

PLANNING, DESIGN AND ACCESS STATEMENT

Erection of a two-storey, two-bedroom (three-person) dwellinghouse with associated cycle and refuse storage, boundary treatment and landscaping

Land to the side of 1 South Walk, Hayes, UB3 2RE



Circle-Z Architectural and Planning Consultants

on behalf of Lotus Soft Ltd.

September 2026

1. Introduction

This statement supports a full planning application for a new two-storey, two-bedroom (three-person) dwellinghouse on land to the side of 1 South Walk, Hayes, UB3 2RE. It is prepared by Circle-Z Architectural and Planning Consultants on behalf of Lotus Soft Ltd.

The application follows pre-application advice issued on 12 February 2026 under reference 79797/PRC/2025/182 (Case Officer: Wai Hing Tse), which related to an earlier three-storey, three-bedroom scheme. That advice was not supportive of the scheme as then designed, but expressly identified a route forward, recommending that the applicant "explore the possibility of proposing a 1-2 bedroom dwelling with significant reduction in scale", with detailing revised to match the existing nineteenth-century dwellings. The scheme now submitted does exactly that. Section 2 answers each point of the advice in turn.

Two things have changed since February 2026 which bear directly on this application. First, a comprehensively restructured National Planning Policy Framework was published on 17 August 2026, replacing the December 2024 Framework. Its national decision-making policies took effect immediately and are material considerations here. Second, the Biodiversity Gain (Town and Country Planning) (Amendments and Transitional Provisions) (England) Regulations 2026 came into force on 6 August 2026 and introduced a new small site exemption from mandatory Biodiversity Net Gain. Both are addressed below.

1.1 Summary of changes made since the pre-application

- Reduced from three bedrooms over three storeys (101.4 sqm GIA) to two bedrooms, three persons, over two storeys (76 sqm GIA).
- Ridge now sits below the ridge of the host dwelling at No. 1 South Walk; front elevation set back 0.5m behind the front building line of No. 1.
- The flat-roofed rear roof extension has been deleted in its entirety and replaced with a traditional pitched, gabled roof.
- The rear building line now aligns with the 3.6m rear extension approved at No. 1 South Walk under reference 14892/APP/2026/675.
- Setback from the eastern boundary with South Walk increased from 0.8m to 1.0m, soft landscaped.
- Front garden depth increased to approximately 9.9m; the cycle store has been relocated out of the frontage and into the rear garden.
- Private amenity space: 60 sqm retained at No. 1 South Walk (fully compliant) and 55 sqm for the new dwelling, against approximately 45 sqm for each under the previous scheme.
- A full BS5837:2012 arboricultural report has been prepared by Harper Tree Consulting (ref. 2026057 v1.0).
- Elevational detailing redrawn to reflect the nineteenth-century character of the terrace.

1.2 Policy framework

The proposal has been assessed against the National Planning Policy Framework (August 2026); the London Plan (2021); the Housing Design Standards London Plan Guidance (2023); the Nationally Described Space Standard (2015); the Hillingdon Local Plan Part 1 (2012) and Part 2 (2020); and the Biodiversity Gain (Town and Country Planning) (Amendments and Transitional Provisions) (England) Regulations 2026. The emerging draft London Plan 2026 is at consultation stage and is not operative policy.

2. Response to Pre-application Advice

Each matter raised in the Council's response of 12 February 2026 is set out below, followed by the applicant's response.

2.1 Principle of development — backland development and Policy DMH 6

Officer position: the site is backland land without street frontage; Policy DMH 6 creates a presumption against the loss of garden land and permits limited backland development only in exceptional cases against four criteria. The earlier scheme resulted in a significant loss of rear garden at No. 1. Officers recommended exploring a 1–2 bedroom dwelling with a significant reduction in scale.

Response: the applicant has followed that recommendation. The dwelling is now a two-bedroom, three-person unit of 76 sqm GIA over two storeys — a reduction of approximately 25% in floorspace and the removal of an entire storey. Critically, the garden arithmetic has changed: No. 1 South Walk now retains 60 sqm of private rear amenity space, the full Table 5.3 requirement, rather than the approximately 45 sqm previously identified. The proposal no longer leaves the host dwelling with substandard garden provision.

