

Planning & Design Statement

For
Domville Properties

In Support of a Planning
Application at No 34 High Street,
Northwood, Middlesex HA6 1BN

October 2021



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1. Pre-application Consultation Response dated 31st January 2020

1 INTRODUCTION

- 1.1 This Planning Statement has been prepared on behalf of Domville Properties in support of a planning application at No 34 High Street, Northwood HA6 1BN for a two storey rear extension at first floor and loft level to enable a reconfiguration of the internal layout of the building to create one additional two bed flat at second floor level with secure refuse/cycle storage.
- 1.2 The development proposal has been informed by pre-application discussions that have taken place with Officers of LB Hillingdon as summarised at **Section 4** of this report.
- 1.3 The Statement addresses the following matters:
- A description of the site and surroundings;
 - A review of the background and history of the site;
 - A summary of pre-application consultation with LB Hillingdon;
 - An explanation of the development proposal;
 - A review of relevant planning policy;
 - An appraisal of the relevant planning and design issues, and
 - Conclusions.
- 1.4 Accordingly, this Statement addresses the design principles and concepts that have been applied to the development in respect of the location, use, layout, scale and appearance – in relation to the site's context. As such, the statement meets the requirement to formally state how design and access issues have been considered.
- 1.5 This Statement should be read in conjunction with the other documents submitted in support of the application, namely:
- Drawings package prepared by MultiCreation.
- 1.6 The submissions conclude that the development proposal is acceptable, and supportable, in planning terms and that full permission should be granted.

2 SITE AND SURROUNDINGS

- 2.1 The site forms part of a mixed use terrace building that accommodates a commercial unit (Use Class E) at ground floor with an existing two bedroom flat (Use Class C3) at first floor and loft level.
- 2.2 The principal frontage of the building faces onto the High Street to the west, whilst the site is abutted by the neighbouring terrace properties of the High Street to the north and south and the rear access to properties off Hilliard Road lies some distance to the east.
- 2.3 Whilst the principal frontage of the building displays a notable architectural style and consistency of scale that contributes in a positive manner to the surrounding area, the rear of the terrace features a number of different extensions and outbuildings which vary in terms of visual appearance and scale. This results in a discordant building line and means that there is no overriding visual character to the rear of the terrace.
- 2.4 The site fronts onto the established shopping parade of Northwood High Street as recognised within the Local Plan and lies within the Old Northwood Area of Special Local Character.
- 2.5 The high street benefits from being sited within 1km of Northwood and Northwood Hills Underground Stations which provide regular services throughout London. Additionally, two bus routes accessed from the Hallowell Road bus stop 90 metres from the site provide regular services between Harrow Bus Station to Mount Vernon Hospital.
- 2.6 Please refer to the images below.



Image 1: View of No 34 from the High Street pictured within the wider terrace



Image 2: Overhead view of rear of terrace and neighbouring properties fronting onto the High Street. The variation in design, character and scale of extensions and alterations to the rear of these properties can be clearly appreciated.

