



## PLANNING STATEMENT

**Site:** 25 New Road  
Harlington  
UB3 5BD

**For:** Komorebi Ventures Limited

**Project Ref:** 24038

**Date:** October 2024

### Prepared by:

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## **Plans and Documents Accompanying the Application**

Completed Application Form
Planning Statement, prepared by Barker Parry Town Planning Ltd
Location Plan
24/3558/1 (Proposed Site Plan)
24/3558/2 (Proposed Plans & Elevations Plots 1-3)
24/3558/3 (Proposed Plans & Elevations Plots 4-9)
24/3558/4 (Proposed Street Scenes / Sections)
24/3358/5 (Cycle Store)
Transport Statement, prepared by Paul Basham Associates
Biodiversity Net Gain Assessment, prepared by Arbtech
Arboricultural Survey, prepared by Archtech
Preliminary Ecological Appraisal, prepared by Arbtech
Preliminary Roost Assessment, prepared by KJF Consultancy
Statutory Biodiversity Net Gain Baseline Metric

## 1.0 Introduction

1.1 This Planning Statement has been prepared on behalf of the Komorebi Ventures Limited ("the Applicant") to support a full planning application for the redevelopment of 25 New Road, Harlington, UB3 5BD.

1.2 The description of the development proposed is as follows:

*Demolition of the existing structures and the erection of nine new dwellings with associated access and hard and soft landscaping.*

1.3 The application site includes a residential property as well as the separate commercial area to the rear which benefits from a separate access. The existing use of the site is not making the best use of the land and the proposed development aims to make a valuable contribution to the housing supply in the Borough.

1.4 Section 2 of this Planning Statement outlines the context of the application site, including any relevant designations and planning history. Section 3 sets out details of the proposed works, whilst Section 4 sets out the relevant local and national policy. A planning assessment of the proposed development can be found at Section 5 and the conclusions of this statement are discussed at Section 6.

## 2.0 Site Context and Surroundings

### **The Site and Surroundings**

2.1 The application site is a 0.22 hectare site located on the eastern side of New Road. The site is broadly rectangular with a single storey residential dwelling located in the north-eastern corner of the site. To the rear of the site, is a commercialised area for the storage of vehicles with associated outbuilding and other structures, which benefits from a separate established access at the southern end of the site. This use does not benefit from any historic planning permission.

2.2 Harlington is described within the Local Plan as a local centre. It is bounded to the north and west by the M4 motorway, the south by Heathrow airport and to the east by the A312.

2.3 The area surrounding the site is predominantly residential in nature; characterised by a mixture of two-storey semi-detached and terraced properties. The site is surrounded to the east, north and south by a large open field and therefore is visible from longer views along West End Lane and from the rear of the properties along Pennie Way.

2.4 Figure 1 shows a Google Earth image location of the site, marked by a red dot in relation to its wider context. Figure 2 shows an enlarged view of the site outlined in red.



**Figure 1** - Google Earth imagery from 2020 showing the site in relation to its wider context



**Figure 2** - Google Earth imagery from 2020 showing an enlarged view of the site

## Planning Designations

2.5 The site is not subject to any specific designations relevant to the development potential or principle. In wider terms it is within the Heathrow Archaeological Protection Zone. It has no other relevant designations.

2.6 It is situated in an area that has a Public Transport Accessibility Level (PTAL) of 0. It is therefore considered to have poor access to public transport. The nearest bus stops are located on Bath Road and High Street Harlington.

2.7 The Site is located within Flood Zone 1 and has a low probability of flooding.

## Planning History

2.8 There is no relevant planning history for the site or the surrounding area relevant to the proposed development.

3.0 **Proposed Development**

3.1 Full planning permission is sought for the demolition of the existing structures and the erection of nine new dwellings comprising of three pairs of semi-detached dwellings and three terraced properties with associated hard and soft landscaping.

3.2 The proposed scheme comprises of the following elements:

**Amount**

3.3 9no. three-bedroom, four person houses are proposed on the 0.22 hectare site. A row of three terraces is proposed to front New Road and three pairs of semi-detached houses are proposed on the southern side of the site, accessed via the existing dropped kerb. The accommodation schedule is as follows:

<b>Plot</b>	<b>Internal Floor Area (sqm)</b>	<b>External Amenity Space</b>
1 (3b4p)	111	97
2 (3b4p)	111	87
3 (3b4p)	107	74
4 (3b4p)	110	100
5 (3b4p)	110	83
6 (3b4p)	110	79
7 (3b4p)	110	99
8 (3b4p)	110	103
9 (3b4p)	110	67.5

### Scale

3.4 The row of terraced properties would be two storeys in height with a gable roof. Plot 3 on the southern end of the row would incorporate a front facing gable end.

