

Land to the Rear of 2 Hilliards Road, Cowley, Uxbridge, UB8 3TA

Planning Statement

February 2024



WARNER



Contents page

1. Introduction	2
2. Site and Surrounding Area	4
3. Proposed Development	9
4. Planning Policy Context	12
5. Analysis	30
6. Conclusion	44



1 Introduction

This Planning Statement is submitted by Warner Planning on behalf of Mr and Mrs Ronald and Sheila Moulder. This Statement is submitted to the London Borough of Hillingdon in association with the proposal at 2 Hilliards Road, Cowley, Uxbridge, UB8 3TA for the resubmission of the following development:

“Construction of One Detached, Single Storey, Self-Build, Accessible Dwelling, with New Highway Access and Associated Landscaping on Land to the Rear of 2 Hilliards Road, UB8 3TA (Resubmission)”.

The following documents support the application:

- Site Location Plan (Ref. 101031-2HRB-1000-ZZ-LZZ-ST-A-0800 REV P2)
- Existing and Proposed Site Plans (Ref. 101031-2HRB-1000-ZZ-LZZ-ST-A-0801 REV P3)
- Proposed Ground & First Floor Plans (Ref. 101031-2HRB-1000-ZZ-LZZ-ST-A-0825 REV P2)
- Proposed Elevations (Ref. 101031-2HRB-1000-ZZ-LZZ-ST-A-0830 REV P3)
- Proposed Sections (Ref. 101031-2HRB-1000-ZZ-LZZ-ST-A-0835 REV P3)
- Existing Views (Ref. 101031-2HRB-1000-ZZ-LZZ-ST-A-0895 REV P1)
- Proposed Sketch Views (Ref. 101031-2HRB-1000-ZZ-LZZ-ST-A-0896 REV P2)
- Design and Access Statement (January 2024);
- Energy Strategy (December 2023);
- Summertime Overheating Report (November 2023);
- SuDS Management and Maintenance Strategy (December 2023);
- Drainage Technical Note (December 2023);
- Daylight/Sunlight Report (December 2023);
- Air Quality Assessment (December 2023); and
- This Planning Statement.

This Planning Statement sets out the background relevant to the determination of the application, by describing the site and its general locality, before setting out details of the proposed development. The statement provides an overview of the planning policy context against which the development is assessed, followed by a detailed consideration of the development proposals against this policy context and all other relevant material considerations, including the previous application on the site.

In making this planning application, it is our submission that the application proposes a high quality, sustainable development that will complement the immediate locality, and the wider area. The Council have previously allowed planning permission for a bungalow on the site.



There are significant benefits to be delivered by the development. It is considered that there are compelling grounds to grant planning permission for the proposed development, with these set out as follows:

- Important addition to the district's housing stock using up to date construction methods and materials;
- Increase in the stock of smaller residential units in the area;
- Provision of a much needed and sought after bungalow;
- Provision of a self-build opportunity
- Economic benefits produced from the increase in housing stock and through employment opportunities during the construction phase of development;
- More effective use of a currently underutilised site in a sustainable location of Hillingdon;
- Creation of a residential unit close to several existing shops and services;
- Minimal impact on amenity of nearby properties and occupiers;
- A proposal that makes use of the existing highway network with limited impact on vehicle movements locally; and,
- The proposed dwelling would not conflict with the nearby vernacular in terms of layout.

This Planning Statement should be read in conjunction with the supporting documents, existing and proposed plans, submitted to accompany this planning application.



2 The site and surrounding area

The application site is situated on land to the rear of 2 Hilliards Road and forms the curtilage of the garden attributed to the existing bungalow. To the West and North of the property, the land is surrounded predominantly by dwelling houses with gardens bordering the site's boundary. 2 Hilliards Road is a property surrounded by largely semi-detached or terraced housing and several detached dwellings which form the Hilliards Road street pattern.



Figure 1: Location of Application Site

The site is located within a settlement, is not subject to identified flood risk, and the site has no designations that influence development on the site. There are a range of services and amenities located near to the site. These include the following:

- Panthers Gym - 225 metres
- Rabbsfarm Primary school - 625 metres
- Tesco - 680 metres
- Aldi - 850 metres
- Iceland Foods – 1.025 km
- St Matthew's C of E Primary School – 1.05km
- West Drayton Train Station - 1.40 km



