

TOWN AND COUNTRY PLANNING ACT 1990
DESIGN AND ACCESS STATEMENT

IN RESPECT OF THE DEMOLITION and REPLACEMENT OF AN EXISTING
DETACHED BUNGALOW and ASSOCIATED GARAGE, and
ERECTION OF A PAIR OF SEMI – DETACHED HOUSES,

29 CLAMMAS WAY, COWLEY, UB8 3AN.



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INTRODUCTION:

This is a straightforward Planning Application to demolish an extremely dated, but typical “sub-urban” bungalow, which has very poor sustainable attributes, and its replacement with a pair of semi – detached homes on this Urban site within the heart of the London Borough of Hillingdon. So the application site is located within the London Borough of Hillingdon, a large predominantly urban borough which covers a large part of North West London, including the main centres of Ruislip and Uxbridge.

We are also aware that the National Planning Policy Framework (NPPF) refers to such changes of use and new – replacement dwellings such as that proposed here, in terms of both Brownfield and Grey Field land, so we will refer to this National guidance, where relevant, plus refer to more local – Hillingdon Adopted Planning Policies too.

In the meantime, as a Planning Consultant, we have been asked to prepare this supporting Design and Access Statement in support of this application for the demolition of the existing modest bungalow, and the erection of a matching pair of semi – detached houses, with associated minor alterations such as sub-division of the rear garden, to provide a garden for each new house, plus on – site parking to the front, bin stores, etc.

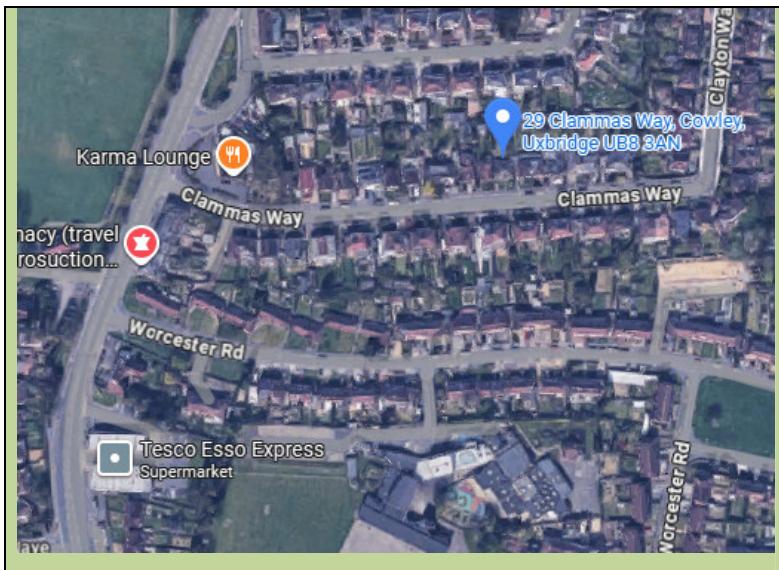
THE SITE and the PROPOSALS:

So No29 Clammas Way is a modest detached bungalow set in this linear “sub-urban” street, in an area of similar parallel linear roads, including Clammas Way, Worcester Road and Dellfield Crescent all running parallel to each other. So the application property is just east of Cowley High Street, which also contains many commercial, retail and cultural facilities, as discussed below.

Uxbridge Tube Station is located to the north, whilst West Drayton Station are also just 30 minutes away, both of which are in Travelcard Zone 5, with a connection to central London via both the Elizabeth line and Metropolitan lines, 45 minutes away.

The area generally therefore enjoys an excellent sustainable location, so close to two train stations and therefore with easy access to Central London, whilst at the same time Hillingdon itself is located on the north western “fringe” – edge of North West London, where space for new homes remains extremely limited, and much of London is clearly surrounded by Metropolitan Green Belt or includes Metropolitan Open Land, where new development is not permitted.

The property is shown below fronting Clammas Way, and backing onto Dellfield Crescent to the north:



So, as background to this Design and Access Statement and the principle of new development – homes here, it is considered the scheme would clearly provide two new homes in north west London, where as we suggest new homes are not readily available, and clearly it would make considerably better use of this sustainable site than the unsustainable bungalow.

