

ET Planning

Planning, Design and Access Statement

Old Mill Retreat, Land adjacent to 38 Benbow Way, Uxbridge, UB8 2EY

Erection of a single-storey dwelling and undercroft car port, and associated hard and soft landscaping and drainage works (part-retrospective)

Stephanie Richards **BA (Hons) MA**
www.etplanning.co.uk

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Appendices

Appendix 1: 78715/PRC/2025/26 – Pre-Application response

Appendix 2: Hillingdon Housing Land Supply Statement (April 2026)

1. Introduction

- 1.1 This statement is produced to support a planning application for the erection of a single-storey dwelling and undercroft car port, and associated hard and soft landscaping and drainage works (part-retrospective) at Old Mill Retreat, Land adjacent to 38 Benbow Waye, Uxbridge, UB8 2EY.
- 1.2 This planning statement will cover the background to the application and provide the necessary information to enable its determination by officers at the Council. It will consider the proposal in light of relevant planning policies and other material considerations. The conclusion reached is that key material considerations and the wider objectives of National and Local planning policy support the grant of permission.
- 1.3 In addition to this planning statement, the application is accompanied by the appropriate planning application forms and ownership certificate, duly signed and completed, and the following documents prepared by Becker Design Ltd, Cryfield Surveys Ltd, GeoSmart, Salopian Tree Consultancy, LanPro and Cherryfield Ecology:
- 2630-01 – Topographical Survey
 - 2627 PRP1.0 Rev A – Location Plan
 - 2627 PRP2.0 Rev.A2 – Site Block Plan
 - 2627 PRP3.0 Rev.A – Proposed Plans
 - 2627 PRP4.0 – Existing Pumphouse (retained)
 - 2627 PRP5.0 – Proposed Undercroft
 - 7321 - Heritage Statement (September 2026)
 - P1324 – Tree Constraints Plan

- P1324 – Tree Schedule
 - 93099R1 - Sustainable Drainage Assessment (September 2026)
- 1.4 The relevant application fee will be submitted by the applicant separately.

2. Site Location and Description

- 2.1 The dwelling on-site comprises a single storey elongated bungalow that is partially constructed. The principal elevation contains three modest projecting gables sat beneath a simple pitched roof form. There is an existing potting shed on site, which will be retained and converted into an ancillary outbuilding.
- 2.2 It is located within the Cowley Lock Conservation Area and is considered within the context of a Grade II Listed 'Old Mill Estate'. The site is in Flood Zone 1 and there are several TPOs along its boundaries.

3. Planning History

- 3.1 **78715/APP/2024/978** – Use of two buildings as a Dwellinghouse (Use Class C3) and ancillary outbuilding (Application for a Certificate of Lawful Development for an Existing Use and Development) (Granted - 27/08/24). The lawful use of the application site is therefore residential, and the site has been subdivided from the original plot.
- 3.2 A pre-application was submitted under ref: **78715/PRC/2025/26** for "*Erection of a single storey dwelling with associated landscaping and the conversion of existing potting shed into an ancillary outbuilding*". Notably, the Council accepted several matters in

principle, including the lawful residential use, previously developed land status, absence of issues regarding neighbour amenity, internal space and garden provision.

- 3.3 For clarity, the legislative context has evolved since the previous Grey Belt assessment was carried out. Namely, footnote 7 has been removed from the definition in Annex B (NPPF – August 2026), which was the primary challenge to the site qualifying as Grey Belt, within the pre-application response included at Appendix 1. Specifically, the Officer states that *“the site is however located within Cowley Lock Conservation Area and therefore, as denoted by Footnote 7 of the NPPF, this designation can exclude land from the grey belt where the application or policies relating to it would provide a strong reason for refusal”*.
- 3.4 With this considered, the enclosed statement identifies that the development meets all the tests at Policy GB7(1)(g), to qualify as Grey Belt. Additionally, the design has been adapted and is accompanied by a Heritage Impact Assessment, which comprehensively analyses the relationship between the built form and the heritage assets, concluding that the development results in **no harm**.

4. Development Proposals

- 4.1 The National Design Guide (2019) identifies that “well-designed homes and buildings are functional, accessible and sustainable. They provide internal environments and associated external spaces that support the health and well-being of their users and all who experience them. They meet the needs of a diverse range of users, taking into account factors such as the ageing population and cultural differences. They are adequate in size, fit for purpose and are

adaptable to the changing needs of their occupants over time” (para 120-121).

- 4.2 Regarding the requirements of NPPG Paragraph: 029 Reference ID: 14-029-20140306 in respect of Design and Access Statements, the proposal is described as follows:
- 4.3 **Use and Amount:** The proposed use is residential, for the retention and completion of a single-storey 3-bedroom dwelling with undercroft for on-site parking. The accommodation comprises an open-plan kitchen and living area, three bedrooms, including a master bedroom, and a bathroom.
- 4.4 The existing historic lawfully residential outbuilding would also be retained for purposes ancillary to the new dwelling and proportionate soft/hard landscaping is provided to facilitate the use.
- 4.5 A car port of matching appearance to the dwelling will provide covered parking.
- 4.6 **Layout:** The proposed dwelling occupies a well-enclosed section of the site; it is positioned near to the eastern boundary and carefully orientated so that its principal elevation faces into the site. This arrangement retains a significant area of private garden around the dwelling.
- 4.7 The historic potting shed is retained separately within the western section. The proposed undercroft will be located to the north-western corner of the plot.
- 4.8 **Scale Height & Mass:** The dwelling is entirely single-storey and has a low and restrained profile. Its principal form is elongated and covered by a simple pitched roof, with three modest projecting gabled elements providing articulation to the principal elevation.