The four criteria of Policy DMH 6 are addressed as follows.

DMH 6 criterion	Response
(i) Neighbouring residential amenity and privacy maintained; unacceptable light spillage avoided	The rear building line aligns with the approved 3.6m rear extension at No. 1. There is no projection beyond the host rear wall and therefore no overshadowing, loss of outlook or enclosure. The flank to South Walk contains no habitable room windows at first floor. Separation from No. 2 South Walk remains 5.7m, which officers accepted. See Section 7.
(ii) Vehicular access or parking not to have an adverse impact; access roads between dwellings and unnecessarily long access roads not normally acceptable	No vehicular access, access road or parking court is proposed. Access is pedestrian only, directly from South Walk, as for the host dwelling and the wider terrace. The criterion is fully satisfied.
(iii) Backland development must be more intimate in mass and scale, and lower than frontage properties	Two storeys rather than three; ridge below that of No. 1; front elevation set back 0.5m behind the host building line; footprint tapers with the plot. The proposal is demonstrably more intimate in scale, and lower, than the frontage properties.
(iv) Trees, shrubs and wildlife habitat retained or re-provided	The only tree of moderate quality (T4 Ash, Category B3) is retained and protected, with no incursion into its Root Protection Area. The three trees to be removed are dead or of low quality. A new tree is proposed, as annotated on the Proposed Site Plan, and approximately 71% of the site remains as garden and soft landscaping. A full landscaping scheme can be secured by condition. See Section 10.

2.2 Overdevelopment of a constrained site

Officer position: the proposal was considered an overdevelopment of the site.

Response: the dwelling has been reduced from 101.4 sqm over three storeys to 76 sqm over two. The proposed footprint of 45 sqm occupies approximately 29% of the 155 sqm application site, leaving approximately 71% as garden, planting and access. This is a modest, plot-appropriate form of development.

2.3 Excessive rear roof extension and insufficient 0.8m setback

Officer position: the dwelling would project 3m beyond the rear building line of Nos. 1–5 at ground floor and included a flat-roofed rear roof extension occupying the entire rear roof slope without any set down from the ridge, reading

as an additional second floor and out of keeping with the roof form of the terrace. The 0.8m setback was insufficient and would create at least 14m of continuous flank presence.

Response: three changes have been made.

- The rear roof extension has been deleted. There is no flat roof and no third storey. The roof is now pitched and gabled, reading as a continuation of the traditional roofscape of the terrace.
- The setback from the eastern boundary with South Walk has been increased from 0.8m to 1.0m, with that strip soft landscaped rather than left as a dead margin.
- The ground floor rear projection now aligns precisely with the 3.6m rear extension approved at No. 1 South Walk under reference 14892/APP/2026/675, shown shaded on the submitted drawings. Both properties are in the same ownership and the approved extension will be built out. On completion the rear building lines of the host and the new dwelling will be flush.

The perceived bulk of the flank is further reduced by the two-storey form, the lower ridge and the 0.5m front setback, which creates a visible break in the elevation.

2.4 Sense of openness along South Walk

Officer position: the existing side garden provides a buffer from South Walk and maintains the sense of openness along the footpath; the proposal would be overbearing and would significantly harm that openness.

Response: the removal of the second storey and the lowering of the ridge below that of No. 1 materially reduce the enclosing effect of the building when experienced from the footpath. A pedestrian will read the new dwelling as a lower, subordinate addition to the end of the terrace rather than as a taller structure standing forward of it. The 1.0m setback is soft landscaped, providing a green edge to the footpath, and the front garden is now approximately 9.9m deep and laid out as a garden rather than a storage yard.

It is also relevant that the western side of South Walk is not the only frontage condition on this footpath. The pair of semi-detached dwellings on the eastern side of South Walk, including Nos. 2 and 4, have their entrances and front gardens facing directly onto South Walk. The footpath is therefore already a route which dwellings address and front onto, rather than one bounded exclusively by flank boundaries. The proposal continues that established pattern.