It would also meet more modern sustainable Building Regulations standards, and essentially would be much more eco – friendly – sustainable properties, which will ensure they meet current and emerging sustainable standards, as advocated by both Central and Local Government, in its sustainable mandates – documents, including Lifetime Homes for example.

MATERIAL CONSIDERATIONS:	PLANNING
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So, there are clearly several main materials considerations for the Local Planning Authority (LPA) to consider:

- (1) *the principle of residential re-development in this urban location, and replacing one small dwelling with two family homes, in this sustainable location;*
- (2) *Design issues;*
- (3) *Highways and the accessible location;*
- (4) *Amenity Space, and any other issues -Trees, etc.*

1. Principle of Development:

So the **National Planning Policy Framework (NPPF), amended December 2024**, states there is a presumption in favour of sustainable development.

72. Small and medium sized sites can make an important contribution to meeting the housing requirement of an area, are essential for Small and Medium Enterprise housebuilders to deliver new homes, and are often built-out relatively quickly. To promote the development of a good mix of sites local planning authorities should:

- a) *identify, through the development plan and brownfield registers, land to accommodate at least 10% of their housing requirement on sites no larger than one hectare; unless it can be shown, through the preparation of relevant plan policies, that there are strong reasons why this 10% target cannot be achieved;*
- b) *seek opportunities, through policies and decisions, to support small sites to come forward for community-led development for housing and self-build and custom-build housing;*
- c) *use tools such as area-wide design assessments, permission in principle and Local Development Orders to help bring small and medium sized sites forward;*

- d) support the development of windfall sites through their policies and decisions – giving great weight to the benefits of using suitable sites within existing settlements for homes; and*
- e) work with developers to encourage the sub-division of large sites where this could help to speed up the delivery of homes.*

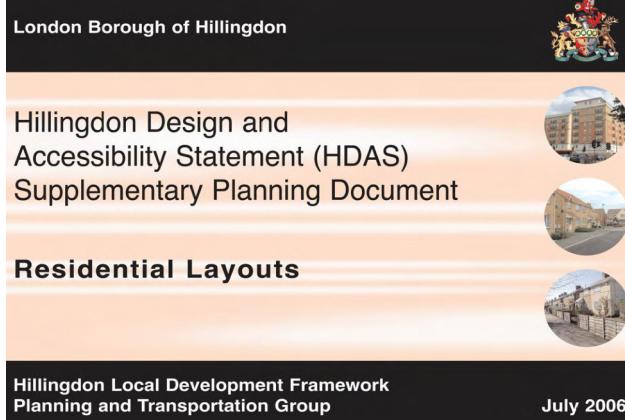
The site currently comprises of a modest detached bungalow, and essentially, the “Carbon footprint” of the two new dwellings would be considerably lower than that of the existing bungalow, as they would have to be to more onerous current Building Regulations exacting standards, and we must again reiterate that, an important consideration is the sustainable location of the property, as discussed earlier, and discussed in greater detail below.

LOCAL GUIDANCE – THE ADOPTED SPD:

The Hillingdon HDAS Residential Layouts guidance is still referenced in current planning documents, suggesting it is not officially out of date. However, it may be supplemented by newer policies like the London Plan.

- **HDAS Residential Layouts** (part of the Hillingdon Design and Accessibility Statement) continues to be cited in recent planning applications and design statements. For example, a 2021 Design & Access Statement explicitly notes that a proposed development meets the internal space standards of both the *London Plan* and *HDAS Residential Layouts*.
- The **Accessible Hillingdon Supplementary Planning Document** also references HDAS as a source of guidance on key design principles such as density, privacy, and amenity.
- While HDAS is still in use, **planning decisions are increasingly guided by the London Plan**, which sets broader regional standards. This means HDAS may be considered secondary or complementary to newer policies:





Paragraph 3.3 of this SPD specifically refers to '*infill plots*', such as this, indicating that the redevelopment of large plots for infill development is particularly common in the northern part of the Borough, where housing densities are generally much lower and there is greater room for new housing on 'brownfield' land such as this, which makes better use of under-utilised sites such as this which contains just one modest bungalow.

