



Planning Statement

Upwards extension to create 3 flats
AT
74-76 Cromwell Road,
Hayes UB3 2PS

Reference:
74CR-3013

Date:
9 June 2026

1. Introduction

- a. This Planning Statement has been prepared by Just Planning on behalf of Mr Opinder Chahal to support a planning application for an upwards extension to the existing block of flats at 74-76 Cromwell Road, in Hayes.
- b. Following a description of the site and surrounding area, the report will consider the planning history, provide an overview of relevant planning policy and outline the case for the proposal.
- c. The revised application responds directly to the council's reasons for refusing a previous application (reference: 78264/APP/2023/2626) for a similar development at the same site and demonstrates that the new proposal complies with the relevant policies of the Hillingdon Local Plan, the London Plan (2021) and the National Planning Policy Framework (NPPF).

2. Site Description

- a. The application site comprises an existing two-storey block of 8 flats on the eastern side of Cromwell Road, in Hayes. The building dates from the 1950s and is constructed in facing brick with a flat roof. It has a simple, functional appearance, as shown in the image in figure 1, below.



Figure 1: Image of the application property.

- b. There are undercroft openings on each side that provide access to the rear, though only the northern opening is currently used for vehicle access. There is a wall along the front boundary, and the front curtilage is laid to hardstanding.
- c. The building has a T-shape, with a two-storey rear projection that is set in from both sides, as shown in the satellite image in figure 2, below.



Figure 2: Satellite image of the application property and immediate surroundings.

- d. Access to the existing flats is via an entrance and staircase between the main part of the building and the rear projection. To the rear of the main building is hardstanding with parking and two rows of garages.
- e. The site adjoins traditional two-storey houses to either side, one of which (number 78) has recently been extended by way of a hip-to-gable roof extension and rear dormer (not shown in figure 2, above). To the rear are playing fields associated with Rosedale College.
- f. The immediate surrounding area is predominantly residential and suburban in character, with pitched roofs and a varied roofscape.
- g. The site has a public transport accessibility level (PTAL) of 1b, indicating poor accessibility by public transport.

3. Relevant Planning History & Application Proposal

- a. On 1 November 2023, the council refused planning permission for the following development at the site (reference: 78264/APP/2023/2626):

Erection of an additional second floor to block of flats to create new 3 self-contained residential units with associated refuse, car parking and cycle facility.

- b. The application was refused for the following reasons:

- 1. The proposal, by reason of the introduction of railings and a roof terrace at eaves level along the road frontage, would appear as an unduly incongruous feature in this traditional residential street scene and its use would be detrimental to its character.*
- 2. The proposal failed to demonstrate that the neighbouring properties within the existing block would not be adversely impacted by the loss of sunlight and daylight, to the detriment of residential amenity.*
- 3. The proposed access and parking arrangements would result in the inappropriate intensification of use of the existing substandard undercroft vehicular access and would fail to provide adequate manoeuvring space to allow ease of access to the two new parking spaces in front of the building.*
- 4. The proposal would result in the provision of substandard residential accommodation by failing to provide an appropriate amount of private amenity space for the new units.*

- c. The officer's report accompanying that refusal confirmed that the proposal was acceptable in principle and that the council accepted the creation of a new second floor set back from the sides of the roofs. Its design concerns related to the front railings.
- d. The current application updates the previous proposal in light of the council's concerns. The railings that previously enclosed the front roof terrace have been omitted. In their place, the existing brickwork is built up to form a parapet wall, finished with precast concrete coping stones. The brickwork is to match the existing building. This creates a much more integrated and architecturally coherent frontage, avoiding the visually intrusive appearance of exposed railings at eaves level.
- e. The design of the upwards extension has also been refined. The new top floor is now designed as a mansard roof extension finished in hanging roof tiles, with

zinc-clad dormer windows. This responds more sympathetically to the pitched and hipped roof forms of the surrounding houses and integrates better with the existing building and the wider street scene.

