

PLANNING AND DESIGN AND ACCESS STATEMENT

Land to the Rear of Midas Industrial Estate

Introduction

This planning and design and access statement is submitted in support of a full planning permission proposing to demolish the existing 20 garages on the site and construct 6 new units within 2 new buildings.

Site Location and Character

The sites' location is described as 'land to the rear of Midas Industrial Estate' and consists of 20 single storey garages and 7 parking spaces. West of the site is the Midas Industrial Estate; east is the two storey residential properties 40-49 Cowley Mill Road and to the north are the 3- storey blocks of flats in Hilton Close. According to the approved committee report the site is within an Air Quality Management Area, therefore an Air Quality Statement has been submitted and the site is within an Archaeological Priority Zone and Flood Zone 1.

The character of the buildings which surround the site vary and this is to be expected due to the different uses. The industrial buildings are as they would be expected and bear the appearance of large industrial sheds. The sheds are the equivalent of two stories in height but vary in design; some have flat roofs and others are pitched. There are 3 storey flatted blocks to the north of the site which are brick built with gable ended roofs. These properties do not have any private amenity space. West of the site are two storey properties, numbers 40-49 Cowley Road. These are terraced, two-storey houses, which have been extended significantly to the rear and the upper floor levels.

Proposal

The proposal consists of the demolition of the existing garages and the construction of 6 flats comprising of 2 x 3-bedroom and 4 x 2-bedroom flats with private amenity space and parking.

Planning History

Application reference 77822/APP/2024/442 was approved on 21/11/2024. The application received planning consent for the demolition of the existing garages and construction of 2 x 4-bedroom houses with private garden space and parking.

Principle of Development

The proposal seeks to demolish 20 existing garages and construct 2 x 3-bedroom flats and 4 x 2-bedroom flats on the site. The principle of this development is considered to be in line with national, regional, and local planning policies that aim to promote the efficient use of land, improve housing provision, and enhance the sustainability of urban areas.

The current permission on the site establishes the principle of a residential redevelopment of this site as being acceptable.

National Planning Policy Framework (NPPF) 2024

The NPPF, particularly in Paragraph 60, highlights the government's commitment to significantly increasing the supply of homes. It sets out the need to provide a sufficient supply of homes to meet the needs of present and future generations. In line with this, the proposal will contribute to meeting housing targets by redeveloping an underused and unsustainable site (the existing garages) for residential use.

Paragraph 119 of the NPPF also emphasizes the importance of making effective use of land, particularly in areas with high levels of demand for housing. The site in question is located in a residential area, and the proposed redevelopment aligns with these objectives by increasing the density of housing in a sustainable location, close to existing amenities, public transport, and local services.

Moreover, Paragraph 124 promotes high-quality design that is reflective of the local context. The design of the flats will integrate well into the surrounding built environment, respecting the scale and character of the area while also providing modern, well-designed living spaces.

The London Plan (2021)

The London Plan (2021) promotes sustainable development and effective land use, which aligns with the objectives of this proposal. Policy H1: Increasing Housing Supply, sets a target for boroughs to deliver more homes, and this development would contribute positively to meeting housing needs in the London Borough of Hillingdon.

Policy H2: Small Sites encourages residential development on small sites, particularly where they are within easy reach of public transport and local services. This site is well-connected to local bus routes and is within walking distance of the nearest railway station, thus fulfilling this policy's objectives.

Policy D6: Housing Quality and Standards emphasizes the need for well-designed, well-located housing that provides a high standard of living. The proposed flats are designed to meet these high standards, offering generous floor areas, appropriate amenity space, and the integration of sustainable design principles.

Hillingdon Local Plan Part 2 (2020)

The Hillingdon Local Plan Part 2 (2020) provides further guidance on housing delivery, land use, and design principles within the borough.

Policy DMH 1: Residential Development emphasizes the importance of developing underutilized sites, such as garages, for residential purposes. The proposal will transform a redundant garage block into high-quality, much-needed housing, supporting the borough's aim to enhance residential provision.

In terms of character and design, **Policy DMHB 11: Design of New Development** requires new buildings to complement the character of the local area and respect surrounding architecture. The proposed development will be designed to blend with the surrounding residential context, ensuring a cohesive and attractive addition to the streetscape.

Having regard for the recent permission on the site, the proposal does not seek to introduce a new use on the site and demonstrates further optimisation of a brownfield site to provide additional housing which is supported by the NPPF and the London Plan.

The proposal would result in a minor uplift in the number of units to be built out, increasing local housing stock, whilst also retaining the 2 family sized properties that were secured by the recent submission. It is

understood that this would be a recognised benefit as the Officer report indicates that there is a need for additional family sized residential properties.

Although there is a slight increase in density, the density of development is not normally applied to smaller sites according to Policy H2 of the London Plan. A design-led approach has been taken to compiling an application which meets the design policies but also optimises the sites potential for housing delivery.