Clearly Uxbridge is located in the northern part of the London Borough of Hillingdon. The SPD states:

"Redevelopment of large plots and infill sites

3.3 The redevelopment of large plots and infill sites currently used for individual dwellings into flats is particularly common in the north of the borough. Individually or combined these buildings and their grounds offer the possibility, through careful and sensitive design, of some redevelopment.

*The redevelopment of large numbers of sites in close proximity to each other is unlikely to be acceptable including large numbers of redevelopments on any one street. **The redevelopment of more than 10% of properties on a residential street is unlikely to be acceptable..."***

So, in this case, the creation of two additional modest 3 bed houses from this site would accord with the general objectives of the SPD, creating two family homes from

one particularly modest bungalow on this large plot, which is considerably wider than its immediate neighbours.

2. DESIGN:

On the question of design, the NPPF also includes a Chapter (No12) regarding design: ***“Achieving well designed places”*** and this recognizes that design is an important consideration, but that:

135: Planning policies and decisions should ensure that developments:

- a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;*
- b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;*
- c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);*
- d) establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;*
- e) optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and*
- f) standard of amenity for existing and future users⁵¹; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.*

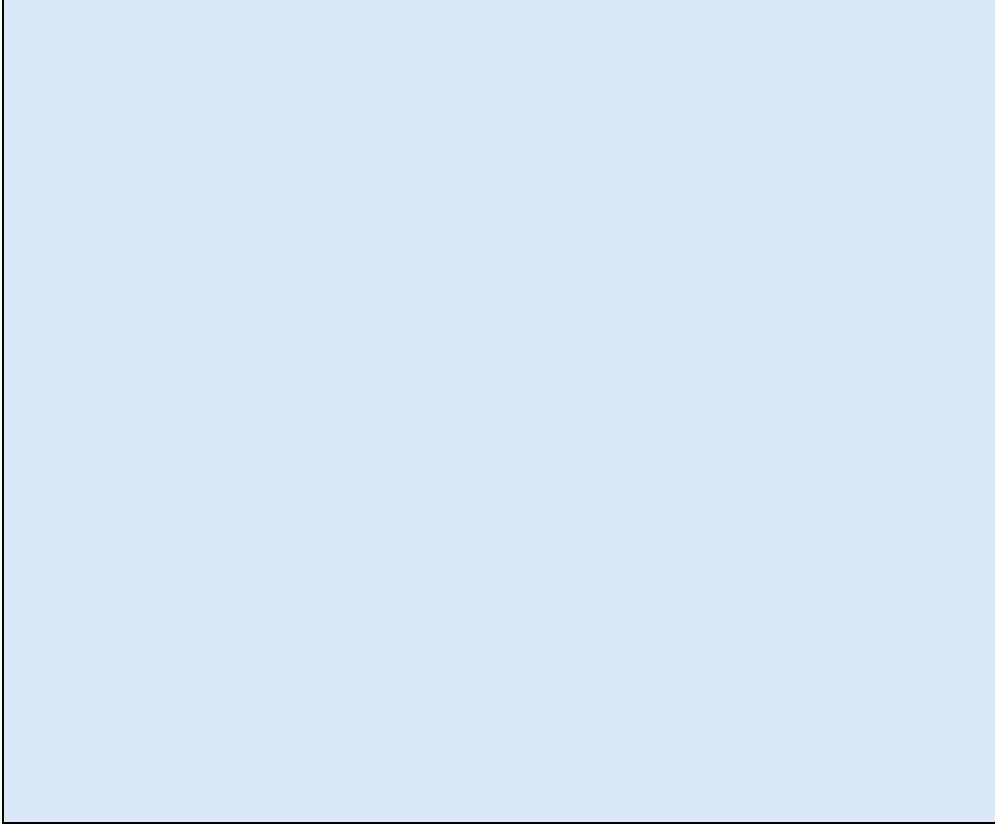
So, given the National guidance, in the form of the NPPF (as amended), then there should be no ‘in-principle’ objections to the new homes, by demolishing an unsustainably constructed dwelling, with two brand new homes which meet much more onerous Building Regulations, Lifetime Homes and other sustainable attributes/requirements. Essentially, the “Carbon footprint” of the two new dwellings would be considerably lower than that of the existing property, and the sooner it can be demolished to create two new considerably more energy efficient and sustainable homes the better.