- f. The previous rear roof terrace has also been omitted from the revised proposal. At the front, the two larger flats open onto small terraces set behind the new parapet. These are integrated into the roof form and do not project visually in the way the earlier open terrace and railings did.
- g. The existing flats at ground and first floor level are retained as they are. The revised proposal therefore affects only the new upper floor and associated external works.
- h. The new upper floor would provide 3 additional self-contained dwellings, all designed for single occupancy. Unit 9 would have a gross internal area of 52.1sqm, Unit 10 would have a gross internal area of 53.91sqm, and Unit 11 would have a gross internal area of 39.86sqm.
- i. The plans show that all 3 units exceed the minimum 37sqm standard for a 1-bedroom, 1-person flat. The bedrooms also exceed the relevant minimum standards. Storage cupboards are provided in each flat and the floor-to-ceiling height is shown as 2.5m.
- j. The new flats are dual or triple aspect. Units 9 and 10 have front-facing dormer openings together with side or rear-facing windows, while Unit 11 has windows to the rear and side, with the flank dormer windows shown as obscure glazed to 1.7m high.
- k. The revised site layout shows 11 marked parking spaces at the rear, one allocated to each flat. This is achieved by demolishing the southern of the two existing garages. Rear access remains via the existing northern undercroft.
- l. A covered, secure cycle store providing 12 spaces is proposed to the rear of the building. Refuse storage is retained in its existing location adjacent to the southern pedestrian entrance, with collection from the Cromwell Road kerbside as existing. The plans also show photovoltaic panels on the roof.

4. Planning Policy

- a. The relevant parts of the development plan for the area are the Hillingdon Local Plan: Part One - Strategic Policies (November 2012), the Hillingdon Local Plan: Part Two - Development Management Policies (January 2020) and the London Plan (2021).
- b. According to the council's reasons for refusing the previous application (78264/APP/2023/2626), the proposal did not comply with policy BE1 of the Local Plan Part One, policies DMHB 11, DMHB 12, DMT 1, DMT 2 and DMHB 18 of the Local Plan Part Two, and policies D6, T2 and T4 of the London Plan (2021).
- c. The officer's report also considered a wider range of development plan policies relevant to the design, housing, parking and environmental effects of the proposal.
- d. Policy BE1 (Built Environment) of the Strategic Policies requires all new development to improve the quality of the built environment in order to create successful and sustainable neighbourhoods. Among other things, it seeks development that is sensitive to local identity, townscape and views, and which improves the quality of the public realm.
- e. Policy DMHB 11 (Design of New Development) of the Development Management Policies requires all development to be designed to a high standard and to harmonise with the local context. It requires regard to surrounding scale, height, mass, bulk, building lines, rooflines, architectural composition and quality of detailing. It also requires development to avoid unacceptable harm to the amenity of adjacent occupiers.
- f. Policy DMHB 12 (Streets and Public Realm) seeks high quality design that preserves or enhances the character of the street scene and public realm.
- g. Policy DMHB 18 (Private Outdoor Amenity Space) requires all new residential development to provide good quality and useable private outdoor amenity space.
- h. Policy DMT 1 (Managing Transport Impacts) requires development to meet its transport needs in a sustainable manner, to be accessible by public transport, walking and cycling, and to provide safe and convenient access for all users.
- i. Policy DMT 2 (Highways Impacts) requires development not to have an unacceptable impact on highway safety or on the operation of the surrounding highway network.
- j. The London Plan is the strategic development plan for Greater London. It promotes additional housing delivery, especially on small urban sites and

previously developed land, and requires development to make efficient use of land through a design-led approach.