- 4.9 The relatively long footprint of the building is mitigated by its single-storey height, simple roof form and material selection; and the subdivision of the elevation into smaller elements. The sense of enclosure and screening from mature vegetation ensures the dwelling does not appear bulky or visually prominent.
- 4.10 The proposed undercroft has a 9m x 6m footprint, approximately 5.95m ridge height, three bays and open elevations.
- 4.11 **Landscaping:** The site benefits from substantial mature trees and vegetation around its boundaries, which create an enclosed and verdant setting. These established landscape features would be retained wherever possible and would continue to provide screening of the dwelling from Old Mill Close, the surrounding waterways and neighbouring land.
- 4.12 Ample garden amenity space is provided, with opportunities to enhance existing boundary vegetation.
- 4.13 **Appearance:** The dwelling adopts a simple and restrained domestic appearance appropriate to its secluded setting. The traditional pitched roof and modest projecting gables break up the principal elevation and provide visual interest without introducing excessive architectural detailing that would be incongruous to the area.
- 4.14 The material palette includes clay roof tiles, brick plinth and timber framing. The design approach is emulated by the proposed undercroft, which includes green-oak frame, timber-clad gables and clay tiles.
- 4.15 **Access & Parking:** Vehicular and pedestrian access would continue to be obtained through the established access from Old Mill Close. The access is presently enclosed by approximately 1.8-metre-high timber gates, with the existing boundary fencing and planting

retained. A vehicle under croft is proposed, which will provide three open parking bays within a 9m x 6m footprint.

- 4.16 The internal yard and existing hardstanding provide sufficient space for the off-street parking of vehicles associated with the three-bedroom dwelling.

5. Policy Assessment

- 5.1 **National Guidance:** The National Planning Policy Framework (NPPF) is a relevant material consideration to the application.

- 5.2 The purpose of the planning system is to contribute to the achievement of sustainable development. So that sustainable development is pursued in a positive way, at the heart of the Framework is a presumption in favour of sustainable development.

- 5.3 The National Design Guide builds on the above, and clarifies that “well-designed neighbourhoods need to include an integrated mix of tenures and housing types that reflect local housing need and market demand. They are designed to be inclusive and to meet the changing needs of people of different ages and abilities. New development reinforces existing places by enhancing local transport, facilities and community services, and maximising their potential use” (para 109).

- 5.4 Annex A of the Framework provides that when considering the development plan, any policies that are materially inconsistent with the national decision-making policies should be given very limited weight, unless they have been examined and adopted, or made, against the updated Framework (August 2026). To caveat, other development plan policies should not be given reduced weight simply because they were adopted before its publication.

- 5.5 **Principle of Development:** Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning applications be

determined in accordance with the Development Plan, unless material considerations indicate otherwise.

- 5.6 The Framework establishes a presumption in favour of sustainable development through **Policy S3**, which provides that proposals that are in accordance with both an up-to-date development plan and national decision-making policies, should be approved without delay. **Policy S3** identifies that **Policy S4** applies to development within settlement boundaries, and **Policy S5** to proposals outside them.
- 5.7 **Policy S5** provides that only certain forms of development should be approved outside settlements, and that those forms should be approved unless the benefits of doing so would be substantially outweighed by any adverse effects. **Policy S5 (5)** elaborates this point by clarifying that S5 does not apply to development in the Green Belt, which is instead, subject to the test under **Policies GB6-GB8**.
- 5.8 The Framework places considerable emphasis on making effective and efficient use of land. **Policy L2** provides that substantial weight should be given to the benefits of proposals which, amongst other matters, remediate despoiled, degraded, derelict, contaminated or unstable land, or make **better use of vacant and underutilised land and buildings.**
- 5.9 Due to the presence of the historic potting shed/pump house, the proposed scheme will fall into this category, through the development optimising its future use. The development does not result in any adverse effects that would outweigh the clear benefits of redeveloping this currently underused site.
- 5.10 **Policy H07** of the NPPF states that substantial weight should be given to the benefits of providing homes which will contribute towards the evidenced accommodation needs of the community. This includes

but is not limited to, homes needed for different groups assessed under **Policy HO1**.

- 5.11 Therefore, the prescriptions in the NPPF endorse diversity; in the type of accommodation available. The proposed bungalow will provide a 3-bedroom unit which can suitably cater to both couples and small families, which promotes market diversity.

Development Plan

- 5.12 Hillingdon Local Plan comprises the following documents:

- Local Plan Part 1 - Strategic Policies
- Local Plan Part 2 – Development Management Policies
- Policies Map

- 5.13 The Hillingdon Local Plan P1 was adopted in March 2012, followed by P2 in 2020. Therefore, it holds weight in the determination of planning applications. However, it is pertinent to note that the plan predates most iterations of the NPPF and the London Plan (2021). Therefore, as per the Framework, weight will be attributed where the policies are consistent the NPPF (August 2026) and the London Plan (2021).

