



Planning Statement

10 High Street, Cowley, Uxbridge, UB8 2HN

Document Reference: 10HR-F3A-ZZ-XX-PP-A-0802

Revision: R1



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Introduction

This planning statement is prepared on behalf of Ms. K Moulder in support of a planning application for the demolition of the existing bungalow at 10 High Street, Cowley, Uxbridge, UB8 2HN and the erection of 3 dwellings with associated car parking, amenity, landscaping and associated works.

This statement sets out the merits of the proposal, explains how it has evolved in response to pre-application advice, and demonstrates how it accords with the Development Plan and relevant material planning considerations. This Statement concludes that the proposal represents sustainable development and respectfully requests that planning permission is granted. This Statement should be read alongside the Design and Access Statement and the submitted plans.

Site and Surrounding Area

The site is located on the north side of High Road, Cowley, approximately 60 meters southeast of the junction with Packet Boat Lane. The site measures 0.12ha and it is currently occupied by a detached bungalow, and a large rear garden that includes outbuildings to the north of the site. There is limited planning history relating to the site.

The surrounding area is characterised as residential with some commercial uses. The surrounding area is mixed, to the west of the site are bungalows and to the east of the site are semi-detached, and terraced dwellings, as well as flatted development.

The northern part of the site comprises a vacant piece of land. Along the eastern boundary of the site, is a public footpath on the eastern boundary which connects High Street the Hilliard Road. The footpath entrance is sign posted but appears as an alleyway with high fences to either side of the path. The surrounding properties have minimal interaction with the pathway.

To the West and North of the property, the land is surrounded by predominantly dwelling houses with gardens bordering the sites boundary. To the North is Hilliards Road, with largely semidetached or terraced housing and a few detached dwellings forming its street pattern.

Whilst the site has a PTAL rating of 1b, the site is located close to several bus stops linking the site to West Drayton and Uxbridge.



Proposed Development

The proposal seeks planning permission for the following:

The erection of 3 x 3-bedroom dwellings with associated car parking, amenity, landscaping and associated works following the demolition of the existing bungalow.

Response to Pre-Application Issues

The main issues raised in the pre-application response were:

- **Overdevelopment:** The Council considered the initial proposal of 4 dwellings to be an overdevelopment of the site, resulting in a cramped layout with insufficient amenity space and parking.
- **Design:** The Council considered the design of the proposed dwellings to be poor, with inadequate articulation, detailing and materials. The layout was also criticised for creating an incongruous gap in the street scene.
- **Highway safety:** The Council raised concerns about the potential impact of the development on highway safety, particularly in relation to access, parking and visibility.



Amendments to the Proposal

In response to these issues, the proposal has been amended as follows:

- **Reduction in units:** The number of dwellings has been reduced from 4 to 3, significantly improving the layout and creating more generous amenity space and parking.
- **Improved design:** The design of the dwellings has been significantly enhanced, with greater articulation, detailing and use of high-quality materials. The layout has also been revised to ensure a more positive relationship with the street scene and ensuring each property is provided with appropriate amenity whilst safeguarding the residential amenity of the existing neighbouring properties.
- **Highway improvements:** The access and parking arrangements have been revised to address the Council's concerns and improve visibility. A detailed Transport Statement is submitted in support of the application which confirms that vehicular access would be safe and suitable and the proposal would not result in adverse highway impacts, nor would it impact the safety and convenience of other road users.

Development Plan

Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning applications are determined in accordance with the development plan unless material considerations indicate otherwise.

The development plan for this area comprises:

- London Plan 2021
- Hillingdon Local Plan: Part 1 Strategic Policies (2012)
- Hillingdon Local Plan: Part 2 Development Management Policies (2020)

The following documents are material considerations in the determination of this application.

- National Planning Policy Framework (2025)
- National Planning Practice Guidance (NPPG)



Principle of Development

Policy H1 of the Local Plan notes that the Council will meet and exceed its minimum strategic dwelling requirement, where this can be achieved, in accordance with other Local Plan policies. The policy notes that it will seek to achieve this through ensuring development makes the most efficient use of brownfield land.