Design

Policy D1: London's Form and Characteristics

This policy focuses on the overarching approach to London's urban form. It requires that development proposals contribute to the creation of high-quality, inclusive, and sustainable places. The development should be well designed and integrated with its surrounding area, respecting local character, enhancing legibility, and reinforcing the identity of the area. Proposals should be designed to integrate with the public realm, create a positive sense of place, and consider the needs of diverse communities.

Key Principles:

- Support for well-designed and integrated developments.
- Enhancing local character and providing high-quality environments.
- Integrating development into the wider urban fabric.

Policy D3: Optimising Site Capacity through Design-led Approach

Policy D3 requires that the design of new development should seek to optimise site capacity. This means considering how the development can best meet housing and space standards, ensuring a mix of housing types, and incorporating high-quality design features. Developers are expected to work with local planning authorities to ensure that proposals are compatible with surrounding areas in terms of scale, height, and form.

Key Principles:

- Optimising housing density without compromising quality.
- Integrating new developments into the local context.

- Adopting a design-led approach to maximise the potential of the site.

Policy D4: Delivering Good Design

This policy emphasizes the need for new developments to be of high design quality. It requires development proposals to meet or exceed the design quality expectations set out in the London Plan. Key considerations include the need for appropriate massing, scale, and layout, as well as the integration of environmental sustainability measures. High-quality materials and careful attention to detailing are also encouraged to create a visually attractive built environment.

Key Principles:

- Delivering designs that improve the built environment.
- High-quality architecture, materials, and finishes.
- Sustainable, climate-responsive design solutions.

Policy BE1: Management of Development

Policy BE1 focuses on achieving high-quality design and placemaking. It sets out the requirements for the design of development proposals, ensuring that they respond positively to their context, contribute to local character, and meet the needs of local residents. Proposals should incorporate sustainable design principles, promote biodiversity, and be sympathetic to the scale, massing, and density of the area.

Key Principles:

- Ensuring high-quality design and visual coherence.
- Responding positively to local context and character.
- Promoting sustainability and environmental performance.

Policy DMHB 11: Design of New Development

This policy ensures that new developments are designed to respect and enhance the character of the area. Developments should be of a scale, massing, and height that is appropriate to the site's context, and they should incorporate high-quality architectural design. The policy also emphasizes the importance of functional, accessible, and safe design solutions for both the public realm and individual buildings.

Key Principles:

- Developments should respect the character of the area in terms of scale and appearance.
- High-quality design that is inclusive and accessible.
- Sustainable design solutions to reduce environmental impact.

Policy DMHB 12: Residential Extensions and Alterations

Policy DMHB 12 ensures that residential extensions or alterations are designed to enhance the appearance of properties and maintain the character of the area. Extensions should not have an adverse effect on the amenities of adjoining properties, including considerations such as daylight, sunlight, privacy, and noise. The policy also stresses the need for well-designed and proportionate alterations that complement the existing structure.

Key Principles:

- Ensuring extensions and alterations are in keeping with the surrounding character.
- No adverse effects on neighbours' amenities, including privacy and light.
- Use of high-quality materials and designs for alterations.

The design has been based on the site layout and scale of the consent for the 2 new houses which was granted in 2024. The two houses were substantial enough in footprint that only a modest increase in the footprint of the buildings has been required to afford a 3-bedroom flat within the ground floor of both new buildings. In reviewing the local design policies DMHB 11 refers to the need to ensure that proposals safeguard the potential redevelopment of neighbouring sites which could come forward for redevelopment in the future. Careful consideration has been given to the relationship the new buildings would have with the Midas Industrial Estate which in order to protect its value and safeguard the site potential for redevelopment in the future should there be a proposal for this.

Although the buildings are proposed to be 0.3 closer to the boundary line than the 2 houses which have planning consent, there are no transparent habitable room windows in the rear elevation which would require a 21-separation distance to be achieved on the Midas Industrial Estate site should it come forward for

redevelopment.

Although there is a modest and potentially de-minimis increase in the footprint of the buildings the height of the buildings would not be increased above the height of the approved houses. The approved houses measure 8.6 metres to the top of the ridge and the proposed two new buildings would also measure 8.6 metres in height to the top of the ridge. There is a change in the roof form and this allows for additional accommodation to be provided within the roof space for the 2 x 4-bedroom properties.

We have reviewed the local character and there is a mix of roof forms within the area. The properties that front Cowley Mill Road are designed with half hipped roofs which are the same as the roof form proposed in this application. There are also properties (40-49 being a relevant example) that feature front dormers; the same as the design of the two proposed buildings. The flatted block to the north of the site features gable ended roofs which are three stories in height. The two proposed buildings would be more intimate in scale as the height would be below the three stories to the north; the bulk and mass would also be less than the flatted block to the north.





