

Environment and Community Services  
London Borough of Hillingdon  
3 North, Civic Centre  
High Street  
Uxbridge  
UB8 1UW

Our Reference: 300001

**Online**  
Via Planning Portal

5 October 2023

Dear Sir/Madam

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**Verve Planning**  
info@verveplanning.com  
www.verveplanning.com

Reg no. 11491335

**Planning Application**  
**Land rear of 32 Hallowell Road, Northwood, HA6 1DW**

We are pleased to submit, on behalf of H&JM Property Services Limited, a planning application for the residential redevelopment of the above site for 6 dwellings. The scheme proposals are described in more detail below.

This planning application follows pre-application advice received on 28 March 2023 (ref: 77806/PRC/2023/11) in respect of a similar form of development. Officers noted that the site is in an area where new development is acceptable in principle subject to compliance with relevant development plan policies. We explain below how the application proposals have been modified to address the pre-application comments with regards to design and amenity issues and therefore comply with policies.

The application is accompanied by the following information:

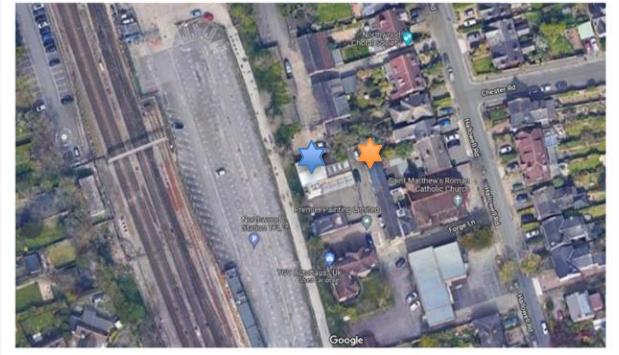
- The completed application forms;
- Completed Cil forms;
- Drawings, prepared by HFP Architects:
  - Location Plan;
  - Existing Site Plan L01/A;
  - Existing Workshop and Store Plans PD05/A;
  - Existing Mews building Plans and Elevations PD03/A;
  - Proposed Site Plan PD201/F;
  - Proposed Flat Plans, Elevations and Section PD202/G;
  - Proposed Dwelling Plans and Elevations PD04/B;
- Planning Statement (this letter)
- Transport Statement, prepared by Pulsar Transport Planning
- Tree Report and Appendices, prepared by SMW Consultancy Ltd
- Phase 1 Contamination Study, prepared by AP Geotechnics
- Application fee (paid to the Planning Portal).

**Site and Surroundings**

The application site is in the built-up area of Northwood, very close to Northwood Underground Station. The area contains a mix of uses including residential, industrial, storage, office, community and ecclesiastical. The site is located on land to the rear of Hallowell Road and comprises two distinct elements identified in the aerial image **below** from google maps:

Site 1      

Site 2      



#### Site 1 – former Northwood Autos site

This site is a vehicle repair centre and contains two linked workshop buildings, a smaller storage building and yard area. It is located to the rear of properties on Hallowell Road (to the east) and accessed via a road between 14 and 16 Hallowell Road. To the north are other commercial units known as 12-18 Whittles Yard with a day nursery beyond, to the east are the rear gardens of residential properties, to the south is a site known as Cooks Garage, Forge Lane and to the west is the surface car park of Northwood Station with the rail line some distance beyond. There are tall trees on the western boundary outside the site. See photo of Site 1 **right**:

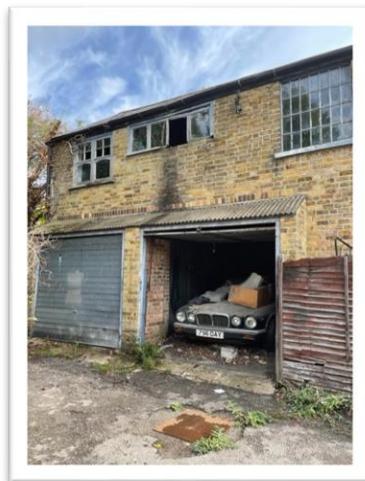


Vehicle Repair Garage (Site 1)

#### Site 2 – Part of Forge House

This is a smaller element of the overall site containing a Victorian building, used for offices on the first floor with ancillary storage. It comprises the end of a terrace, accessed via Forge Lane, known as Forge House. Other units in the terrace on the eastern side of Forge Lane comprise offices, the Presbytery and residential accommodation for St Matthew's Church (32 Hallowell Road). Further down Forge Lane is a three storey block of residential flats known as St Matthew's Court (granted permission in 2003).