Policy H1 of the London Plan (2021) notes that housing supply should be delivered by optimising the potential for housing delivery on all suitable and available brownfield sites through their planning decisions.

Policy H2 of the London Plan (2021) notes that should pro-actively support well-designed new homes on small sites (below 0.25 hectares in size) through planning decisions in order to:

- 1) significantly increase the contribution of small sites to meeting London's housing needs
- 2) diversify the sources, locations, type and mix of housing supply
- 3) support small and medium-sized housebuilders

The site lies within a residential area where new development is acceptable in principle, subject to compliance with relevant policies in the Hillingdon Local Plan and London Plan. The principle of residential development on this site is therefore supported.

Whilst there is a presumption against back land development within Policy DMH 6 (Garden and Backland Development), however this proposal presents an **exceptional case** warranting approval. The proposal has been carefully considered (as set out in the Design and Access Statement) demonstrating a limited scale of development that successfully addresses and mitigates the policy's key concerns as follows:

- The existing single bungalow represents an inefficient use of land, particularly considering the current housing demand. Replacing it with three family-sized dwellings offers a more sustainable and efficient use of the site, contributing to local housing needs.
- The proposed layout has been carefully designed to minimise its impact and ensure a 'limited scale' of development. The density, at 25 dwelling per hectare, remains appropriate for the context and avoids overdevelopment.
- The current garden space is largely underutilised, with parts of the garden attracting anti-social behaviour. The proposed development incorporates thoughtfully designed and useable private amenity spaces for each dwelling.



While acknowledging the presumption against garden and backland development, this proposal presents an exceptional case that satisfies the criteria outlined in Policy DMH 6. The carefully considered design as demonstrated within the Design and Access Statement, and comprehensive mitigation measures demonstrate that the proposed development will not adversely affect neighbouring amenity or privacy. Instead, it offers a more efficient and sustainable use of the land, contributing to local housing needs while respecting the character and context of the surrounding area.

Housing Mix

Policy H10 on the London Plan (2021) and Policy DMH2 of the Hillingdon Local Plan (2020) notes that the Council will require the provision of a mix of housing units of different sizes in schemes of residential development to reflect the Council's latest information on housing need. There is a recognised need for family sized housing within Hillingdon. The proposed development would provide a net addition of 3 x 3 bedroom dwellings which would make a contribution towards the acknowledged need for family sized housing within Hillingdon.

Design / Impact on the Character and Appearance of the Area

Policy BE1 of the Hillingdon Local Plan: Part One - Strategic Policies (November 2012) states that all new developments should achieve a high quality of design in all new buildings and the public realm contributes to community cohesion and a sense of place.

Local Plan Policy DMHB 11 states that all development, including extensions, alterations and new buildings will be required to be designed to the highest standards and, incorporate principles of good design including harmonising with the local context and considering the height, mass and bulk of adjacent structures. They should also ensure the use of high-quality building materials and finishes, and ensure that the internal design and layout of development maximises sustainability and is adaptable to different activities.

Policy DMHB 14 advises that all development will be expected to retain or enhance existing landscaping, trees, biodiversity or other features of merit.

The site is located within a residential area and is not subject to any specific designations or constraints.



The proposed development seeks to replace an existing bungalow with three, two-storey, three-bedroom dwellings. This design has been carefully considered to ensure it harmonises with the scale and massing of the local built environment. The new dwellings are designed to be lower than the prevailing height of buildings in the vicinity, thereby maintaining a respectful relationship with the existing street scene.

In terms of layout, the development adopts a cul-de-sac design, which is a common feature in suburban residential areas and aligns with the pattern observed in the neighbouring Barnacre Close. This layout not only facilitates efficient vehicular movement with a designated turning head for service vehicles but also enhances pedestrian safety by segregating vehicle and pedestrian access. The design thoughtfully incorporates secure cycle storage and refuse facilities, incorporating sustainable travel and appropriate waste management. Moreover, the carefully thought-out placement of the proposed dwellings and landscaping has been informed by a thorough analysis of the site and its context, ensuring that the development does not adversely impact the amenity of neighbouring properties.