So, it should be noted that, on the question of design, the recent National Planning Policy Framework (NPPF – as amended) indicates that Local Planning Authorities such as Hillingdon should not be too prescriptive in the application of their Local Development Plans, stating:

“Development that is not well designed should be refused, especially where it fails to reflect local design policies and government guidance on design⁵⁴, taking into account any local design guidance and supplementary planning documents such as design guides and codes. Conversely, significant weight should be given to:

- a) development which reflects local design policies and government guidance on design, taking into account any local design guidance and supplementary planning documents such as design guides and codes; and/or*

- b) outstanding or innovative designs which promote high levels of sustainability, or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings.”*



In this case, the new dwellings have been designed as part brick, part render and plain tiles, which would closely match the “inter – war” pallet of materials in the area, which consists of a broad range of bricks, render and roofing materials. The general built up nature of the area, and broader streetscene would not be harmed, and the Local Planning Authority also can control the potential finish, in terms of materials, window sizes, eaves, doors, etc, by imposing relevant and enforceable planning conditions, requiring approval of materials. Indeed, we will provide examples – precedents later on within this statement.

In this case, then the simple design solution, has taken on board the National NPPF guidance above and the more local planning policy stance, as set out in **Policies DMH6, DMHB11 and DMHD1**, shown below at Appendix A and B respectively, which we will now refer to in greater detail below.

More locally, the recently Adopted local Development Plan for Hillingdon is the 2020 Adopted Local Plan Policies, as set out below, which we will refer to shortly in support of this application:

- ❖ **Policy DMH6 Garden and Backland Development;**
- ❖ **Policy DMHB11: Design of new development;**
- ❖ **Policy DMHD1: Alterations and Extensions to Residential Dwellings**

Paragraph 4.4(i) then refers to density, and requires new development to reflect the;

'...form, height, scale, massing and layout (plot ratio) in relation to the character of the area and the surrounding buildings, having regard to the provisions of this guidance. The location of the site, the context and quality of the area. Where brownfield sites are located in sensitive locations, such as Conservation Areas or Areas of Special Local Character, new housing developments should take into account the context of the site, including the proximity to historic and Listed Buildings.

- _ The accessibility of the site in relation to public transport, shops, services and community infrastructure. The Public Transport Accessibility Level (PTAL) method (as set out in the London Plan) provides a consistent framework for assessing public transport accessibility of larger sites across London. In assessing application proposals over 10 units and applications which propose a significant intensification of density, the Council will consider the PTAL index and the findings of the Transport/Accessibility Assessment submitted with the proposal.*
- _ The ability of schemes to provide a satisfactory environment across all tenures. Where a mix of tenures are proposed, they should be properly integrated into the layout and design of a scheme. It will not be appropriate for certain tenures to be developed in a way which cannot provide good living conditions for future occupiers.*
- _ The impact of the proposed development on the physical environment i.e. whether the development will increase the risk of flooding.'*

In this case, we genuinely believe this large plot, which is largely covered by a single modest bungalow, with just 3 bedrooms under-utilises this large ‘infill’ plot and that two new homes, of the style, scale, massing, height and depth would not dominate the street-scene, whilst the site also is NOT located in a designated Conservation Area or other local designation, such as an Area of Special Local Character, (a local Hillingdon designation) where indeed ‘design’ is much more critical.

So, with regards the specific design considerations in respect of these two new homes, also in accordance with the above SPD, an adequate degree of separation would be maintained between ALL the proposed dwellings, but also between the new flank walls of the dwellings and existing homes either side.

Clammas Way consists of a broad pallet of single storey, 1 ½ storey and two storey homes, so the style of these two new homes, with a brick exterior – ground floor and first floor, plain tile roof, white UPVC windows with stone cill, will all reflect the typical ‘sub-urban’ style of properties in the area. It is acknowledged that 2x two storey houses in lieu of one single storey bungalow will change the character and appearance of the area, however in our view the usual question is whether indeed it would *‘seriously detract’* from the broader character of the wider area; we suggest not.