- k. Policy GG2 supports the development of brownfield land and the more intensive use of land in appropriate locations. Policy GG4 supports the delivery of the homes Londoners need. Policy H1 seeks increased housing supply across London.
- l. Policy H2 is particularly relevant to this proposal. It states that boroughs should pro-actively support well-designed new homes on small sites through planning decisions in order to significantly increase the contribution of small sites to meeting London's housing needs, diversify the sources and locations of housing supply, and support smaller builders. The policy also recognises that local character evolves over time and will need to change in appropriate locations to accommodate additional housing on small sites.
- m. Policy D3 requires development to make the best use of land by following a design-led approach that optimises site capacity. It requires development to enhance local context by responding positively to local distinctiveness through its layout, orientation, scale, appearance and shape.
- n. Policy D4 requires high quality design in all development.
- o. Policy D6 requires new housing to provide high quality internal accommodation, sufficient daylight and sunlight, and a good standard of amenity for future occupiers.
- p. Policy T2 seeks to create healthy streets and support walking and cycling. Policy T4 requires transport impacts to be properly assessed and mitigated.
- q. Policies T6 and T6.1 are also relevant. They deal with car parking standards and require parking provision to be considered in accordance with the location and characteristics of the development.
- r. The National Planning Policy Framework (NPPF), adopted on 12 December 2024, sets out the government's national planning policies and how these policies should be applied. It identifies a presumption in favour of sustainable development. Development is sustainable when it meets the economic, social and environmental needs of a community.
- s. According to paragraph 39:

"Local planning authorities should approach decisions on proposed development in a positive and creative way. They should use the full range of planning tools available, including brownfield registers and permission

in principle, and work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area. Decision-makers at every level should seek to approve applications for sustainable development where possible."

- t. Chapter 5 sets out the government's objective "*of significantly boosting the supply of homes*". According to paragraph 73:

"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."

- u. Chapter 11 encourages the effective use of land, including the development of under-utilised land and buildings.
- v. Paragraph 125(e) supports opportunities to use the airspace above existing residential and commercial premises for new homes and says planning policies and decisions should allow upward extensions, as long as they are well designed.
- w. Paragraph 131 describes the creation of high quality, beautiful and sustainable buildings and places as fundamental to the planning process. Paragraph 135 requires that development function well, be visually attractive, be sympathetic to local character and provide a high standard of amenity for existing and future users.
- x. According to paragraph 116:

"Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe."

5. Assessment

Principle of Development

- a. The application site is an existing block of flats in an established residential area. It is previously developed land, and the proposal makes more efficient use of an existing urban building by adding a further floor containing 3 additional self-contained dwellings.
- b. The NPPF places strong emphasis on significantly boosting the supply of homes and making effective use of under-utilised land and buildings. Policy GG2 of the London Plan supports the development of brownfield land and the more intensive use of land in appropriate locations, while policies GG4 and H1 support the delivery of the homes Londoners need.
- c. Policy H2 states that boroughs should pro-actively support well-designed new homes on small sites through planning decisions and recognises that local character evolves over time and will need to change in appropriate locations to accommodate additional housing on small sites.
- d. National policy is now also more explicit in its support for upward extensions. Paragraph 125(e) of the NPPF 2024 states that planning policies and decisions should support opportunities to use the airspace above existing residential and commercial premises for new homes and, in particular, should allow upward extensions, including mansard roofs.
- e. The proposal is therefore strongly supported in principle, subject to the more detailed questions of design, daylight and sunlight, parking and access, and the quality of accommodation provided.

Matters Not in Dispute

- f. The current application is a resubmission of a previous proposal refused under reference 78264/APP/2023/2626. The reasons for refusal identify the specific aspects of the earlier scheme to which the council objected.
- g. The officer's report for that application confirmed that the council accepted the principle of development and did not object to adding an additional floor to the building. The case officer judged that, because it was recessed from the front and side elevations, it would read as a subordinate addition to the existing building as viewed from the road.

- h. The report also accepted that the proposed unit sizes complied with London Plan standards, that the bedrooms were of appropriate size and that the units had dual aspect.
- i. The highway objection to the previous scheme was not to the principle of parking provision or to the number of units in itself. Rather, it related to the particular layout then proposed, including the two front parking spaces and the lack of adequate manoeuvring space.
- j. Similarly, the design objection was directed specifically at the introduction of railings and a roof terrace at eaves level along the road frontage. It was not a rejection of an upwards extension as such.
- k. The main issues in this application are whether the updated design now integrates satisfactorily with the existing building and street scene, whether the application addresses the daylight and sunlight issue identified previously, whether the revised access and parking arrangement is acceptable and whether the new homes would enjoy a sufficient level of amenity.