The architectural language of the proposed dwellings is characterised by a contemporary interpretation of traditional forms, featuring pitched roofs and a material palette that complements the local vernacular. This design ensures that the development contributes positively to the area's character while providing modern, functional living spaces.

Each dwelling is designed to meet or exceed internal space standards, with a focus on maximising natural light and ventilation. The inclusion of private outdoor amenity space for each property further enhances the quality of accommodation, ensuring that the development not only meets but exceeds the expectations for contemporary family living. This is further illustrated in the comprehensive design evolution and explanation provided within the Design and Access Statement and supporting visualisations. The proposal would comply with Policies BE1 of the Hillingdon Local Plan: Part One - Strategic Policies (November 2012) and Policies Policy DMHB 11 and DMHB 14 of the Local Plan: Part Two (2020).



Neighbouring Amenity

Local Plan Policy DMHB 11 sets out design guidance for all new development in the borough. Part B of the policy states 'development proposals should not adversely impact on the amenity, daylight and sunlight of adjacent properties and open space'.

Guidance for Policy DMHB 11 states 'The Council will aim to ensure that there is sufficient privacy for residents, and it will resist proposals where there is an unreasonable level of overlooking between habitable rooms of adjacent residential properties, schools or onto private open spaces. A minimum of 21 metres separation distance between windows of habitable rooms will be required to maintain levels of privacy and to prevent the possibility of overlooking. In some locations where there is a significant difference in ground levels between dwellings, a greater separation distance may be necessary'.

Guidance for Policy DMHB 11 also states 'For the purposes of this policy, outlook is defined as the visual amenity enjoyed by occupants when looking out of their windows or from their garden. The Council will expect new development proposals to carefully consider layout and massing in order to ensure development does not result in an increased sense of enclosure and loss of outlook. Single aspect dwellings should be avoided'.

Paragraph 135 (f) of the NPPF (2025) states that new development should seek to 'create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience'.

The nearest properties include No. 8 and No. 9 High Street to the west, and properties along Hilliards Road to the north. The orientation of the proposed bungalows ensures that they are set back from the boundaries, with House A being approximately 21 meters from the nearest first-floor windows of the neighbouring properties. This distance maintains a sense of openness and mitigates against potential overshadowing and overbearing impacts on the adjacent dwellings.

To address concerns of overshadowing, a detailed sunlight and daylight analysis was conducted. This study informed the orientation and placement of the dwellings to minimise any reduction in natural light to neighbouring properties, particularly those to the north and south. The design incorporates features such as pitched roofs and thoughtful landscaping to further mitigate potential overshadowing. The development



ensures that neighbouring gardens and living spaces continue to receive adequate sunlight, preserving the amenity of these spaces.

In terms of privacy, the layout of the dwellings and the positioning of windows have been carefully planned to prevent direct overlooking between properties. This is illustrated within the Design and Access Statement (Figure 29). Existing mature landscaping along the site's boundaries is to be retained and supplemented with additional planting to create natural privacy screens.

Given the separation distance to other neighbouring properties. No harm would arise in terms of loss of light, overshadowing, loss of outlook, nor would it be overbearing.

Noise

The site would be used in an exclusively residential capacity. In terms of the operational phase of the proposed development, no significant issues would be expected. Noise during construction could be controlled by way of a condition.

The proposed development would have an acceptable impact on the neighbouring properties amenities complying with Policy DMHB 11 of the Hillingdon Local Plan, Part 2 (2020).

Quality of Residential Accommodation

Internal

Table 3.1 of the London Plan set out the minimum internal space standards for new dwellings.

The schedule of accommodation proposed is as follows:

- House A – 110.6 sqm
- House B – 131.6 sq.m
- House C – 131.2 sq.m

This demonstrates that the proposal not only meets but significantly exceeds the minimum internal space standards for new dwellings, ensuring that future residents will benefit from good quality accommodation and appropriate accommodation for a family dwelling.