2.5 Front garden reduced to 2m and occupied by cycle and refuse storage

Officer position: a front garden of only 2m in width, largely occupied by cycle and refuse storage, was contrived and out of keeping with the deep front gardens characteristic of Nos. 1–5 South Walk.

Response: the front garden is now approximately 9.9m in depth, and the cycle store has been relocated to the rear garden. The refuse and recycling store remains near the frontage, which is necessary — refuse vehicles cannot enter South Walk and bins must be presented on foot; a rear store would require bins to be carried through the dwelling. The store is a small timber enclosure set within planting and occupies only a small proportion of a now generous front garden.

The applicant accepts that the front garden is narrower than the very deep and wide front gardens of Nos. 1–5 South Walk. That difference is, however, a product of the geometry of this particular plot and is not harmful in townscape terms, for two reasons. First, the front gardens of Nos. 1–5 are seen from Middleton Road and read as part of that wider street frontage; the front garden of the proposed dwelling is not visible from Middleton Road and does not form part of that composition. Second, the appropriate comparison is with the semi-detached pair on the eastern side of South Walk, whose front gardens address the footpath itself. The proposed front garden is directly comparable to those, and at approximately 9.9m in depth is a genuine garden rather than a token forecourt.

2.6 Detailing does not match the existing nineteenth-century dwellings

Officer position: detailing with regard to bricks, tiles and window details should be revised to match the existing nineteenth-century dwellings.

Response: the elevations have been redrawn to take their cues from the existing terrace and from the character of dwellings of this period in the locality. The proposal incorporates yellow stock brickwork to match Nos. 1–5 South Walk; segmental gauged brick arches over openings; a pitched, gabled natural slate roof with slate hanging to the gable; vertically proportioned windows with traditional subdivision; and a traditional panelled entrance door in a recessed reveal. The canted front bay is a form characteristic of dwellings of this era in the surrounding area, and gives articulation and interest to the elevation addressing South Walk.

Detailed specification of materials is not fixed at this stage and the applicant would welcome a condition requiring samples of brick, slate, mortar and joinery to be submitted for approval.

2.7 Overshadowing of and enclosure to No. 1 South Walk

Officer position: the ground floor rear projection would project 3m beyond the rear wall of No. 1 at a height of 2.8m, fall within the 45-degree line from the nearest habitable window at No. 1, and create substantial overshadowing, loss of outlook and a sense of enclosure.

Response: this is resolved by the change of circumstances at No. 1. Planning permission has been granted at No. 1 South Walk for a 3.6m rear extension under reference 14892/APP/2026/675. That permission is extant and, both properties being in the same ownership, will be implemented. The rear building line of the proposed dwelling has been designed to align with it. In that scenario there is no projection beyond the rear wall of the host dwelling, the 45-degree test is not engaged, and there is no material overshadowing, loss of outlook or sense of enclosure. No. 1 also retains a fully compliant 60 sqm rear garden. The combination of substandard garden and overbearing projection which drove the earlier objection no longer exists.

2.8 Private amenity space

Officer position: both the new dwelling and No. 1 would have approximately 45 sqm of rear garden against the 60 sqm standard in Table 5.3, resulting in poor external amenity for both.

Response: the revised layout provides 60 sqm to No. 1 South Walk and 55 sqm to the new dwelling. The host dwelling is fully compliant and the position of the existing occupiers is materially improved. The new dwelling falls 5 sqm short — approximately 8% — and that shortfall is addressed in full at Section 8.3.

2.9 Highways, parking and cycle storage

Officer position: no off-street parking is proposed and overspill parking was anticipated; however, if the applicant can provide an independent parking survey demonstrating that the local highway network has capacity to accommodate the additional demand without compromising highway and pedestrian safety, the absence of off-street parking may be acceptable. Officers could not determine whether cycle storage in the narrow front garden would be fit for purpose.

Response: the dwelling is now a two-bedroom unit, which reduces the standard applicable under Policy DMT 6 — the pre-application response recorded that two spaces are required for units of three or more bedrooms. An independent parking stress survey has been commissioned and the results will be submitted during the determination period, following the route officers themselves identified. The cycle store has been relocated to the rear garden and will accommodate three cycles in a secure, weatherproof, ground-anchored enclosure, exceeding the two-space minimum under London Plan Policy T5.