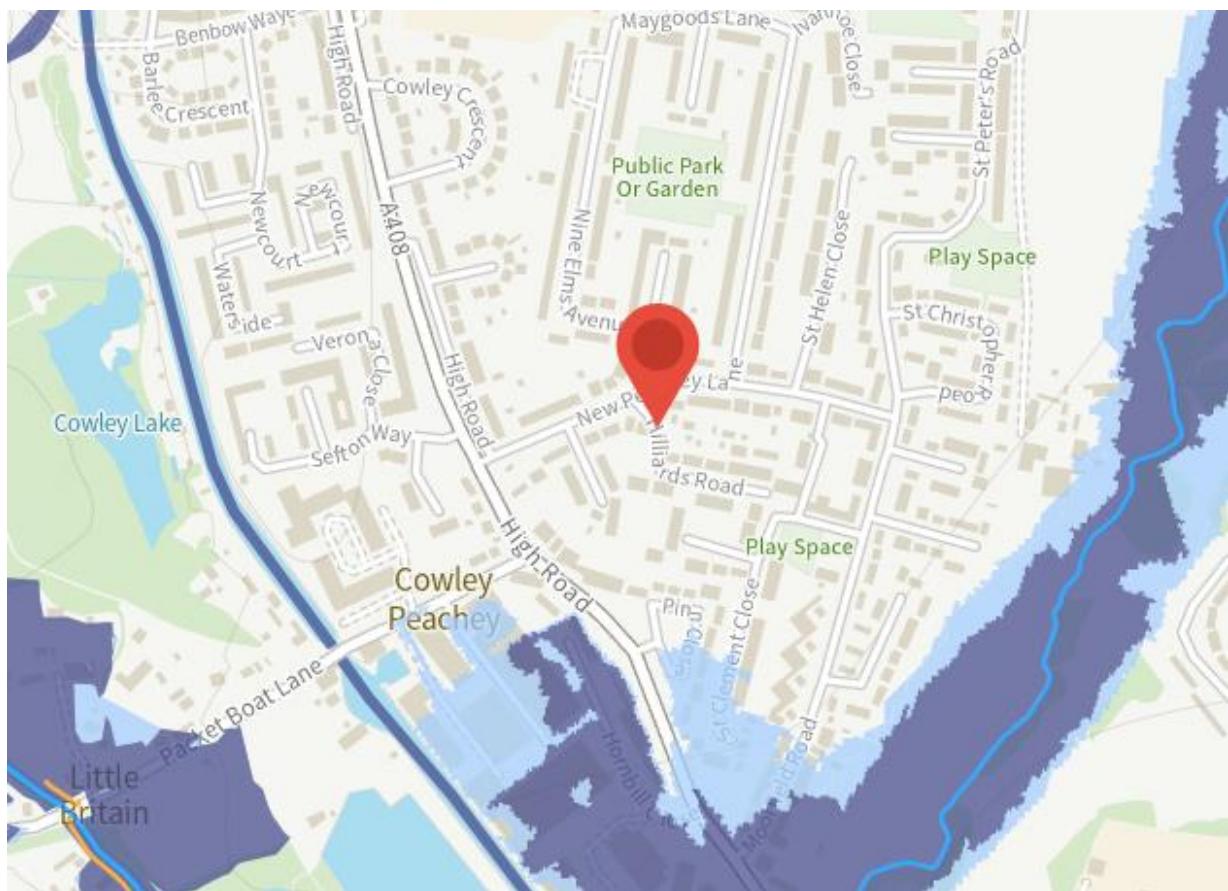


Figure 2: Flood Zone Map

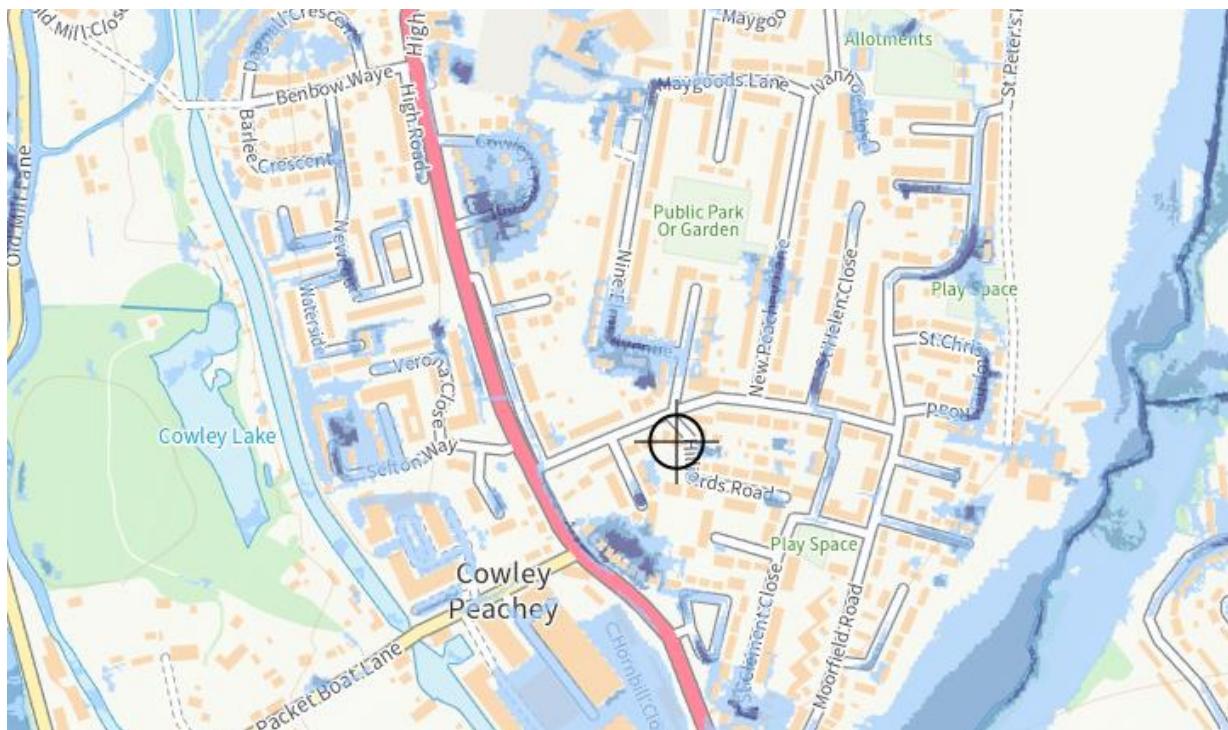


Figure 3: Risk of Flooding from Surface Water



Site Attributes and Constraints

Attribute / Constraint	Comment
Green Belt	✗ No
SSSI	✗ No
Local Nature Reserve	✗ No
SNCI (Site of Nature Conservation Interest)	✗ No
Listed Building	✗ No
Locally Listed Building	✗ No
Flood Zone	✗ No
Ancient Woodlands	✗ No
Registered Parks and Gardens	✗ No
Common Land	✗ No

Table 1: Site Attributes and Constraints

Planning History

This application is a resubmission that has built on comments from a previous application, which are summarised in Section 3 of this Statement. There is further planning history attributed to the site, that has been tabulated below.

Reference	Address	Proposal	Status
61347/APP/2023/920	2 Hilliards Road Cowley UB8 3TA	Construction of 1 no. detached single storey dwelling, with new associated garage and highway access	Refused (Currently at Appeal) 12-06-23
61347/APP/2012/2377	2 Hilliards Road Cowley UB8 3TA	Application for non-material amendment of planning permission Ref: 61347/APP/2011/2280 dated 21/12/2011 to make alterations to the dormer (raising of roof to allow for conversion of roof space to habitable use to include a side dormer and 3 side rooflights)	Approval 16-10-12



61347/APP/2011/2280	2 Hilliards Road Cowley UB8 3TA	Raising of roof to allow for conversion of roof space to habitable use to include a side dormer and 3 side rooflights	Approval 21-12-11
61347/APP/2007/1005	2 Hilliards Road Cowley UB8 3TA	Erection of a Single Storey Side and Rear Extension (Involving Demolition of Existing Detached Garage and Rear Extension). (Revised Scheme Involving Minor Amendments to Northeast and Southwest Elevations).	Approval 06-06-07
61347/APP/2006/853	2 Hilliards Road Cowley UB8 3TA	Erection of a Single-Storey Side and Rear Extension (Involving Demolition of Existing Detached Garage and Rear Extension)	Appeal Allowed 12-12-06
61347/APP/2006/194	2 Hilliards Road Cowley UB8 3TA	Erection of Single-Storey Rear Extension and Attached Garage to The Side of The House (Involving Demolition of Existing Rear Conservatory and Detached Garage)	Refusal 21-03-06
61347/APP/2005/3263	2 Hilliards Road Cowley UB8 3TA	Erection of single storey extensions to front and side and to rear, the former to include an integral garage, and the subdivision of the site into two plots (involving demolition of existing single storey rear extension and detached garage)	Refusal 12-01-06
58610/APP/2004/2393	Land Forming Part of 2 Hilliards Road, Cowley	Erection of a Detached Bungalow (Involving Demolition of Existing Detached Garage)	Approval



58610/APP/2003/1753	2 Hilliards Road Cowley	Erection Of a Detached Two-Bedroom Bungalow on Part of Garden	Refusal 16-09-03
---------------------	----------------------------	---	---------------------

Table 2: Planning History



3 Proposed Development

This section outlines the proposal and seeks to discuss the resubmission proposal for the construction of a 2-bedroom bungalow on land to the rear of 2 Hilliards Road, Coxey, Hillingdon, UB8 3TA. The proposal includes a new access and landscaping to further incorporate the proposal, both aesthetically and functionally, into the streetscene.