- 5.14 **Green Belt:** The site is located within the Green Belt. The NPPF, at Policy GB6, states that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. ‘Very Special Circumstances’ will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.

- 5.15 Firstly, **Policy GB7(1)(e)** of the NPPF (August 2026) states that the redevelopment of previously developed land, including development

involving residential use, is not inappropriate development in the Green Belt where it would not cause substantial harm to openness.

5.16 The proposed dwelling is single-storey, low in profile and visually contained by the site's mature vegetation at its peripheries; it would therefore not cause substantial harm to Green Belt openness. The lawful residential use and associated buildings are consolidated through Certificate of Lawfulness reference **78715/APP/2024/978**, whilst the site also contains the retained ancillary potting shed and residual physical elements of its earlier built development. Crucially, the Council's pre-application response (see Appendix 1) expressly acknowledged these circumstances and agreed that the site could be considered previously developed land.

5.17 Further to this, the proposed undercroft, by virtue of its open-framed appearance and intentional separation from the dwelling in the north-western corner ensures that there would be no cumulative, substantial harm to openness; in the visual and spatial sense.

5.18 Secondly, the site is deemed to be Grey Belt as per the definition under Annex B. In conjunction with this, the development satisfies the relevant tests at Policy GB7(1)(g) of the NPPF. Therefore, it constitutes development which is **not inappropriate** in the Green Belt and as such, the Very Special Circumstances test under Policy GB6 (2) is not triggered.

5.19 For clarification, 'Grey Belt' is explicitly defined within the Framework Annex B (August 2026):

"Land in the Green Belt comprising previously developed land and/or any other land that, in either case, does not strongly contribute to any of purposes (a), (b), or (d) in Policy GB2".

- 5.20 For a broader context, the site is enclosed by residential properties on three sides and the river to the west and access road to the north creates a visual 'break' between countryside or fields. Furthermore, this consolidates the plot's relationship to the cluster of residential dwellings nearby; as opposed to 'open' Green Belt land. The site itself is enclosed by trees and mature vegetation, thus, it has robust boundaries and is fortified on all sides by natural features; which allow the site to appear contained.
- 5.21 Annex E (Green Belt Assessments) identifies that land is more likely to contribute strongly to purpose a) "where it is free from development and **lacks nearby physical features** capable of restricting and containing development".
- 5.22 As such, it is established that the site is neatly contained by natural features and therefore, provides a weak or absent contribution to purpose a).
- 5.23 For similar reasons and by virtue of its size and position, the site does not undermine purpose (b). The site does not form a strategic gap between towns and constitutes a self-contained plot. Moreover, if redeveloped it would not equate to the loss of visual separation between settlements, largely due to the site-specific factors already mentioned.
- 5.24 Finally, purpose (d) is not relevant to this site as it is not in the vicinity of a historic town. With the above considered, the site qualifies as Grey Belt under the definition at Annex B.
- 5.25 The site's position ensures that it would not fundamentally undermine the purposes of the remaining Green Belt as per Policy GB7(1)(g)(i). Therefore, the development satisfies the first limb of the test at Policy GB7(1)(g)(i).

- 5.26 The second limb of the Grey Belt test relates to whether there is an identified need for the type of development. The lack of a housing land supply in the London Borough of Hillingdon provides the demonstrable unmet need for the type of development as per Policy GB7(1)(g)(ii).
- 5.27 The latest position from the London Borough of Hillingdon is summarised in their 5-year supply statement published in April 2026 (see Appendix 2). This expressly states that Hillingdon can only demonstrate a **2.5-year supply** of deliverable housing sites, equating to a significant shortfall.
- 5.28 This element is crucial because at the time of the pre-application, it was highlighted that the Council could demonstrate an adequate housing land supply, which disqualified it from the second limb of the Grey Belt test. Cumulatively then, with Hillingdon's serious lack of housing land supply, there has been a material shift in favour of the development.
- 5.29 With reference to the third limb of the Grey Belt test at Policy GB7(1)(g)(iii), the site is in a sustainable location, enclosed by development and across Benbow Waye Bridge, there is built-up residential cluster of housing.
- 5.30 The plot itself is a 5-minute walk from Tesco Express, 3-minute drive to Tesco Superstore West Drayton, 7-minute walk to 'Mango' Pharmacy and a 12-minute walk from a bus stop at 'Station Road' Cowley. This establishes its connectivity to the settlement and valued services/facilities.
- 5.31 **Policy TR3 (1)** establishes that "So that development is located where it can support sustainable patterns of movement, enable good accessibility for different users and make the most of existing and proposed transport infrastructure, development proposals should

reflect the following principles, taking into account the vision for the site, the type of development and its location". With this considered, the site satisfactorily meets this part of the policy test and should therefore be considered a sustainable location for the specific type of development proposed.

