to incorporate 2 parking spaces.

4.14 Cycle parking, together with secure bin storage, can be provided within the site as per the status quo. Should the LPA require further detail of this, we are happy to provide it pre-determination or post determination via condition.

4.15 The site has a PTAL rating of 2, which indicates a decent level of public transport access, as indicated in image 4.

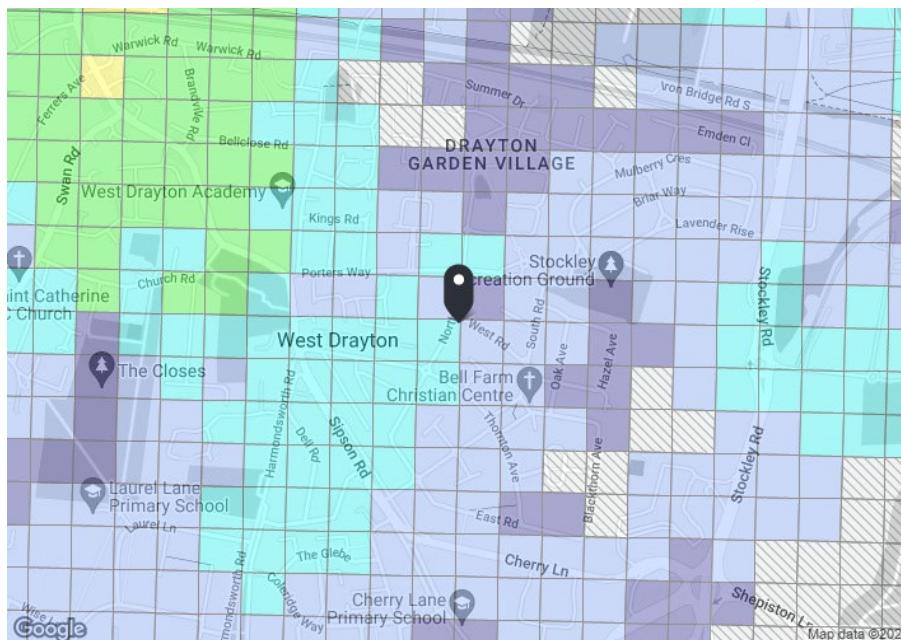


Image 4 – PTAL Rating

4.16 Given that this is also true of the existing residential dwelling, it is considered that this is acceptable in this instance.

4.17 As such, it is contended that the proposals are therefore in full accordance with the requirements of the NPPF and Development Plan in so far as they have regard to the development's impact on the highway network.

5.0 Summary

5.1 This application provides a clear and logical assessment of the site's constraints such that the nature, detail and impact of the proposed change of use, as described in the sections above, and illustrated within the accompanying plans, provides an appropriate response to the site's status. As such appropriate consideration has been given to the existing property, relevant planning history, relevant current Development Plan policy requirements and to the important guidelines within the NPPF as also identified in the sections above.

5.2 The proposals will contribute towards delivery of targets associated with an objectively identified need for supporting living accommodation, as set out within the SHMA 2018 and the Development Plan.

5.3 The scheme will deliver a new use that is wholly in keeping with the character of the site and its surroundings.

5.4 The scheme would have not detrimental impact on the amenity enjoyed by existing or future occupiers of adjoining properties.

5.5 The proposals would have a neutral impact on the highway network.

5.6 The development can therefore be considered to accord with the relevant planning policies as detailed above and to be consistent with the aims and objectives of the NPPF that provides overarching guidance. In line with Paragraph 11 of the NPPF, the application accords with the Development Plan and should be approved without delay.