See photo of Site 2 **left**.

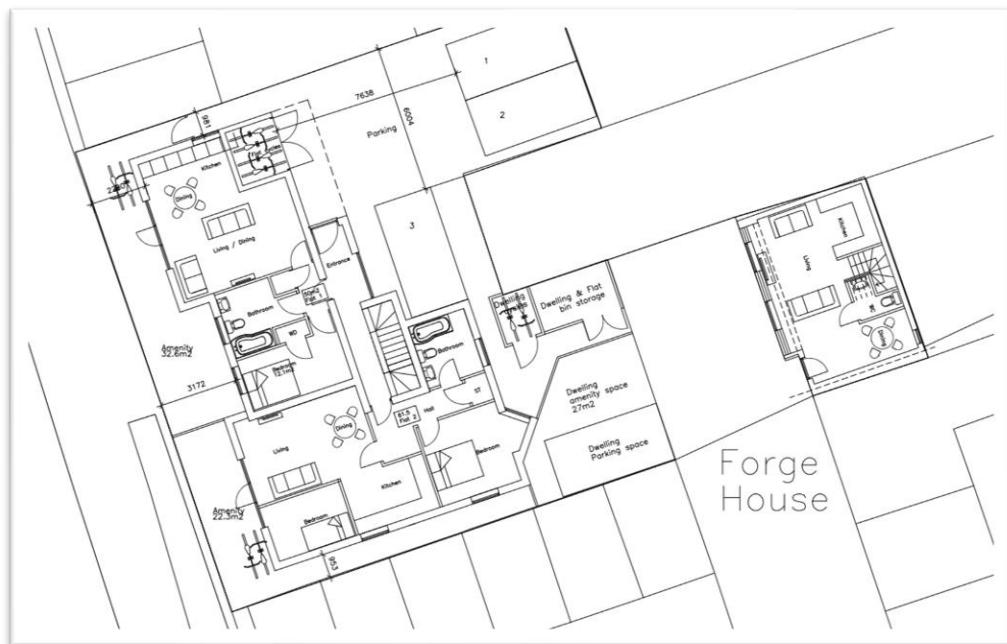


## The Proposals

Site 1 – It is proposed to redevelop the vehicle repair centre site and provide a 2½ storey residential building containing 5 flats (3x1 bed and 2x2 beds). Site 1 would have a contemporary design but with traditional features such as a hipped roof and brick materials. It includes 3 parking spaces, cycle spaces and refuse storage. The parking spaces are accessed from the north via the existing access drive into the site. Each dwelling would have amenity space either in the form of a ground floor garden or a balcony. Cycle and bin storage is also provided.

Site 2 - It is proposed to convert mews building into a two bedroom dwelling. It would retain the Edwardian appearance of the existing building, but the unattractive garage doors would be replaced with attractive windows. This property would have a dedicated amenity space, cycle storage for 2 cycles and a parking space – sited opposite the premises. The site would be accessed from the south via Forge Lane as per the existing situation.

The proposed overall site layout plan is below:



## Planning History

There is only limited planning history for the vehicle repair centre (Site 1) on the council's online planning database as follows:

| Reference       | Proposal                                       | Decision | Date       |
|-----------------|--|----------|------------|
| 14671/F/91/1183 | Increase in roof height to accept new car lift | Granted  | 24.10.1991 |

There is nothing recorded for the office/storage mews building in Forge House (Site 2).

There is other relevant planning history for Whittles Yard (north), Cooks Garage (south) and other nearby sites and these are discussed in the Planning Assessment section below.

## Planning Policy Context

This application takes account of the relevant policies contained within the Development Plan, comprising the London Plan (2021) and the Hillingdon Local Plan Part 1 Strategic Policies (2012) and Part 2 (Development Management Policies and Site Allocations (2020).

According to the council's adopted Proposals Map, the sites fall within the Old Northwood Area of Special Local Character (ASLC). Site 1 lies adjacent to the Northwood town centre boundary and Site Allocation SA16 (which relates to Northwood Station) to the west. The sites are on the boundary of Public Transport Accessibility Level (PTAL) rating of 2 and 3.