External

In terms of outdoor amenity space for future residents, the requirement is to provide 60 sq.m for each dwelling. This proposal provides the following:

- House A: 3b5p 88.8m²
- House B: 3b6p 135.8m²
- House C: 3b6p 102.6m²

This clearly demonstrates that the proposal not only meets but significantly exceeds the policy requirements for outdoor amenity space, ensuring that future residents will benefit from ample private space. This provision of generous outdoor space is a key factor in the development's design, which seeks to create comfortable and spacious homes that contribute positively to the well-being of future occupants.

Highways and Parking

Policy DMT 2 states that proposals must ensure that safe and efficient vehicular access to the highway network is provided; they do not contribute to the deterioration of air quality, noise or local amenity; have safe, secure and convenient access and facilities for cyclists and pedestrian; that impacts on local amenity and congestion are minimised; and there are suitable mitigation measures to address any traffic impacts.

Policy DMT 6 states 'Development proposals must comply with the parking standards outlined in Appendix C Table 1 in order to facilitate sustainable development and address issues relating to congestion and amenity. The Council may agree to vary these requirements when the variance would not lead to a deleterious impact on street parking provision, congestion or local amenity.'

Policy T6 of the London Plan (2021) makes it clear that car-free development should be the starting point for all development proposals in places that are (or are planned to be) well-connected by public transport, with developments elsewhere designed to provide the minimum necessary parking ('car-lite'). Table 10.3 of the London Plan notes that the *maximum* car parking provision for a site with a PTAL rating of 1 should be upto 1.5 spaces per dwelling.



Access

The proposed access is located in the same position as the existing driveway access, which is on the A408 High Street, a main north-south route through the area. The carriageway at this location is approximately 14 metres in width, providing two traffic lanes in each direction along with a hatched central reserve of approximately 2.5 metres. The proposed access will be slightly widened to 4.0 metres to accommodate the increased use. Vehicle tracking has demonstrated that all manoeuvres, including those for large cars and delivery vehicles, can be made easily and safely. The right-turn into the site from the south can wait in the hatched central reserve before accessing the site when there is a gap in southbound traffic. For traffic turning right out of the site, the vehicle tracking has shown that the traffic island in the centre of the road does not affect the manoeuvre, ensuring safe access and egress.

The access arrangements also include provisions for refuse collections, which will be undertaken from High Street, similar to the servicing of the existing residential property. A refuse store will be provided on the access route into the site, approximately 20 metres from the main road, within the 25-metre distance recommended in the Manual for Streets guidance. The proposed access replicates the existing driveway access, and the small change in traffic movements as a result of the redevelopment will not affect the risk to highway safety. The presence of pedestrian islands in the central reserve enhances options for pedestrians crossing the road, further contributing to the safety and accessibility of the site. The existing access arrangements have been shown to be safe and satisfactory, with no underlying highway safety issues identified in the vicinity of the site.

Trip Generation

In terms of trip generation, the proposed development is expected to result in no more than 1-2 vehicle movements during peak hours, based on typical trip generation for residential dwellings. This is a small volume of trips, and the level of use of the access will remain minor. The Crashmap data for the most recent five-year period (2018-2022) shows no accidents on the section of High Street in the immediate vicinity of the site, suggesting that the proposed access arrangements will not adversely impact highway safety. Therefore, the proposed vehicular access and trip generation are considered acceptable and in line with planning and safety requirements.



Parking

The proposal seeks to provide 4 car parking spaces. 1 dedicated parking space per dwelling and 1 visitor parking space shared between the 3 dwellings. Given its proximity to a bus stop and the frequency of buses, providing a convenient connection to Uxbridge or West Drayton, this level of car parking is adequate for the site and the development would provide a policy compliant level of car parking to serve the development. Each parking space will include electric vehicle charging.

Cycle Parking

Each property will include cycle storage located within the rear garden of the site in compliance with Policy DMT 5 of the Hillingdon Local Plan: Part 2.