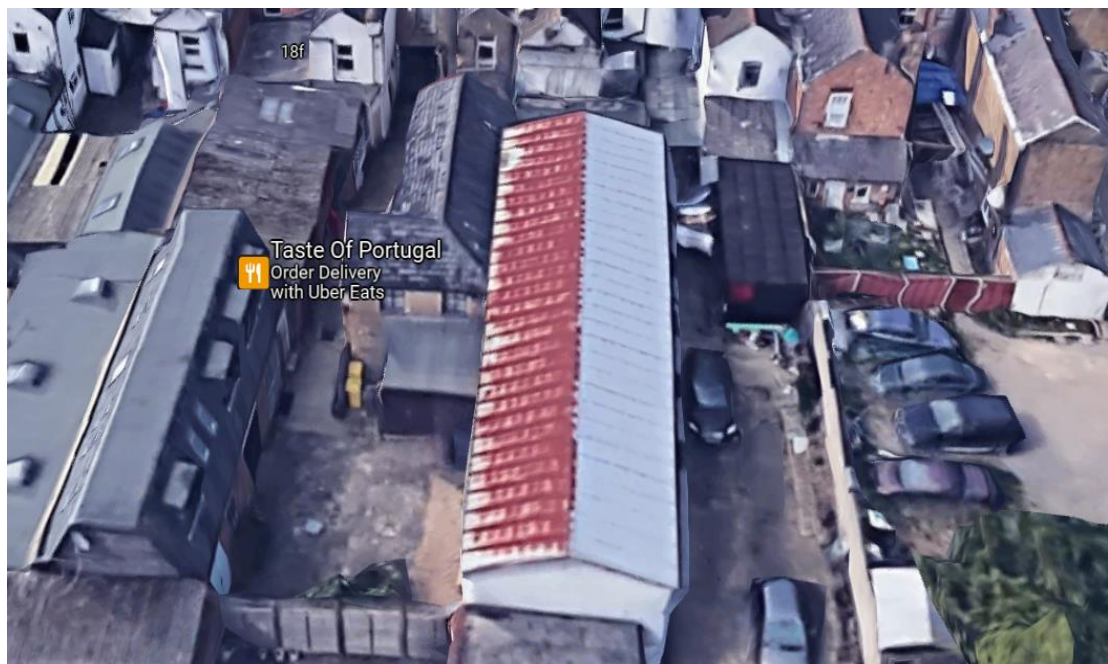


Image 3: Two storey pitched steel roof rear extension to No. 20 High Street



Image 4: Mansard roof extension to the rear of No. 18 High Street

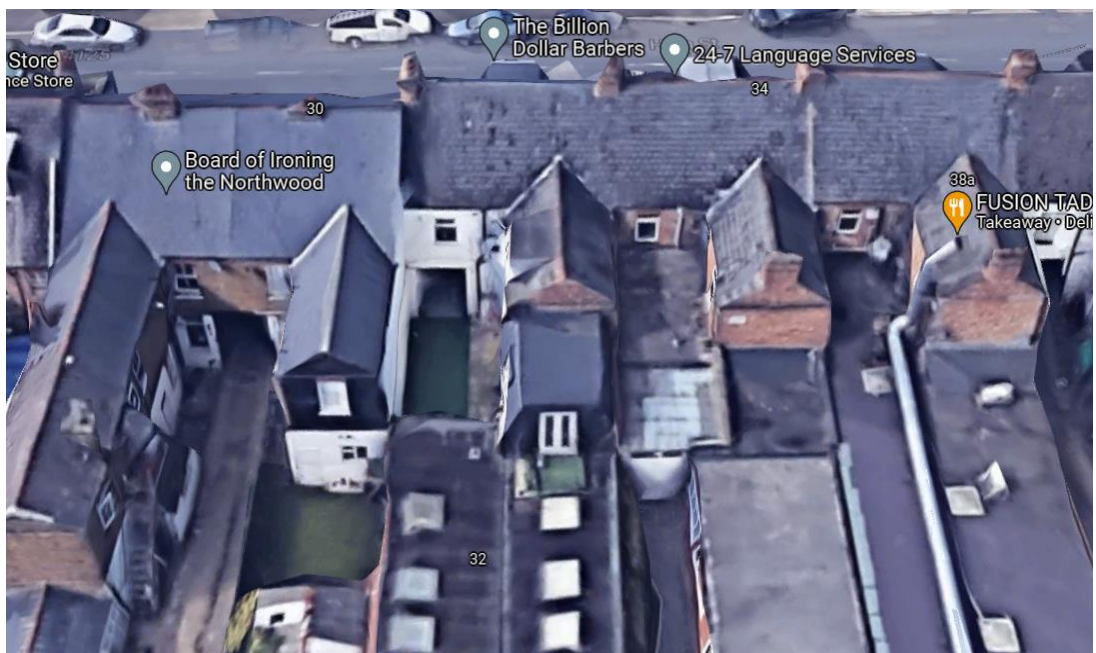


Image 5: Mansard roof extension to rear of No. 32 High Street

3 PLANNING HISTORY

- 3.1 A review of the Council's records indicates that the site has been subject to several previous planning applications, the most relevant of which is summarised below.
- 3.2 An application (Ref 61226/APP/2020/3208) was made for the change of use from office (Use Class B1a) to 3 x studio flats (Use Class C3) (Prior Approval) at ground floor level. This was granted permission on 21st January 2021.

4 PRE-APPLICATION CONSULTATION

- 4.1 The NPPF outlines the need for effective consultation as part of the development process and confirms the importance of early engagement with the local authority in association with the preparation of planning applications.
- 4.2 Although not directly comparable to the scheme proposed as part of this application, the pre-app consultation process (Ref 61226/PRC/2019/129) established a number of the Council's viewpoints regarding future residential development on the site. As such it is a relevant consideration to this application.
- 4.3 The applicant attended a pre-application meeting on the 12th August 2019 to discuss the merits of a Change of use of 34a from a 2 bed flat (Use Class C3) and of 34b from offices (Use Class B1, now E) to form 10 self-contained studio flats.
- 4.3 A written response from the Case Officer Liz Arnold was subsequently received on 31st January 2020 (please refer to **Appendix 1**) which importantly clarifies with respect to design at page 3 that:
- 4.4 *"The proposal would not result in any changes to the front elevation and minimal changes to the window and door details on the rear extension. There is proposed a first floor rear extension, which measure 4.88m in depth 3.9m in width and 7.24m in height. This would sit between the existing outriggers of the host property and that of the neighbouring property at no. 32. The proposed extension is of the same design as the existing projections and although at a depth of 4.88m this would be a large addition to the original building, it is noted that other properties within the terrace have been extended in a similar way. It may therefore be unreasonable to object to the proposal on this basis."*
- 4.5 In terms of the impact upon amenity of neighbouring occupiers the Council confirmed at page 4 that:
- 4.6 *"The proposed rear extension would comply with the aims of policy guidance and would comply with the 45 degree requirement to adjoining occupiers. The proposed windows will all face the garden of the application site. It is not considered that the proposal would significantly harm the residential amenities of the occupiers of the adjoining property from increased overshadowing, visual intrusion, over-dominance or loss of privacy."*
- 4.7 With regard to accessibility of the site and its sustainability for a residential use pages 4 and 5 state:
- 4.8 *"It is noted that the existing dwelling and offices do not benefit from any parking and the site is within 1km of both Norwood and Northwood Hills stations. Two bus routes run close to the site and provide frequent peak services from Harrow Bus Station and Ealing Hospital to Mount Vernon Hospital. Northwood and Northwood Hills Town Centres provide a range of shops and services. Moreover, the site is located within an urban area in a parade of shops amongst a wider shopping area with a selection of shops and services. Therefore, given the sites location amongst such services and as it is within walking and cycling distance of trains and buses, it would not be necessary for the occupants of the dwellings to use a car to access day to day services."*

- 4.9 Following the detailed pre-application consultation process, the applicant has invested significant time and resource into preparing a comprehensive submission which seeks to respond positively (as necessary) to the comments of Officers.
- 4.10 Accordingly, discussions held with the Council have proven beneficial in preparing the development proposal which forms the basis of this planning application.

5 THE PROPOSAL

- 5.1 The development proposal is for an infill rear extension at first floor level and raising of the roof height at loft level with associated alterations to form a mansard roof which will enable a reconfiguration of the internal layout of the building to create one additional two bed flat at second floor level with secure refuse/cycle storage.
- 5.2 The infill extension at first floor level will project 4.86 metres to the rear allowing a unified building line to be formed with the existing outrigger. It is also confirmed that the proposed roof ridge height will not exceed that of the existing building and will be set in from both side elevation to ensure the proposed development remains subservient to the character of the host building.
- 5.3 A complementary fenestration is proposed that has been considered to replicate the style and appearance of the existing property from the rear to produce a coherent visual symmetry with all external materials chosen to match those of the existing property.
- 5.4 There will be no alterations to the principal elevation.
- 5.5 The application proposal has been informed by the pre-application consultation with Officers that took place in 2019 as summarised in Section 4.
- 5.6 The new flat and reconfigured flat at first floor will both comfortably exceed nationally described floorspace standards. Furthermore, they will be served by generous glazing providing high quality outlook and sunlight/daylight for all occupiers.
- 5.7 Careful consideration has been given to ensure that all elements of the proposed scheme respond positively to local distinctiveness and sit comfortably in terms of visual appearance and massing with the surrounding terrace and street scene given the site's location within an Area of Special Local Character.
- 5.8 Provision for secure cycle and refuse/recycling space is made at ground floor level as shown on the accompanying drawings.

6 PLANNING POLICY

6.1 This section provides a review of relevant national and local planning policy and guidance.

NATIONAL POLICY

6.2 The National Planning Policy Framework (NPPF) was revised in July 2021 and sets out the Government's objectives for achieving sustainable development. At the heart of the NPPF is a presumption in favour of sustainable development.