Therefore, also in terms of the overall scale and appearance, this scheme would still not detract or fail to harmonise with the wider street scene, and the development would not conflict with Policies DMH6, DMHB11 or DMHD1 of the Adopted UDP, or result in a development that would not be in keeping with the architectural style of the area – which does indeed contain a broad pallet of single storey, chalet and two storey properties.

So, in this respect, we remain of the view that the proposed dwellings are visually attractive as a result of good architecture, layout and indeed the design. As such, then we do not believe the new homes would detract from the character and visual amenities or openness of the location, and therefore would meet the ***Hillingdon Design and***

Accessibility Statement (HDAS) Supplementary Planning Document (SPD) "Residential Layouts" in relation to new dwellings.

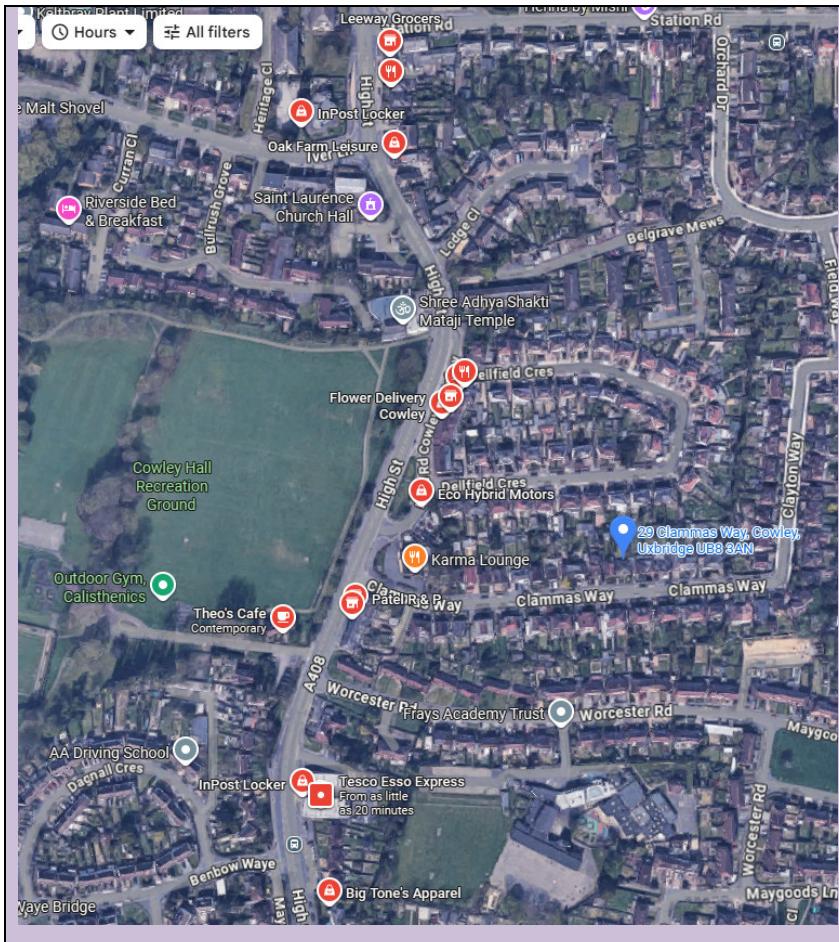
3: HIGHWAYS and ACCESSIBILITY:

So the **National Planning Policy Framework (NPPF)**, as amended, states there is a presumption in favour of sustainable development...as a core planning principle the effective use of land is encouraged by re-using land that has been previously developed (brownfield land), OR making better use of land in our villages, towns and cities, such as here in 'sub-urban' West London, so entirely in accordance with this National guidance.

As discussed above, Clammas Way is located in this extremely sustainable location, relatively close to TWO Tube Stations, which connects the area to central London, just 40 minutes away by train, and the broader area containing a varied range of commercial, educational, retail, leisure, religious and other uses. The sustainable location is shown below.