2.10 Landscaping and trees

Officer position: in the absence of a tree survey or arboricultural report, officers were uncertain whether the dwelling could be constructed without harm to existing trees.

Response: a full Arboricultural Report has been prepared by Jon Harper cert. Arb (RFS) of Harper Tree Consulting (ref. 2026057 v1.0, survey 25 August 2026) in accordance with BS5837:2012, comprising a tree survey schedule, impact assessment, method statement, tree constraints plan, tree removal plan and tree protection plan. It accompanies this application and is summarised at Section 10.

2.11 Biodiversity Net Gain

Officer position: any application would need to confirm how the site would meet the Biodiversity Gain criteria or an exemption, with a self-build exemption requiring BNG metrics to be secured in a legal agreement.

Response: the statutory position has changed. The Biodiversity Gain (Town and Country Planning) (Amendments and Transitional Provisions) (England) Regulations 2026 came into force on 6 August 2026 and introduced a new exemption for development where the red line boundary is 0.2 hectares (2,000 sqm) or less, provided the development does not negatively affect on-site priority habitat. The same Regulations removed the former self-build and custom build exemption for applications made on or after that date, so the route referred to in the pre-application response is no longer available.

This application falls squarely within the new small site exemption. The application site is approximately 155 sqm and the red line boundary is far below the 2,000 sqm threshold. A search of the DEFRA MAGIC Map records no priority habitat on the site or in close proximity to it, and the arboricultural survey identifies no habitat of ecological significance — the trees to be removed comprise one dead weeping willow, one wild cherry of poor vitality and one stunted holly. The development would not negatively affect on-site priority habitat. The mandatory biodiversity gain condition therefore does not apply, and the applicant will complete the exemption section of the application form accordingly.

National decision-making Policy N2 of the NPPF (2026) confirms that decision-makers should not give weight to local policies seeking more than the statutory framework, and that higher local standards should not apply to development which is exempt from the statutory regime. Policies DMEI 7 and EM7 of the Local Plan should be applied consistently with that direction. Voluntary enhancements are nevertheless offered at Section 10.

