



## PLANNING STATEMENT

**Site:** Land to the rear of 32 & 33 Hillingdon Road  
Uxbridge  
UB8 2BW

**For:** Shaan Homes

**Project Ref:** 25074

**Date:** February 2026

**Prepared by:**

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## **Plans And Documents Accompanying The Application**

Completed Application Form
Planning Statement, Prepared By Barker Parry Town Planning Ltd
Location Plan, drg no. 1714-os-01
Proposed Plans, drg no. 1714-pl-02
Existing Block Plan, drg 1714-ex-03
Existing Floor Plans and Elevations, drg
Transport Statement, prepared by RGP Consulting Ltd
Heritage Statement, prepared by Heritage Unlimited
Biodiversity Net Gain Assessment & Statutory Metric, prepared by ProHort Ltd
CIL Form

1.0 **Introduction**

1.1 This Planning Design and Access Statement (PDAS) has been prepared on behalf of our client, Shaan Homes, to support a full planning application for the redevelopment of underutilised residential land to the rear of 32 and 33 Hillingdon Road, Uxbridge, UB8 2BW.

1.2 The description of development proposed is as follows:

*Erection of 2x 3-bedroom dwellings plus associated hard and soft landscaping works, including alterations to existing boundary wall, following demolition of existing outbuilding.*

1.3 This submission is a significantly altered proposal to a previously refused scheme from 2017. The changes seek to respond to previous concerns raised whilst looking to make efficient use of redundant urban land.

1.4 This Statement will demonstrate that the proposals seek to make best use of this site with a scheme designed to reflect the character and scale of the area, further that the development respects neighbouring properties and will add to the quality of the local context without resulting in substantial heritage harm. The overall planning balance will be assessed including that the application site is in a sustainable location within an established residential area and will provide for much needed additional family dwellings.

## 2.0 Site Context

### Site and Surroundings

- 2.1 The Application Site is a 374sqm area currently comprising redundant sections of the rear gardens of Nos 32-33 Hillingdon Road and includes a derelict 80sqm outbuilding in the curtilage of No 33. The site has a direct road frontage onto Orchard Way and previously a pedestrian access through No 32 existed to the outbuilding as can be seen by the path visible on Figure 1 below. The road frontage is bound by a free-standing brick wall.
- 2.2 No 32 is Grade II listed and was used as a care home from 1990s until a fire in 2022, since which it has been vacant. No 34 Hillingdon Road to the north is also Grade II listed and has been converted into flats. No 33 is not listed and comprises HMO accommodation.



Figure 1 – Site Location and surrounding context (Google 2025)

2.3 To the rear of No 32 there is metal gated access to a hard standing parking area separating the property from its rear garden. Along the site boundary fronting Orchard Way is an on-street parking bay. These bays are restricted to use by permit holders only between 9am and 5pm Monday to Friday. The bay finishes before the previous pedestrian entrance to the site which has since been bricked up (see Figure 4 from 2008).



Figure 2 – Google Streetview image showing gated vehicular access to parking area of No 32



Figure 3 – Google Streetview showing blocked up form pedestrian access to No 33



*Figure 4 – Google Streetview image (August 2008) showing previous access to No 33's outbuilding.*

- 2.4 This part of Uxbridge is residential in character and predominantly comprises family-sized dwellings with a mix of semi-detached and terrace housing as well as some flatted development.
- 2.5 The Application Site is located within central Uxbridge and is within a 10 to 15-minute walking distance of all of the extensive town centre services including Uxbridge Station. Uxbridge Station is served by the Piccadilly and Hammersmith/City/Metropolitan underground lines which link it to the rest of Greater London and the National main line rail network.

### **Planning Designations**

- 2.6 The site is not subject to any specific designations relevant to development potential or principle. The site has a PTAL rating of 3.
- 2.7 The site is in Flood Zone 1 and is not at risk of surface water flooding.