6.3 Development proposals that accord with an up-to-date Development Plan should be approved without delay. Where there are no relevant development plan policies, or the policies which are most important for determining the application are out of date, permission should be granted unless:

- The application of policies in the Framework that protect areas or assets of particular importance provides a clear reason for refusing the proposed development; or
- Any adverse impact of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.

6.4 Paragraph 8 confirms that there are three dimensions to sustainable development; economic, social and environmental. To achieve sustainable development, economic, social and environmental gains should be pursued in mutually supportive ways through the planning system.

6.5 The NPPF explains that the purpose of the planning system is to contribute to the achievement of sustainable development. Planning policies and decisions should play an active role in guiding development towards sustainable solutions, but in doing so should take local circumstances into account, to reflect the character, needs and opportunities of each area. These sustainable objectives should be delivered through the preparation and implementation of plans and the application of the policies in the framework.

6.6 Guidance in paragraph 38 states that local planning authorities should approach decision-taking in a positive and creative way. They should work proactively with planners to secure developments that will improve the economic, social and environmental conditions of the area. Decision-makers at every level should seek to approve applications for sustainable development where possible.

Delivering a Sufficient Supply of Homes

6.7 Paragraph 60 explains that in order to support the Government's commitment to significantly boosting the supply of homes, it is important that a sufficient amount and variety of land comes forward for development where it is needed, that needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay.

6.8 Local Planning Authorities should identify and update annually a supply of specific deliverable sites sufficient to provide five years' worth of housing against their housing requirement set out in adopted strategic policies or against their local housing need where strategic policies are more than five years old. The five year supply should include an appropriate buffer. Where the local authority chooses to demonstrate a five year supply of deliverable sites through an annual position statement or recently adopted plan the buffer should be 10% to account for any fluctuations in the market during that year. In the event that there has been significant under delivery when measures against the Housing Delivery Test (November 2018 onwards) then a 20% buffer should be applied.

6.9 The NPPF is clear at paragraph 11 that housing applications should be considered in the context of the presumption in favour of sustainable development and that relevant policies for the supply of housing should not be considered up to date if the local planning authority cannot demonstrate a five

year supply of deliverable housing sites or the Housing Delivery Test indicates that the delivery of housing was substantially below the housing requirement over the previous three years.

Building a Strong and Competitive Economy

- 6.10 Chapter 6 of the NPPF emphasises that the government is committed to ensuring that the planning system should help create conditions in which businesses can invest, expand and adapt. Significant weight is afforded to the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. This section also recognises that a poor environment and lack of housing can act as a potential barrier to investment.

Promoting Healthy Communities

- 6.11 The planning system can play an important role in facilitating social interaction and creating healthy, inclusive and safe communities. Planning decisions should aim to achieve places which promote, amongst other things, safe and accessible developments, where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion.

Promoting Sustainable Transport

- 6.12 To protect and exploit opportunities for the use of sustainable transport modes, development should be located and designed to give priority to pedestrian and cycle movements and have access to high quality public transport facilities; address the needs of people with disabilities by all modes of transport; create safe and secure places minimising conflicts between traffic and pedestrians; allow for the efficient delivery of goods and access by service and emergency vehicles; and be designed to enable the charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations.

Making Effective Use of Land

- 6.13 The NPPF recognises the need for the planning system to promote an effective use of land in meeting the need for homes and other uses. Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or 'brownfield' land.
- 6.14 Paragraph 120 (c) explains that the planning system should specifically give substantial weight to the value of using suitable brownfield land within settlements for new homes and other identified needs. Furthermore, sub-section (d) of this paragraph explains that planning should also promote and support the development of under-utilised land and buildings especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively.
- 6.15 Sub Section (e) of paragraph 120 outlines that Council's should support opportunities to use the airspace above existing residential and commercial premises for new homes. In particular, they should allow upward extensions where the development would be consistent with the prevailing height and form of neighbouring properties and the overall street scene, is well designed (including complying with any local design policies and standards) and can maintain safe access and egress for occupiers.
- 6.16 The chapter goes on to discuss how appropriate densities can be achieved. Paragraph 124 sets out that the planning system should support development that makes efficient use of land, taking into account the following:
- a) The identified need for different types of housing and other forms of development, and the availability of land suitable for accommodating it;
 - b) Local market conditions and viability;

- c) The availability and capacity of infrastructure and services – both existing and proposed – as well as their potential for further improvement and the scope to promote sustainable travel modes that limit future car use;
- d) The desirability of maintaining an area’s prevailing character and setting or of promoting regeneration and change; and
- e) The importance of securing well-designed, attractive and healthy places.

Achieving Well Designed Places

6.17 This chapter sets out at paragraph 130 that planning policies and decisions should aim to ensure that developments:

- Will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;
- Are visually attractive as a result of good architecture and appropriate landscaping;
- Are sympathetic to local character and history including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation;
- Establish a strong sense of place, using streetscapes and buildings to create attractive and comfortable places to live, work and visit;
- Optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development and support local facilities and transport networks, and
- Create places that are safe, inclusive and accessible and which promote health and well-being.

LONDON PLAN (2021)

6.18 The London Plan sets the Mayor’s strategic development strategy for the capital up until 2046 and forms part of the development plan for Greater London.

6.19 The site falls within the London Borough of Hillingdon and so the relevant policies include:

6.20 **Policy D3 (Optimising Site Capacity Through the Design-led Approach)** states that all development must make the best use of land by following a design-led approach that optimises the capacity of sites, including site allocations. Optimising site capacity means ensuring that development is of the most appropriate form and land use for the site. The design-led approach requires consideration of design options to determine the most appropriate form of development that responds to a site’s context and capacity for growth, and existing and planned supporting infrastructure capacity.

6.21 Higher density developments should generally be promoted in locations that are well connected to jobs, services, infrastructure and amenities by public transport, walking and cycling in accordance with policy D2. Where these locations have existing areas of high density buildings, expansion of the areas should be positively considered by Boroughs where appropriate.

6.22 In other areas incremental densification should be actively encouraged by Boroughs to achieve a change in densities in the most appropriate way. This should be interpreted in the context of policy H2.