Whilst the Council is preparing a new Local Plan, this is currently at an early stage.

### Other Material Considerations

The National Planning Policy Framework 2021 (NPPF), National Planning Practice Guidance (NPPG) and Supplementary Planning Documents are important material considerations in the determination of planning applications.

We reserve the right to update this Planning Statement if the forthcoming changes to the NPPF are published and considered material to the determination of this application.

## Key Planning Considerations

The key planning considerations in relation to this application are:

- Principle of Development
- Heritage, Design and Character and Appearance
- Neighbouring Amenity
- Quality and Type of Accommodation
- Transport and Construction
- Trees
- Contamination

## Principle of Development

### Loss of Employment

The application site was last used for employment purposes, with Site 1 being used as a car repair workshop and Site 2 as an office with ancillary storage.

The NPPF 2021 (chapter 11) advises on making effective use of land to meet the need for homes, including promoting and supporting the development of land and buildings especially if this would help to meet the identified needs for housing where land supply is constrained and available sites could be used more effectively. It also advises that 'local planning authorities should take a positive approach to applications for alternative uses of land which is currently developed but not allocated for a specific purpose in plans, where this would help to meet identified development needs'. In particular, the NPPF advises at para 123 that local authorities should support proposals to:

*'(a) use retail and employment land for homes in areas of high housing demand, provided this would not undermine key economic sectors or sites or*

*the vitality and viability of town centres, and would be compatible with other policies in this Framework'*

As set out below, the application site lies within an area of high housing demand, would not undermine the economic function of the area and would be compatible with other policies in the NPPF.

As the proposals are for residential uses of employment sites, we have considered the scheme against London Plan Policies E2 and E7 (2021) and Policy DME2 of the Hillingdon Local Plan: Part Two - Development Management Policies (2020). The London Plan policies seek to resist the loss of employment sites with a particular focus on strategic sites. The application site does not fall within this category.

The local policy context is provided by the local plan. Local Plan Policy DME2 permits proposals which involve the loss of employment floorspace or land outside of designated employment areas if:

- i) the existing use negatively impacts on local amenity, through disturbance to neighbours, visual intrusion or has an adverse impact on the character of the area; or
- ii) the site is unsuitable for employment reuse or development because of its size, shape, location, or unsuitability of access; or
- iii) Sufficient evidence has been provided to demonstrate there is no realistic prospect of land being reused for employment purposes; or
- iv) The new use will not adversely affect the functioning of any adjoining employment land; or
- v) The proposed use relates to a specific land use allocation or designation identified elsewhere in the plan.

Policy DME2 is therefore a criteria-based policy which requires one of the criteria only to be met to address the policy. This is the approach taken by the council in determining other nearby applications (Whittles Yard and Cooks Garage) where loss of employment was an issue - as discussed below. The Policy does not require all five criteria to be achieved or for marketing evidence to be provided unless you are seeking to show that the scheme meets criteria iv).

#### Garage Site (site 1)

The site falls outside of a designated employment area. We would argue that parts i), ii) and iv) of Policy DME2 would be satisfied by the proposals as:

- the lawful use of Site 1 could cause conflict and noise and disturbance issues to residents due to its close proximity to existing and proposed residential properties. Its release for residential use would therefore remove this negative impact on the area and is supported by part i of the policy;
- Site 1 has a narrow and unsuitable access and is not well suited to access the lawful or any alternative employment uses – this was also the conclusion of previous Whittles Yard applications to the north that uses the same narrow access road, see below (part ii); and
- the proposal to change the use to residential would not adversely affect the functioning of adjoining employment land. The site is backland and in a predominantly residential area. Land to the north (Whittles Yard) is vacant and being promoted for housing and the site to the south (Cooks Garage) which is used for storage had permission for a day care centre (2019) and has more recently been promoted for housing (2021).