- 5.32 Overall, the Appeal site meets all the relevant tests for acceptable Grey Belt development, set out in the updated NPPF (**Policy GB7(1)(g) & Annex B**). Additionally, it is considered previously developed land under **Policy GB7(1)(e)** and for the reasons outlined above, the principle of residential development is deemed acceptable.
- 5.33 **Heritage: Policy HE6 (1)** of the NPPF (amended August 2026), states that when considering the potential effect of a development proposal on the significance of a designated heritage asset, substantial weight should be given to the asset's conservation.
- 5.34 **Policy HE5 (1)** of the NPPF states that development proposals should require an assessment of:
- The significance of each affected heritage asset
 - The contribution made by its setting; and
 - The effect of the proposal upon that significance
- 5.35 **Policy HE6 (4)** of the NPPF indicates that where a development proposal would harm the significance of a designated heritage asset, the effect on the asset and its significance should be weighed against any public benefits resulting from the proposal. As will be substantiated by the Heritage Statement, the proposed scheme results in **no harm** to the historic setting of the Old Mill House, or the wider Cowley Lock Conservation Area.

5.36 **Policy HE1** of the Local Plan P1 (Heritage) identifies that Hillingdon's unique, historic environment and its setting should be conserved and enhanced, as per the Framework.

5.37 To effectively address these policy points and the feedback within the pre-application, the submission is accompanied by a Heritage Impact Assessment provided by LanPro which fully assesses the development's effect on:

- The Cowley Lock Conservation Area;
- The setting of the Grade II listed Old Mill House; and
- The surviving historic potting shed/pumphouse within the curtilage

5.38 The report confirms that historic mapping identifies that the site originally formed part of the wider grounds of Old Mill House.

5.39 The report clarifies that the site retains a degree of historic association with Old Mill House. It confirms that this relationship has been substantially weakened through the subdivision of the former landholding, subsequent built development, shifts to the boundaries over time and mature vegetation.

5.40 It is concluded by the Heritage specialist that:

- The dwelling is single-storey, low-profile and visually subservient and therefore, does not compete with the historic Old Mill House, by virtue of its scale, architecture or overall visual prominence;
- Mature boundary vegetation limits views in and out of the site
- There is no direct impact on the listed building's fabric nor does the development disrupt any significant historic relationship

- The dwelling generates localised change within the Cowley Lock Conservation Area, but retains its verdant, low-density and waterside character
- Retention of the historic outbuilding visually preserves the site's historic horticultural use.

5.41 In summary, the Heritage Statement concludes that the development results in **no harm** to either the significance of Old Mill House or the character and appearance of the Cowley Lock Conservation Area.

5.42 These conclusions determine that “*no harm*” occurs and thus, the test stemming from “*less than substantial harm*” where public benefits should be weighed against the identified harm; is not required.

5.43 In terms of the proposed undercroft, this would be positioned within the north-western part of the plot, separate from the dwelling and against an established backdrop of boundary vegetation. Its open elevations would reduce its appearance of solidity, whilst its simple rural outbuilding character would avoid the appearance of a conventional suburban garage. Therefore, it would remain entirely visually subordinate to the dwelling and would sit comfortably within the site's verdant setting, preserving the character and appearance of the Cowley Lock Conservation Area and the setting of the nearby Grade II listed Old Mill House.

5.44 With this considered, the proposals are in full compliance with the relevant heritage policies at **HE4-HE6** of the NPPF (2026) and **Policy HE1** of the Local Plan.

5.45 **Character of the Area and Cowley Lock Conservation Area:** Firstly, it is prefaced that the Cowley Lock Conservation Area is not subject to a character appraisal or supplementary planning document

that incorporates a design code, which would identify uniform features or distinct materials.

- 5.46 The nearest cluster of residential housing at Benbow Way, has properties that are predominantly two-storey dwellings with hip-to-gable roofs and varying material finishes. Benbow Way itself falls within the parameters of Cowley Lock Conservation Area (see below at Figure 1).