6.23 Development proposals should:

1. 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;
2. Encourage and facilitate active travel with convenient and inclusive pedestrian and cycling routes, crossing points, cycle parking and legible entrances to buildings that are aligned with peoples' movement patterns and desire lines in the area;
3. Be street based with clearly defined public and private environments;
4. Facilitate efficient servicing and maintenance of buildings and the public realm, as well as deliveries, that minimise negative impacts on the environment, public realm and vulnerable road users;
5. Achieve safe, secure and inclusive environments;
6. Provide active frontages and positive reciprocal relationships between what happens inside the buildings and outside to generate liveliness and interest;
7. Deliver appropriate outlook, privacy and amenity;
8. Provide conveniently located green and open spaces
9. Prevent or mitigate impacts of air quality
10. Respond to the existing character of a place by identifying the special and valued features and characteristics that are unique to the locality and respect, enhance and utilise the heritage assets and architectural features that contribute towards the character
11. Be of high quality with architecture that pays attention to detail, and gives thorough consideration to the practicality of use, flexibility, safety and building lifespan through appropriate construction methods and the use of attractive robust materials which weather well.

6.24 **Policy D6 (Housing Quality and Standards)** requires development proposals to make the most efficient use of land and to be developed at the optimum density. The optimum density of a development should result from a design-led approach to determine the capacity of the site.

6.25 In these terms, particular consideration should be given to: the site context, its connectivity and accessibility by walking, cycling and public transport (including PTAL) and the capacity of surrounding infrastructure. Development should provide sufficient daylight and sunlight to new and surrounding housing that is appropriate for its context, whilst avoiding overheating, minimising overshadowing and maximising the usability of outside amenity space. Private internal and external space should be inline with standards outlined within the plan.

6.26 **Policy H1 (Increasing Housing Supply)** outlines an increased housing target for Lewisham of 1,667 dwellings per annum. In meeting this target, the policy confirms that boroughs should apply a presumption in favour of small housing developments which provide between one and 25 homes on infill development on vacant or underused sites.

6.27 **Policy H2 (Small Sites)** states that boroughs should proactively support well designed new homes on small sites (below 0.25 hectares in size) through both planning decisions and plan making to:

- 1) Significantly increase the contribution of small site to meeting London's housing needs
- 2) Diversify the sources, locations, type and mix of housing supply

3) Support small and medium housebuilders

6.28 **Policy H10 (Housing Size and Mix)** advises schemes should generally consist of a range of unit sizes. To determine the appropriate mix of unit sizes in relation to the number of bedrooms for a scheme regard should be given to a number of factors as outlined within the plan.

6.29 **Policy E7 (Industrial Intensification, Co-location and Substitution)** states that residential development proposals on Non-Designated Industrial Sites should be supported where there is no reasonable prospect of the site being used for the industrial and related purposes.

DEVELOPMENT PLAN

6.30 The Development Plan for the London Borough of Hillingdon consists of the Local Plan Part 1 Strategic Policies which sets out the spatial vision and strategy for the borough and the Local Plan part 2 Development Management Policies and Site Allocations which provides more detailed, specific development management policies in order to support the delivery of the overall spatial vision for the borough.

6.31 Accordingly, the adopted policies relevant to the determination of this application are summarised below.

Hillingdon Local Plan Part 2 (2020)

6.32 **Policy DMTC 3 (Maintaining the Viability of Local Centres and Local Parades)** advises that the council will protect and enhance the function of local centres and local shopping parades by retaining uses that support their continued viability and attractiveness to the locality they serve. In considering applications for changes of use of shops the Council will ensure that:

- i. The local centre or shopping parade retains sufficient essential shops uses to provide a range and choice of shops appropriate to the size of the parade, and its function in the Borough shopping hierarchy;
- ii. At least 50% of the local centre or shopping parade is retained as Use Class A1 Shops; and
- iii. The surrounding residential area is not deficient in essential shop uses

6.33 **Policy DMH 1 (Safeguarding Existing Housing)** states that the Council will grant planning permission for the subdivision of dwellings only if:

- i. Car parking standards can be met within the curtilage of the site without being detrimental to the street scene;
- ii. All units are self-contained with exclusive use of sanitary and kitchen facilities and provided with individual entrances and internal staircases to serve units above ground floor level;
- iii. Adequate amenity space is provided for the benefit of residents; and
- iv. Adequate living space standards are met.

6.34 **Policy DMH 2 (Housing Mix)** advocates 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.

- 6.35 **Policy DMHB 5 (Areas of Special Local character)** confirms within Areas of Special Local Character, new development should reflect the character of the area and its original layout. Alterations should respect the established scale, buildings lines, height, design and materials of the area.
- 6.36 Extensions to dwellings should be subservient to, and respect the architectural style of the original buildings and allow sufficient space for appropriate landscaping, particularly between, and in front of, buildings.
- 6.37 The replacement of buildings which positively contribute to the character and local importance of Areas of Special Local Character will normally be resisted.
- 6.38 **Policy DMHB 11 (Design of New Development)** Outlines 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:
- i. Harmonising with the local context by taking into account the surrounding:
 - Scale of development, considering the height, mass and bulk of adjacent structures;
 - Building plot sizes and widths, plot coverage and established street patterns;
 - Building lines and setbacks, rooflines, streetscape rhythm, gaps between structures and other streetscape elements, such as degree of enclosure;
 - Architectural composition and quality of detailing;
 - Local topography, views both from and to the site; and
 - Impact on neighbouring open spaces and their environment.
 - ii. Ensuring the use of high quality building materials and finishes;
 - iii. Ensuring that the internal design and layout of development maximises sustainability and is adaptable to different activities;
 - iv. Protecting features of positive value within and adjacent to the site, including the safeguarding of heritage assets, designated and un-designated and their settings; and
 - v. Landscaping and tree planting to protect and enhance amenity, biodiversity and green infrastructure.
- 6.39 Development proposals should not adversely impact on the amenity, daylight and sunlight of adjacent properties and open space.
- 6.40 Development will be required to ensure that the design safeguards the satisfactory re-development of any adjoining sites which have development potential. In the case of proposals for major development sites, the Council will expect developers to prepare master plans and design codes and to agree these with the Council before developing detailed designs.
- 6.41 Development proposals should make sufficient provision for well designed internal and external storage space for general, recycling and organic waste, with suitable access for collection. External bins should be located and screened to avoid nuisance and adverse visual impacts to occupiers and neighbours.
- 6.42 **Policy DMHB 16 (Housing Standards)** States that all housing development should have an adequate provision of internal space in order to provide an appropriate living environment. To achieve this all residential development or conversions should:
- i. Meet or exceed the most up to date internal space standards, as set out in Table 5.1; and
 - ii. In the case of major developments, provide at least 10% of new housing to be accessible or easily adaptable for wheelchair users.