There have been two relatively recent decisions on employment sites adjacent to the application site where the council has taken a flexible approach to its application of

Policy DME2 for schemes that involved the loss of employment uses to residential. These applications were not required to provide marketing evidence and are explained further below:

- *Whittles Yard (adjacent to north)*

Although this application for the conversion of light industrial buildings to 6 residential units was refused in November 2022, the council did not refuse the application at Whittles Yard (ref: 77095/APP/2022/1530) due to the loss of the workshop employment use. The officer report for that application stated that that:

*'The proposed residential use would not impact on the viability of other employment land, as the site is a backland location located within a residential area. The site is currently vacant and the buildings at the site are in disrepair. The submitted Planning Statement states that "the location and size of the units have caused them to be difficult to market for light industrial workshops. Although attempts have been made to do this over the past twelve months". It is noted that no evidence has been submitted to substantiate the claim that the existing workshops have been marketed.'*

*Notwithstanding the above, Officers recognise that the site's narrow access, its location within a residential area and the internal footprint and layout of the workshop buildings would mean that these units are likely to be inappropriate for many businesses. Also, the layout of the site and its close relationship to neighbouring houses and gardens could provide opportunities for conflict between commercial and residential uses. The site does not fall within a designated employment area. It is considered that these factors reduce the weight of the harm resulting from the loss of employment proposed and the subsequent conflict with the Development Plan.*

*The use of previously development land for the creation of new residential accommodation is supported by the Local Plan, London Plan, and NPPF. It is considered that weight should be assigned to the benefits of using suitable brownfield sites for homes. Given the above, on balance, the proposed change of use would be acceptable in principle. As such, residential accommodation on this site would be acceptable in principle'.*

- *Cooks Garage (adjacent to south)*

Although the council refused an application at Cooks Garage in 2021 for residential development, they did not object to the loss of the employment site, presumably because the principle of the change of use from its lawful Class B8 storage use was established via a previous approval in June 2019 (Ref: 62125/APP/2018/3118) that allowed its change to a day care facility. For the 2019 application, the council did not object to the loss of the employment use as part iv) of the policy allows a loss where 'the new use will not adversely affect the functioning of any adjoining employment land'.

We would argue that the same approach should be applied to the redevelopment of the application site as its redevelopment would not harm other nearby employment uses; it is not within one of the council's designated employment areas; it is served by the same narrow accessway as Whittles Yard; the building is in a poor state of repair; and the site is in close proximity to residential properties which could lead to complaints from a noisy employment use.

Further, the council's Employment Land Study Update (2014) (ELS) advises at paragraph 8.1 that:

*'there is a total of approximately 383.9ha of land currently in active industrial use in LB Hillingdon (please refer to Table 2). Our demand forecast shows that there is projected to be a decrease in demand for industrial land of between 20.6ha and 16.3ha in the period 2013 to 2026. This is due largely to a forecast decrease in industrial employment as projected by the GLA'.*

Paragraph 8.2 provides policy recommendations on how to ensure an appropriate portfolio of industrial land is available to meet the boroughs future needs. This seeks to retain existing designated employment land such as SILs and LSISs, save for the partial release of some areas, and a list of non-designated clusters.

The application site falls outside of any of these areas, suggesting that a more flexible approach to changes of use/employment land release should be adopted, especially at underused sites. This follows through to the flexible approach adopted in Policy DME2. The loss of this car repair workshop for alternative uses would also align with the ELS conclusions that projected a decrease in demand for industrial land to 2026.

#### Mews Building (site 2)

The mews building (in Forge House) is also outside a designated employment area. Whilst previously used as an office, this building is run down, very small and in need of significant investment. We therefore consider a flexible approach to the application of Policy DME2 should be applied to bring this building back into beneficial use and improve its visual appearance.

We would argue that parts i) and iv) of Policy DME2 would be satisfied by the proposals as:

- the visual appearance of the existing building has been changed to the extent that it detracts from the character of the ASLC. A change of use to residential would allow for the renovation of the building to create a design more in keeping with the area (part i). The officer report for another application for a residential conversion in Forge House, approved in 2013 (ref: 62020/APP/2013/2704), stated that 'Originally it is likely to have been some sort of mews development and therefore the conversion to residential accommodation is acceptable in principle....';
- iv) The new use will not adversely affect the functioning of any adjoining employment land. The adjacent site (in Forge House) is an office which is compatible with a residential use; the site opposite forms the main part of the application site which is being promoted for residential; Cooks Garage further to the south is also being promoted for alternative uses (part iv).

Further, this office could be changed to residential using permitted development allowances under class MA of Schedule 2 the GPDO – it is vacant (a), it would be classed as an office (formally Class B1 now Class E) (b); it is less than 1,500 square metres; it does not form part of areas specified (d); it is not within the areas listed (e); and it is not occupied by an agricultural tenancy (f). This approach would not therefore require marketing evidence or other requirements of Policy DME2 to be demonstrated. However, as the applicant wanted to prepare a comprehensive scheme for the entire site, they decided not to pursue this option.