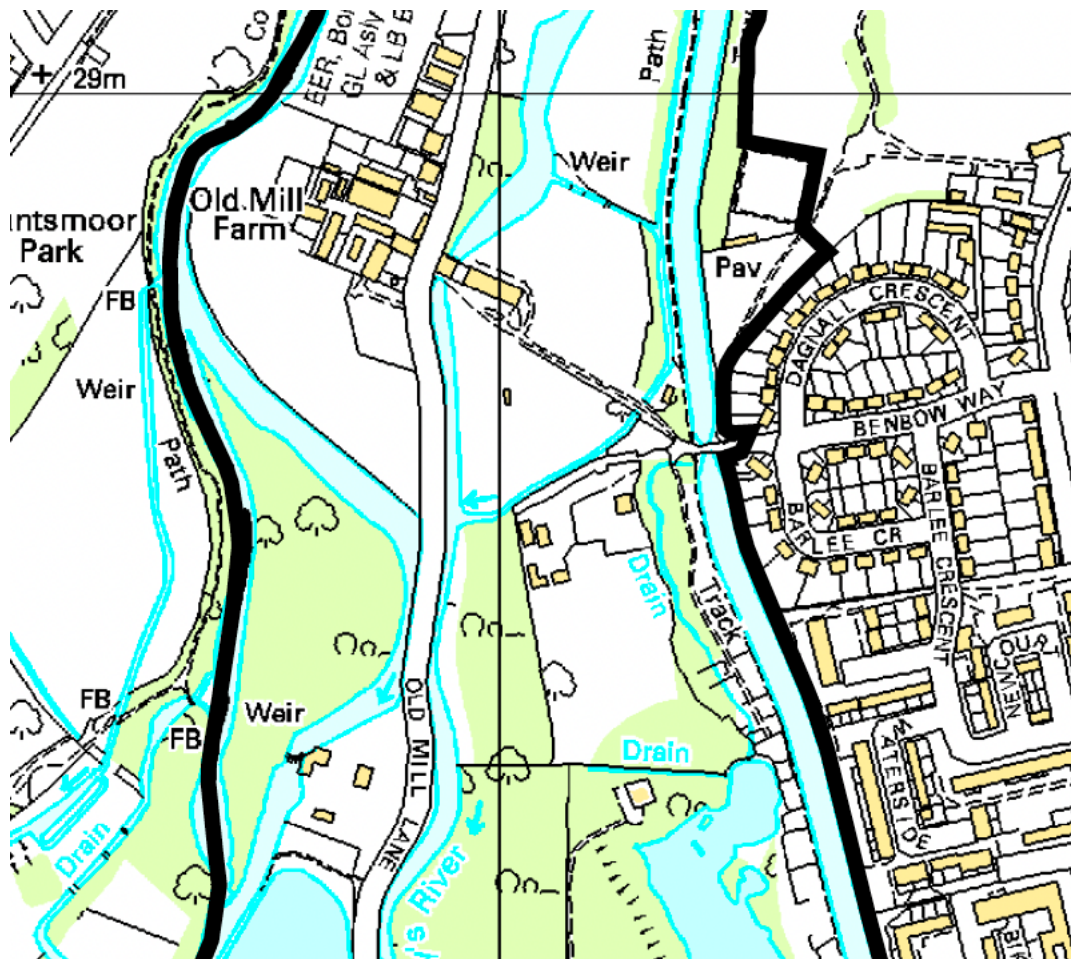


Figure 1 – Cowley Lock Conservation Area map

- 5.47 With reference to the 'Heritage' section, the proposed dwelling has been sensitively designed and takes visual cues from the buildings in the vicinity (both current and historic) that lie within the boundaries of the Cowley Lock Conservation Area.

- 5.48 On balance, the self-contained nature of the plot, siting/orientation of the dwelling and the strong belt of mature vegetation means the development would not visually encroach into the countryside or alter the landscape character in a harmful manner.
- 5.49 The dwelling itself comprises a low-profile single-storey form which is an appropriate design response to the site's self-contained and verdant setting. It's simple form and material palette is reminiscent of a traditional rural or waterside building, rather than a suburban dwelling. This allows for the dwelling to assimilate effectively within the wider plot.
- 5.50 The combined natural timber detailing, brickwork and clay-roof tiles demonstrates a subtle and contextually responsive material palette that correlates positively with the retained historic potting shed. The modest height and pitched roof form softens its perceived scale and prominence, and the boundary vegetation creates a layer of screening and reinforces its enclosure. Cumulatively, the design reads as a coherent and sensitive addition that preserves the character an appearance of the area and the Cowley Lock Conservation Area.
- 5.51 For clarity, the under croft parking structure is a proposed element of the scheme and does not constitute part of the retrospective works on site. It has been designed to emulate the new dwelling, comprising a traditional, open-sided ancillary structure with a green-oak frame, timber detailing and a 45-degree pitched roof with clay tiles. The shared material palette between the structure and the main dwelling create a strong visual symmetry.
- 5.52 The simple form and rural character will read appropriately within the landscaped setting and retain a sensitivity to the character of the Cowley Lock Conservation Area. The positioning away from the

dwelling, nearer to the boundary vegetation ensures it appears visually subservient.

5.53 Overall, all elements of the scheme would comply with **Policies DMHB 4, DMHB 11** of the Hillingdon Local Plan and **Policy D4** of the London Plan and the development would not conflict with the established character of the Conservation area.

5.54 **Residential Amenity:** The single-storey dwelling is modest in height and overall aesthetic. The GIA amounts to 149sqm, which is relative to the spacious nature of the plot and separation distances from neighbouring built form.

5.55 The enclosure of the site and effective layer of screening through trees, in addition to the visual 'break' provided by natural features ensures that the dwelling would not appear over-prominent in the landscape. It was echoed within the pre-application response (see Appendix 1) that a residential dwelling on this plot would not generate any harmful amenity impacts. Specifically, that *"the proposed dwelling would cause no harmful loss of light or outlook to neighbouring properties, due to its siting and separation distance from neighbouring properties"*. Overall, the site is well-contained and suitably distanced from neighbouring development.

5.56 The proposed undercroft fits in with this earlier assessment, through its subservient form and positioning away from the dwelling, near to the boundary vegetation on the north-western side of the plot. With this considered, the undercroft will result in no harm to amenity to the occupiers on site.

5.57 **Policy D6** of the London Plan sets out the minimum internal floor space standards required for new residential development. With regards to internal amenity space for occupiers, the 3-bedroom single-storey dwelling would have a total GIA that equates to

149sqm. In accordance with the London Plan Internal Space Standards, the 3-bedroom, 1-storey dwelling would require a minimum of 74sqm for 4 bedspaces. Thus, the total GIA of 149sqm exceeds these minimum standards and would provide an excellent quality of living space for the occupier.