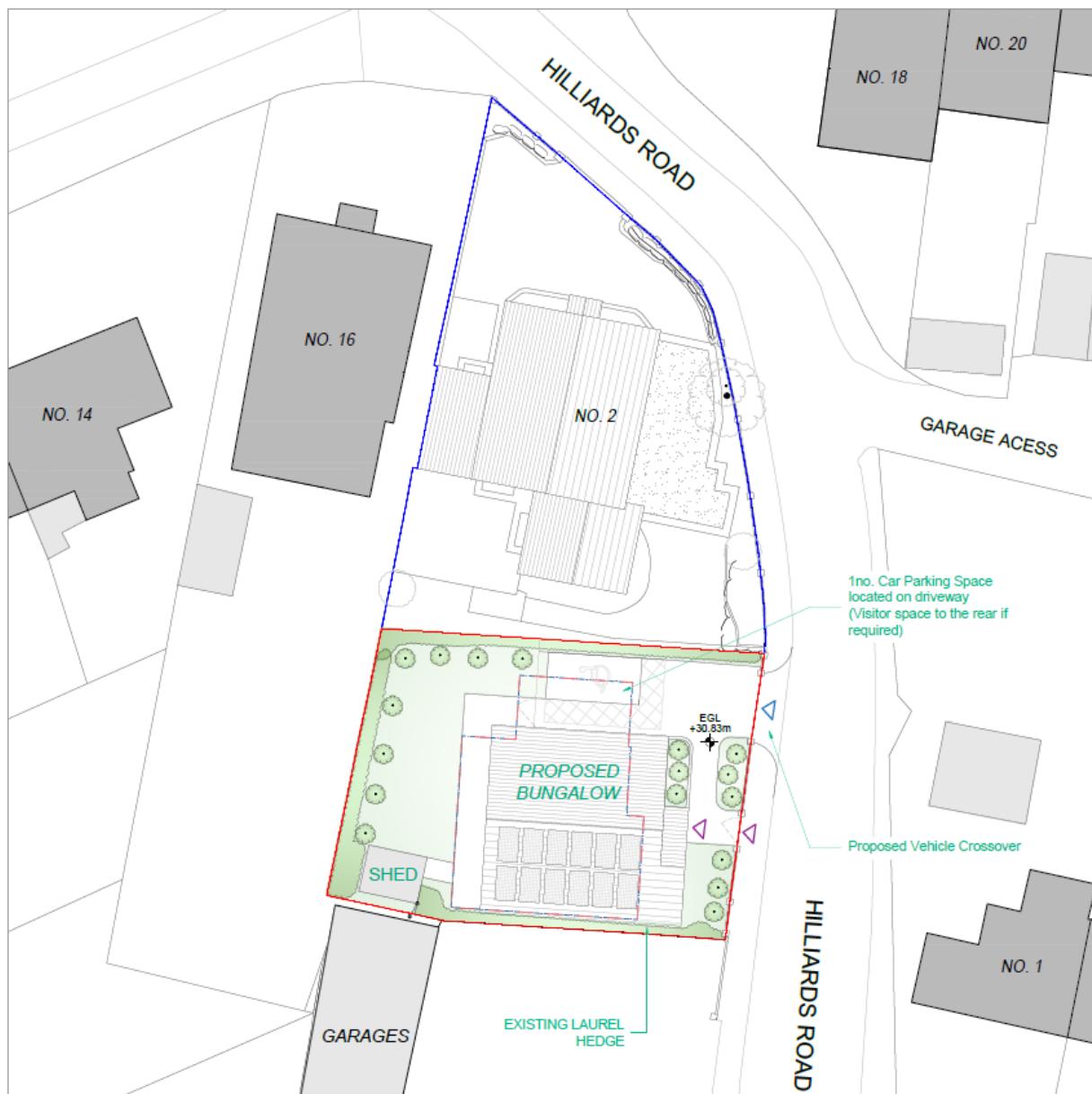


Figure 4: Proposed Site Plan



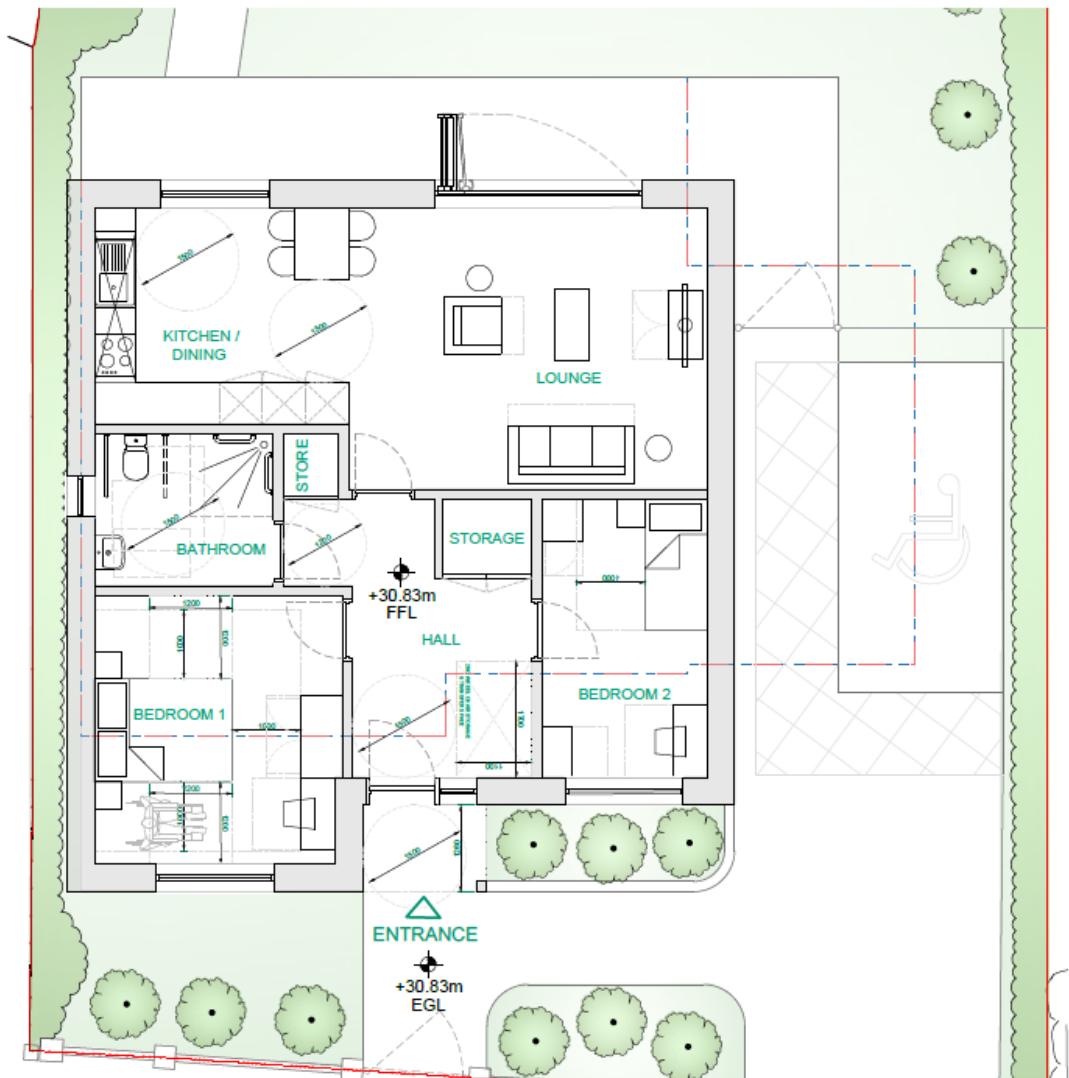


Figure 5: Proposed Floor Plans

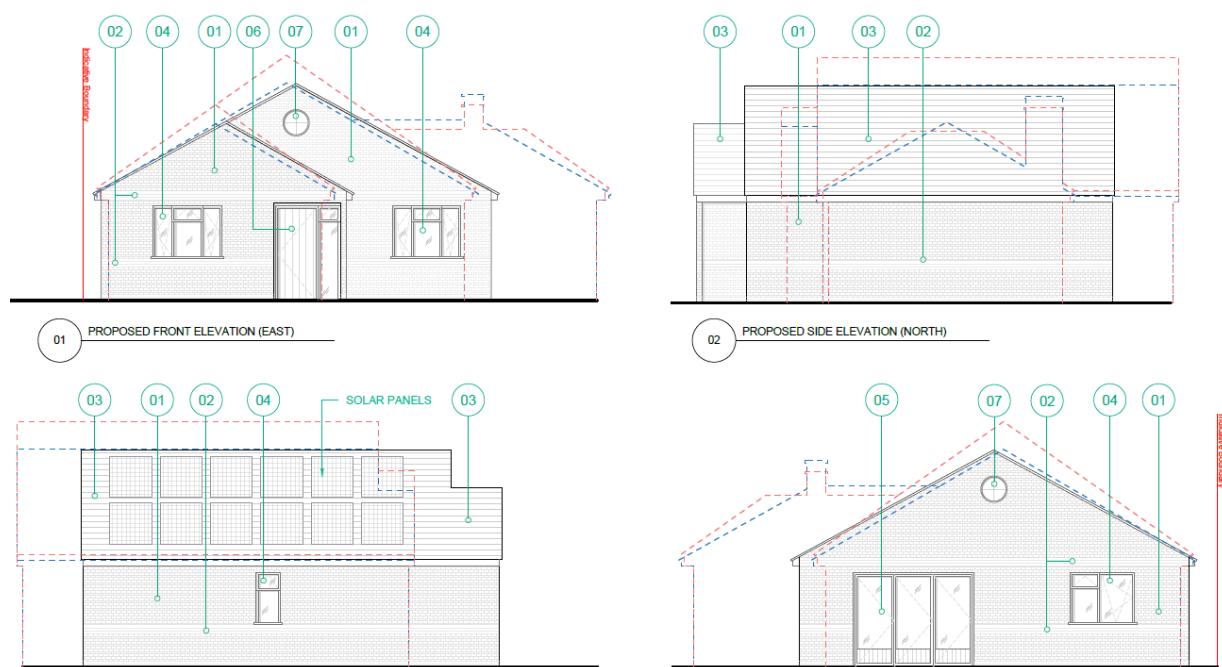


Figure 6: Proposed Elevations



Full versions of the plans as submitted will include a key to support the plans. This includes references to previous planning applications, of which this resubmitted application has looked to respond to. Further specifications regarding the site's layout and accessibility can be read within the associated Design and Access Statement.

This application is a resubmission following the refusal of application 61347/APP/2023/920. The application has been revised to overcome the reasons for refusal. The amendments include:

- Reconfiguration of the internal layout;
- Reduction in ridge height;
- Reduction in footprint;
- Increased the separation distances
- Omission of integrated garage;
- Altered elevations; and,
- Improvements to external aesthetics.

The bungalow is proposed to have 110m² of rear garden amenity space attributed to the bungalow (excluding the front garden and parking areas which also contribute to the openness) exceeding Hillingdon's Garden amenity requirement. The existing bungalow, 2 Hilliards Road, also retains an acceptable level of amenity space (approx. 109m²).



4 Planning Policy Context

The planning policy context relating to the application site is formed through:

- National Planning Policy
- Local Planning Policy

Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires applications for planning permission to be determined in accordance with the Development Plan unless material considerations indicate otherwise. The Development Plan material for this proposal comprises:

- National Planning Policy Framework (2023)
- London Plan: The Spatial Development Strategy for Greater London (March 2021)
- Hillingdon Local Plan: Part One – Strategic Policies (2012).
- London Borough Of Hillingdon Local Plan: Part Two - Development Management Policies (2020)

National Planning Policy Framework (2021)

The National Planning Policy Framework (NPPF) sets out the Government's planning policies for England and how these should be applied. It provides a framework within which locally prepared plans for housing, and other development can be produced.

Planning law requires that applications for planning permission be determined in accordance with the development plan unless material considerations indicate otherwise. The National Planning Policy Framework must be taken into account in preparing the development plan and is a material consideration in planning decisions. Planning policies and decisions must also reflect relevant international obligations and statutory requirements.

At the heart of the Framework is a "presumption in favour of sustainable development". Therefore, where there are no relevant development plan policies or the policies which are most important for determining the application are out of date, planning permission should be granted unless: i. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits when assessed against the policies in this Framework taken as a whole.

To support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed,



that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay.

Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. 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.

Local planning authorities, and other plan-making bodies, should take a proactive role in identifying and helping to bring forward land that may be suitable for meeting development needs, including suitable sites on brownfield registers or held in public ownership, using the full range of powers available to them. This should include identifying opportunities to facilitate land assembly, supported where necessary by compulsory purchase powers, where this can help to bring more land forward for meeting development needs and/or secure better development outcomes.

London Plan: The Spatial Development Strategy for Greater London (March 2021)

Policy D1 London's form, character and capacity for growth

Defining an area's character to understand its capacity for growth

- A. Boroughs should undertake area assessments to define the characteristics, qualities and value of different places within the plan area to develop an understanding of different areas' capacity for growth. Area assessments should cover the elements listed below:
 - 1) demographic make-up and socio-economic data (such as Indices of Multiple Deprivation, health and wellbeing indicators, population density, employment data, educational qualifications, crime statistics)
 - 2) housing types and tenure
 - 3) urban form and structure (for example townscape, block pattern, urban grain, extent of frontages, building heights and density)
 - 4) existing and planned transport networks (particularly walking and cycling networks) and public transport connectivity
 - 5) air quality and noise levels
 - 6) open space networks, green infrastructure, and water bodies
 - 7) historical evolution and heritage assets (including an assessment of their significance and contribution to local character)
 - 8) topography and hydrology
 - 9) land availability
 - 10) existing and emerging Development Plan designations



- 11) land uses
- 12) views and landmarks.

Planning for growth

- B. In preparing Development Plans, boroughs should plan to meet borough-wide growth requirements, including their overall housing targets, by:
 - 1) using the findings of area assessments (as required in Part A) to identify suitable locations for growth, and the potential scale of that growth (e.g. opportunities for extensive, moderate or limited growth) consistent with the spatial approach set out in this Plan; and
 - 2) assessing the capacity of existing and planned physical, environmental and social infrastructure to support the required level of growth and, where necessary, improvements to infrastructure capacity should be planned in infrastructure delivery plans or programmes to support growth; and
 - 3) following the design-led approach (set out in Policy D3 Optimising site capacity through the design-led approach) to establish optimised site capacities for site allocations. Boroughs are encouraged to set out acceptable building heights, scale, massing and indicative layouts for allocated sites, and, where appropriate, the amount of floorspace that should be provided for different land uses.