The design draws from the design of the properties within the local area and the buildings have been designed to fit within the envelope and parameters of the recent consent on the site. This would not result in harm to the street scene. It could be argued that as a back land site it will form a character of its own and the design has drawn from the features of local properties in order to integrate better than the two approved properties.

Policy DMHB 11 aims to safeguard the amenities of neighbouring properties by ensuring that new developments are carefully designed to avoid adverse impacts such as overshadowing, loss of privacy, and overlooking. The policy promotes a thoughtful, context-sensitive approach to development, balancing the need for new housing and urban regeneration with the protection of the quality of life for existing residents. Through careful consideration of massing, scale, and layout, the policy ensures that new developments integrate smoothly into the existing built environment without compromising the living conditions of neighbouring properties.

The separation distances between the new buildings and the rear of the properties in Cowley Mill Road meet the minimum separation distance requirements as set out in the Local Plan. The separation distances between the new building in the north end of the side and the windows in the elevation of the 3-storey block to the north would be maintained in line with the approved application. The only difference is the inclusion of a secondary side facing window which would be a small window to provide additional light into the kitchen and living spaces. Planning policy requires neighbour privacy to be maintained and a 21 metre separation distance

is used as a guide. This policy is relevant to primary habitable room windows. The proposed windows in the side elevation are not primary habitable room windows and their sole purpose is to add additional light into the kitchen and living room areas. The main habitable room windows are to the front of the buildings. Although we do not see a requirement to obscurely glaze the window should this be required then a condition could be added.

As the layout is almost identical to the approved application and the heights of the buildings remain the same as the approved application there is no increase in the potential loss of light or overshadowing of neighbouring buildings above that which was deemed acceptable by the Council when recently approving the two residential properties.

The London Plan (2021) outlines various policies and standards that guide the design and layout of new housing to ensure quality living environments for residents. The key policies related to housing standards are:

Policy D6: Housing Quality and Standards

Policy D6 sets out the essential housing quality standards that all new residential developments must meet.

Key elements of this policy include:

1. Minimum Space Standards:

The policy adheres to the Nationally Described Space Standards (NDSS) for new dwellings. These standards set minimum internal floor areas for different types of residential units. For example:

- A 1-bedroom, 2-person flat should have a minimum of 50 m² of internal space.
- A 2-bedroom, 3-person flat should have a minimum of 61 m² of internal space.
- A 3-bedroom, 5-person flat should have a minimum of 86 m² of internal space.

These standards ensure that flats are spacious enough to meet the needs of residents.

2. Layout and Functionality:

The layout of new residential units should be functional and adaptable, ensuring that rooms are of a practical size and can be used for a variety of purposes

Key living areas, such as living rooms, kitchens, and bedrooms, should be well-proportioned to allow for comfortable living.

3. Natural Light and Ventilation:

All homes should be designed to maximize natural light and ensure adequate ventilation. This is achieved through appropriate window sizes and placements.

Glazing and window-to-room ratios should be optimised to improve indoor environmental quality.

4. Private Amenity Space:

Residential units should include private outdoor amenity space, such as balconies, terraces, or gardens, where possible. The minimum requirements for amenity space are:

Private outdoor space of at least 5 m² for 1-2 person dwellings and 1 m² for each additional occupant (up to a maximum of 10 m²).

This ensures that residents have access to external spaces for recreation, relaxation, and social activities.

5. Accessibility:

New housing developments must be designed to be accessible and inclusive, ensuring they meet the needs of people with disabilities.

A significant proportion of homes should meet Building Regulation Part M4(2) standards for accessible and adaptable dwellings, and M4(3) standards for wheelchair-user dwellings where appropriate.

6. Storage:

Sufficient storage space must be provided within each dwelling for general storage, as well as specific storage for items such as bikes and prams.

The standards specify the minimum floor area for storage within individual units, as well as guidance for communal storage areas in multi-unit developments.

The Hillingdon Local Plan (2020) also includes several policies to ensure that new housing developments provide a high standard of accommodation. Key policies relating to housing standards are:

Policy DMH 3: Residential Amenity Space

This policy sets out the requirements for private and communal amenity space for residential developments.

The key provisions include:

1. Private Amenity Space:

For flats, the policy requires a minimum of 5 m² of private outdoor space for 1-2 person dwellings and an additional 1 m² for each additional occupant, in line with the London Plan. For example, a 2-bedroom flat with 3 occupants would need at least 6 m² of private outdoor space.

For houses, private garden space should be provided, with an emphasis on providing usable, well-designed outdoor space.

2. Communal Amenity Space:

In developments of multiple units, especially flats, there should be adequate communal amenity space that can serve as an additional recreational area for residents.

This space should be designed with flexible, useable layouts that accommodate a range of activities for residents of all ages.