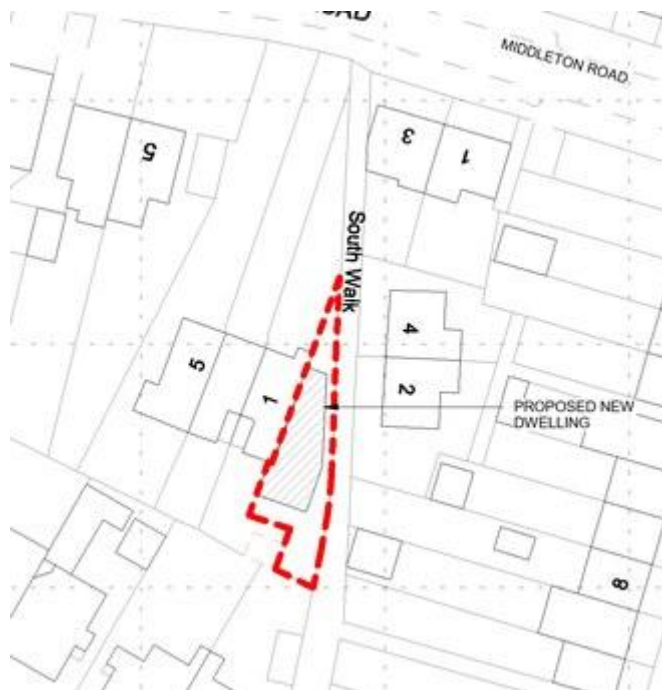
2.12 Other matters raised

Officer issue	Response
The rear projection would fall outside the red line and encroach into the boundary of No. 1.	The site boundaries have been redrawn. The whole of the proposed dwelling and its curtilage lie within the application site, and the new boundary between the two properties reflects the 60 sqm / 55 sqm garden split.
Access should not rely on passing through the front garden of No. 1; the dwelling should be self-contained with independent access.	The new dwelling has its own independent pedestrian access taken directly from South Walk, within the application site. No part of the access route passes through land remaining in the curtilage of No. 1.
Security and natural surveillance (Policy DMHB 15) given the absence of street frontage.	The front elevation faces South Walk with habitable room windows at ground and first floor, providing natural surveillance where there is currently a blank fenced boundary. The entrance is in a visible, accessible location, with clear delineation between footpath, defensible front garden and private rear garden. This mirrors the arrangement at the semi-detached dwellings opposite, which also front and address South Walk.
Community Infrastructure Levy.	The proposal creates 76 sqm of new internal floorspace and therefore falls below the 100 sqm threshold for Mayoral CIL. Hillingdon CIL is chargeable and the requisite forms accompany the application.

3. The Site and its Context

The application site comprises the side garden of 1 South Walk, on the western side of South Walk. The plot is broadly triangular, tapering from north to south, and extends to approximately 155 sqm. It is bounded to the east by South Walk, to the west by the side boundary of No. 1, and to the south by properties fronting Wood End Green Road.

South Walk is a pedestrian footpath connecting Wood End Green Road to the south with Middleton Road to the north, and carries no vehicular traffic. The host property is a two-storey end-of-terrace dwelling forming part of a short terrace of nineteenth-century cottages at Nos. 1–5 (odd numbers), in yellow stock brick with slate roofs, whose front gardens address Middleton Road. On the eastern side of South Walk, Nos. 2 and 4 are a pair of semi-detached dwellings whose entrances and front gardens face directly onto the footpath.



Location plan — the application site outlined in red, with South Walk running north to Middleton Road



Left: the front elevation of the host dwelling at No. 1 South Walk, addressing its deep front garden to Middleton Road. Right: the flank of No. 1 facing the application site, in pebbledash render



Left: Nos. 2 and 4 South Walk, on the eastern side of the footpath, whose entrances and front gardens face directly onto South Walk. Right: the existing close-boarded timber fence enclosing the application site along the South Walk boundary



The rear elevation of the host dwelling at No. 1 South Walk, where the approved 3.6m rear extension will be constructed

Designation	Status
Conservation Area / listed buildings	None. The pre-application response confirms the site is not the subject of heritage policies.
Tree Preservation Orders	None (arboricultural report, section 2.4).
Flood risk	Flood Zone 1; low risk of surface water flooding.
Air quality	Within the Hillingdon Air Quality Management Area.
Public transport	PTAL 2 (2023, grid ID 85634).
Priority habitat	None on or adjoining the site (DEFRA MAGIC Map).
Controlled Parking Zone	Not within a CPZ.

3.1 Public transport

The 2023 PTAL assessment records a rating of 2. Bus stops at Wood End Green Road (route H98, 6 buses per hour) lie 228m from the site, and Hayes End (routes 427, SL8 Superloop and 278, together 17.5 buses per hour) lies 429m away — approximately 23.5 buses per hour within a 430m walk. Hayes & Harlington station, on the Elizabeth line and Great Western Main Line, is accessible by the H98 and 427. The Uxbridge Road (A4020) district centre lies a short walk to the north.

3.2 Access to parks and public open space

The site has an unusually good level of access to publicly accessible open space for a suburban location.

Open space	Distance	Character and facilities
Wood End Green Road Allotments	c. 150 m	Large allotment site providing green infrastructure and, for plot holders, outdoor growing space.
Park Road Green and Park Road Green Playground	c. 400–450 m	Local open green with informal grass area for ball games and picnics, children's playground with swings and play equipment, and outdoor fitness equipment.
Hayes End Park and Hayes End Community Park (Recreation Ground), Kingsway	c. 500–540 m	Recreation ground with a perimeter path of approximately one kilometre used for walking and running, children's play area and basketball provision.