Policy D3 Optimising site capacity through the design-led approach

The design-led approach

- A. 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 (as set out in Policy D2 Infrastructure requirements for sustainable densities), and that best delivers the requirements set out in Part D.
- B. 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 Infrastructure requirements for sustainable densities. Where these locations have existing areas of high density buildings, expansion of the areas should be positively considered by Boroughs where appropriate. This could also include expanding Opportunity Area boundaries where appropriate.
- C. 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 Small sites.
- D. Development proposals should:



Form and layout

- 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

Experience

- 5) achieve safe, secure and inclusive environments
- 6) provide active frontages and positive reciprocal relationships between what happens inside the buildings and outside in the public realm to generate liveliness and interest
- 7) deliver appropriate outlook, privacy and amenity
- 8) provide conveniently located green and open spaces for social interaction, play, relaxation and physical activity
- 9) help prevent or mitigate the impacts of noise and poor air quality
- 10) achieve indoor and outdoor environments that are comfortable and inviting for people to use

Quality and character

- 11) 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 local character
- 12) 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 and mature well
- 13) aim for high sustainability standards (with reference to the policies within London Plan Chapters 8 and 9) and take into account the principles of the circular economy.
- 14) provide spaces and buildings that maximise opportunities for urban greening to create attractive resilient places that can also help the management of surface water.

E. Where development parameters for allocated sites have been set out in a Development Plan, development proposals that do not accord with the site capacity in a site allocation



can be refused for this reason

Policy D4 Delivering Good Design

Design and access statements submitted with development proposals should demonstrate that the proposal meets the design requirements of the London Plan.

The design quality of development should be retained through to completion by:

- ensuring maximum detail appropriate for the design stage is provided to avoid the need for later design amendments and to ensure scheme quality is not adversely affected by later decisions on construction, materials, landscaping details or minor alterations to layout or form of the development.
- ensuring the wording of the planning permission, and associated conditions and legal agreement, provide clarity regarding the quality of design.
- avoiding deferring the assessment of the design quality of large elements of a development to the consideration of a planning condition or referred matter.
- local planning authorities considering conditioning the ongoing involvement of the original design team to monitor the design quality of a development through to completion.

Policy D6 Housing quality and standards

- A. Housing development should be of high quality design and provide adequately-sized rooms (see Table 3.1) with comfortable and functional layouts which are fit for purpose and meet the needs of Londoners without differentiating between tenures.
- B. Qualitative aspects of a development are key to ensuring successful sustainable housing. Table 3.2 sets out key qualitative aspects which should be addressed in the design of housing developments.
- C. Housing development should maximise the provision of dual aspect dwellings and normally avoid the provision of single aspect dwellings. A single aspect dwelling should only be provided where it is considered a more appropriate design solution to meet the requirements of Part B in Policy D3 Optimising site capacity through the design-led approach than a dual aspect dwelling, and it can be demonstrated that it will have adequate passive ventilation, daylight and privacy, and avoid overheating.
- D. The design of 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.
- E. Housing should be designed with adequate and easily accessible storage space that supports the separate collection of dry recyclables (for at least card, paper, mixed plastics, metals, glass) and food waste as well as residual waste.



F. Housing developments are required to meet the minimum standards below which apply to all tenures and all residential accommodation that is self contained.

Private internal space

- 1) Dwellings must provide at least the gross internal floor area and built-in storage area set out in Table 3.1.
- 2) A dwelling with two or more bedspaces must have at least one double (or twin) bedroom that is at least 2.75m wide. Every other additional double (or twin) bedroom must be at least 2.55m wide.
- 3) A one bedspace single bedroom must have a floor area of at least 7.5 sq.m. and be at least 2.15m wide.
- 4) A two bedspace double (or twin) bedroom must have a floor area of at least 11.5 sq.m..
- 5) Any area with a headroom of less than 1.5m is not counted within the Gross Internal Area unless used solely for storage (If the area under the stairs is to be used for storage, assume a general floor area of 1 sq.m. within the Gross Internal Area).
- 6) Any other area that is used solely for storage and has a headroom of 0.9- 1.5m (such as under eaves) can only be counted up to 50 per cent of its floor area, and any area lower than 0.9m is not counted at all.
- 7) A built-in wardrobe counts towards the Gross Internal Area and bedroom floor area requirements, but should not reduce the effective width of the room below the minimum widths set out above. Any built-in area in excess of 0.72 sq.m. in a double bedroom and 0.36 sq.m. in a single bedroom counts towards the built-in storage requirement.
- 8) The minimum floor to ceiling height must be 2.5m for at least 75 per cent of the Gross Internal Area of each dwelling.

Private outside space

- 9) Where there are no higher local standards in the borough Development Plan Documents, a minimum of 5 sq.m. of private outdoor space should be provided for 1-2 person dwellings and an extra 1 sq.m. should be provided for each additional occupant, and it must achieve a minimum depth and width of 1.5m. This does not count towards the minimum Gross Internal Area space standards required in Table 3.1

G. The Mayor will produce guidance on the implementation of this policy for all housing tenures.



Type of dwelling		Minimum gross internal floor areas ^a and storage (square metres)			
Number of bedrooms (b)	Number of bed spaces (persons(p))	1 storey dwellings	2 storey dwellings	3 storey dwellings	Built-in storage
1b	1p	39 (37) *	N/A	N/A	1
	2p	50	58	N/A	1.5
2b	3p	61	70	N/A	2
	4p	70	79	N/A	2
3b	4p	74	84	90	2.5
	5p	86	93	99	2.5
	6p	95	102	108	2.5
4b	5p	90	97	103	3
	6p	99	106	112	3
	7p	108	115	121	3
	8p	117	124	130	3
5b	6p	103	110	116	3.5
	7p	112	119	125	3.5
	8p	121	128	134	3.5
6b	7p	116	123	129	4
	8p	125	132	138	4

Table 3: Minimum Internal Space Standards for New Dwellings (Table 3.1 in the Policy)

Policy D7 Accessible Housing

To provide suitable housing and genuine choice for London's diverse population, including disabled people, older people and families with young children

Policy H1 Increasing Housing Supply

Sets the ten-year targets for net housing completions that each local planning authority should plan for. Boroughs must include these targets in their Development Plan Documents.

Policy H2 Small Sites

Boroughs should pro-actively support well-designed new homes on small sites (below 0.25 hectares in size) through both planning decisions and plan-making 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
- 4) support those wishing to bring forward custom, self-build and community led housing



- 5) achieve the minimum targets for small sites set out in Table 4.2 as a component of the overall housing targets set out in Table 4.1.

Boroughs should:

- 1) recognise in their Development Plans that local character evolves over time and will need to change in appropriate locations to accommodate additional housing on small sites
- 2) where appropriate, prepare site-specific briefs, masterplans and housing design codes for small sites
- 3) identify and allocate appropriate small sites for residential development
- 4) list these small sites on their brownfield registers
- 5) grant permission in principle on specific sites or prepare local development orders

Policy H10 Housing Size Mix

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, applicants and decision-makers should have regard to:

- the aim to optimise housing potential on sites
- the ability of new development to reduce pressure on conversion, subdivision and amalgamation of existing stock

Policy T6 & 6.1 Car Parking

Car parking should be restricted in line with levels of existing and future public transport accessibility and connectivity. Where car parking is provided in new developments, provision should be made for infrastructure for electric or other Ultra-Low Emission vehicles.

Policy GG2 Making the Best Use of Land

Proactively explore the potential to intensify the use of land to support additional homes and workspaces, promoting higher density development, particularly in locations that are well-connected to jobs, services, infrastructure and amenities by public transport, walking and cycling.

Policy GG4 Delivering the Homes Londoners Need

To create a housing market that works better for all Londoners, those involved in planning and development must:



- ensure that more homes are delivered.
- create mixed and inclusive communities, with good quality homes that meet high standards of design and provide for identified needs, including for specialist housing.

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

Policy BE1: Built Environment

The Council will require all new development to improve and maintain the quality of the built environment in order to create successful and sustainable neighbourhoods, where people enjoy living and working and that serve the long-term needs of all residents. All new developments should:

1. Achieve a high quality of design in all new buildings, alterations, extensions and the public realm which enhances the local distinctiveness of the area, contributes to community cohesion and a sense of place;
2. Be designed to be appropriate to the identity and context of Hillingdon's buildings, townscapes, landscapes and views, and make a positive contribution to the local area in terms of layout, form, scale and materials and seek to protect the amenity of surrounding land and buildings, particularly residential properties;
3. Be designed to include "Lifetime Homes" principles so that they can be readily adapted to meet the needs of those with disabilities and the elderly, 10% of these should be wheelchair accessible or easily adaptable to wheelchair accessibility encouraging places of work and leisure, streets, neighbourhoods, parks and open spaces to be designed to meet the needs of the community at all stages of people's lives;
4. In the case of 10 dwellings or over, achieve a satisfactory assessment rating in terms of the latest Building for Life standards (as amended or replaced from time to time);
5. Improve areas of poorer environmental quality, including within the areas of relative disadvantage of Hayes, Yiewsley and West Drayton. All regeneration schemes should ensure that they are appropriate to their historic context, make use of heritage assets and reinforce their significance;
6. Incorporate a clear network of routes that are easy to understand, inclusive, safe, secure and connect positively with interchanges, public transport, community facilities and services;
7. Improve the quality of the public realm and provide for public and private spaces that are attractive, safe, functional, diverse, sustainable, accessible to all, respect the local character and landscape, integrate with the development, enhance and protect biodiversity through the inclusion of living walls, roofs and areas for wildlife, encourage physical activity and where appropriate introduce public art;
8. Create safe and secure environments that reduce crime and fear of crime, anti-social behaviour and risks from fire and arson having regard to Secure by Design standards



and address resilience to terrorism in major development proposals;