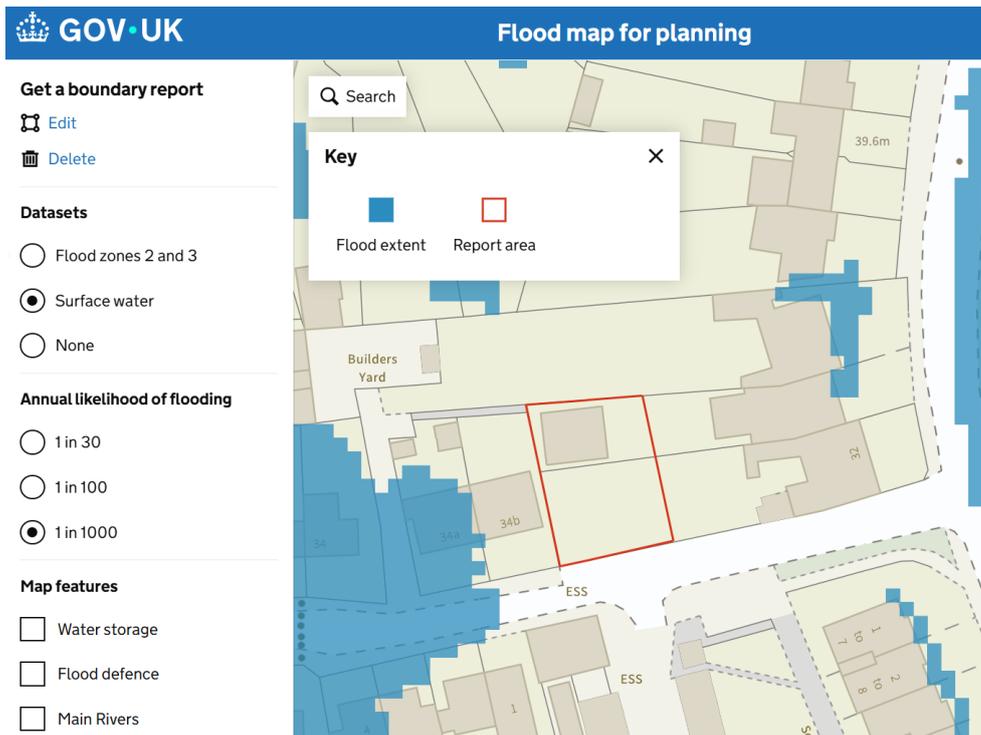


Figure 5 - Extract of EA's Flood Map for Planning – Surface Water Flooding

## Planning History

2.8 On 29 June 2017, a full planning application was refused which sought the construction of two new semi-detached houses to the rear of 32 and 33 Hillingdon Road fronting onto Orchard Way (LPA Ref 72820/APP/2017/1588). The application was subject to four reasons for refusal which can be summarised as follows:

1. Resultant cramped development would be visually incongruous and fail to harmonise with the surrounding area. Intensifying the residential use of the site to the level proposed, as well as the loss of private rear gardens would have a detrimental impact.
2. The proposal would be detrimental to the setting of the Listed Buildings and to the visual amenity of the street scene and the surrounding area.

3. The development would be detrimental to the amenities of the adjoining occupiers at 32 and 33 Hillingdon Road and the use of their private amenity area, by reason of overdominance and visual intrusion.
4. The creation of four vehicular access points would result in the loss of resident permit parking spaces, resulting in the exacerbation of parking stress within the surrounding area.

2.9 It should be noted that since the 2017 approval, both the Hillingdon Local Plan Part 2 and the new London Plan have been adopted and there have been various NPPF updates. Therefore, this proposal was assessed under a significantly different policy context.

2.10 The Applicant has subsequently sought pre-application feedback on alternative proposals for the site of differing types but has since returned to the concept of a pair of semi-detached dwellings.

### 3.0 **Relevant Planning Policy**

3.1 Policies from the relevant, adopted Development Plan Documents (DPDs) are summarised below.

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

3.2 Relevant policies from this DPD include:

- Policy H1: Housing Growth
- Policy BE1: Built Environment
- Policy EM1: Climate Change Adaptation and Mitigation
- Policy EM6: Flood Risk Management
- Policy EM7: Biodiversity and Geological Conservation
- Policy HE1: Heritage
- Policy T1 Accessible Local Destinations

#### **HLP: Part Two - Development Management Policies (2020)**

3.3 Relevant policies from this DPD include:

- Policy DMH 2 Housing Mix
- Policy DMHB 1 Heritage Assets
- Policy DMHB 2 Listed Buildings
- Policy DMHB 11 Design of New Development
- Policy DMHB 12 Streets and Public Realm
- Policy DMHB 12 Housing Standards
- Policy DMHB 17 Residential Density
- Policy DMHB 18 Private Outdoor Amenity Space
- Policy DMT 1 Managing Transport Impacts
- Policy DMT 5 Pedestrians and Cyclists

- Policy DMT 6 Vehicle Parking

### **HLP: Part Two – Site Allocations and Designations (2020)**

3.4 The Application Site is not allocated for development and therefore no policies from this DPD are relevant to the proposed scheme.