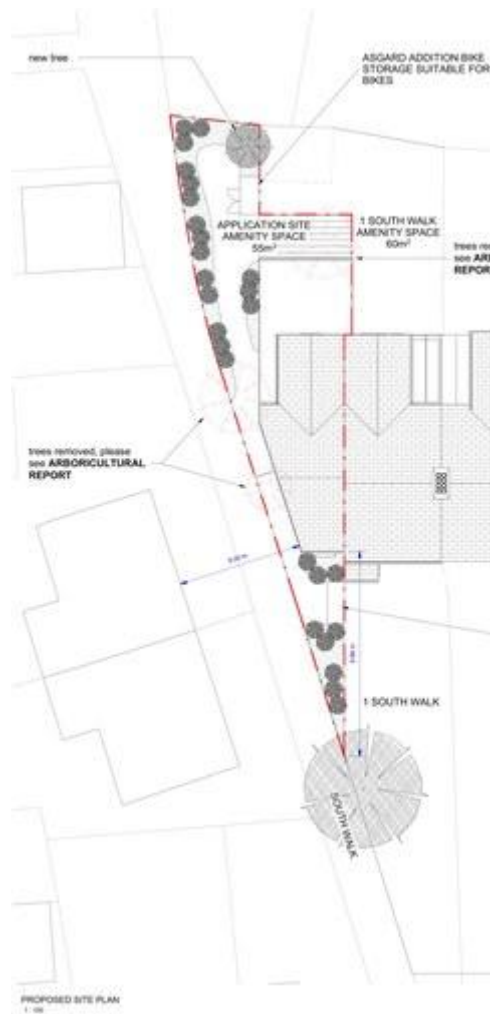
Open space	Distance	Character and facilities
Norman Leddy Memorial Gardens, Hayes End Road	c. 645 m	Formal ornamental gardens, formerly the Hayes Botanical Gardens, with a pond and quiet seating areas.
Barra Hall Park, Freemans Lane	c. 770 m	The principal park serving central Hayes: open lawns, mature trees, three age-related children's play areas and a regular programme of community events.
Lake Farm Country Park, Dawley Road	c. 1.25 km	Large country park with open meadow, walking and jogging routes, BMX track and skate park, play area and paths to the Grand Union Canal towpath.

Six accessible open spaces lie within a fifteen-minute walk. This is directly material to the assessment of the 5 sqm shortfall in private amenity space, addressed at Section 8.3.

4. The Proposal

Full planning permission is sought for the erection of a two-storey, two-bedroom (three-person) dwellinghouse with associated cycle and refuse storage, boundary treatment, tree works and landscaping.

Item	Figure
Gross Internal Area (ground and first floor)	76 sqm
Building footprint	45 sqm (approximately 29% of the 155 sqm site)
Storeys	Two (previously three)
Bedroom 1 (double, first floor, with walk-in wardrobe)	18 sqm
Bedroom 2 (single, ground floor)	9 sqm
Combined kitchen / living / dining	25 sqm
Private rear amenity space — new dwelling	55 sqm
Private rear amenity space retained at No. 1 South Walk	60 sqm
Front garden depth	c. 9.9 m
Setback from eastern boundary with South Walk	1.0 m
Front elevation set back behind front building line of No. 1	0.5 m
Rear building line	Aligned with the 3.6m rear extension approved at No. 1 (ref. 14892/APP/2026/675)
Ridge height	Below the ridge of No. 1 South Walk
Floor to ceiling heights	2.5 m or greater throughout



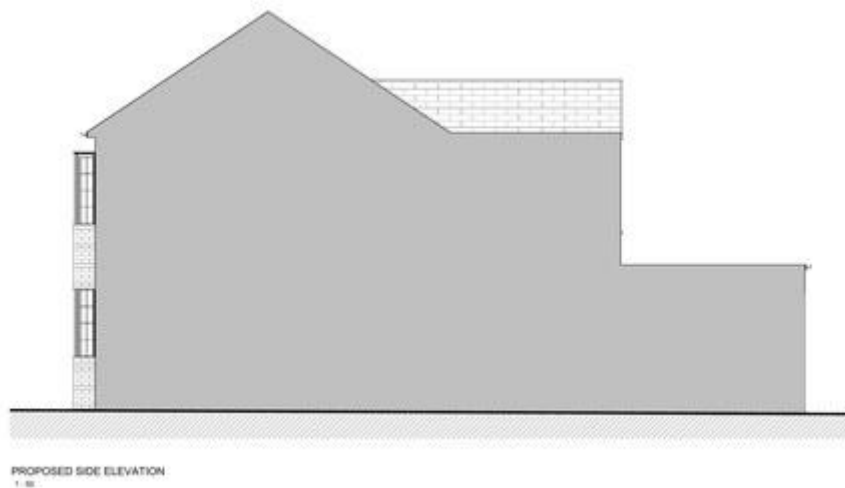
Proposed Site Plan, drawing 25102-02 Rev B — cycle store relocated to the rear garden, new tree, amenity space split of 60 sqm to No. 1 and 55 sqm to the new dwelling