3.5 The semi-detached properties would be two and half storeys in height and would include habitable roof space. The properties would also incorporate a gable roof with rear dormers and front facing roof lights.

### Access

3.6 Access to Plots 1 and 2 would be provided via a new vehicular crossover on New Road. Access to Plots 3-9 would be via a new access road using the existing vehicular access on the southern end of the site. 1 parking space would be provided for each dwelling with an additional visitor space provided at the eastern end of the new access road.



**Figure 3** - Extract from Proposed Site Plan

#### 4.0 **Planning Policy**

4.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that applications for development must be determined in accordance with the development plan, unless material considerations indicate otherwise. At present, the adopted Development Plan for the Borough comprises of:

- Hillingdon Local Plan: Part One – Strategic Policies (2012)
- Hillingdon Local Plan: Part Two – Development Management Policies (2020)
- Hillingdon Local Plan: Part Two – Site Allocations and Designations (2020)
- London Plan (2021)
- West London Waste Plan (2015)

#### **Hillingdon Local Plan: Part One – Strategic Policies (2012)**

4.2 Relevant policies from this DPD include:

- Policy BE1 (Built environment)
- Policy H1 (Housing growth)
- Policy EM1 (Climate change adaption and mitigation)
- Policy EM8 (Land, water, air and noise)
- Policy EM11 (Sustainable waste management)

#### **Hillingdon Local Plan: Part Two – Development Management Policies (2020)**

4.3 Relevant policies from this DPD include:

- Policy DME2 (Employment uses outside of designated sites)

- Policy DMH2 (Housing mix)
- Policy DMH6 (Garden and backland development)
- Policy DMHB1 (Heritage assets)
- Policy DMHB7 (Archaeological priority areas and archaeological priority zones)
- Policy DMHB 11 (Design of new development)
- Policy DMHBB12 (Streets and public realm)
- Policy DMHB14 (Trees and landscaping)
- Policy DMB15 (Planning for safer places)
- Policy DMHB16 (Housing standards)
- Policy DMHB17 (Residential density)
- Policy DMHB18 (Private outdoor amenity space)
- Policy DMEI2 (Reducing carbon emissions)
- Policy DMEI7 (Biodiversity protection and enhancement)
- Policy DMEI10 (Water management, efficiency and quality)
- Policy DME12 (Development of land affected by contamination)
- Policy DMEI14 (Air quality)
- Policy DMT1 (Managing transport impacts)
- Policy DMT2 (Highways Impacts)
- Policy DMT5 (Pedestrians and cyclists)
- Policy DMT6 (Vehicle Parking)
- Policy DMAV1 (Safe operation of airports)

4.4 The Application Site is not allocated for development and therefore no policies from this DPD are relevant to the proposed scheme. However, Section 7 sets out Community Infrastructure information.

### **London Plan (2021)**

4.5 Relevant policies from this DPD include:

- Policy GG1 (Building strong and inclusive communities)
- Policy GG2 (Making the best use of land)
- Policy GG4 (Delivering the homes Londoners need)
- Policy GG6 (Increasing efficiency and resilience)
- Policy D1 (London's form, character and capacity for growth)
- Policy D3 (Optimising site capacity through the design led-approach)
- Policy D4 (Delivering good design)
- Policy D5 (Inclusive design)
- Policy D6 (Housing quality and standards)
- Policy D12 (Fire safety)
- Policy D14 (Noise)
- Policy H1 (Increasing housing supply)
- Policy H2 (Small Sites)
- Policy H10 (Housing Mix)
- Policy G6 (Biodiversity and access to nature)
- Policy G7 (Trees and woodlands)
- Policy SI1 (Improving air quality)

- Policy SI2 (Minimising greenhouse gas emissions)
- Policy SI3 (Energy infrastructure)
- Policy SI5 (Water infrastructure)
- Policy SI7 (Reducing waste and supporting the circular economy)
- Policy T5 (Cycling)
- Policy T6 (Car parking)
- Policy T8 (Aviation)

#### **National Planning Policy Framework (December 2023) (NPPF)**

4.6 The NPPF is also a material consideration in decision-making and sets out the national policy approach to matters such as the assessment of heritage impacts. The NPPF advocates for supporting sustainable development, encouraging the efficient use of land, focusing development in sustainable locations and achieving well designed places.