On this aspect the National Planning Policy Framework (As amended) has previously suggested to Councils throughout the UK and refer to '*Making more effective use of land*' and suggests that Planning Policies and decisions should:

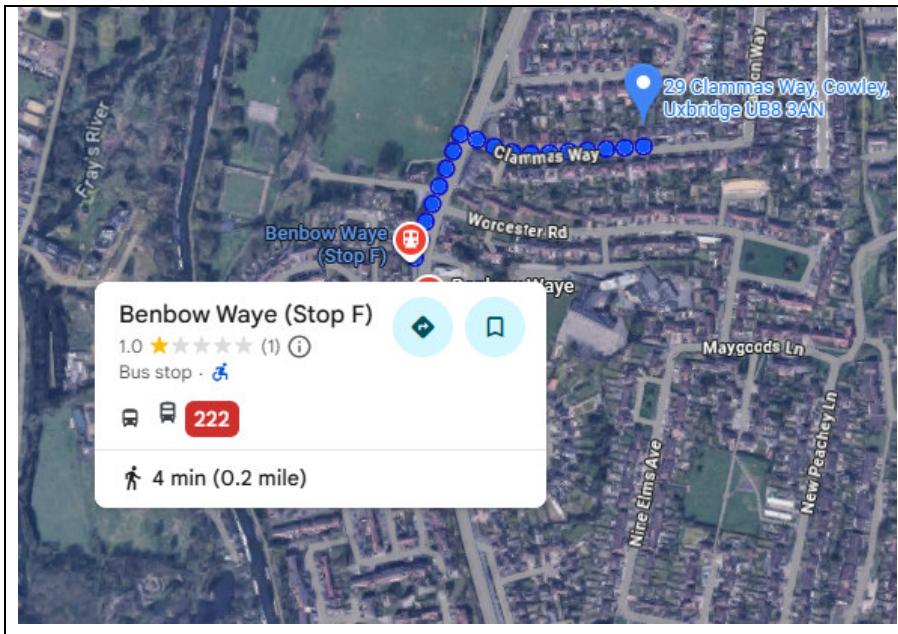
- c) "...give substantial weight to the value of using suitable brownfield land within settlements for homes..."
- d) promote and support the development of under-utilised land and buildings, especially if this would help meet identified needs...where land supply is constrained and available sites could be used more effectively..."



So with regards to Highways and Accessibility as Hillingdon often refer to, Section 4 of the SPD, then also (as quoted above), Hillingdon will assess sites in relation to their “*accessibility*” in relation to Public transport, shops, services and community infrastructure. They use what is termed a “**Public Transport Accessibility Level**” or PTAL.

Public Transport:

So, the closest bus stop is just 4 (Four) minutes walk away:



So, these buses travel north and south along the High Street, with buses every 5 to 10 minutes:

Stop	Arrival Time
Benbow Waye (Stop F)	5:44 PM
Benbow Waye (Stop Q)	5:55 PM
Station Road Cowley (Stop BR)	6:03 PM
Station Road Cowley (Stop BS)	6:11PM
Station Road Cowley (Stop BN)	6:21PM
Benbow Waye (Stop F)	6:29 PM
Benbow Waye (Stop Q)	6:38 PM
Station Road Cowley (Stop BR)	6:46 PM
Station Road Cowley (Stop BS)	6:55 PM
Station Road Cowley (Stop BN)	7:03 PM

Parking:

With regards parking, then there are indeed 2 spaces per dwelling situated typically in front of each new property, so a total of 4 spaces, and there is also scope for some low

level planting between various bays, providing an element of soft landscaping too, but which will not interfere with visibility for cars entering and exiting the site.

We assume therefore the Local Highways Authority will consider two spaces per dwelling as a reasonable level of car parking provision, given the proximity to Public transport – buses and trains (underground) either side of the application site.

Consequently, once again it is contended that the proposed dwellings here would accord with both National (the NPPF) guidance, offering new family homes in an extremely sustainable location where other (non car) modes of transport are available and also in accordance with more local (SPD) guidance too, as outlined and discussed earlier.

4. AMENITY Space and other issues:

Finally, there are no issues relating to trees or as far as we are aware flooding. With regards to amenity space provision, the rear gardens would be, by comparison to newer housing development on estates, by major housebuilders, then it would far exceed the amenity-garden space provision provided on those developments. Indeed, the overall garden depth is approximately 21 metres deep, and 7 metres wide for these semi-detached dwellings.