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

3.5 Relevant policies from this DPD include:

- Policy GG2 Making the Best use of Land
- Policy GG4 Delivering the homes Londoners need
- Policy D3 Optimising Site Capacity through the Design-led Approach
- Policy D4 Delivering Good Growth
- Policy D6 Housing Quality and Standards
- Policy D7 Accessible Housing
- Policy H1 Increasing Housing Supply
- Policy H2 Small Sites
- Policy HC1 Heritage Conservation and Growth
- Policy T5 Cycling
- Policy T6.1 Residential Parking

### **National Planning Policy Framework (2024) (NPPF)**

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

3.7 The following chapters are of particular relevance to this proposal:

- Chapter 11: Making effective use of land
- Chapter 12: Achieving well-designed and beautiful places
- Chapter 16: Conserving and enhancing the historic environment

3.8 In addition, consultation is presently ongoing in respect of significant revisions to the NPPF. Key messages from the consultation document include making best use of sustainable, well-connected urban land for new homes particularly by increasing densities.

#### 4.0 **The Proposed Scheme**

4.1 The proposed scheme is a full planning application for the following scope of works:

- Demolition of the existing, detached outbuilding (total GIA of 80sqm).
- Erection of a pair of semi-detached, hipped roof dwellings to provide 2 x 3-bedroom, 4-person dwellings (total GIA of 84.6sqm per dwelling).
- Provision of hard and soft landscaping including:
  - Provision of 1 car parking space utilising previous access point to outbuilding.
  - Works to existing boundary wall.
  - New soft landscaping.
  - Provision of policy compliant private rear gardens for each dwelling, including retained garden areas for donor dwellings.

4.2 Conversely to previous applications, no works to the highway are proposed or required other than a dropped kerb.

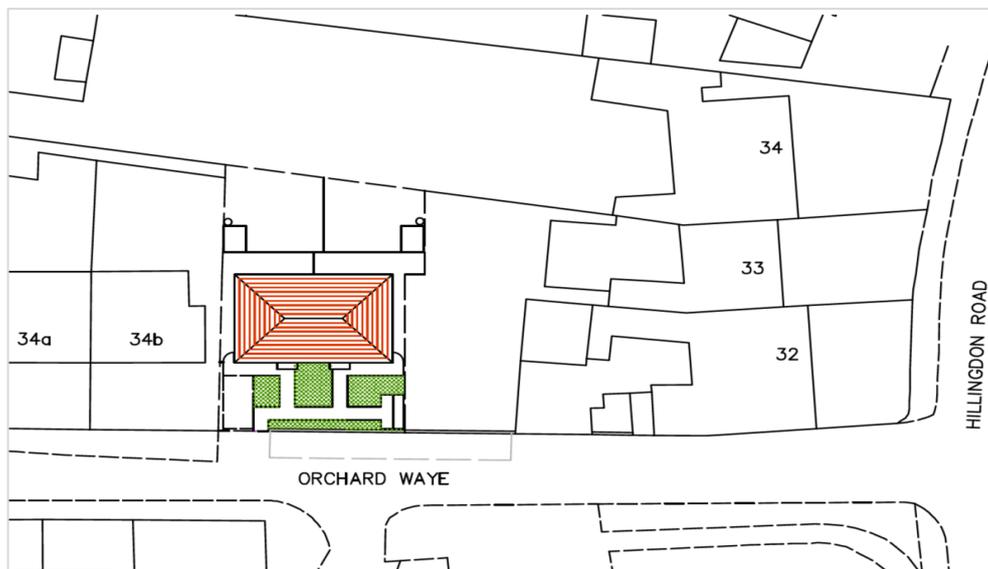


Figure 6 - Extract of Proposed Site

## 5.0 **Planning Considerations**

### **Principle of Development**

3.9 It is understood that presently the LPA cannot demonstrate a five-year housing land supply. Under paragraph 11d) on the NPPF, this means, for decision-taking, that the policies which are most important for determining the application are considered out-of-date, and planning permission must be granted unless:

- i. the application of policies in the NPPF that protect areas or assets of particular importance<sup>7</sup> provides a strong 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 the NPPF taken as a whole, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes.