5.0

## **Planning Assessment**

### **Principle of Development**

5.1

The NPPF, London Plan and Local Plan place emphasis on Local Authorities to provide housing. The application site lies in an established residential area where additional residential use and intensification of brownfield sites should be supported.

5.2

London Plan Policy H2 (Small sites) should be given full weight. This policy requires LPAs to pro-actively support well-designed new homes on small sites (below 0.25 hectares in size). It also clearly expresses that Boroughs should recognise that local character evolves over time and will need to change in appropriate locations to accommodate additional housing on small sites. In Hillingdon, there is a requirement to deliver 2,950 dwellings on small sites by 2028/29.

5.3

The site is in an established residential use, whilst it is noted there are commercial uses to the rear of the site; these have not been regularised through the planning process. Furthermore, the location of the site is not considered appropriate for commercial uses such as are existing on the site and therefore the loss of these services should not be resisted by the Local Planning Authority.

5.4

Local Plan Policy DMH6 (Garden and backland development) is also considered relevant to the proposal. This policy states there is a presumption against the loss of gardens due to the need to maintain local character, amenity space and biodiversity. In accordance with this policy, backland development may be acceptable subject to the following criteria:

*(i) neighbouring residential amenity and privacy of existing homes and gardens must be maintained and unacceptable light spillage avoided;*

- (ii) *vehicular access or car parking should not have an adverse impact on neighbours in terms of noise or light. Access roads between dwellings and unnecessarily long access roads will not normally be acceptable;*
- (iii) *development on backland sites must be more intimate in mass and scale and lower than frontage properties; and*
- (iv) *features such as trees, shrubs and wildlife habitat must be retained or re-provided*

5.5 The below assessment will demonstrate how the proposal complies with these criteria and is therefore considered an acceptable form of backland development.

### **Density**

5.6 Both National and London Policy is clear, that increasing densities on sites should be supported and encouraged where it is appropriate in the local context.

5.7 The area surrounding the application site along New Road is comprised of two-storey semi-detached and terraced properties with moderately sized gardens. There are some examples of backland development within the immediate context of the site on Harlington Close to the north-west.

5.8 The proposed development has a dwelling density of 41 dwellings per hectare which is in full accordance with the density range for suburban sites by Table 5.2 / Policy DMHB 17. The proposal has 213 habitable rooms per hectare which is considered appropriate for type and location of the development.

5.9 As such, the proposal is considered to optimise the capacity of the site in accordance with NPPF paragraph 135c), London Policy D3, and Local Policy DMH 17.

### **Design and Appearance**

5.10 Local Plan Policy DMHB 11 requires all development to be designed to the highest standards and incorporate principles of good design, including harmonising with the local context and protecting features of positive value, taking into account the surrounding scale of development, building plot sizes and coverage, established street patterns and building lines. The 'local context' is not limited to the dwellings which immediately surround the application site. In this case, all of New Road as well as the surrounding streets including Harlington Close, Brendan Close, Browngraves Road and West End Lane form part of the local context.

5.11 This policy aspiration should be balanced against London Plan Policy D3 (Optimising site capacity through the design-led approach) which outlines that all developments must make the best use of land by following a design-led approach that optimises the capacity of the site. It states that we should seek to enhance local context by delivering buildings and spaces that positively respond to local distinctiveness through their layout, orientation, scale, appearance and shape, with due regard to existing and emerging street hierarchy, building types, forms and proportions. This cascades down from NPPF Paragraph 130 which is clear that development should be sympathetic to local character whilst not preventing or discouraging appropriate innovation or change, such as increased densities.

5.12 New Road is characterised by a mixture of moderately sized terraced and semi-detached properties, a number of which have historically been extended to the rear and at roof level. The proposed development has been

designed to be of a similar scale and have a similar footprint to the surrounding properties.

5.13 By virtue of being a combination of terraces and semi-detached properties with gable roofs, the form, massing and scale of the proposed development would be very similar to the surrounding built form. The ridge heights of the proposed dwellings would be similar to the surrounding properties and as a result would sit comfortably within the street scene.