9. Not result in the inappropriate development of gardens and green spaces that erode the character and biodiversity of suburban areas and increase the risk of flooding through the loss of permeable areas;
10. Maximise the opportunities for all new homes to contribute to tackling and adapting to climate change and reducing emissions of local air quality pollutants. The Council will require all new development to achieve reductions in carbon dioxide emission in line with the London Plan targets through energy efficient design and effective use of low and zero carbon technologies. Where the required reduction from on-site renewable energy is not feasible within major developments, contributions off-site will be sought. The Council will seek to merge a suite of sustainable design goals, such as the use of SUDS, water efficiency, lifetime homes, and energy efficiency into a requirement measured against the Code for Sustainable Homes and BREEAM. These will be set out within the Hillingdon Local Plan: Part 2- Development Management Policies Local Development Document (LDD). All developments should be designed to make the most efficient use of natural resources whilst safeguarding historic assets, their settings and local amenity and include sustainable design and construction techniques to increase the re-use and recycling of construction, demolition and excavation waste and reduce the amount disposed to landfill;
11. In the case of tall buildings, not adversely affect their surroundings including the local character, cause harm to the significance of heritage assets or impact on important views. Appropriate locations for tall buildings will be defined on a Character Study and may include parts of Uxbridge and Hayes subject to considering the Obstacle Limitation Surfaces for Heathrow Airport. Outside of Uxbridge and Hayes town centres, tall buildings will not be supported. The height of all buildings should be based upon an understanding of the local character and be appropriate to the positive qualities of the surrounding townscape.

Support will be given for proposals that are consistent with local strategies, guidelines, supplementary planning documents and Hillingdon Local Plan: Part 2- Development Management Policies.

London Borough Of Hillingdon Local Plan: Part 2 - Development Management Policies (2020)

Policy DMH 1: Safeguarding Existing Housing

- A. The net loss of existing self-contained housing, including affordable housing, will be resisted unless the housing is replaced with at least equivalent residential floorspace.



B. 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.

Policy DMH 4: Residential Conversions and Redevelopment

Residential conversions and the redevelopment of dwellings into new blocks of flats will only be permitted where:

- i. it is on a residential street where the proposal will not result in more than 10% of properties being redeveloped into flats;
- ii. On residential streets longer than 1km the proposed redevelopment site should be taken as the midpoint of a 1km length of road for assessment purposes;
- iii. the internal floor area of the original building to be converted is at least 120 sqm; and
- iv. units are limited to one unit per floor for residential conversions.

Policy DMH 6: Garden and Backland Development

There is a presumption against the loss of gardens due to the need to maintain local character, amenity space and biodiversity. In exceptional cases a limited scale of backland development may be acceptable, subject to the following criteria:

- i. neighbouring residential amenity and privacy of existing homes and gardens must be maintained and unacceptable light spillage avoided;
- ii. vehicular access or car parking should not have an adverse impact on neighbours in terms of noise or light. Access roads between dwellings and unnecessarily long access roads will not normally be acceptable;
- iii. development on backland sites must be more intimate in mass and scale and lower than frontage properties; and
- iv. features such as trees, shrubs and wildlife habitat must be retained or re-provided.



Policy DMHB 11: Design of New Development

- A. 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, for example, 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.
- B. Development proposals should not adversely impact on the amenity, daylight and sunlight of adjacent properties and open space.
- C. 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 developments⁵ sites, the Council will expect developers to prepare master plans and design codes and to agree these with the Council before developing detailed designs.
- D. 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.

Policy DMHB 12: Streets and Public Realm

- A. Development should be well integrated with the surrounding area and accessible. It should:



- i. improve legibility and promote routes and wayfinding between the development and local amenities;
- ii. ensure public realm design takes account of the established townscape character and quality of the surrounding area;
- iii. include landscaping treatment that is suitable for the location, serves a purpose, contributes to local green infrastructure, the appearance of the area and ease of movement through the space;
- iv. provide safe and direct pedestrian and cycle movement through the space;
- v. incorporate appropriate and robust hard landscaping, using good quality materials, undertaken to a high standard;
- vi. where appropriate, include the installation of public art; and
- vii. deliver proposals which incorporate the principles of inclusive design. Proposals for gated developments will be resisted.

B. Public realm improvements will be sought from developments located close to transport interchanges and community facilities to ensure easy access between different transport modes and into local community facilities.

Policy DMHB 14: Trees and Landscaping

- A. All developments will be expected to retain or enhance existing landscaping, trees, biodiversity or other natural features of merit.
- B. Development proposals will be required to provide a landscape scheme that includes hard and soft landscaping appropriate to the character of the area, which supports and enhances biodiversity and amenity particularly in areas deficient in green infrastructure.
- C. Where space for ground level planting is limited, such as high rise buildings, the inclusion of living walls and roofs will be expected where feasible.
- D. Planning applications for proposals that would affect existing trees will be required to provide an accurate tree survey showing the location, height, spread and species of trees. Where the tree survey identifies trees of merit, tree root protection areas and an arboricultural method statement will be required to show how the trees will be protected. Where trees are to be removed, proposals for replanting of new trees on-site must be provided or include contributions to offsite provision.

Policy DMHB 15: Planning for Safer Places

The Council will require all new development to ensure safe and attractive public and private spaces by referring to the Council's latest guidance on Secured by Design



principles. Where relevant, these should be included in the Design and Access Statement.

Development will be required to comprise good design and create inclusive environments whilst improving safety and security by incorporating the following specific measures:

- i. providing entrances in visible, safe and accessible locations;
- ii. maximising natural surveillance;
- iii. ensuring adequate defensible space is provided;
- iv. providing clear delineations between public and private spaces; and
- v. providing appropriate lighting and CCTV

Policy DMHB 16: Housing Standards

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.

Policy DMHB 17: Residential Density

All new residential development should take account of the Residential Density Matrix contained in Table 5.3. Developments will be expected to meet habitable rooms standards.



Number of bedrooms	Number of bed spaces	Minimum Gross Internal Area (m ²)			Built-in storage (m ²)
		1 storey dwellings	2 storey dwellings	3 storey dwellings	
1b	1p	39 (37)*			1.0
	2p	50	58		1.5
2b	3p	61	70		2.0
	4p	70	79		
3b	4p	74	84	90	2.5
	5p	86	93	99	
	6p	95	102	108	
4b	5p	90	97	103	3.0
	6p	99	106	112	
	7p	108	115	121	
	8p	117	124	130	
5b	6p	103	110	116	3.5
	7p	112	119	125	
	8p	121	128	134	
6b	7p	116	123	129	4.0

Table 4: Habitable Rooms Standards

Dwelling type	No of bedrooms	Minimum amenity space provision (sqm)
Houses	1 bedroom	40
	2 and 3 bedrooms	60
	4 + bedrooms	100
Flats	Studio and 1 bedroom	20
	2 bedrooms	25
	3 + bedrooms	30

Table 5: Private Outdoor Amenity Space Standards



			Dwelling Type		
Location	PTAL	Setting	Detached and linked houses	Terraced houses and flats	Mostly Flats
			Ave. 3.5 hr/unit	Ave. 3.3 hr/unit	Ave. 3 hr/unit
Uxbridge Town Centre	4 - 6	Central	175 - 385 hr/ha	170 - 792 hr/ha	495 - 1,100 hr/ha
			50 - 110 u/ha	55 - 240 u/ha	165 - 405 u/ha
West Drayton/Hayes Town Centres	3 - 6	Urban	175 - 385 hr/ha	170 - 660 hr/ha	450 - 750 hr/ha
			50 - 110 u/ha	55 - 200 u/ha	150 - 250 u/ha
Other town centres	2 - 3	Suburban /urban	140 - 200 hr/ha	155 - 396 hr/ha	200 - 510 hr/ha
			35 - 65 u/ha	50 - 120 u/ha	80 - 170 u/ha
Residential areas with suburban character within 800m of a town centre*	2 - 3	Suburban /urban	105 - 175 hr/ha	108 - 264 hr/ha	150 - 330 hr/ha
			35 - 50 u/ha	35 - 80 u/ha	50 - 110 u/ha
Other non town centre areas	0 - 2	Suburban /semi rural	105 - 150 hr/ha	105 - 231 hr/ha	105 - 300 hr/ha
			35 - 50 u/ha	35 - 70 u/ha	35 - 100 u/ha

Table 6: Residential Density Matrix

Policy DMHB 18: Private Outdoor Amenity Space

- 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 in Table 5.3.
- Balconies should have a depth of not less than 1.5 metres and a width of not less than 2 metres.
- Any ground floor and/or basement floor unit that is non-street facing should have a defensible space of not less than 3 metres in depth in front of any window to a bedroom or habitable room. However, for new developments in Conservation Areas, Areas of Special Local Character or for developments, which include Listed Buildings, the provision of private open space will be required to enhance the streetscene and the character of the buildings on the site.
- 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.



Residential Development

In line with London Plan Policy 3.8, Hillingdon Council has adopted the Housing - Optional Technical Standards.

Ninety percent of new dwellings should meet M4(2) for an accessible and adaptable home as set out in Approved Document M to the Building Regulations (AD M) • ten percent of new homes should meet the requirements of an M4(3) wheelchair adaptable or accessible dwelling as prescribed in AD M Full details of a proposed development, including its external design features, should be submitted with a planning application. Floor plans should include detailed furniture plan layouts, the requisite room dimensions, and critical measurements between items of furniture in rooms. All new residential developments must also:

- adhere to GLA minimum floor space standards (refer to London Plan Policy 3.5 and Mayor of London's 'Housing' Supplementary Planning Guidance, March 2016) NB: These standards are applicable to all new housing in the private and affordable housing sectors.