Policy DMHB 11: Design of New Development

This policy establishes standards to ensure that new housing developments meet good design principles, providing functional and attractive living environments. The policy addresses several factors that contribute to housing quality, such as:

1. Internal Space Standards:

Residential units should meet appropriate internal space standards, ensuring that rooms are of a functional size. The policy aligns with the principles of the Nationally Described Space Standards (NDSS), ensuring that units are spacious and provide a high level of comfort for residents.

2. Natural Light and Ventilation:

The design of new homes should incorporate adequate natural light through properly sized windows and appropriate orientation to ensure that all habitable rooms are well-lit.

Ventilation is also a key consideration, with the policy requiring that developments provide adequate means of cross-ventilation for all rooms to ensure a healthy indoor environment.

3. Accessibility and Adaptability:

The policy supports the provision of accessible and adaptable homes, particularly for people with disabilities.

Developments should meet Part M of the Building Regulations, ensuring that homes are adaptable to the changing needs of their occupants.

A proportion of homes should be designed to be wheelchair accessible (M4(3)), ensuring inclusivity for all residents.

4. Privacy and Overlooking:

The policy ensures that privacy for both new and existing residents is maintained, preventing excessive overlooking or the creation of uncomfortable living conditions. The layout of new developments should avoid placing windows that directly overlook the private spaces of neighbouring homes.

Each of the new flats has been designed to meet the London Plan minimum space standards which are apparent within the Local Plan Part 2. The nationally described space standards for each of the rooms has also been complied with.

In terms of amenity space, the ground floor 3-bedroom flats would have access to ground floor amenity space at both sides of the property and this exceeds both the minimum local plan and London Plan standards.

The upper floor units have been designed as duplex units which is supported in the London Plan. While the London Plan (2021) does not contain a policy exclusively dedicated to duplex units, various sections support the development of duplex and maisonette units within the broader framework for optimising site capacity, increasing housing supply, and providing a range of housing types. Policy D3 and Policy H2, in particular, highlight the role of innovative housing forms like duplex units in achieving higher-density, designed development on small and medium sites.

Each of the two-bedroom flats would have access to private amenity space in the form of a balcony which complies with the London Plan standards. All habitable room windows are served by at least 1 window which will enable good daylight and sunlight and natural ventilation for all of the flats.

Overall, the proposal provides good quality and accessible accommodation which exceeds the minimum policy standards.

Highways

A Transport Assessment will be submitted with this application and that will provide a more detailed assessment of the highway related matters. In summary the proposal for 6 units on this site would result in a significant decrease in the number of traffic movements when compared with the existing use of the site. 6 car parking spaces are proposed for future residents of the flats and this accords with the maximum parking standards in the London Plan.

The previously approved Officer report refers to a legal agreement for a contribution towards a future parking management scheme as the site is within a non PTAL rated area. Although we do not consider this necessary, the applicant will enter into a Unilateral Undertaking at their cost to ensure that this contribution is retained if required.

Flooding

The flood mapping data reveals that the site is in Flood Zone 1 which means that there is an extremely low-level potential for flooding in a 1-to-100-year scenario. No flood mitigation measures were secured in the existing consent. The site is heavily dominated by hard surfacing and the proposal would result in a significant increase in soft landscaping which is a natural form of attenuation. This combined with the low-level flooding probability and the area to be built upon for the new buildings only extending modestly above the consented layout, results in the same level of potential flooding as the approved application.

Air Quality

Similar to transport an Air Quality Technical Note has been prepared and this is a more detailed assessment of AQ matters. In summary the proposal would result in a net decrease in vehicle trips and this would have a positive impact on air quality. This was the conclusion reached by the Council when approving the recent application.

Conclusion

This planning application proposes the demolition of 20 existing garages and the construction of 6 new flats, consisting of a mix of family-sized accommodation, designed to meet the needs of modern living. The proposed development is in full alignment with national, regional, and local planning policies, particularly those that encourage the efficient use of land, the delivery of high-quality housing, and the provision of family-sized units in sustainable locations.

The design of the development has been carefully considered to ensure that it integrates seamlessly with the surrounding area, respecting the local character and maintaining the visual cohesion of the streetscape. The proposed flats offer spacious, well-lit, and functional living spaces that meet or exceed current housing quality standards, with ample provision for private amenity space for all future residents.

This development will make a valuable contribution to addressing the local housing need, particularly in terms of family-sized units, which are in high demand. By redeveloping an underutilized site and providing much-needed new homes, the proposal aligns with strategic objectives to increase housing supply and promote sustainable development within the borough.

In conclusion, the proposal will deliver a high-quality residential development that contributes positively to the local community, enhances the area's character, and supports the borough's housing targets. We respectfully request that this application is granted planning permission in light of the significant planning benefits it offers.

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