5.58 Overall, the proposed scheme would comply with **Policies DMHB 16, DMHB 18** of the Hillingdon Local Plan and **Policies D4 and D6** of the London Plan.

5.59 **Trees and Landscaping: Policy DMHB 14** (Trees and Landscaping) of the Local Plan Part 2 requires development to retain or enhance existing trees, landscaping or other related natural features. London Plan **Policy G7** seeks the protection and maintenance of London's urban forest.

5.60 An Arboricultural Survey has been provided by Salopian Tree Consultancy. The survey identifies 12 individual trees or groups, mainly concentrated around the site boundaries and access. These are summarised below:

- Group 11 (comprising beech and sycamore, graded CAT A1)
- Trees 3, 6 and 7, all sycamores graded CAT B/B1 and;
- The remaining yew, Leyland cypress, sycamore and elm trees, predominantly graded CAT C

5.61 A strong degree of mature vegetation exists and these trees provide effective cover and contribute the site's enclosed, verdant character. No urgent tree works are recommended in the schedule.

5.62 The accompanying Tree Constraints Plan records canopy spreads and Root Protection Areas in accordance with BS5837:2012.

- 5.63 With this considered, the Arboricultural documentation identifies that the existing trees and vegetation will be retained and will continue to provide effective screening for the site, enhancing its verdant character. The information submitted determines that the proposals are in accordance with **Policy DMHB 14** and **Policy G7** of the London Plan.
- 5.64 **Transport and Parking: Policy TR6(4)** of the NPPF (2026) states that development proposals should only be refused where they would have a severe adverse impact on the transport network or an unacceptable impact on highway safety. The approach to highways would be acceptable in relation to this scheme, for the following reasons.
- 5.65 For context, vehicle and pedestrian access to the site is obtained via the existing access from Old Mill Close. This existing gated access, internal yard and hardstanding provide ample space for the parking and manoeuvring of vehicles within the site. This enables the safe entry and exit from the adjoining highway.
- 5.66 The proposed timber undercroft provides a total of 3no. car spaces, and 3no. spaces are provided on the associated hardstanding, which is adequate on-site parking for the 3-bed dwelling. As such, this would not amount to additional parking pressure on Old Mill Close; that could generate unacceptable highways impacts.
- 5.67 Due to the low intensity of the use and minimal generation of vehicular movements arising from 1no. residential dwelling, there will not be adverse harm to the highway network, and the development will not impede the safety of road users. Therefore, the proposal is in full compliance with **Policy TR6** of the NPPF, London Plan **Policy T6** and **Policies DMT 2** and **DMT 6** of the Hillingdon Local Plan.
- 5.68 **Cycle Provision:** Secure and lockable cycle storage will be provided on-site, in accordance with local and city-wide standards. This is in

alignment with Policy T5 of the London Plan pertaining to cycle parking.

5.69 **Refuse Provision:** Adequate refuse storage will be provided on-site for general waste and recycling.

5.70 **Drainage and SuDS: Policy EM6** (Flood Risk Management) echoes the NPPF (2026), stating that new development should be channelled away from Flood Zones 2 and 3. The site is located in Flood Zone 1, therefore, residential development at this location would be at lowest risk and would not require a Flood Risk Assessment.

5.71 A Sustainable Drainage Strategy has been provided by GeoSmart. Following an initial site assessment, the findings are listed below:

- River/fluviat flooding risk: **very low**.
- Surface-water flooding risk: **very low to medium** across the site.
- Groundwater flooding risk: **moderate**.
- Infiltration potential: theoretically moderate but likely constrained by groundwater only around 1–1.5 metres below ground level.
- Public surface-water or combined sewers: no suitable connections identified nearby.
- Preferred discharge destination: controlled discharge to the Fray’s River.

5.72 With this considered, the proposed SuDS comprises:

- rainwater harvesting butts connected to the dwelling’s roof drainage;

- a lined detention basin providing approximately 9 cubic metres of storage;
- a restricted discharge to the Fray's River at 1 litre per second;
- a non-return valve to protect against backing-up from the watercourse;
- directing exceptional exceedance flows towards landscaped areas; and
- permeable construction for any new driveway or hardstanding.

5.73 Cumulatively, these mechanisms create a drainage strategy that is capable of preventing increased flood risk elsewhere, in addition to providing biodiversity and amenity benefits.

5.74 The report identifies two matters that require resolution at conditions stage, relating to the final pipe route of the Fray's River and the condition/capacity of the watercourse and any necessary outfall consent. This can be suitably secured with a planning condition.

5.75 Overall, the development complies with **Policy EM6** of the Hillingdon Local Plan Part 1, in addition to city-wide and national flood policy.