Policy DME10 – Water Management, Efficiency and Quality

Applications for all new build developments (not conversions, change of use, or refurbishment) are required to include a drainage assessment demonstrating that appropriate sustainable drainage systems (SuDS) have been incorporated in accordance with the London Plan Hierarchy.

All new development proposals (including refurbishments and conversions) will be required to include water efficiency measures, including the collection and reuse of rain water and grey water.

All new residential development should demonstrate water usage rates of no more than 105 litres/person/day.

All new development proposals will be required to demonstrate that there is sufficient capacity in the water and wastewater infrastructure network to support the proposed development.

Policy DMT 2 – Highways Impacts

Development proposals must ensure that:

- safe and efficient vehicular access to the highway network is provided to the Council's standards;



- ④ they do not contribute to the deterioration of air quality, noise or local amenity or safety of all road users and residents;
- ④ safe, secure and convenient access and facilities for cyclists and pedestrian are satisfactorily accommodated in the design of highway and traffic management schemes;
- ④ impacts on local amenity and congestion are minimised by routing through traffic by the most direct means to the strategic road network, avoiding local distributor and access roads; and
- ④ there are suitable mitigation measures to address any traffic impacts in terms of capacity and functions of existing and committed roads, including along roads or through junctions which are at capacity.

Policy DMT 6 – Vehicle Parking

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.



5 Analysis

An assessment of the proposed development has been undertaken against the relevant planning policy framework for the site, and other material considerations in accordance with Section 38 (6) of the 2004 Planning and Compulsory Purchase Act. The Assessment considers the following matters:

- Principle of Development
- Design
- Sustainable Location
- Garden and Backland Development
- Drainage
- Energy
- Air Quality
- Access and Parking

This section will also highlight the relevant sections from the previous planning application that have been enacted upon and responded to as part of this application.

Principle of Development

The development of a dwelling at the site represents an effective use of land with the garden space currently being underutilised by the owners of 2 Hilliards Road. The aim of Chapter 11 of the National Planning Policy Framework, (Making Effective Use of Land) is to ensure that underutilised and disused land is brought forward used for more effective and efficient uses such as meeting housing needs. Chapter 11 states:

"Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. 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".

This is also reflected within Policy GG2.

The land is in use as a back garden for 2 Hilliards Road but is underutilised as the owners do not require such a large area for their own personal needs. This represents a site that is not currently making effective use of the land available. As land becomes surplus to requirements it can also lead to poor management and maintenance. The scheme as presented therefore on behalf of



our client will enable the site to be effectively managed whilst making a positive contribution to the local housing needs for this part of Hillingdon.

This proposed redevelopment will therefore be in compliance with Chapter 5 of the NPPF, Delivering a Sufficient Supply of Homes, which states:

"To support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed".

This proposal allows residential development to come forward on surplus land, to provide an important dwelling that will help to supply the current needs of residents within the community as per the requirements of Policy H1.

The Council sets out a broadly restrictive approach to garden development as expressed in Policy DMH 6, which will be discussed in later sections of this statement. As stated, the restrictive approach reflects what the Council's perceives as the direct and indirect value of gardens. Their contribution is recognised with regards to local character, providing safe and secure amenity and play space, supporting biodiversity, helping to reduce flood risk and mitigating the effects of climate change, including the 'heat island' effect.

As with the policy specific criteria discussed later in this analysis, the proposal does not contradict any of these 'values' and is able to maintain these key priorities. Safe and secure amenity and play space is retained for the existing property and provided for the proposed bungalow ensuring amenity standards are sufficient for existing and new occupiers., Ecology and biodiversity is considered to be very limited on site however the addition of a high-quality landscaping scheme will increase local wildlife opportunities and improve the appearance of the local landscape. A drainage strategy (further discussed later) has been produced to limit the impact of any flood risk in an area which falls within flood zone 1, and is thought to have limited effect on climate change. The inclusion of sustainable construction methods is to be highlighted as a positive contribution to tackling the effects of climate change.

Issues regarding development on this site appearing uncharacteristic were cited as a reason for refusal on the previously refused scheme (61347/APP/2023/920). Specifically, the refusal mentioned that the previous proposal:

'...would fail to harmonise with the urban grain and character of the surrounding area. The proposal is therefore considered to be detrimental to the visual amenity and character of the surrounding area..."



Whilst we do not agree with the assessment of the previous proposal, this resubmission has been designed with great care to ensure that these reasons for refusal have been responded to, with these set out in Section 3 of this Statement and the Design and Access Statement.

The Planning Officer stated in their report that:

‘Gardens within the area vary in size’

The Planning Officer goes onto further qualify the trend of gardens by saying:

‘...however they are generally spacious, long and rectangular. Each garden remains free from development of the size and scale proposed’.

Despite this further statement, there is still a recognition from the Planning Officer that there is evidence in the immediate surroundings of gardens of a variety of different shapes and sizes. This variety is obvious at 18, 20, and 22 New Peachy Lane and 1, 3, 5 and 7 Barnace Close, less than 50 metres from the application site. The Officer notes the urban grain of the area but fails to identify that many of the houses on New Peachy Lane have garden spaces between 40 – 45 sqm. These dwellings are clearly a part of the urban grain of the immediate area and should be assessed as such. The focus on long, thin gardens is not a genuine representation of the immediate area.

Despite our contentions with the character assessment, the height, bulk, scale and layout of this resubmitted scheme has been amended to create a more open development, more in line with the assessment previously made by the Planning Officer. With the amended footprint, ridge height and garage omission, the site now represents a more visually open development when compared to the previous proposal and other sites within the area.

EDP Environmental were appointed to undertake an overheating assessment of the proposal to ascertain whether there is excessive risk of overheating for the proposed dwelling. The proposal passes the TM59 assessment and therefore complies with Approved Document Part O of the Building Regulations.

With further discussion on garden development to come, the initial principle of garden development is thought to be acceptable.

Sustainable Location

The Revised Framework states, in Paragraph 7, that the purpose of the planning system is to contribute to the achievement of sustainable development. ‘Sustainable development’ is defined within the Revised Framework via three overarching objectives. These are:



- a) **an economic objective** – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;
- b) **a social objective** – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and
- c) **an environmental objective** – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.

It should be remembered that these objectives are not seen as a complete criterion for proposals, but instead should, wherever applicable, be adhered to throughout both the design and decision-making process. The following paragraphs consider the proposed development against the three objectives.

Economic Objective

The proposal would deliver moderate yet significant economic benefits during the construction phase, whilst the additional expenditure generated by potential future occupants would be of benefit to the local economy. The proposals will result in a number of economic benefits including job creation, economic investment, New Homes Bonus payments and increased generation of Council Tax payments. None of these benefits are disputed and the Government recognises the construction industry as one of the key sectors within the UK economy.

Based upon a multiplier of 2.3 jobs per new home, as stated within "Economic Footprint of UK Housebuilding" (2018), then an additional dwelling is estimated to create approximately 2.3 new jobs. Furthermore, the proposed dwelling is estimated to deliver a significant boost to the local economy through 'first occupation' expenditure. Research suggests that the average homeowner, when moving into a new dwelling, spends approximately £5,500 to make their house 'feel like home'. This money is spent on furnishing and decorating a property, which will generate a range of economic benefits including further indirect and induced jobs in local businesses. In terms of household expenditure, data from ONS Family Expenditure Survey 2020-2021 shows that the 'average UK household spend' is £553.80 per week (or £28,877 per year), whereas in the East of England it is 3.3% higher than the UK average at £572.20 per week.



It is considered that the proposed development would fulfil the economic role of sustainable development, and would contribute to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type was available for housing in the right place and at the right time to support growth.

Social Objective

The Revised Framework seeks to deliver a wide choice of high-quality homes whilst also ensuring that the needs of groups with specific housing requirements are addressed. The proposed development will support the creation of a strong, vibrant and healthy community by increasing the supply of housing within the district of Hillingdon.

Lack of housing supply has a direct impact on affordability. Accordingly, the Government is committed to ensuring that a sufficient amount and variety of land can come forward where it is needed. Furthermore, Paragraph 60 of the Revised Framework stresses that land with permission should be developed without unnecessary delay.

Environmental Objective

Access to sustainable modes of transport is a key consideration in determining the sustainability of a site for development. It is stated within Chapter 9 of the Revised Framework that transport issues should be considered from the earlier stages of plan-making and development proposals with opportunities to promote walking, cycling and public transport identified and pursued. The Revised Framework goes on to state, in Paragraph 109, that development should be focused in locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes.

Notwithstanding this, Paragraph 109 also recognises that opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be considered in both plan-making and decision-making. Nevertheless, the Revised Framework does not set specific criteria or maximum distances that it considers are appropriate in terms of the proximity between proposed developments and key supporting services and infrastructure. Similarly, the highways authority has no such local criteria that it applies in the assessment of schemes, and instead defers to guidance including the Institute of Highways and Transportation's (IHT) 'Guidelines for Providing for Journeys on Foot'. The IHT guidelines within that document state that the preferred maximum walking distances to town centres and schools range from 800m to 2km, and for other uses 1.2km. Due to its location, many amenities fall within this distance.

- Panthers Gym - 225 metres
- Rabbsfarm Primary school - 625 metres



- Tesco - 680 metres
- Aldi - 850 metres
- Iceland Foods – 1.025 km
- St Matthew's C of E Primary School – 1.05km
- West Drayton Train Station - 1.40 km

This is not an exhaustive list but highlights the number of facilities available to residents in this area of Hillingdon. These can be accessed by walking, cycling and private or public transport.