5.14 The scheme proposes a number of architectural features including the use of brick soldier course banding to add visual interest to the design. The adopted Mayors Housing Design Standards LPG (B1.1) states that private and communal entrances should be visible and clearly identifiable from the public realm. Plots 1 & 2 would be directly accessed from New Road, while Plots 3-9 would be accessible from the access road; which would have active frontages which would provide surveillance and activity.

5.15 Overall, it is considered that the proposed development would result in a high-quality development that would create a good living environment for future occupiers. It would respond to and complement the character of the surrounding area. It is considered to comply with the relevant London and Local Plan policies and the intentions of the NPPF.

### **Housing Mix and Quality**

#### Housing Mix

5.16 Policy DMH 2 requires a mix of different sized housing units to reflect the Council's latest information on housing need. The greatest identified need for housing in the SHMA (2018) is for 3+bed family sized houses, followed by 2-bed houses.

5.17 The proposed development would deliver 9no. three-bed, family sized dwellings. The proposed scheme would therefore make a notable contribution to the housing supply within the borough. This is a planning benefit on which substantial weight should be placed.

#### Quality of Accommodation

5.18 London Plan Policy D6 (Housing Quality and Standards) regards housing quality and standards and stresses the importance of meeting the minimum space standards; providing dual aspect homes that would receive adequate passive ventilation, daylight/sunlight, and avoids overheating; incorporating sufficient storage space; and the provision of adequate outdoor amenity space. This is reflected in Local Plan Policies DMHB16 (Housing standards) and DMHB18 (Private outdoor amenity space).

5.19 The proposed accommodation schedule is as follows:

Plot	Internal Floor Area (sqm)	Complies with NDSS?	External Amenity Space	Complies with DMHB 18?
1 (3b4p)	111	Y	97	Y
2 (3b4p)	111	Y	87	Y
3 (3b4p)	107	Y	74	Y
4 (3b4p)	110	Y	100	Y
5 (3b4p)	110	Y	83	Y
6 (3b4p)	110	Y	79	Y
7 (3b4p)	110	Y	99	Y
8 (3b4p)	110	Y	103	Y
9 (3b4p)	110	Y	67.5	Y

5.20 Policy DMHB 16 requires all new units to comply with the Nationally Described Space Standards (NDSS).

5.21 As the table above demonstrates; all dwellings would exceed minimum space standards and would provide bedrooms and built-in storage in accordance with NDSS requirements. All properties would be dual aspect which would allow for adequate ventilation and would prevent overheating. All habitable rooms would be afforded a good quality of outlook to their private amenity space and the front gardens.

5.22 There would be a minimum separation of 13.1 metres between plots 2 & 3 and plot 4; thus, preventing any sense of enclosure and given there would be no upper floor side facing windows it is considered there would be no overlooking or loss of privacy.

5.23 Policy DMHB 18 outlines that all new residential development and conversions will be required to provide good quality and usable private outdoor amenity space. Table 5.3 outlines a minimum amenity space standard of 60sqm for 2 and 3 bedroom houses.

5.24 Each dwelling would be provided with in excess of 65sqm of external amenity space and therefore fully complies with this policy requirement. The scheme would provide a good quality of private amenity space which meets the everyday needs of future occupiers.

5.25 Overall, the proposed scheme provides a high quality of residential accommodation which will directly meet an identified housing need.

### **Residential Amenity**

5.26 Local Plan Policy DMHB 11 states that development proposals should not adversely impact on the amenity, daylight and sunlight of adjacent properties and open space.

5.27 The proposed development has been designed and positioned as such to reduce its impact on neighbouring properties. Plots 1 -3 would continue the

existing building line and as such would not affect the occupiers of No 23 New Road by reason of loss of light, outlook or increased sense of enclosure and overbearingness.

5.28 There would be a distance of over 23 metres front-to-front between Plots 1-3 and the properties on the opposite side of New Road. This is well in excess of the 18-21 metre distance the London Plan Housing SPG states is a good yard stick to use.

5.29 Plots 4 – 9 would be positioned behind the existing development which fronts New Road. There would be separation of 13.5 metres to the northern edge of the site. Due to the positioning of the development, there would be no loss of privacy, loss of light or outlook for properties along New Road as a result of the development.

5.30 The proposed development would therefore preserve the living conditions of neighbouring properties in accordance with Local Plan policy DMHB 11.