- 6.43 **Policy DMHB 17 (Residential Density)** States that all new residential development should take account of the residential density matrix within the plan and developments will be expected to meet habitable room standards.
- 6.44 **Policy DMHB 18 (Private Outdoor Amenity Space)** Outlines that all new residential development and conversions will be required to provide good quality and useable private outdoor amenity space. Amenity space should be provided in accordance with the standards set out within the plan.
- 6.45 Balconies should have a depth of not less than 1.5 metres and a width of not less than 2 metres.
- 6.46 The design, materials and height of any front boundary must be in keeping with the character of the area to ensure harmonisation with the existing street scene.
- 6.47 **Policy DMCI 7 (Planning Obligations and Community Infrastructure Levy)** Advocates that to ensure development is sustainable, planning permission will only be granted for development that clearly demonstrates there will be sufficient infrastructure of all types to support it. Infrastructure requirements will be predominantly addressed through the Council's Community Infrastructure Levy (CIL).
- 6.48 Planning obligations will be sought on a scheme-by-scheme basis:
- i. To secure the provision of affordable housing in relation to residential development schemes;
 - ii. Where a development has infrastructure needs that are not addressed through CIL; and
 - iii. To ensure that development proposals provide or fund improvements to mitigate site specific impacts made necessary by the proposal.
- 6.49 Applications that fail to secure an appropriate Planning Obligation to make the proposal acceptable will be refused.
- 6.50 **Policy DMT 1 (Managing Transport Impacts)** States that development proposals will be required to meet the transport needs of the development and address its transport impacts in a sustainable manner. In order for developments to be acceptable they are required to:
- i. Be accessible by public transport, walking and cycling either from the catchment area that it is likely to draw its employees, customers or visitors from and/or the services and facilities necessary to support the development;
 - ii. Maximise safe, convenient and inclusive accessibility to, and from within developments for pedestrians, cyclists and public transport users;
 - iii. Provide equal access for all people, including inclusive access for disabled people;
 - iv. Adequately address delivery, servicing and drop-off requirements; and
 - v. Have no significant adverse transport or associated air quality and noise impacts on the local and wider environment, particularly on the strategic road network.
- 6.51 **Policy DMT 6 (Vehicle Parking)** Outlines that 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:
- i. The variance would not lead to a deleterious impact on street parking provision, congestion or local amenity; and/or

- ii. A transport appraisal and travel plan has been approved and parking provision is in accordance with its recommendations;
- iii. All car parks provided for new residential development will be required to contain conveniently located reserved spaces for wheelchair users and those with restricted mobility in accordance with the Council's Accessible Hillingdon SPD.

General Permitted Development Order

- 6.52 The Government has introduced a suite of new permitted development rights which apply in England.
- 6.53 A right to construct dwellings on top of existing terraced mixed commercial and residential buildings was introduced on 1st August 2020 under Class AB of Part 20.
- 6.54 Furthermore, additional permitted development rights allows flats to be constructed on the topmost storey of commercial/mixed use or residential buildings under Classes AA, AC and AD from 31st August 2020.
- 6.55 Whilst not directly applicable to this application, the above legislation demonstrates the current national policy position that encourages developers and Councils to utilise redundant airspace above existing buildings in order to deliver the homes required to meet the national housing crisis.

SUMMARY

- 6.56 It is acknowledged within national, regional and local policy that proposals for residential development above existing residential and commercial sites in accessible, sustainable locations should be supported.
- 6.57 The creation of new residential floorspace through the re-use of previously developed sites is supported by policy at a national and local level.
- 6.58 However, the Council will seek to ensure that acceptable living conditions for residents are achieved by ensuring that there are no adverse impacts upon the amenity of the occupiers of any neighbouring properties. Furthermore, the scheme must be of an acceptable design and respect the wider ASLC.
- 6.59 There is a clear intent at national and local level to ensure that residential living conditions are optimised through design.

7 PLANNING CONSIDERATIONS

- 7.1 The planning issues relevant to the determination of the development proposal are assessed in detail below.

Principle of Development

- 7.2 As examined within the previous section, the National Planning Policy Framework (NPPF) requires the Council to make the most efficient use of land by maximising the use of previously developed sites and converting existing buildings.
- 7.3 Of relevance to the proposal is Sub Section (e) of paragraph 120, which outlines that Councils should support opportunities to use the airspace above existing residential and commercial premises for new residential floorspace.
- 7.4 Accordingly, the principle of development is considered acceptable provided that there is good accessibility to local amenities and public transport, satisfactory living conditions provided for intended occupiers, no adverse impact on the amenity of neighbouring properties or the character of the ASLC and that the external design will have no unacceptable impact upon the visual character of the host property or the wider street scene.
- 7.5 In addition, the proposed mix will enable the creation of a new 2 bed apartment that will make a positive contribution towards the Borough's housing requirements.
- 7.6 Accordingly, the principle of development is considered acceptable and the scheme complies with Policies DMTC 3 and DMH 2 of the Local Plan Part 2.

Design and Heritage

- 7.7 The drawings package sets out the context of the scheme design in terms of its layout, scale, visual impact and appearance.
- 7.8 The site benefits from being located within the Old Northwood Area of Special Local Character and as such particular consideration has been given to ensure that no impact is made upon the traditional street scene of the High Street that features a notable architectural style and consistency of scale throughout.
- 7.9 To the rear of the property no such consistency or style is apparent with an eclectic mix in both the scale and design of rear extensions throughout the terrace. This is reflected in part by the pre-application response provided by the Council that concludes with regard to design (**Appendix 1, page 3**) that "It is noted that other properties within the terrace have been extended in a similar way. It may therefore be unreasonable to object to the proposal on this basis".
- 7.10 As summarised above the proposed extension will maintain the existing building line of the rear outrigger present within the terrace and as such will project 4.86 metres. The proposed mansard roof will be set in from both sides and the rear elevation and importantly will not exceed the existing ridge height of the terrace. Therefore, the proposed extension will not be visible at all from the High Street and will remain subordinate to the host property.