The nearest bus stop is located roughly 210 metres away and provides a route between Uxbridge and Hounslow, allowing for access to a greater range and choice of amenities and facilities. The development's location within an already established residential area ensures that these facilities are also already established to serve the community. The size of this development will not add an unsustainable number of new residents to this established community and will add an important, if not small, contribution to the local community.

The proposal also incorporates solar panels on the roof of the property. This utilises valuable south facing roof space, the most efficient direction for harnessing solar energy. Solar energy has been proved to be extremely beneficial – not only for the environment but also for the private economy. Among all the benefits of solar panels, the most important thing is that solar energy is a renewable energy source.

Within the Officer's Report for application (61347/APP/2023/920), the Officer does not offer the unsustainable location of development as a reason for refusal. As such, we feel as though the application site represents a sustainable location for development with regards to planning policy.

Design

'The creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities. Being clear about design expectations, and how these will be tested, is essential for achieving this. So too is effective engagement between applicants, communities, local planning authorities and other interests throughout the process.'

This is stated within the paragraph 131 of the NPPF, under chapter 12 concerned with achieving well-designed places. An aspect of high-quality design is the proposals that are sympathetic to local character, including the surrounding built environment and landscape setting. This is also reflected within the adopted Development Plan policies.



The proposal is designed to reflect the neighbouring built environment, particularly reflecting the bungalow immediately adjacent to the site (2 Hilliards Road). This is reflective in the size, massing and scale of the proposal as well as the construction materials that have been put forward.

As stated within Policy DMHB11 of Hillingdon's Development Management Policies, all development, including extensions, alterations and new buildings will be required to be designed to the highest standards and incorporate principles of good design. The criteria set out within this Policy has been adhered to with a design led approach to development, which seeks to make the most effective use of the land available. Most notably, scale, height, massing and bulk of the adjacent 2 Hilliards Road has been reflected in the design. The design is consistent with that approved in 2004, albeit with the addition of sustainable measures such as solar panels.

As such, the proposal adheres to both National and Local Planning Policy (specifically, Chapter 12 of the NPPF and Policy DMHB11 of Hillingdon's Development Management Policies).

It is noted that the previous application, ref. (61347/APP/2023/920), was refused for design reasons. This application has looked to amend the design of the dwelling in order to alleviate the previous concerns.

The height, bulk, scale, and site coverage of the proposal have all been reduced in this resubmission to provide a better relationship with surrounding residential properties. This moves development footprint away from the existing dwellings to the north and reduces the height of the development to further reduce the development's impact upon residential amenity. The comparison is clearly visible within the submitted drawings.

There has also been an alteration to the internal configuration of the proposed dwellings. This design change should result in a reduced impact from overlooking from no.16 New Peachy Lane. With a private bedroom moved to the other side of the proposed footprint and an increased distance between the two dwellings, it is proposed that the impact has been reduced to an acceptable level.

It should be noted that in compliance with Policy D7, the dwelling will be in accordance with the necessary adaptable home requirements.

Garden and Backland Development

Policy DMH 6: Garden and Backland Development from the London Borough of Hillingdon Local Plan and Policy Overview, Local Plan: Part 2 Development Management Policies, January 2020



states that "There is a presumption against the loss of gardens due to the need to maintain local character, amenity space and biodiversity". There are 'exceptional circumstances' listed within this policy that the proposal adheres to, and these are listed below:

- i) neighbouring residential amenity and privacy of existing homes and gardens must be maintained, and unacceptable light spillage avoided.

Due to its modest scale, massing and design, it is considered that the proposal will not cause harm to the living conditions of the adjoining occupiers. The proposed dwelling is distanced as far from the existing property at 2 Hilliard Road as possible, with garden space and landscaping between the two dwellings. With the amendment to remove the proposed associated garage, the gap is even greater than previous proposals. To the south, a car park sits between the proposed dwelling and the nearest neighbour in this direction, maintaining their privacy. As well as the distances provided, windows will be located on elevations that face away from neighbouring dwellings.

The existing dwelling retains an acceptable amount of outdoor amenity space despite losing some of their land to the proposal. The new dwelling would also have similar amounts of outdoor amenity space as the existing dwelling, sufficient for the enjoyment of the new property. The London Borough of Hillingdon Local Plan and Policy overview, Local Plan 2 Development Management policies, January 2020 states that the following amenity space standards must be followed:

Minimum private outdoor amenity space provision		Sq.m
Houses	1 bedroom	40
	2 and 3 bedrooms	60
	4 + bedrooms	100
Flats	Studio and 1 bedroom	20
	2 bedrooms	25
	3 + bedrooms	30

Table 4: Private Outdoor Amenity Space Standards

The garden is proposed to have 110m² of rear garden amenity space attributed to the bungalow (excluding the front garden and parking areas). This outdoor amenity space is only increased when the side and front garden is also considered. The proposal exceeds the minimum private outdoor amenity space provision as stated with the Council's space standards.

For a two-bedroom, three-person, single storey dwelling, the development should exceed a minimum gross internal area of 61 m². The proposed dwelling has a GIA of 78.2m², which exceeds the minimum standards as expressed.



The new dwelling is designed to slope away from the existing dwelling, with the roof of the garage reaching its peak away from the boundary between the two dwellings. In comparison to the previous planning application, the distance between the new and existing dwellings has been increased and the bulk, height and size of the development reduced. These amendments have looked to build upon the Planning Officer's previous reasons for refusal and produce a scheme that can be assessed as having a lesser impact on existing residential amenity of neighbouring buildings.

Vehicular access or car parking should not have an adverse impact on neighbours in terms of noise or light. Access roads between dwellings and unnecessarily long access roads will not normally be acceptable.

The application site abuts the highway on its eastern boundary, and therefore any access will be short and will not exist between dwellings. The development is for one new dwelling and therefore there is not expected to be an unacceptable increase in vehicle movements because of the development. As existing, the boundaries will be landscaped to increase privacy and ensure that any impact arising from light or noise pollution of the development is reduced.

The access matches that proposed in the previous application on the site. This was assessed by the Planning Officer as there being 'no highways reasons for refusing the proposed development'.

Development on backland sites must be more intimate in mass and scale and lower than frontage properties.

The development is more of a garden development than a backland development. The nature of the application site means that despite it being a garden development, it will also be a frontage property and, as such, the height of the development is a lot less relevant as it directly abuts the highway. Despite this, the proposal is only one storey, 2 Hilliards Road has accommodation in the roof and is classed as 1.5/2 storeys in comparison. Great effort has been made to reduce the height of the roof ridge and bulk of the property when compared to previous schemes, creating a more subordinate development in comparison to neighbouring dwellings. Due to its modest scale, massing and design, the proposal would not cause harm to the character and appearance of the area.

The assessment of the previous application has been taken into account in the design of this resubmitted application on the same site. There has been a clear attempt to reduce the size, scale and bulk of the proposal. The property still remains both a frontage and backland property, but it is now more subordinate to the existing dwellings than before.



Features such as trees, shrubs and wildlife habitat must be retained or re-provided.

The garden in its current configuration does not hold great value in terms of biodiversity. There is some planting at the boundaries, of which some will be retained, and others of less biodiversity value will be replaced with something of greater value and more befitting of the new development. The landscaping design and provision of soft planting to the boundaries has been considered throughout the proposal's design development. The North and West Boundary are proposed to have close-board timber fencing with hedges for privacy and soft screening. The existing South boundary is to be retained with the existing Laurel Hedge. Further information is available in the associated Design and Access Statement.

The proposal abides by criteria for appropriate backland and back garden development, as per Policy DMH 6: Garden and Backland Development of the London Borough of Hillingdon Local Plan and Policy Overview, Local Plan: Part 2 Development Management Policies, January 2020.

Drainage

A Drainage Technical Note and SuDS Management and Maintenance Strategy have been prepared by Paul Basham Associates to accompany this application.

The Technical Note summarises that:

The surface water drainage strategy employed includes the following:

- Underground piped network fed by gravity
- Attenuation storage and limited discharge into the existing sewer via a packaged pump chamber at a reduced rate to match the existing greenfield run-off rate.

The proposed attenuation tank has been sized at 15m² and at a depth of 0.8m. It is to be located within the car-parking area to the side of the proposed residential dwelling.

Soakage Tests completed by Ground Condition Consultants show that sufficient infiltration rates cannot be achieved at this location. However, it is noted that an existing soakaway exists within the rear garden. As the soakaway cannot be located the proposal is to outfall to the existing sewer in New Peachey Lane at a reduced rate to match the existing greenfield run-off rate.

The proposed foul water network is to be fed by gravity and connect into the existing sewer located within the carriageway of Hilliards Road. This connection is subject to a Section 106 Application with Thames Water.



Based on Sewers for Adoption 7th Edition allowance of 4,000 litres of water per property per day, the foul water will be discharged from the site at 0.05l/s for the proposed residential dwelling.

The submitted SuDS Management and Maintenance Strategy goes into increased detail as to the proposed drainage methods and how they will be managed.

The application site is located within Flood Zone 1 and is therefore at a low risk of flooding. An extract of the flood map is shown below.