Proposed ground and first floor plans, drawing 25102-03 Rev B. The blue shaded area indicates the approved rear extension at No. 1 South Walk (ref. 14892/APP/2026/675), with which the rear building line aligns



Proposed front and rear elevations, drawing 25102-04 Rev B. The front elevation shows the ridge set below that of No. 1 and the front wall set back behind the host building line



Proposed side elevation, drawing 25102-04 Rev B — the new dwelling shown shaded against the host dwelling behind

4.1 Materials

Materials are indicative at this stage and the applicant would welcome a condition requiring samples and details to be approved. The current intention is:

Element	Specification
External walls	Yellow stock brick to match Nos. 1–5 South Walk, with segmental gauged brick arches over openings
Roof	Natural slate, pitched and gabled, with slate hanging to the gable
Windows	White framed windows, vertically proportioned with traditional subdivision
Front door	Traditional panelled door in a recessed reveal
Rainwater goods	Black PVC
Boundary treatment	Timber, to match the existing boundary treatment on the site
Hard landscaping	Permeable surfacing to paths and the refuse store base

5. Principle of Development

Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires applications to be determined in accordance with the development plan unless material considerations indicate otherwise. The National Planning Policy Framework is a material consideration of critical importance.

5.1 The National Planning Policy Framework (August 2026)

The Framework published on 17 August 2026 separates plan-making from national decision-making policy, replaces the former paragraph 11 tilted balance, and changes how older development plan policies are weighted. Its national decision-making policies took effect immediately on publication and must be taken into account in determining this application. This is a materially different position from that which applied when the pre-application advice was issued in February 2026.

Policy S4 provides that development proposals within settlements should be approved unless the benefits would be substantially outweighed by adverse effects when assessed against the national decision-making policies. The site is unambiguously within a settlement for the purposes of the Framework's glossary definition: it lies within the continuous built-up area of Hayes, surrounded on all sides by residential development, in a London borough, close to the A4020 Uxbridge Road district centre.

Policy L2 gives substantial weight to the delivery of additional homes and floorspace within settlements and expressly supports the creation of additional units within residential curtilages, which may create opportunities for appropriately designed backland or garden development. This is a significant change of national policy direction and it applies directly to this proposal.

Policy L2 is accompanied by national parameters which safeguard gardens from disproportionate development. Development within a residential curtilage should ordinarily not occupy more than twice the footprint of all existing buildings on the site, taking those buildings as they stood on 17 August 2026, and at least 50% of the currently undeveloped area within the curtilage should remain undeveloped. The proposal complies with both.

National parameter	Proposal	Compliant
Footprint not more than twice that of existing buildings on the site	The proposed footprint is 45 sqm. The existing dwelling at No. 1 South Walk, together with its approved rear extension, has a footprint substantially greater than half that figure. The proposal is comfortably within the parameter.	Yes
At least 50% of the currently undeveloped curtilage to remain undeveloped	The 45 sqm footprint occupies approximately 29% of the 155 sqm application site, leaving approximately 71% undeveloped. Across the whole curtilage of No. 1, including the retained 60 sqm rear garden and the front gardens, the proportion is higher still.	Yes

Policy L3 expects density within settlements to increase unless there is clear justification otherwise. One dwelling on a 155 sqm site equates to a net density of approximately 64 dwellings per hectare, well above the national minimum density expectations applied to qualifying sites, while remaining subordinate in scale to its neighbours.