#### Conclusions on Loss of Employment

It is also of note that the application site lies within a sustainable location, benefitting from good public transport accessibility and within walking distance the town centre

and its local amenities. There is policy support at all levels to provide housing in urban areas. As with other applications nearby, we consider that weight should be 'assigned to the benefits of using suitable brownfield sites for homes'.

As the loss of employment policies have been addressed, then the principle of reusing the previously development application site for residential accommodation is supported by the Local Plan, London Plan, and NPPF.

### **Need for Housing**

The NPPF 2021 reconfirms the government's requirement to increase the delivery of new housing in sustainable locations. It acknowledges at paragraph 69 that small sites can make an important contribution to meeting the housing requirement in an area and they are often built out relatively quickly. Paragraph 120 advises that decisions should give substantial weight to the value of using suitable brownfield land within settlements for homes (c); support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained (d) and support opportunities to use the airspace above existing residential and commercial premises for new homes.

Importantly, the NPPF (2021) advises that decisions should apply a presumption in favour of sustainable development and that for decision taking this means approving development proposals that accord with an up-to-date development plan without delay.

The London Plan 2021 sets 10-year housing targets for net housing completions of 2,950 on small sites below 0.25 hectares in size across Hillingdon. This equates to 295 new dwellings per year. Increasing the rate of housing delivery from small sites is a strategic priority for the Mayor, who recognises that achieving this objective will require positive and proactive planning by boroughs both in terms of planning decisions and planning policy objectives. The proposals would make a small but important contribution towards meeting the Council's housing targets set out in the London Plan.

In view of the above, we consider that, in the overall planning balance, the council should support the principle of housing at the application site.

### **Heritage, Design and Character and Appearance**

The NPPF states at paragraph 203, that 'the effect of an application on the significance of a non-designated heritage asset should be taken into account in determining applications. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.'

Paragraph 126 of the NPPF (2021) seeks the creation of high quality, beautiful and sustainable buildings. Parts b) and c) of paragraph 130 of the NPPF (2021) states that planning decisions should ensure that developments are visually attractive as a result of good architecture and are sympathetic to local character and history, including the surrounding built environment. London Plan Policies D1, D3 and D4 require development proposals to be of high quality and to enhance the local context by delivering buildings and spaces that positively respond to local distinctiveness.

London Plan Policy HC1 requires developments affecting heritage assets and their settings to conserve their significance and be sympathetic to the assets significance and appreciation within their surroundings. Similarly, Local Plan Policy DMHB1 supports development proposals that sustain and enhance the significance of heritage assets, would not lead to a loss of significance or harm to an asset; make a positive

contribution to local character, relate appropriately in terms of siting, styles, scale, massing, height, design and materials.

Local Plan Policy DMHB5 requires development in Areas of Special Local Character, to reflect the character of the area and its original layout. The replacement of buildings which do not positively contribute to the character and local importance of Areas of Special Local Character are resisted.

Local Plan Policy BE1 seeks new development to enhance and contribute to the area in terms of form, scale and materials; is appropriate to the identity and context of the townscape; and would improve the quality of the public realm and respect local character. Policies DMHB11 and DMHB12 require high standards of design and for developments to integrate into areas.

#### Significance of ASLC

The site falls within the Old Northwood Area of Special Local Character which was designated in March 2005. The council's website states that 'there are 15 designated areas of special local character (ASLC) in Hillingdon. They are non-designated local heritage assets, which have a character and identity local residents value and the council wishes to preserve or enhance'. These areas are designated based on their local architectural, townscape or historic merits, as defined in the adopted Criteria for designating Conservation Areas and Areas of Special Local Character.

There is limited specific information on the council's website or in the Local Plan about the Old Northwood Area of Special Local Character (ASLC) in terms of its architectural, townscape or historic merits.

A Planning Inspector for an appeal in 2021 (APP/R5510/W/21/3281603) at the Cooks garage site noted that the ASLC 'is predominantly characterised by Victorian and Edwardian buildings and has an established mature and attractive character'. The Inspector also noted that the 'buildings of size, substance and significance generally adopted a traditional form and appearance, incorporating pitched roofs. They consequently contribute positively to the character of and appearance of the area'.