5.1 The only relevant consideration under footnote 7 is the potential impact on designated heritage assets. However, as outlined in the following sub-section and in the accompanying Heritage Statement, this is not considered to provide a strong reason for refusing the proposed development.

5.2 In the context of the tilted balance, it is considered that Policy DMH 6 (Garden and Backland Development) should be given limited weight as an out-of-date policy. The policy also conflicts with the London Plan and NPPF which are both more recent and expressly support making best use of urban land to deliver additional housing, particularly in sustainable locations. In this regard, London Plan Policy H2 is considered more relevant. This policy requires LPAs to pro-actively support well-designed new homes on small

sites (below 0.25 hectares in size). It also clearly expresses that Boroughs should recognise that local character evolves over time and will need to change in appropriate locations to accommodate additional housing on small sites. In Hillingdon, there is a requirement to deliver at least 2,950 dwellings on small sites by 2028/29 and the LPA has made insufficient progress on this target to date.

5.3 Further, London Plan Policy D3 sets out a clear requirement that all development must make the best use of land by following a design led approach which optimises the capacity of sites. This means ensuring that development is of the most appropriate form and land use for a site but with incremental densification actively encouraged to achieve a change in densities in the most appropriate way. This cascades down from NPPF Paragraph 130 which is clear that development should be sympathetic to local character whilst not preventing or discouraging appropriate innovation or change, such as increased densities. In accordance with London Plan Policy D3 the development will:

- Enhance local context by redeveloping a derelict garden area with dilapidated outbuilding to provide high quality residential development.
- Be in a highly accessible location well linked to active travel routes for pedestrians and cyclists, with convenient cycle parking proposed to encourage such sustainable movements.
- Be a street-based proposal with clearly defined public and private environments, including enhancing the streetscene.

5.4 The Application Site is not within an area of 'Special Local Character' as set out by Policy DMHB 5 which provides a specific level of protection to local

character in sensitive areas. Therefore, the implication is that the site should be considered as less sensitive and appropriate in principle for increased density subject to compliance with other local design policies, namely DMHB 2 and 11. These are considered in the following sub-section.

- 5.5 Overall, more recent London and National policy supporting effective use of land, it is considered that the proposed scheme is acceptable in principle, subject to compliance with relevant heritage and design policies.

### **Density**

- 5.6 As outlined above, National and London Policy is clear that increasing densities on sites should be supported and encouraged where it is appropriate in the local context.
- 5.7 The Application Site is within a high-density area, and the proposed scheme is appropriate to the character of the area. The pair of semis will mirror the adjacent dwellings form on Orchard Way and will provide more family sized dwellings.
- 5.8 As such, the proposal is considered sympathetic to local character whilst optimising the site in accordance with NPPF paragraph 135, London Policy D3, and Local Policy DMHB 17.

### **Design & Character**

- 5.9 Policy DMHB 11 requires all development to be designed to the highest standards and incorporate principles of good design, including harmonising with the local context and protecting features of positive value, taking into account the surrounding scale of development, building plot sizes and coverage, established street patterns and building lines. This policy aspiration

should be balanced against London Plan Policy D3 which requires development to make best use of land and promotes increasing densities, particularly on sustainable urban sites like this. Such an approach should still be design led and appropriate to local context.

- 5.10 The proposed pair of semi-detached dwellings will have directly comparable footprints in terms of scale of surrounding dwellings on Orchard Way. The hipped roof form and scale and proportions of the buildings will be very similar to all other two storey dwellings on Orchard Way. The ridge heights of the proposed dwellings match The Ridgeway, Orchard Way and will sit below that of No 32 Hillingdon Road. This will mean they will sit comfortably within the streetscene as can be seen from Figure 7 below.