We note that the Hillingdon SPD requirement is for 100sq.m per 4 bed unit and that in this case the gardens exceed this requirement, even though they are only 3 bed dwellings. We also note the plans indicate cycle stores and bins presentations points will be provided too.

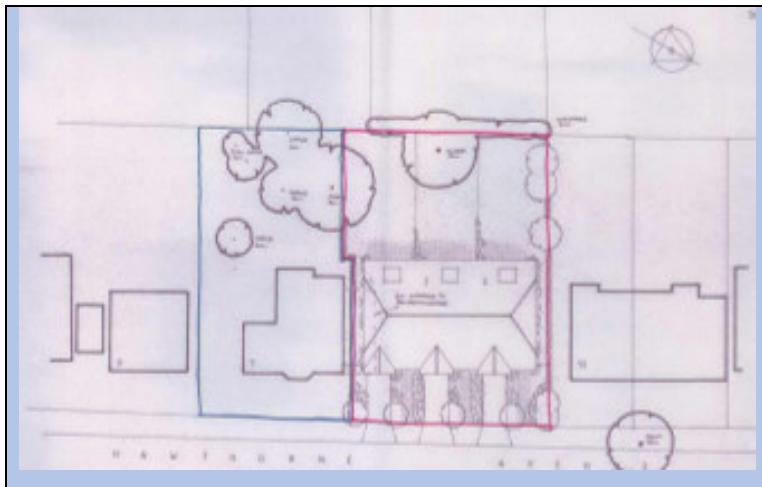
PRECEDENTS:

We would also point out this scheme is very similar to a scheme we also secured Planning Permission at 59 Elm Avenue, via an appeal in 2019, at the junction with Oak Grove. Hillingdon file reference for this is: 60130/APP/2019/1369, refused on 23rd April 2019, but with a subsequent appeal allowed. That approval was in respect of:

"Two x 2-storey, 3-bed detached dwellings with associated parking and amenity space involving demolition of existing bungalow."

No7 to 9 Hawthorne Avenue:

The two sites below are similar 'infill' sites, between existing dwellings either side, so similar to the proposals here at Acacia Avenue. The first is a development of land between No7 and 9 Hawthorne Avenue, which was approved in 2005/2006. These were approved under the following file references 61379/APP/2005/3356 and 2006/2030 respectively. The 2006 plans are not available but the 2005 Block plan is shown below, and clearly shows a very similar layout being sought here at Acacia Avenue, with an infill development between existing frontage properties either side:





53 Hawthorne Road:

Another similar infill development is here at 53 and 53A Hawthorne Road, approved more recently in 2018, under LBH Planning file reference: 15248/APP/2018/3353:





We note that this approval in 2018 had the recommendation of the Case Officer who stated:

"Policy BE1 of the Hillingdon Local Plan: Part One requires all new development to improve and maintain the quality of the built environment in order to create successful and sustainable neighbourhoods. Policies BE13 and BE19 of the Hillingdon Local Plan: Part Two - Saved UDP Policies (November 2012) states that new development should complement or improves the character and amenity of the area whilst safeguarding the design of existing and adjoining sites.

In addition, Policy BE22 states that buildings of two or more storeys in height should be set back a minimum of 1 metre from the side boundary of the property for the full height of the building. The proposed dwellings would be located 1 metre from the Northern and Southern side boundaries by 1 metre. In addition there would be a gap of two metres between the detached and semi-detached properties. The proposed replacement dwelling at No.53 would now be set further away than the existing bungalow.

Although the neighbouring property at No.51 is a bungalow there would be a distance of 3 metres from the side boundary of 51 due to the public footpath. The replacement dwelling at No.53A would be closer to the boundary than the existing, however, No.55 is a two storey property and the 1 metre set in is still maintained. Therefore, it is considered that on balance the proposal is acceptable and would not appear as an over-dominant or cramped on site. The open character and appearance of the surrounding area and the visual amenities of the street scene are therefore maintained.