Air Quality

The Air Quality Assessment for the proposed development has been prepared by DustScanAQ, which considers the potential air quality impacts during both the construction and operational phases. The assessment identifies key pollutants such as nitrogen dioxide (NO₂) and particulate matter (PM_{2.5} and PM₁₀) associated with construction activities and road traffic emissions.

The site is located within the London Borough of Hillingdon Air Quality Management Area (AQMA), but there are no nationally designated ecological sites nearby. The baseline conditions indicate that the annual mean NO₂ concentration at the closest monitoring site is well below the air quality objective, and the projected background concentrations for PM₁₀ and PM_{2.5} are also within acceptable limits for the anticipated year of occupation.

The report has also found that during the construction phase, the risk of dust soiling and human health impacts is considered low to negligible, with appropriate mitigation measures recommended to minimise these impacts.

The operational phase assessment concludes that the proposed development will not significantly affect local air quality, as the site is expected to meet the relevant air quality objectives for NO₂, PM₁₀, and PM_{2.5}. The development is also deemed to be Air Quality Neutral, with no additional mitigation required for building or transport emissions. Overall, the assessment demonstrates that the proposed development is suitable for residential use and complies with Policy DMEI 14 of the Local Plan: Part two.



Accessibility

Policy D5 of the London Plan (2021) seeks to ensure development proposals achieve the highest standards of accessible and inclusive design. Policy D7 of the London Plan (2021) requires at least ten percent of dwellings to meet Building Regulation requirement M4(3) 'wheelchair user dwellings', with all other dwellings meeting Category M4(2) 'accessible and adaptable dwellings'.

The proposal has been designed to ensure it is accessible and adaptable. Level access is provided from the front entranceway to the whole of the ground floor ensuring that the development is both accessible and adaptable for all residents.

Trees and Landscaping

Policy DMHB 14 advises that all development will be expected to retain or enhance existing landscaping, trees, biodiversity or other features of merit.

This application is accompanied a comprehensive Design and Access Statement which explains the design rationale for the proposal in great detail. The proposal incorporates high quality hard and soft landscaping. The planting in the front gardens softens the appearance of the properties and enhances the overall aesthetic of the development. The proposal also includes soft landscaping throughout the site, including private gardens for each dwelling with fenced gardens and soft planting. This combination of hard and soft landscaping ensures that the development is both functional and visually appealing.

The proposed development would comply with Policy DMHB 14 of the Hillingdon Local Plan, Part 2.



Ecology

The Environment Act 2021 introduced a mandatory requirement for Biodiversity Net Gain, ensuring that most new developments increase the baseline biodiversity value by a minimum of 10%. The Environment Act 2021 also necessitates ongoing monitoring. Specifically, it requires that significant on-site habitat enhancements and all off-site habitat gains be secured for at least 30 years.

This implies a need for monitoring to ensure that the habitats are maintained and that the biodiversity gains are realised over that period.

An Ecological Impact Assessment (EclA) for the proposed development has been prepared by Logika Consultants Ltd. The assessment identifies that the existing site comprises a residential bungalow and associated garden, with habitats including vegetated garden, hardstanding, and an ornamental pond. The site is of low ecological importance, supporting common species. The assessment concludes that the proposed development will not have significant adverse effects on these species, provided that appropriate mitigation measures are implemented during construction.

The assessment also includes a Biodiversity Net Gain (BNG) calculation, which demonstrates a positive net gain in biodiversity as a result of the proposed development. The BNG assessment, conducted using Natural England's Small Sites Metric, indicates an uplift of approximately 45.23% in habitat units. This gain is achieved through the creation of new habitats, including the planting of native trees, shrubs and vegetated garden areas. The proposed development will also include features such as hedgehog holes in garden fencing and bird boxes, further enhancing the site's biodiversity.

Overall, the EclA and BNG assessment demonstrate that the proposed development at is would not affect protected species and will result in a net gain biodiversity. The implementation of embedded environmental measures, such as a Landscape and Ecological Management Plan (LEMP) and a Construction Environment Management Plan (CEMP) can be secured by way of a condition to ensure that the development to secure the net gain in line with the requirements of the legislation.