Similarly, the officer report (Nov 2022) for the Whittles Yard site application to convert and extend the existing light industrial buildings to provide 6 residential units (ref: 77095/APP/2022/1530) stated that 'in terms of character, the ASLC encompasses the early Victorian and Edwardian development of Northwood, prior to the later 20th century development to the north and north-west of the ward. It is an intimate area, with a tight urban grain comprising modestly sized buildings'.

#### Relevance of Application Sites to Significance

As part of the pre-application enquiry, the case officer requested that more information is provided on the existing workshop to be demolished (site 1) and the existing building mews building to be converted (site 2) in support of a forthcoming application.

A review of old maps indicates that in the mid 1860s the entire area was farmland probably associated with Kiln Farm. Later in the 1880 and 1890s after the railway had been constructed, the land associated with the application site remained undeveloped (as well as all land north and south of the site). Later, a map dated 1914 shows a number of buildings had been constructed including the housing on Hallowell Road to the east, Forge House (Site 2), and the eastern section of Whittles Yard (to the north). The 1914 map also identifies land that now forms the car park to St Mathew's Court as a smithy, which appears to include the buildings known as Forge House, Cooks Garage and the land associated with Site 1. By the late 1930s, St Matthew's RC church had been constructed along with buildings at the western end of Site 1 and the

western buildings on Whittles Yard. Access to Site 1 and the mews house is from the south at this stage.

The yard area for Site 1 was formally the end part of rear gardens of Nos 20 and 22 Hallowell Road and access from the north appears to have been added later. From this review, we can deduce that Forge House dates from the early 1900s whereas the buildings on the main Site 1 date from a much later period.

**Site 1** – the existing workshop building comprises a modern large floorplate, industrial structure, with the rear (western) section redeveloped with an increased height in the 1990s. It makes little contribution to the character and importance of the ASLC save for its pitched roof and being part of the 'tight urban grain'. We consider its demolition and replacement with a suitably designed building should be regarded as acceptable.

**Site 2** – is an original Edwardian building with many original features, although it has been altered (and harmed) by the insertion of modern garage doors. It is in a poor state and would benefit from significant renovation.

The design officer for application 62020/APP/2013/2704 which related to the conversion to residential of another one of the mews properties in Forge House (41 Forge Lane) advised that it:

*'... forms party of a modest terrace dating from the turn of the century constructed in yellow London Stock brick with slate roof. It is situated within the Old Northwood Area of Special Local Character (ASLC). Although altered, this is an unassuming terrace, retaining many original attributes including its continual slate and red ridge roof and 'low-key mews-like' cottage appearance....'.* And that

*'As stated above, the existing terrace is modest, unassuming if somewhat altered. Nevertheless, it retains much character, plan-form and the opportunity should be taken to improve its appearance. Originally it is likely to have been some sort of mews development and therefore the conversion to residential accommodation is acceptable in principle....'.*

#### Heritage Assessment

**Site 1** – the pre-application scheme has been revised with reduced height so that the top floor of the proposed development is now set within the roofspace to reduce the massing of the development. The scheme is therefore reduced to 2.5 storeys in height and would not be visible from Hallowell Road. As the site is backland and next to the station car-park, an increased height to the existing building should be considered appropriate. There is no real justification to require the building's existing footprint to be adhered to (as the building is not an original Victorian or Edwardian feature). That said, the proposal's footprint has been pulled away from the southern boundary by 0.95 metres and from the western boundary by 3.2 metres to respond to comments of officers. Although it has a different layout, the footprint of the proposal is smaller than the existing footprint [150sqm versus 134sqm]. The roof would have a traditional hipped appearance with a number of small flat roofed dormers and a tile covering. The walls would have a brick finish.

The proposal's scale and traditional form and appearance would therefore correspond with many of the townscape features of the ASLC in terms of siting, style, scale, massing, height, design and materials. The same design approach has previously been approved at the residential site known as St Matthew's Court, 1 Forge Lane (to the south). The proposed residential building has a similar scale, form, layout and materials to the development at St Matthews Court, which is in the ASLS, brick built, 2.5 storeys and has a pitched tiled roof.

We consider the proposal would be of an appropriate scale and design and would make a positive contribution to and preserve the character and local importance of the ASLC. The proposals at Site 1 would not therefore harm the significance of the heritage asset in accordance with Local Plan policies DMHB1 and DMHB5 and the NPPF.