*Figure 7 – Extract of proposed streetscene showing ridge heights.*

- 5.11 Nos 32 & 33 Hillingdon Road will retain generous garden areas.
- 5.12 On this basis, it is considered that the proposals will deliver a high quality of development of a form, scale and massing directly reflective of surrounding two-storey development and will maintain the suburban and spacious local character in accordance with Policy DMHB 11, DMHB 12 and London Plan Policy D3.

### **Heritage**

- 5.13 The submission is supported by a Heritage Statement which fully assesses the heritage assets around the site and the impact of the proposed development against relevant local and national heritage policies.

5.14 It outlines the details of the potentially affected heritage assets and their significance. The Statement can be summarised as follows:

- Both Nos 32 and 34 Hillingdon Road are of high significance and also have a group value. The most significant part of both buildings is the principal elevation to Hillingdon Road.
- By contrast the rear elevations and back garden areas are of a medium to lower significance.
- The scheme sits built form to provide the maximum set back from the listed buildings.
- The existing brick wall has already been modified and therefore opening part of this up and altering part of its height is logical whilst retaining the remainder of the historic boundary wall.
- The principal elevations of the listed buildings on Hillingdon Road will not be affected as such the significance of the listed buildings will be preserved.
- The development is within the setting of both listed buildings but has been designed to minimize the visual presence of the new dwellings in views from the listed building and the setting.
- Overall, the development will result in a negligible impact to the setting and special interest of the adjacent listed building.
- The proposal preserves the character and significance of the adjacent listed buildings through high quality and harmonious design. As such, local policies HE1, BE1, DMHB1 and DMHB2 are satisfied, as is London Plan Policy HC1.

5.15 If the LPA disagree and consider the proposal to result in less than substantial harm, it is considered that there are public benefits arising from the proposed development which would outweigh this. There are public benefits arising from the delivery of two, family sized dwellings to meet a specific identified

need for that type of housing in the context of a Borough which cannot presently demonstrate a five-year-housing land supply.

- 5.16 Overall, the Heritage Statement concludes that the proposal would meet the requirements of the Planning (Listed Building and Conservation Area) Act 1990, the NPPF and local planning policies. As such, there is no heritage reason to resist the proposed development and the presumption in favour of sustainable development applies.

### **Housing Mix & Quality**

- 5.17 Policy DMH 2 requires a mix of different sized housing units to reflect the Council's latest information on housing need. The greatest identified need for housing in the SHMA (2018) is for 3+bedroom, family sized houses, followed by 2-bedroom houses.
- 5.18 The proposed scheme will deliver 2no three-bedroom, family sized dwellings. The proposed scheme therefore makes a notable contribution towards housing needs within the borough. This is a planning benefit upon which substantial weight should be placed.
- 5.19 Both dwellings are 3-bedrooms, 4-person with a GIA of 84.6sqm and have one double room and two single rooms. Therefore, all dwellings comply with minimum space standards and will deliver a high quality of residential accommodation.
- 5.20 Policy DMHB 18 outlines that all new residential development and conversions will be required to provide good quality and usable private outdoor amenity space. Table 5.3 outlines a minimum amenity space standard of 60sqm for 2 and 3 bedroom houses. Each dwelling has a private rear garden in excess of 60sqm (72sqm and 68sqm) and therefore fully

complies with this policy requirement, providing a good quality of amenity to future occupiers. Additionally, No 33 will retain a garden area of 121sqm and No 33 will retain an 80sqm garden.

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

### **Highway Matters & Parking**

- 5.22 Unlike the previous applications, no alterations to the on-street parking bay are proposed and therefore a legal agreement for this matter is not required. The proposals make use of the former entrance to the existing outbuilding and propose to provide a one off-road car parking space. The other dwelling will be car free which is considered appropriate given the very good accessibility to Uxbridge High Street and Station. This also accords with the London Plan maxima standards for 3-bedroom dwellings.
- 5.23 The Applicant is willing to enter into a unilateral undertaking (UU) to prevent future occupiers from applying for resident's parking permits, if required. However, a parking stress survey has shown capacity within on-street parking.
- 5.24 Secure stores for cycle parking are shown to the rear of properties with direct access from the side paths to provide safe and convenient storage of bicycles which do not conflict with cars and therefore will encourage use of sustainable transport methods.
- 5.25 Additionally, the submission is supported by a Transport Statement which confirms the following:

- A suitable servicing arrangement including for fire tenders and refuse vehicles will be provided.
- Appropriate car and cycle parking provision will be provided on-site, in accordance with relevant local standards.
- The vehicle trip generation created by the development will be negligible.
- A parking stress survey has demonstrated that any additional off-street parking demands associated with the proposed development would not have a material impact upon the on-street car parking available locally.
- The development proposals will have no material impact on the capacity of the surrounding highway network.