- 7.11 The building has been designed to use similar materials to those in the locality and to reference the varied roofscape of the surrounding area as illustrated within Section 2. As such, the scheme proposes a simple palette of materials, namely facing brickwork for the walls. Whilst, a complementary fenestration is also proposed that has been carefully considered to replicate the style and appearance of the existing property to produce a coherent visual symmetry. Accordingly, the building will sit harmoniously within its immediate context as demonstrated on the submitted plans.
- 7.12 The redevelopment of the site to provide a high quality design is considered to be acceptable by Local Plan Part 2 Policies DMHB 5 and DMHB 11.

Living Environment

- 7.13 As demonstrated on the enclosed drawings package, the scheme has been designed to ensure all habitable rooms benefit from high levels of outlook and sunlight/daylight with large elements of glazing to all habitable rooms.
- 7.14 Additionally it is confirmed that the first floor flat comprising 2 bedrooms for 3 persons will measure 67.97 sqm whilst the corresponding second floor unit (also accommodating two bedrooms for three persons) will provide 64.64 sqm of floorspace. Accordingly, both flats will comfortably exceed the nationally described standard of 61 sqm.
- 7.15 As the site relates to an existing commercial building within a defined local parade there is unfortunately no scope to introduce private external amenity space on site.
- 7.16 However, it is important to note that the site lies directly to the north of Northwood Recreation Grounds, which extends to some 12.5 hectares and provides landscaped amenity space, children's playground, ball court, tennis court, cricket pitch football pitches and an outdoor gym. Accordingly, our view is that occupiers of the new unit will be able to access outdoor landscaped amenity space in close proximity to the site (less than 300 metres walking distance).
- 7.17 Whilst the provision of amenity space for residents is an important issue, it needs to be considered in the context of the wider planning balance and the benefits that the scheme will provide, most notably in terms of contributing to the Borough's housing supply within a sustainable location of a defined local parade.
- 7.18 It is also noted that units comfortably exceed national internal space standards as outlined above. The additional internal living space is a factor that should be taken into account in helping to create a high quality living environment for future occupiers and to help compensate for the lack of private amenity space in this instance.
- 7.19 Accordingly, the scheme will provide a high quality living environment for occupiers in accordance with Policies DMHB 11, DMHB 16, DMHB 18 of the Local Plan Part 2.

Impact on Neighbouring Properties

- 7.20 A proposed rear extension of the same projection has previously been confirmed by the Council to result in no significant harm to residential amenity of adjoining occupiers by way of increased overshadowing, visual intrusion, over-dominance and loss of privacy (please refer to the Council's pre application response at **Appendix 1**).

7.21 Whilst this revised development incorporates a different roof design with additional windows at loft level, it is considered these conclusions remain valid and the proposed development will have no impact upon neighbouring occupiers by way of overshadowing, overdominance or loss of privacy.

7.22 Therefore, the scheme is considered to comply with Policy DMHB 11 and of the Local Plan Part 2.

Transport and Highways

7.23 As confirmed by the Council within their pre-app response at **Appendix 1**, given the site's location within an established local parade with a wide range of shops and services, two prominent bus routes that run nearby and the lack of parking for the existing dwelling, it would not be necessary for occupants of residential dwellings in this location to use a car to access day to day services. This was further confirmed in the Council's approval of Ref 61226/APP/2020/3208 which raised no objections on the grounds of highway safety.

7.24 Add in NPPF paragraph 109 reference here

7.25 Therefore, the scheme is considered to meet Policies DMT 1 and DMT 6 of the Local Plan Part 2.

8 CONCLUSIONS

8.1 It is concluded that the scheme is in accordance with the NPPF and the Council's adopted Local Plan. It therefore constitutes appropriate development and should be supported for the following reasons:

- The principle of creating new residential dwellings through conversion of existing buildings and re-use of previously developed sites is supported by policy at a national and local level. The NPPF recognises the need for the planning system to promote an effective use of land in meeting the need for homes and other uses. Moreover, the NPPF recognises the need for the planning system to promote an effective use of land in meeting the need for homes and other uses. The document introduces guidance to confirm that local authorities should support opportunities to use the airspace above existing residential and commercial premises for new residential floorspace. The scheme has been designed in accordance with this guidance and will represent an efficient and effective use of an existing building;
- The design of the proposed rear extension has been informed by the surrounding context and will make a positive contribution to the visual appearance of the host property, remaining subservient in nature and incorporating high quality materials and external detailing. The detailed assessment presented as part of this submission demonstrates that the proposal as a whole will have no harmful impact upon the visual character or appearance of the ALSC;
- The overall standard of accommodation proposed is considered to be extremely good. The proposed development will provide a high quality living environment for new residents by ensuring appropriate levels of privacy, outlook and internal floorspace areas which exceed relevant target standards. The site is also located within a sustainable area in very close proximity (less than 300 metres) to substantial landscaped amenity space and as such it is considered that non-provision of private amenity space is acceptable in this instance.
- The impact of the proposed development upon neighbouring properties has been carefully considered. The application submission demonstrates that the scheme will have no unacceptable adverse impacts upon the amenity of occupiers of any neighbouring properties;
- The site is within a sustainable area with a wide range of shops and amenities close by and is well served by the local bus network, as such the scheme complies with all relevant Transport, Highways and parking standards within the NPPF and London Plan.

8.2 Overall, the scheme adopts the principles of sustainable development in relation to social, economic and environmental factors. This is because it recycles urban land and delivers two family sized dwellings which are accessible by a choice of travel modes including foot, cycle and public transport. It has been demonstrated to comply with all relevant planning policies (including the NPPF, London Plan, Policies DMTC3, DMH1, DMH2, DMHB5, DMHB11, DMHB16, DMHB17, DMHB18, DMCI7, DMT1 and DMT6) and should therefore be considered acceptable.

Appendix 1



Mr Ajay Modhwadia
Multicreation
239 Western Road
Southall
Middlesex UB2 5HS

Planning Applications Team
London Borough of Hillingdon
Civic Centre, High Street
Uxbridge UB8 1UW

Tel: 01895 250230
Case Officer: Liz Arnold
Email: larnold@hillingsdon.gov.uk
Date: 31st January 2020
Our Ref: 61226/PRC/2019/129

Dear Mr Ajay Modhwadia

RE: Change of use of 34a from 2/3 bed flat (Use Class C3) and of 34b from offices (Use Class B1) to form 10 self contained studio flats

SITE: 34a & 34b High Street Northwood

I refer to your request for pre-application planning advice dated 22 July 2019 and our subsequent meeting on 12 August 2019. The advice provided is based on the following drawings and documents issued to the Local Planning Authority for consideration.