Site 2 – the proposed conversion to a dwelling would retain the ‘modest, unassuming’ nature of the terrace as no extensions are proposed. The proposal does involve removing the unsightly garage doors, which currently detract from the character of the host building and the ASLC, and replacing them with traditional fenestration/door in keeping with the building. The remainder of the building would be updated to provide traditional window and door openings and replacement tiles that relate well to the local character. Overall, therefore, we consider that the proposed conversion and significant investment would make a positive contribution to and enhance the significance of the host building and the significance of the ASLC, in accordance with Local Plan policies DMHB1 and DMHB5, London Plan Policies HC1, D1, D3 and D4 and the NPPF.

### **Residential Amenity**

Local Plan Policy BE24 states that the proposals should protect the privacy of the occupiers and their neighbours. Policy DMHB 11 states that development proposals should not adversely impact on the amenity, daylight and sunlight of adjacent properties and open space.

The scheme has been designed to ensure that the amenity of nearby residents on Hallowell Road is maintained and that there is an acceptable relationship between residents in the converted mews and the new residential building.

The pre-application response advised that property adjoins a car park to the west and backland garages or parking spaces to its north and south such that there would be limited impact to the immediate surrounds. It also advised that the proposed three storey building would be sited a minimum of approximately 24m from the rear of the dwellings fronting Hallowell Road – 21 metres being the separation distance noted in the local plan to maintain privacy. It also advised that the ‘proposed three storey building should not have an unacceptable impact on the amenity, daylight and sunlight of the rear gardens of adjacent properties’. Officers were though concerned the distance between the new building and the mews building would cause occupiers to overlook each other leading to a loss of privacy.

As with the pre-application scheme, the proposed development on Site 1 is set in from the eastern boundary so that the first and second floor habitable rooms are some distance from the rear habitable rooms of 20-24 Hallowell Road [25-28 metres]. The bedroom windows on the ground and first floors on the eastern elevation of Flats 2 and 4 have been angled so that they do not directly overlook the mews property or its amenity space to respond to the officers’ previous concerns. The other first floor window (facing east opposite the mews) serves a bathroom on the first floor and the top floor recessed dormer (opposite the mews) would not be able to look directly into the garden or windows of No. 24 due to the mews being positioned between. The mews property faces west and there are no proposals to insert new windows on the eastern (rear) elevation. The existing rear ground floor window on the mews would be retained and obscure glazed.

Other windows on the upper floors facing east (towards the rear of Nos 20 and 22 Hallowell Road) not only have a significant distance of 25/28 metres between habitable rooms, but also serve either bathrooms or are secondary windows.

In terms of possible noise/vibration from the underground line, given the distance from the site we consider it unlikely that it would result in any harmful effects on future residents.

Overall, we consider that there would not be harm to existing or future occupiers and the scheme would accord with Local Plan Policies BE24 and DMHB 11.

#### **Quality and Type of Accommodation – size, amenity space and unit mix**

The dwellings have been designed to provide high quality accommodation, each unit complying with the London Plan minimum space standards and the Nationally Described Housing Standards for dwellings.

Local Plan Policy DMHB18 requires new residential development and conversions to provide good quality and usable private outdoor amenity space. Table 5.3 of the policy indicates that it should be 20sqm for 1 bed flats and 25sqm for 2 bed flats, with upper floors having access to private balconies. The Hillingdon outdoor amenity space standards are considerably greater than the London Plan standards (which are 5sqm per 1-2 person dwelling with an extra 1sqm for each additional occupant).

As this is a backland, flatted development, the Local Plan requirements are difficult to achieve for all units, but the scheme does adhere to the more recent London Plan standards. The proposed gardens on ground floor flats of site 1 have a suitable shape, aspect and siting being broadly rectangle, west facing and positioned to the rear. They measure 32.6sqm and 22.3 sqm. The units on the first floor have west facing balconies measuring 7sqm. The mews building (Site 2) has its own separate amenity area positioned opposite the dwelling, which measures 27sqm.

We maintain the view that the proposed layout and size of the private amenity space would be entirely in keeping with prevailing grain of development in the immediate area. Whilst the scheme does not fully adhere to the council's amenity space standards, we consider that for a backland, centrally located site the council should apply flexibility to the space standards bearing in mind they all comply with the London Plan.