5.76 **Sustainability and Energy:** Policy CC2 of the NPPF supports the transition of development to a low carbon future. The national Code for Sustainable Homes has now been abolished, however it is proposed that the development would conform to Part L of the Building Regulations which as of 2022 requires a 30% reduction than current standards. By way of contributing to the reduction in carbon, the proposal would also achieve current building construction standards with added sustainability measures through;

- A. The limitation of the amount of inherent material, structure and embodied energy through the employment of good building standards to create an excellent SAP rating;
- B. Use of locally sourced, recycled materials and labour where practicable;
- C. Maximizing the use of natural light through floor-ceiling windows;
- D. Reduced internal water consumption of 110 litres per person per day through the incorporation of water efficient sanitary fittings, including low flow toilets and water efficient taps for wash basins;
- E. Refuse, recycling and composting facilities to be provided to work with the Council's existing waste and recycling collection service;
- F. Secure cycle provision to encourage sustainable modes of transport;
- G. 'A' rated electrical appliances and energy saving light fittings;
- H. 'A' rated double glazed windows with natural cross ventilation provision;
- I. Water butts fitted to the rainwater down pipes for watering the garden;
- J. Recycling of waste construction materials where practicable;
- K. Permeable driveway/parking spaces to avoid increase in surface water runoff;

- 5.77 The proposal is therefore considered to comply with sustainability objectives in this respect.
- 5.78 **Policy DMEI 2** of the Hillingdon Local Plan Part 2 requires all development to make the fullest reasonable contribution towards minimising carbon emissions. London Plan Policy SI2 similarly promotes the reduction of energy demand and carbon emissions through the energy hierarchy.
- 5.79 **Policy DMEI 10** requires new residential development to incorporate water-efficiency measures and achieve water consumption of no more than 105 litres per person per day. The development will meet this standard through water-efficient fixtures and fittings. Rainwater harvesting butts will collect roof water for garden use, while the proposed detention basin and permeable external surfaces will manage surface-water runoff sustainably.
- 5.80 As the proposal comprises a single dwelling and is not major development, a detailed Energy assessment is not required by these policies.
- 5.81 Cumulatively, the measures set out in the Sustainable Drainage Assessment, suitably address the requirements of **Policy DMEI2, DMEI 10**, the relevant London Plan policies and the NPPF 2026.
- 5.82 **Ecology: Policy EM7** of the Hillingdon Local Plan Part 1 seeks to preserve and enhance the Borough's biodiversity, including through the protection of designated sites, protected and priority species and habitats, the provision of biodiversity improvements within development and the use of sustainable drainage measures that promote habitats and ecological connectivity.
- 5.83 **Policy DMEI 7** of the Hillingdon Local Plan Part 2 requires the design and layout of development to retain and enhance existing features of

biodiversity value. Where development is situated on or near land with ecological value, appropriate surveys and assessments should demonstrate that unacceptable effects would not arise.

- 5.84 Development alongside, or benefiting from a frontage to, a main river or the Grand Union Canal is expected to contribute additional biodiversity improvements. In parallel, **Policy G6** of the London Plan requires development to suitably manage its effect upon biodiversity and seek enhanced, informed by the best available ecological information.
- 5.85 Ecological surveys have been conducted and are to follow this submission.
- 5.86 For clarity, the site falls within the 'Small Sites' exemption and additionally, due to the retrospective nature of the retrospective application, the statutory 10% Biodiversity Net Gain does not apply.
- 5.87 With the upcoming ecological information considered, the proposal complies with **Policies EM7** and **DMEI 7** of the Hillingdon Local Plan, in addition to city-wide and national policy.
- 5.88 **Affordable Housing:** In accordance with **Policy H4** of the London Plan affordable housing requirements are applied to major residential developments. The proposal provides 1no. dwelling and therefore, falls below the threshold for Affordable Housing provision or contribution.
- 5.89 **Community Infrastructure Levy:** The relevant CIL forms have been submitted with this application.

6. Conclusion

- 6.1 This statement has demonstrated that the proposed development is acceptable in principle and makes an efficient use of land.
- 6.2 Material planning considerations have been carefully considered and analysed, as evidenced in section 5 of this statement and the supporting plans and documents. It is considered the proposed development would contribute an appropriate windfall site to the Borough's housing supply, without adverse effect on the character of the area or the amenity of neighbouring residents.
- 6.3 The application site constitutes previously developed land, as recognised expressly by the Council in its pre-application response and corroborated by the lawful residential use established through ref: **78715/APP/2024/978**.
- 6.4 The proposal therefore accords with Policy GB7(1)(e) of the NPPF (2026), which confirms that the redevelopment of previously developed land is not inappropriate development where it would not cause substantial harm to Green Belt openness. The dwelling is single-storey, low in profile and contained by mature vegetation. It would not materially erode the spatial or visual openness of the Green Belt. Further to this, the undercroft comprises an open-sided oak framed structure positioned adjacent to mature vegetation, this enclosure would inherently limit its spatial and visual effects. The development would not therefore, either individually or cumulatively, cause substantial harm to Green Belt openness.
- 6.5 In any event, the site also falls within the definition of Grey Belt under **Policy GB7(1)(g)** and satisfies each limb of the test.
- 6.6 Hillingdon are significantly under-delivering on their housing targets, with only 2.5 years of housing land supply recorded as of April 2026.

The provision of an additional 3-bedroom family-sized dwelling would make a valuable contribution towards addressing Hillingdon's severe shortage of housing land and the persistent need to increase housing delivery.