Plan Numbers: 3281-05/BK - received 13 Jun 2019
3281-01/FP - received 13 Jun 2019
3281-02/FP - received 13 Jun 2019
3281-04/FP - received 13 Jun 2019
3281-03/FP - received 13 Jun 2019
Photos - received 13 Jun 2019

Outlined below is a preliminary assessment of the proposal, including an indication of the main issues that should be addressed should you choose to submit a formal planning application. Please note that the views expressed in this letter represent officer opinion only and cannot be taken to prejudice the formal decision of the Council in respect of any subsequent planning application, on which consultation would be carried out which may raise additional issues. In addition, the depth of analysis provided corresponds with the scope of information made available to Council officers.

The Site and Surrounds

The application site is located on the Eastern side of Northwood High Street and comprises a shop unit at ground floor to the front, with a flat above and large single storey extension at the rear currently in use as office space. There is also a detached single storey building across the rear of the plot. This site forms part of a terrace of properties with retail at ground floor and residential above.

The street scene is primarily residential in character comprising a mix of house types on one side and retail units with residential above on the other. The application site lies within the Old Northwood Area of Special Local Character (ASLC) and the Developed Area as designated in the Hillingdon Local Plan: Part One - Strategic Policies (November 2012). It has a PTAL of 2.

The Proposal

The proposal is described within the application form as a change of use of the flat and offices to a HMO (house in multiple occupation). By definition a HMO comprises of at least 3 tenants living there, forming more than 1 household and they share toilet, bathroom or kitchen facilities with other the tenants. The actual proposal shown within the submitted plans, include a first floor rear extension and the conversion of the flat, office and outbuilding to form 10 self contained bedsits. The proposal has therefore been considered on that basis.

Planning Policy

The proposed development would be assessed against the Development Plan Policies contained within Hillingdon Local Plan: Part 1, Local Plan: Part Two - Development Management Policies (2020), the London Plan 2015 and the NPPF.

Part 1 Policies:

PT1.BE1	(2012) Built Environment
PT1.HE1	(2012) Heritage

Other Policies:

DMH 3	Office Conversions
DMH 5	Houses in Multiple Occupation
DMHB 5	Areas of Special Local Character
DMHB 11	Design of New Development
DMHB 12	Streets and Public Realm
DMHB 16	Housing Standards
DMHB 18	Private Outdoor Amenity Space
DMHD 1	Alterations and Extensions to Residential Dwellings
DMT 6	Vehicle Parking
LPP 3.3	(2016) Increasing housing supply
LPP 3.4	(2015) Optimising housing potential
LPP 3.5	(2016) Quality and design of housing developments
LPP 3.8	(2016) Housing Choice
NPPF- 11	NPPF-11 2018 - Making effective use of land
NPPF- 12	NPPF-12 2018 - Achieving well-designed places

Main Planning Issues

1. Principle of development

National Planning Policy Framework states there is a presumption in favour of sustainable development which is described for decision taking as "approving development proposals which accord with the development plan." As a core planning principle the effective use of land is encouraged by reusing land that has been previously developed (brownfield land). The proposed site currently comprises a mix of residential and office uses and constitutes 'previously developed land'. There is a presumption in favour of residential development on brownfield land subject to other material planning considerations as detailed below.

Policy DMH 3 of the Local Plan: Part Two - Development Management Policies (2020) advises that the Local Planning Authority where offices are found to be redundant their redevelopment will be supported where the external finish is suitable for a residential building and in keeping with the character of the area. Also amenity space is designed as an integral facility. Where a sole aspect home overlooking shared use areas will generally be unacceptable. All conversions that fall outside of existing permitted development rights will be expected to accord with London Plan minimum space and parking standards.

Therefore the Council does not have an 'in principle' objection to the extension and conversion of the building to provide additional residential units, subject to the application demonstrating compliance with all of the above criteria and relevant Development Plan policies.

For reference Policy DMH 5 advises that proposals for the provision of large HMO's will be required to demonstrate that:

- i) there is good accessibility to local amenities and public transport
- ii) they accord with Accessible Homes standards and provide satisfactory living conditions for the intended occupiers; and
- iii) there is no adverse impact on the amenity of neighbouring properties or the character of the area.

2. Design

Policy BE1 of the Hillingdon Local Plan: Part One - Strategic Policies (November 2012) requires all new development to maintain the quality of the built environment including providing high quality urban design.

Policy DMHB 5 of the of the Local Plan: Part Two - Development Management Policies (2020) advises that within Areas of Special Local Character new development should reflect the character of the area. Alterations should respect the established scale, building lines, height, design and materials of the area. Extensions should be subservient to and respect the architectural style of the original buildings. Furthermore Policy DMHB 11 advises that all development will be required to be designed to the highest standards and incorporate principles of good design. It should take into account aspects including the scale of the development considering the height, mass and bulk of adjacent structures; building plot sizes and established street patterns; building lines and streetscape rhythm and landscaping. It should also not adversary impact on the amenity, daylight and sunlight of adjacent properties and open space.

Policy DMHB 11 of the Local Plan: Part Two - Development Management Policies (2020) advises that all development will be required to be designed to the highest standards and incorporate principles of good design. It should take into account aspects including the scale of the development considering the height, mass and bulk of adjacent structures; building plot sizes and established street patterns; building lines and streetscape rhythm and landscaping. It should also not adversary impact on the amenity, daylight and sunlight of adjacent properties and open space.

Policy DMHD 1 requires that alterations and extension of dwellings would not have an adverse cumulative impact on the character and appearance of the street scene, and should appear subordinate to the main dwelling. It also required that there is no unacceptable loss of outlook to neighbouring occupiers.

The proposal would not result in any changes to the front elevation and minimal changes to the window and door details on the rear extension. There is proposed a first floor rear extension, which measures 4.88m in depth, 3.9m in width and 7.24m in height. This would sit between the existing outriggers of the host property and that of the neighbouring property at no. 32. The proposed extension is of the same design as the existing projections and although at a depth of 4.88m this would be a large addition to the original building, it is noted that other properties within the terrace have been extended in a similar way. It may therefore be unreasonable to object to the proposal on this basis.

3. Amenity

Policy DMHB 11 advises that all development should not have an adversary impact on the amenity, daylight and sunlight of adjacent properties and open space. Policy DMHD 1 requires there is no unacceptable loss of outlook to neighbouring occupiers.