### **Highways, Access and Parking**

5.31 Local Plan Policy DMT 1 (Managing Transport Impacts) outlines that development proposals will be required to meet the transport needs of the development and address its transport impacts in a sustainable manner.

5.32 The application site has a Public Transport Accessibility Level (PTAL) of 0. It is therefore considered to have poor access to public transport; however, despite this is well located in terms of accessibility with good pedestrian and cycle infrastructure in the vicinity of the site and frequent public transport services.

5.33 The submission has been accompanied by a Transport Statement prepared by Paul Basham Associates which addresses the transport impacts of the development in detail.

5.34 The proposed development would utilise the existing vehicular access from New Road to provide access to 3 to 9. Plots 1 and 2 would be accessed directly from a new vehicular access point on New Road. A Parking Survey was undertaken which demonstrates there would still be adequate on-street parking bays available to accommodate the existing demand.

5.35 With regards to car parking, in accordance with London Plan maximum car parking standards, each dwelling would have access to one car parking space. A further visitor space would also be provided.

5.36 Cycle parking stores are shown to the rear of properties with direct access from the side path to provide safe and convenient storage of bicycles which do not conflict with cars and therefore will encourage use of sustainable transport methods.

5.37 The proposals therefore comply with Policy DMT 1, DMT 2 and DMT 6 of the Development Management Policies and Policies T4, T6 and T6.1 of the London Plan.

## **Environmental Considerations**

### Sustainability

5.38 Local Plan Policy DMEI 2 requires all developments to make the fullest contribution to minimising carbon dioxide emissions in accordance with London Plan targets.

5.39 Given the scale of the development, it is considered that any renewable energy / sustainability measures can be secured via condition.

### Trees and Landscaping

5.40 An Arboricultural Report accompanies this application which highlights that all the trees on site are either category B, C or U trees. 10 trees would be felled, all of which would be either category C or U specimens. These low value trees would be replaced through the planting of an additional 11 trees.

5.41 These replacement trees would be integrated into the landscaping scheme. The landscaping scheme would include areas of hardscaping for vehicular parking as well as soft landscaping within both in the rear and front gardens. The landscaping proposed along New Road would reflect the character of neighbouring front gardens which comprise of a mixture of hardscaped vehicular parking or soft landscaped grass areas with low boundary fencing.

5.42 The proposal complies with Local Policies DMH6 and DMHB14.

### Ecology

5.43 The application has been accompanied by a Preliminary Ecological Appraisals and Preliminary Roost Assessment with a desk and site survey which determined the potential presence of protected and notable species. The site is not considered suitable for species including community and foraging bats, nesting birds, amphibians, reptiles, badgers or dormice.

5.44 With regards to bats, no evidence of bat activity was found on the dwelling, and negligible foraging bat habitats are found adjacent to the dwelling and it was therefore not considered necessary to complete any further bat surveys prior to the submission of the application.

5.45 It is therefore considered the information submitted alongside this application demonstrates the proposed development would not result in any harm to protected species or their habitats.

### Biodiversity Net Gain

5.46 The application is accompanied by a Biodiversity Net Gain Assessment which shows the site as existing has a baseline habitat value of 0.33 units and therefore to achieve a 10 percent uplift, 0.36 units need to be provided. Given the constraints of the site and the requirement not to place significant demands on the future occupier in relation to maintaining a habitat within their private curtilage, it is considered an offsite contribution will be required to provide the 10% increase in biodiversity.

## 6.0 Conclusion

6.1 This Planning Statement has been prepared to support a full planning application for the demolition of the existing structures and the erection of nine new dwellings comprising of three pairs of semi-detached dwellings and three terraced properties with associated hard and soft landscaping.

6.2 The proposed development has been assessed against both local and national planning policies. It has been demonstrated that the proposed development would comply with the relevant development plan policies and is therefore acceptable in principle. In relation to backland development; it has been demonstrated that the proposed development would avoid harm to neighbouring residential amenity and have no adverse impacts on neighbouring properties in relation to noise and or light. The development has been suitably designed for the backland site and would reflect the character of the area, it would include the planting of 11 additional trees and would not negatively affect any existing habitats. It is therefore considered the requirements of Local Plan Policy DMH6 (Garden and backland development) have been met.

6.3 The proposed development would be acceptable in design, amenity and highway terms. It would provide a good standard of accommodation for future occupiers meeting an identified housing need in the borough for three-bedroom family homes.

6.4 We therefore respectfully request that planning permission is granted without delay.