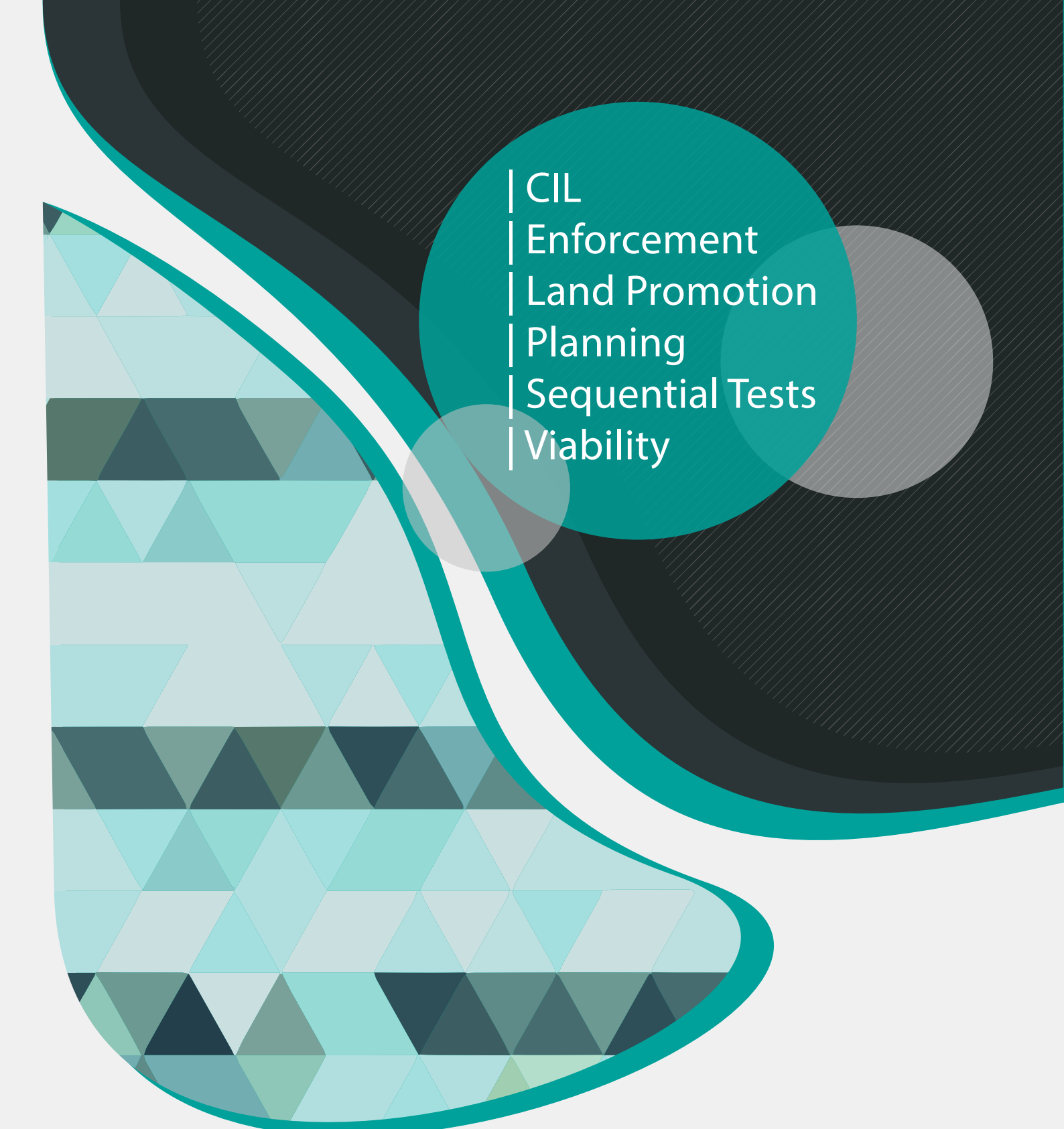
- 6.7 The proposal provides a single dwelling, however, this contribution is still valued, particularly, where the NPPF explicitly supports the effective use of previously developed land and recognises the important role of small sites in meeting housing needs.
- 6.8 Regarding heritage, the accompanying Heritage Statement demonstrates that the scheme, would cause no harm to the Cowley Lock Conservation Area or to the significance and setting of Grade II listed Old Mill House.
- 6.9 The application is supported by technical information addressing the environmental considerations. The Sustainable Drainage assessment provides a workable SuDS strategy incorporating rainwater harvesting, attenuation and controlled discharge; the arboricultural information identifies the existing trees, their quality and Root Protection Areas; and the retention of mature vegetation, native landscaping and sustainable drainage features would protect and enhance the site's ecological function. These measures demonstrate that the development can be completed without unacceptable effects upon flood risk, trees or biodiversity.
- 6.10 It is considered that the proposed scheme complies with relevant Development Plan Policies and is further supported by National Guidance. Therefore, it is respectfully requested that planning permission is granted.

Stephanie Richards BA (Hons) MA

Senior Planner | ET Planning

Head Office: 200 Dukes Ride Crowthorne RG45 6DS

stephanie.richards@etplanning.co.uk 01344 508048



| CIL
| Enforcement
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| Viability

Contact

Address

200 Dukes Ride RG45 6DS
One St Aldates OX1 1DE
32 London Road GU1 2AB
14 The Square SY1 1LH

Phone

01344 508048
01865 507265
01483 363950
01743 612043

Web & Mail

Email: office@etplanning.co.uk
ET Planning Ltd | 10646740

Web: www.etplanning.co.uk