The proposed rear extension would comply with the aims of policy guidance and would comply with the 45 degree requirement in relation to adjoining occupiers. The proposed windows will all face the garden of the application site. It is not considered that the proposal would significantly harm the residential amenities of the occupiers of the adjoining property from increased overshadowing, visual intrusion over-dominance or loss of privacy.

Internal Floorspace

On 25 March 2015, the Government introduced new technical housing standards in England, which comprise of new additional 'optional' Building Regulations on water and access, and a nationally described space standard (referred to as "the new national technical standards"). These new standards came into effect on 1 October 2015. The Mayor of London has adopted the new national technical standards through a minor alteration to The London Plan.

The Housing Standards (Minor Alterations to the London Plan) March 2016 sets out the minimum internal floor spaces required for developments in order to ensure that there is an adequate level of amenity for existing and future occupants. The standards require a 1 bed (1 person) dwelling (with shower) on 1 floor to have a minimum internal floor area of 37 sqm. The proposed layouts appear to show approximate floor areas of between 14.9sqm to 28.77sqm. It is therefore considered the proposal fails to provide a satisfactory living environment for the future occupants in accordance with Policy 3.5 of the London Plan 2016.

It is also noted that the proposed floor plans indicate cycle storage in front of the windows of the proposed units. The elevations indicate this as within low level fenced areas, but cycle storage should be secure and covered and the siting in front of the windows may lead to limited light and outlook for the future occupiers, which would be unacceptable.

External Amenity Space

Policy DMHB 18 requires that all new residential development will be required to provide good quality and usable private outdoor amenity space. For studio flats there is a requirement of 20sqm per unit. It also requires that any ground floor unit that is non street facing should have a defensible space of not less than 3m in depth in front of any window to a bedroom or habitable room.

Policy DMHB 18 states that developments should incorporate good quality and usable private outdoor amenity space. Any ground floor unit that is non-street facing should have a defensible space not less than 3 meters in depth in front of any window to a bedroom or habitable space.

Adequate garden space should be provided according to the number of units created. The garden space standards have a requirement of 20sqm per 1 bed flat, giving a total requirement of 200sqm.

4. Highways

Car Parking

The site has a PTAL of 2 and in compliance with Policy AM14 would require the provision of 1 off street parking space for each dwelling.

Policy DMT 6 of the emerging Hillingdon Local Plan: Part Two - Development Management Policies with Modifications (March 2019) advises that 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 the requirements when this would not lead to a deleterious impact on street parking provision. The maximum requirements for studio apartments are 1 space per 2 units giving a need for 5 spaces.

However it is noted that the existing dwelling and offices do not benefit from any parking and the site is within 1km of both Northwood and Northwood Hills stations. 2 bus routes run close

to the site and provide frequent peak services from Harrow Bus Station and Ealing Hospital to Mount Vernon Hospital. Both Northwood and Northwood Hills Town Centres, provide a range of shops and services. Moreover, the site is located within an urban area in a parade of shops amongst a wider shopping area with a selection of shops and services. Therefore, given the site's location amongst such services and as it is within walking and cycling distance of trains and buses, it would not be necessary for the occupants of the dwellings to use a car to access day to day services.

Cycle Parking

A secure covered cycle parking area would also be required at a minimum of one space per unit.

Refuse and Recycling

Refuse collection would continue via the public highway. A bin storage area should be presented with conformity to the Council's maximum 'waste collection' distance of 10m from bin store to the waste collection point (i.e. refuse vehicle) on the public highway.

5. Other

Access for people with disabilities

The London Borough of Hillingdon is committed to achieving the highest standards of access and inclusion. All housing development schemes must be constructed in accordance with the Lifetime Homes Standards as outlined in the SPG Hillingdon Design and Accessibility Statement (HDAS) Accessible Hillingdon' and Policy 3.8 of the London Plan 2011.

It is important that any proposal conforms with the aforementioned documents and requirements and you may wish to discuss the scheme with the Council's Access Officer, Ali Kashmiri akashmiri@hillingsdon.gov.uk prior to the submission of any application.

6. Planning Obligation and CIL (Mayor and LBH)

CIL

The Council adopted its own Community Infrastructure Levy (CIL) on August 1st 2014 and the Hillingdon CIL charge for residential developments is £95 per square metre of additional floorspace. This is in addition to the Mayoral CIL charge of £60 per sq metre.

7. Application Submission

List of documents to be submitted:

Application Form

CIL Form

Location Plan

Block Plan

Existing and proposed floor plans and elevations

Proposed Roof Plan

Planning Statement,

Design & Access Statement

Daylight/sunlight assessment

Please note that this list is not exhaustive and that should you choose to submit an application, other information may be required as the scheme progresses.

8. Conclusion

The current proposal, based on the plans and supporting documents that have been submitted could not be supported, as it results in an overdevelopment of the site in that it would provide a poor standard of residential accommodation for its future occupiers.

Any revisions would need to ensure they are correct and follow the guidelines within the

latest Government guidance as well as the relevant policies and guidance contained within the local plan, the adopted supplementary guidance and the London Plan (2015).

A formal application would be subject to public consultation which may raise other issues.

Please be advised that the Council require confirmation that you wish to enter into a PPA as soon as possible, in order to ensure the necessary resource are in place to meet the terms of the PPA.

Thank you for entering into the Councils pre-application advice service and I trust you have found this service of assistance.

**Liz Arnold
Planning Consultant
Major Applications Team
London Borough of Hillingdon**

Planning Guarantee

For complex applications which are likely to exceed the statutory timeframes, the applicant is encouraged to enter into a Planning Performance Agreement (PPA) to allow for the negotiation of complex cases. Central Government encourages the use of PPAs for larger and more complex planning proposals to bring together the developer, the Local Planning Authority and key stakeholders to work in partnership throughout the planning process.

Providing a PPA helps ensure that major proposals progress through the application process in a timely fashion and result in high quality development but the service is both time consuming and costly. The charge for all Planning Performance Agreements will ensure that adequate resources and expertise can be provided to advise on major development proposals, the charges are determined on a site by site basis.

Hillingdon are committed to ensure the best possible service provision to all of our applicants. In order to ensure this, we will not be able to facilitate negotiation which would result in an application being determined outside of statutory timeframes, unless the applicant has entered into a Planning Performance Agreement.