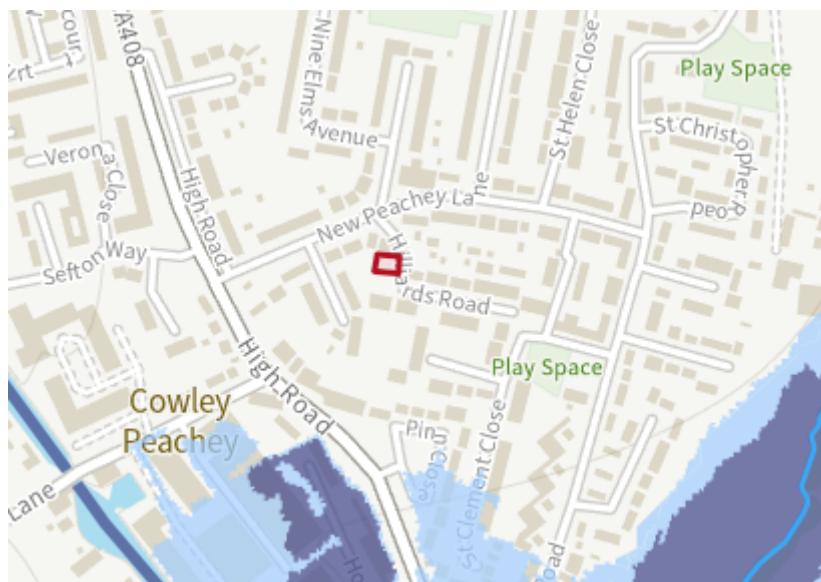


Figure 7: Flood Map

Energy

EDP Environmental have been asked to produce an Energy Strategy for a new dwelling. This has been included within the submission and summarised below.

The proposed bungalow at 2 Hilliard's Road complies with energy planning guidance and requirements set out by the local council, London Plan and Building Regulations according to the baseline scenario. The clean and green scenarios set out improvements to the baseline that reduce required PV and carbon emissions.

ASHPs are recommended in conjunction with PV with battery storage and WWHR to reduce carbon emissions and running costs. The amount of PV installed is dependent on carbon and SAP targets. At least 2.4 kWp is recommended to achieve an SAP rating of an A when a 5 kWh battery is installed. At least 4.0 kWp is recommended to achieve the zero-carbon target.

The development will also comply with the necessary parameters of Policy DME10.



Air Quality

DustScan (DS) have been instructed to produce an Air Quality Assessment to support the planning application. This is included within the submission and summarised below.

An assessment of the construction and operational air quality impact has been undertaken for the proposed development.

A qualitative assessment of the construction phase activities has been carried out. The largest risk of these activities with respect to dust soiling was considered to be 'Low', while that towards human health was also considered to be 'Negligible'. Following proper implementation of the measures recommended in Appendix C, the impact of emissions during construction of the proposed development are likely to be 'Negligible' and therefore 'Not Significant'.

The annual mean and one hour mean NO₂ AQO are expected to be met at the proposed development for the anticipated earliest year of occupation. Likewise, the annual mean and 24-hour mean PM₁₀ AQO is expected to be met at the proposed development for the earliest year of occupation.

The annual mean for PM_{2.5} is expected to exceed the newly legislated for AQO to be achieved by 2040, but be below the interim target to be achieved by 2028. It is expected that the both the interim target and AQO will be achieved by their target dates.

Following Air Quality Neutral Guidance, the proposed development is Air Quality Neutral. Based upon the above, no further air quality mitigation measures are recommended.

It can therefore be concluded that the proposed development is not considered to conflict with national, regional and local planning guidance.

Sunlight and Daylight

Anstey Horne have been instructed to produce a Daylight and Sunlight Report to support the planning application. This is included within the submission and summarised below.

Hillingdon's planning policy seeks to safeguard daylight and sunlight to existing buildings and points to the guidance published in BRE Report 209, Site Layout Planning for Daylight and Sunlight: A guide to good practice.

We have undertaken a study of the impact of the proposed development on the relevant rooms in the surrounding dwellings. The tests were undertaken in accordance with the BRE Report



209, Site Layout Planning for Daylight and Sunlight: A guide to good practice (third edition, 2022). The BRE guide gives useful advice and recommends various numerical guidelines by which to assess the impact of development on daylight and sunlight to existing surrounding properties.

We have assessed the windows and rooms within the neighbouring property at 2 Hilliards Road which faces towards the development site. The assessment demonstrates that all of the windows and rooms within this property exceed the BRE's guideline values in terms of both daylight and sunlight availability with the proposed development in place.

In conclusion, the layout of the proposed development follows the BRE guidelines and will not significantly reduce sunlight or daylight to existing surrounding properties. In our opinion Hillingdon's planning policy on daylight and sunlight to neighbouring will be satisfied.

The inclusion of this report is in direct response to the 3rd reason for refusal cited by the Planning Officer on application 61347/APP/2023/920, which states:

'...the proposed dwelling (and associated boundary treatment) would cause a significant loss of outlook and light to the rear habitable room windows of No.2 Hilliards Road. The visual intrusion and light loss would create an unsatisfactory and poor living environment for existing and future residents of No.2 to the detriment of their amenities'

We would like it to be noted that the amended scheme has gone to great lengths to improve the relationship between the proposed and existing dwelling, and this has been reflected in the findings of the Daylight and Sunlight report.

Access and Parking

The proposal will be accessed via Hilliards Road, achieved through the implementation of a new access.

The new dwelling will have 1 parking space in line with Hillingdon's Parking Standards and will provide opportunities for cycle parking and EV charging. There is opportunity for an additional visitor parking space off-road on the proposed hardstanding.

2 Hilliards will retain its front parking area, which provides space for at least 2 to 3 cars.

The proposed access and parking remains consistent to the previous refused application, of which the Planning Officer had no issues and is compliant with Policies T6, T6.1 and DMT6.





6 Conclusion

Warner Planning submits this Planning Statement on behalf Mr and Mrs Ronald and Sheila Moulder. The statement provides the overview and justification for the resubmission of the proposal on land to the rear of 2 Hilliards Road, UB8 3TA, with the description:

"Construction of One Detached, Single Storey, Self-Build Dwelling, with New Highway Access on Land to the Rear of 2 Hilliards Road, UB8 3TA (Resubmission)".

The proposal adheres to Local Plan Policy regarding garden and backland developments as set out in the London Borough of Hillingdon Local Plan and Policy Overview, Local Plan: Part 2 Development Management Policies and the National Planning Policy Framework. The proposal has considered the amenities of existing and future residents in its location, design and architecture, ensuring the surrounding community is not disturbed by the new development.

The area represents an ideal area for development, with an already existing residential community and local facilities within close proximity of the Site. The Site is currently underused space associated with 2 Hilliards Road and development on the Site allows for a more sustainable use of land, whilst increasing the housing stock at a time when, nationally, the government are seeking to deliver new housing to meet demand. The Council have previously allowed consent on the site for a similar proposal.

The application site's sustainability has been considered. This area of Hillingdon has been long established as a residential area and, as such, has a range of facilities and amenities attributed to it and is expected to be able to easily accommodate the additional dwelling. The proposal will be well serviced with well-placed public transport available for facilities further afield.

The scheme has taken on board comments from a previously refused application on the same site.

Reason	Response
Due to its siting, height, bulk, scale, layout, and site coverage, and the resultant loss of rear garden space, the proposed development would result in an cramped, uncharacteristic and oversized form of development which would fail to harmonise with the urban grain and character of the surrounding area.	<p>The design of the proposed dwelling has been reduced in size, the amendments include:</p> <ul style="list-style-type: none">● Reduction in ridge height;● Reduction in footprint;● Increased the separation distances● Omission of integrated garage



	These amendments dramatically reduce the size of the proposed dwelling and overcome the reason for refusal.
Due to its orientation and close proximity to No.16 Hilliards Road, the rear habitable room windows and garden of the new dwelling would be severely overlooked. The lack of privacy to habitable internal and external spaces would create a poor and unsatisfactory living environment for future residents of the dwelling, to the detriment of their amenities.	The internal layout of the house has been revised to remove any perceived overlooking. In addition the scale of the proposed dwelling has been reduced. It is also intended that landscaping is provided on the boundary to further limit any overlook and maintain a high level of privacy. This amendment overcomes the reason for refusal.
Due to its height, bulk, design and close proximity to No.2 Hilliards Road, the proposed dwelling (and associated boundary treatment) would cause a significant loss of outlook and light to the rear habitable room windows of No.2 Hilliards Road. The visual intrusion and light loss would create a unsatisfactory and poor living environment for existing and future residents of No.2 to the detriment of their amenities.	The design of the proposed dwelling has been reduced in size. In addition the application is supported by a daylight and sunlight report which assessed the windows and rooms within the neighbouring property at 2 Hilliards Road which faces towards the development site. The assessment demonstrates that all of the windows and rooms within this property exceed the BRE's guideline values in terms of both daylight and sunlight availability with the proposed development in place. This amendment overcomes the reason for refusal.

The proposal has been reduced in size, limiting the scale, bulk and mass of the new dwelling. The amendments have been undertaken to alleviate the concerns regarding residential amenity that were listed as reasons for refusal within the Officer's Report. Reference has been made to this application throughout this statement.



It is considered that there are compelling grounds to support the proposed development, including:

- Important addition to the district's housing stock using up to date construction methods and materials;
- Increase in the stock of smaller residential units in the area;
- Provision of a much needed and sought after bungalow;
- Provision of a self-build opportunity
- Economic benefits produced from the increase in housing stock and through employment opportunities during the construction phase of development;
- More effective use of a currently underutilised site in a sustainable location of Hillingdon;
- Creation of a residential unit close to several existing shops and services;
- Minimal impact on amenity of nearby properties and occupiers;
- A proposal that makes use of the existing highway network with limited impact on vehicle movements locally; and,
- The proposed dwelling would not conflict with the nearby vernacular in terms of layout.

The applicant is committed to working with the Council and happy to meet the Council to discuss the application and consider any amendments where appropriate.

In view of the above information contained within this report, and the supporting plans and statements, we respectfully invite the Council to approve this application.