Design & Appearance

- l. The council's first reason for refusal on the previous application objected to the introduction of railings at eaves level along the road frontage, describing this as an unduly incongruous feature in the traditional residential street scene.
- m. The current proposal omits the exposed front railings, instead proposing to build up the existing brickwork to form a parapet wall, finished with precast concrete coping stones.
- n. The effect is to create a much more integrated frontage, avoiding the lightweight and visually intrusive appearance of metal railings and giving the new work a stronger architectural relationship with the existing building.
- o. The overall roof design has also been substantially improved. The earlier proposal was for a simpler additional storey with light grey aluminium cladding behind a flat roof arrangement. The revised scheme now takes the form of a mansard roof extension, finished in hanging roof tiles, with zinc-clad dormer windows and photovoltaic panels on the roof. This is a much more sympathetic response to the local context.
- p. The surrounding area is characterised predominantly by two-storey houses with pitched roofs. The revised roof form reflects that roofscape far more naturally than the previous design. The hipped mansard reduces the visual bulk of the upper floor, softens the profile of the extension and allows it to sit more comfortably within the established suburban street scene.

- q. The existing and proposed streetscene drawings show that the new mansard significantly improves the appearance of the the existing, squat, flat-roofed building, and that it would integrate well with the wider run of pitched roofs on Cromwell Road in a way that the earlier railing-enclosed terrace proposal would not.
- r. The proposal is also consistent with paragraph 125(e) of the NPPF, which expressly supports upward extensions, including mansard roofs, where they are consistent with the prevailing form of neighbouring properties and the overall street scene, and where they are well-designed.
- s. The revised scheme therefore responds carefully and directly to the council's earlier objection. It preserves the subordinate form of the extension previously acknowledged by officers, while materially improving the way the development is expressed architecturally. It follows that the proposal now complies with policy BE1 of the Local Plan Part One, policies DMHB 11 and DMHB 12 of the Local Plan Part Two, policies D3 and D4 of the London Plan, and paragraphs 125(e), 131 and 135 of the NPPF.

Daylight & Sunlight

- t. The council's second reason for refusal on the previous application stated that the proposal failed to demonstrate that neighbouring properties within the existing block would not be adversely impacted by the loss of sunlight and daylight.
- u. The officer's report records that the daylight and sunlight assessment submitted with the earlier application assessed the adjoining residential properties but did not assess the existing flats within the block itself, particularly three rear-facing windows on the main block to the north of the projecting rear wing.
- v. This application is accompanied by a Daylight & Sunlight Assessment prepared by Aval Consulting Group, assessed against BRE BR-209-2022. The assessment finds no undue impact on neighbouring windows.

Highways & Parking

- w. The council's third reason for refusal stated that the development would intensify the use of the existing substandard undercroft access and fail to provide adequate manoeuvring space for the two front parking spaces then proposed. The full reason also alleged vehicular and pedestrian conflict and obstruction of the highway.
- x. The two front parking spaces have been removed. The application is accompanied by a Transport Statement prepared by Pulsar Transport Planning.

The rear parking area will provide 11 marked spaces, one per flat, by demolishing the southern garage. This meets the council's standard of one space per unit. The existing garages were used only for storage, so their loss is not a loss of parking provision.

- y. Swept-path analysis confirms that a large car can enter and exit the site via the existing crossover and undercroft and manoeuvre into the spaces in forward gear. The site has a PTAL of 1b, but the Transport Statement notes this understates accessibility, as the Uxbridge Road bus stops fall just beyond the PTAL walking threshold. A TRICS assessment estimates the three additional flats would generate a modest increase of around one two-way vehicle trip in each peak hour and approximately 8 two-way trips daily.
- z. Paragraph 116 of the NPPF provides that development should only be refused on highways grounds if there would be an unacceptable impact on highway safety or the residual cumulative impacts on the road network would be severe.