5.26 The proposals therefore comply with Policy DMT 1, DMT 2 and DMT 6 of the Development Management Policies and Policies T4, T6 and T6.1 of the London Plan. As such, there is no highway reasons to restrict the grant of planning permission.

### **Accessibility**

5.27 London Plan Policy D7 requires 10% of dwellings to be M4(3) and all other dwellings to be M4(2). As the proposal is for only two dwellings, 10% would equate to less than one dwelling and so the proposed dwellings are designed as M4(2).

### **Landscaping & BNG**

5.28 Policy DMHB 14 expects all development to retain or enhance existing landscaping, trees, biodiversity or other natural features of merit.

- 5.29 The submission is accompanied by a Biodiversity Net Gain Assessment and statutory metric prepared by ProHort Ltd. This confirmed that there are no existing landscape features of merit on the site as there are no habitat of high distinctiveness. There is no existing hedgerow, and the site comprises grass, brambles and bare and developed land. Its existing condition is considered to be a visual detraction for the area which has significant scope of enhancement.
- 5.30 Given all existing and proposed habitat land is contained entirely within the curtilage of dwellings, it is not possible to provide an on-site gain of biodiversity, and an off-site enhancement will instead be secured.
- 5.31 The proposed plans show details for hard and soft landscaping on-site. This includes retaining the existing brick boundary wall but lowering it to 1.0m across the front of the new dwellings to create an attractive boundary feature.
- 5.32 If required, further details of hard and soft landscaping can be conditioned to the permission alongside the statutory Biodiversity Gain condition. However, it is considered that the proposal complies with Local Policy DMHB14.

## 6.0 **Summary & Planning Balance**

6.1 This Statement has demonstrated that the proposed scheme will deliver significant benefits in the form of making effective use of underutilised urban land to deliver two, much needed family homes. Further that it will result in a negligible impact to the setting and special interest of the adjacent listed building. However, if the LPA consider there to be less than substantial harm, it is considered that the public benefit of additional housing delivery outweighs this. Therefore, heritage does not provide a strong reason for refusal, and the titled balance is engaged under NPPF paragraph 11d).

6.2 In assessing the overall planning balance, the Applicant has afforded the following weight to relevant matters:

### **Positive Matters**

- The development optimises the use of this existing residential site via gentle densification which is specifically encouraged by Policy D3 and H3 of the London Plan. This warrants significant positive weight.
- The net gain of two family-sized dwellings within an LPA lacking a 5-year housing land supply. This warrants substantial positive weight.
- Will provide an attractive, well-design development to replace a run-down garden area and derelict outbuilding which presently detract from the quality of the area. This warrants moderate positive weight.
- The site is located in a sustainable and established urban location in short walking and cycling distance of Uxbridge town centre and a significant range of sustainable transport options. This warrants significant positive weight.

### **Neutral Matters**

- The proposal is supported by a technical report which demonstrates that the proposed scheme does not generate any highways or parking issues. This matter is attributed neutral weight.
- The proposal is supported by a Heritage Statement which concludes that the proposed works will result in a negligible impact to the setting and special interest of the adjacent listed buildings. This matter is attributed neutral weight, particularly given that public benefits have also been identified.

### **Negative Matters**

- The development will result in the loss of garden land contrary to Policy DMH 6. This is afforded moderate negative weight.

6.3 Therefore, the proposed scheme does not result in any significant or demonstrable harm which would outweigh the benefit of the additional housing delivery as a more efficient use of a sustainable urban development site. The proposal therefore constitutes sustainable development and should be granted.

6.4 Overall, the proposed scheme redevelops the site to provide a harmonious, attractive and high-quality development which will assimilate with the established character of the area whilst providing a significant benefit in additional delivery of housing. The proposal does not conflict with any policy and therefore the presumption in favour of sustainable development should be applied, and planning permission granted without delay.