In addition, the proposed would be set back from the main road and the prevailing building line to the front thereby reducing their presence on the overall street scene. Hawthorne Avenue consists of properties of varying design and sizes with a mix of one and two storey properties. It is considered that the erection of two storey dwelling houses in the replacement of bungalows would not have a detrimental impact on the street scene...

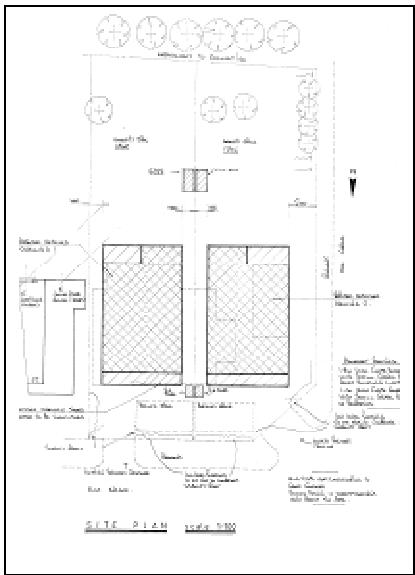
It is also noted that the design of the proposed dwellings has taken inspiration from these neighbouring properties with a mock tudor frontage and front roof forms, and a similar overall massing and scale. The two storey projected bays set under the modest gable pitched roofs appear subordinate and would not appeal out of character within the general street scene.”

117 to 119 Elm Avenue:



59 ELM AVENUE:

Finally, whilst appreciating this example is corner plot, I can confirm we acted on behalf of a previous application – applicant at 59 Elm Avenue, which was a similar detached bungalow fronting Elm Avenue, but positioned on the corner of Oak Grove. We appealed a refusal of Planning Permission here at 59 Elm Avenue, (Hillingdon Ref:60130/APP/2019/1369), refused on 23rd April 2019, however the appeal was allowed:



We lodged the appeal as it was considered better utilising this similar plot also containing a large bungalow, and providing two 3-4 bedroom houses would also accord with both National (NPPF) and local Development plan and SPD guidance too, as outlined above. We note that the Inspector did indeed agree with our case and in allowing the appeal confirmed:

“The proposed dwellings would be modest in size and would be in keeping with the scale of built development in the area. Whilst the proposed properties would appear prominent on the corner plot, they would not be visually intrusive due to the separation with neighbouring properties. The highway junction and surrounding verges maintains visual relief within the built form.

The proposal, due to its size and positioning would not encroach on this visual gap and would not have a detrimental effect on openness. The proposed dwellings are sensitive in scale and would not appear as cramped or dominating features within the street scene or surrounding area.

...the proposed development would not have a harmful effect on the character and appearance of the surrounding area. These matters would not result in the proposal having a harmful effect on the surrounding environment including the living conditions of neighbouring occupiers. For the reasons set out above, the proposed development would accord with the development plan and therefore having had regard to all other matters raised the appeal should be allowed."

Importantly, we hope that the above examples demonstrate to the potential Case

Officer, that new houses which replace existing bungalow(s) have been accepted close to this application site, and equally that such new houses in place of bungalows can be developed, without detriment to the wider street – scene.

CONCLUSION:

So, this supporting Design and Access Statement is to be read alongside this planning application, and to demonstrate the proposed dwellings would accord with both National policy guidance in the form of the **National Planning Policy Framework (NPPF)**, the more local Adopted Development plan and the guidance set out in The London Borough of Hillingdon in **The Hillingdon Supplementary Planning Document (SPD), Design and Accessibility Statement (HDAS)**, entitled *Residential Layouts* .

To reiterate, we consider this particular site is also in an extremely sustainable location, as it is so close to 2 tube stations, which in turn offers a short trip to get into central London, whilst the High Street is a local – shopping frontage area, so with retail, educational, leisure, religious and other uses.

Therefore, also in accordance with the NPPF and Adopted Local Plan policies, this slightly more intense – density of residential development makes much better use of this urban site, where other “non – car” modes of (Public) transport are available.

Finally, we note the CIL contributions and ultimately we can confirm that the Applicant would agree to such CIL contributions as necessary, and those necessary and enforceable planning conditions, relating to such matters as the approval of materials, and this would accord with the advice contained in the Circular 11/95, *'The use of Planning Conditions'*.