Quality of Accommodation

- aa. The revised proposal provides 3 good quality additional homes. Units 9, 10 and 11 have gross internal areas of 52.10sqm, 53.91sqm and 39.86sqm respectively. All 3 therefore exceed the minimum 37sqm standard for a 1-bedroom, 1-person flat.
- bb. The bedrooms also exceed the minimum standard for single bedrooms. Storage cupboards are shown in each flat, and the proposed sections show a floor-to-ceiling height of 2.5m, all as required by policy D6 of the London Plan. The flats are also dual or triple aspect.
- cc. The council's fourth reason for refusal in respect of the previous application stated that the proposal would provide substandard accommodation because it failed to provide an appropriate amount of private amenity space for the new units.
- dd. Policy DMHB 18 of the council's Development Management Policies requires that all new dwellings "*provide good quality and useable private outdoor amenity space*". Table 5.3 states that single-person dwellings should provide 20sqm.
- ee. In this case, the configuration of the existing building and the design constraints associated with an upwards extension limit the amount of private amenity space that can be provided. The applicant has nevertheless taken the opportunity to provide the two front flats with useable outdoor terraces behind the new front parapets.

- ff. It is not possible to provide each of those flats with the full 20sqm referred to in the council's guidance. Nor is it possible to provide the rear flat with a terrace of that size. A smaller rear terrace or balcony could in theory be created, but this would be more likely to give rise to concerns in respect of overlooking and design, and would sit less comfortably with the overall roof form.
- gg. In these circumstances, the proposal represents a reasonable and balanced response to the site's constraints, securing some private amenity space where it can be provided without creating further planning harm.

Refuse Storage & Cycle Parking

- hh. The revised plans also show secure cycle parking provided within the southern undercroft. The previous officer's report accepted that the location of cycle parking in the undercroft was in principle acceptable.
- ii. The revised plans also show refuse storage within the undercroft, as shown on the proposed site layout.

Planning Balance

- jj. The applicant accepts that the proposal does not meet the council's usual 20sqm guideline for private amenity space for each flat. The proposal must be assessed in the round. This is an upwards extension to an existing flatted building on previously developed land. It provides three additional homes in a form of development expressly supported by national policy and by the London Plan's emphasis on small sites, housing delivery and the efficient use of land.
- kk. The revised scheme addresses the council's earlier concerns. The front railings and roof terrace have been removed and replaced with a mansard design that sits more comfortably in the street scene. The two front parking spaces have been removed and the rear parking formalised to 11 marked spaces, one per flat, meeting the council's standard. The Transport Statement confirms the trip generation is modest and the impact on the highway network insignificant. The Daylight & Sunlight Assessment confirms a high level of compliance with the BRE guidance.
- ll. The new flats are all single-person units and are generous for that type of accommodation. They exceed the minimum space standard in all three cases, two of them substantially. Two of the flats also have private terraces.
- mm. The only respect in which the proposal falls short of the council's guidance is the amount of private amenity space. That shortfall is the product of the site's constraints as an upwards extension. It is limited, and some amenity space is provided where it can be. It does not outweigh the benefits of the proposal:

three good quality additional homes, the better use of an existing urban site, and a design that responds to each of the council's refusal reasons.

nn. Assessed overall, the planning balance weighs in favour of the proposal and planning permission should be granted.

6. Conclusions

- a. The proposal is for a well-designed upwards extension to an existing block of flats on previously developed land in an established residential area.
- b. It would provide 3 additional small homes in a form of development supported by the London Plan and by paragraph 125(e) of the NPPF, which expressly supports upward extensions, including mansard roofs, where they are well designed and respect the prevailing form of neighbouring properties and the street scene.
- c. The revised scheme responds directly to the council's previous concerns. The objectionable front railings have been omitted and replaced with a more coherent mansard design that integrates more successfully with the building and the surrounding roofscape.
- d. The application is accompanied by updated technical material addressing the previous concerns in respect of daylight and sunlight and highways.
- e. The new flats are generous in size for single-person dwellings and provide a good standard of internal accommodation. Although the proposal does not fully meet the council's usual private amenity space guideline for each flat, that shortfall is outweighed by the overall quality of the homes, the design improvements made and the benefits of delivering 3 additional dwellings on an under-utilised urban site.
- f. For these reasons, the applicant contends that the proposal represents sustainable development and respectfully requests that the application be recommended for approval.



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