Flooding and Drainage

The site is not located in Flood Zones 2 or 3 and therefore not at risk of fluvial flooding. Nor is it identified as being within a critical drainage area.

A Sustainable Drainage System (SuDS) Management and Maintenance Plan for the proposed development has been prepared by Paul Basham Limited. It outlines the strategy for managing surface water drainage to mitigate flood risk and ensure long-term sustainability. The plan includes the use of pervious paving, which allows rainwater to infiltrate through the surface, temporarily storing surface water before controlled discharge downstream. The site will utilize a Type C system, which involves wrapping the system in an impermeable, flexible membrane placed above the subgrade, with water conveyed to the outfall via perforated pipes or fin drains.

The plan also includes the use of attenuation storage tanks, specifically geocellular storage systems, to create below-ground void space for the temporary storage of surface water before infiltration, controlled release, or use. The maintenance schedule for these systems includes regular inspections, debris removal, and remedial actions as necessary to ensure their proper functioning. The proposed SuDS features are designed to manage surface water runoff effectively, reduce the risk of flooding, and improve water quality by filtering pollutants. The implementation of this plan will ensure that the development complies with relevant drainage and flood risk management policies, contributing to the overall sustainability of the site.

Sustainability

An Energy Strategy has been prepared in support of the development. The Energy Statement outlines a comprehensive approach to achieving energy efficiency and sustainability. The strategy accords with the requirements of the London Plan, and Part L1 Building Regulations. The strategy focuses on two scenarios: Clean and Green. The Clean scenario involves the use of low carbon systems such as air source heat pumps (ASHP), high-efficiency LEDs, and wastewater heat recovery (WWHR). The Green scenario incorporates renewable energy solutions, including photovoltaic (PV) panels on all south-facing roof spaces and battery storage to minimise energy export

The Clean scenario achieves a SAP rating of 83 B for the semi-detached houses and 80 C for the detached house. The Green scenario, which includes PV panels, achieves regulated net-zero carbon emissions for the development as a whole. However, the detached house (House A) requires a 4.1 kWp PV array, while the semi-detached



houses (House B and House C) require 5 kWp PV arrays to offset the development's carbon emissions. The strategy demonstrates that the proposed development can achieve high energy efficiency and sustainability standards, contributing to the overall goal of reducing carbon emissions and promoting renewable energy use.

The methodology used in the Energy Strategy includes SAP assessments performed using Elmhurst Energy SAP 10, with specifications for building fabric, mechanical, electrical, and plumbing (MEP) systems. The results show that the Clean scenario significantly reduces energy associated with heating and hot water, while the Green scenario uses on-site renewable energy to offset energy consumption and carbon emissions. The strategy concludes that the proposed development complies with energy planning guidance and requirements, with ASHPs, PV panels, and battery storage recommended to achieve net-zero carbon emissions and reduce running costs



Conclusion

In conclusion, the proposed development at 10 High Street, Cowley, Uxbridge, UB8 2HN, has been carefully designed and considered to ensure it accords with the Development Plan and addresses the concerns raised during the pre-application stage. The proposal would:

- Replace a single bungalow with three dwellings resulting in the efficient use of a brownfield site, contributing to the identified local housing need for family houses in the local area.
- Deliver a well designed and thought-out scheme which would ensure a positive relationship with the street scene and safeguard the residential amenity of existing neighbouring properties.
- Provide good quality homes with appropriately sized gardens providing good accommodation for families with an improved sense of well being as a result of the good quality layout and design of the dwellings.
- Provide safe and convenient access to the site.
- Biodiversity net gain of 45.23%.
- Incorporate sustainable design features, including energy-efficient systems and renewable energy solutions, contributing to the overall goal of reducing carbon emissions.

The proposed development offers significant benefits, including the efficient use of land to deliver much needed family homes, high-quality design, good quality amenity space and an improvement to biodiversity on site. Any potential adverse impacts have been carefully mitigated through thoughtful design. There are significant social, economic and environmental benefits attributed with this development. It is a sustainable development that complies with the Development Plan. It is respectfully requested that planning permission is granted without delay.