In terms of the unit mix, Policy H10 of the London Plan and Policy DMH 2 of the Local Plan seek a mix of housing units reflective of identified need. The pre-application advice from officers stated that 'Given the location of the site, a short walk from Green Lane Northwood district town centre and Northwood Underground Station, the proposed housing mix could be supported by the Council'. The current application proposes a similar mix of 1 and 2 bed units and therefore should be supported by the council.

#### **Transport, Access and Servicing Arrangements**

According to TfL's WebCAT tool, the site has a PTAL rating of 2. The transport consultant has undertaken a manual calculation which confirms the mews dwelling would have a PTAL of 2, but that the flats would have a PTAL of 3, given the slightly shorter walk to local public transport facilities.

The proposed development provides 4 parking spaces, of which three would be allocated to the flats and one would be allocated to the mews house. This accords with the London Plan parking standards set out in Table 10.3, which the council confirmed in the pre-application advice that they are using to determine applications. The pre-application feedback advised that 5 spaces for 7 dwellings was acceptable and so it follows that 4 spaces for 6 dwellings should also be acceptable.

As per the London Plan, 20% of spaces will have active electric vehicle charging (EVC) facilities and 80% would have passive EVC infrastructure. This equates to one bay with active EVC capability. This can be controlled by planning condition.

The access for the mews parking spaces is via Forge Lane to the south. The three spaces for the flats are accessed via the access road between 14/16 Hallowell Road and then through Whittles Yard to the north, as per the current arrangements. The proposal would result in a significant reduction in traffic movements and noise generation from the vehicle servicing centre which should be regarded as beneficial in terms of the relationship with neighbouring sites, especially as the owners of Whittles Yard are seeking to convert the units to residential.

Swept path analysis has been undertaken for the proposed car parking at the development. The resulting drawings, Drawing 22122/TR002 and 22122/TR003 are shown at Appendix C of the Transport Statement. These demonstrate the successful access and egress of a car into the proposed spaces.

Cycle spaces can be included in line with the London Plan along with appropriate refuse storage. The refuse and recycling storage for the development can be serviced as per the existing situation.

The submitted Transport Statement confirms that:

*'In conclusion, and on the basis of the above, the proposed development is considered to be acceptable in transport terms and the cumulative residual transport impacts of the proposal are likely to be minimal. The proposal would comply with national, London-wide and local policy'.*

### **Trees**

There are no trees on the site but there are trees on parts of the eastern and western boundary.

A Tree Report has been submitted as part of the application. This confirms that of the six trees survey, Trees T1, T2 and T3 have Ash Dieback disease resulting in an extremely limited life expectancy. The report advises that these should be removed and should be discounted from the assessment. Tree T4 (John Downie) is located in the centre of the rear garden of No.22 and T5 (Black Italian Poplar) and T6 (Black Italian Poplar) are located within the Underground Station car park (to the west). The report advises that there could be some impact on these trees, but this is considerably mitigated by the presence of existing building foundations by T4 and the large expansive concrete parking surface for the present garage servicing buildings (T5 and T6).

The report advises that standard tree protection fencing is installed, and further investigations could be useful to agree a foundation solution. This can be controlled by condition.

### **Contamination**

Policy DMEI 12 of the Local Plan indicates that proposals on potentially contaminated sites should be accompanied by an initial study of the likely contaminants. Given the previous use of the site, a Phase 1 contamination study has been prepared by AP Geotechnics. This confirms that:

*Information obtained during the course of this assessment has indicated there to be a low to moderate risk of significant contamination from on site and off site uses. The gas risk is considered to be low.*

### **Sustainability and Energy**

Policies SI 2 of the London Plan and DMEI 2 and DME1 10 of the Local Plan require developments to contribute to minimising the effects of climate change. As with other minor applications, an Energy / Sustainability Statement can be requested as a planning condition.

### **Conclusion**

The proposal provides an excellent opportunity to make better use of this sustainable site in the urban area. It would deliver much needed residential properties in line with the aspirations of the Local Plan, London Plan and NPPF.

The proposal would create a high-quality redevelopment of sites not well suited for continued employment use and would provide much needed homes without harming the character of the area, neighbouring residential amenity or have any transport implications.

If you require any further information, then please contact us.

Yours faithfully



Helen Greenhalgh

Enc: As listed on page 1  
Cc: James Murphy