5.2 Policy L2 as a material consideration

Policy L2 is a national decision-making policy which post-dates the adoption of the Hillingdon Local Plan Part 2 in January 2020, and it is a material consideration of considerable importance in the determination of this application. The applicant does not invite the Council to set Policy DMH 6 aside: Section 2.1 demonstrates that the proposal satisfies each of its four criteria on their own terms. The point is simply that the substantial weight which Policy L2 requires to be given to a well-designed additional home within a residential curtilage, on a proposal which meets both of the national parameters accompanying that policy, is a matter which must now be weighed in the balance alongside the development plan.

5.3 Housing need and small sites

The August 2026 Framework strengthens the national emphasis on housing delivery. Annex D now calculates local housing need from a stock-based baseline with an affordability uplift, producing higher requirements in high-cost areas such as west London, and the Framework shifts emphasis from permissions granted to homes actually completed. When the 2025 Housing Delivery Test measurements were published alongside the new Framework on 17 August 2026, 147 of the 301 authorities with a numerical result — 48.8% — recorded delivery below 95% of their requirement, and 93 authorities, 30.9%, recorded delivery below 75%.

The case for this proposal does not, however, depend on a housing land supply shortfall. Policies S4 and L2 apply to sites within settlements regardless of the authority's supply position, and their effect is that a well-designed

home on an underused parcel within a settlement now starts from a position of national policy support. London Plan Policy H2 requires boroughs to pro-actively support well-designed new homes on small sites, Policy GG2 requires the potential to intensify the use of land to be proactively explored, and Policy H10 seeks the maximum intensity of use compatible with local context. This proposal is deliverable: the applicant owns both the land and the adjoining property, there is no infrastructure constraint, and construction could begin promptly on the grant of permission.

5.4 Small shortfalls and the planning balance

The proposal meets the Nationally Described Space Standard, the London Plan internal space and ceiling height requirements, the Housing Design Standards LPG requirement for combined living, dining and kitchen space, the London Plan cycle parking minimum, and each of the four criteria of Policy DMH 6. The host dwelling is left fully compliant with the private amenity space standard.

Two matters fall short of an adopted standard: private amenity space for the new dwelling (55 sqm against 60 sqm, a shortfall of approximately 8%) and Building Regulation requirement M4(2). Both are addressed at Sections 8.3 and 8.4 respectively. Policy DM3 of the Framework requires decision-makers to work positively and proactively, to consider before refusing whether a lawful condition or planning obligation could make a proposal acceptable, and to identify a real and unresolved harm before refusing. Policy DM7 requires decision-makers to assume that other regulatory regimes, including the Building Regulations, will operate effectively.

6. Design, Scale and Streetscene

The design has been developed from the character of the existing terrace rather than imposed on it. The governing principles are subordination to the host building, continuity of the terrace form, and traditional detailing.

The dwelling reads as the natural termination of the terrace. Its two-storey form matches the host, but its ridge sits below that of No. 1 and its front elevation is set back 0.5m behind the front building line, so the terrace steps down and back as it approaches the narrow southern end of the plot. The plan form tapers with the site, so that mass is concentrated where the plot is widest and diminishes towards the point at which South Walk is narrowest. This directly answers criterion (iii) of Policy DMH 6 and the officer's finding that the previous scheme featured no set back or set down from the host.

The flat-roofed rear roof extension has been deleted and the roof is now pitched and gabled with a slate covering and slate hanging to the gable, with a modest gabled dormer to the rear in place of a full-width rear roof extension. The elevations use yellow stock brick to match the existing terrace, with segmental gauged brick arches, vertically proportioned windows with traditional subdivision, a panelled entrance door in a recessed reveal, and a canted front bay of a form characteristic of dwellings of this era in the locality. The flank to South Walk is relieved by the front setback, the stepped massing, the bay and the planted margin.

The proposal improves the experience of South Walk. It replaces a blank fenced boundary with an active frontage containing habitable room windows, providing natural surveillance in accordance with Policy DMHB 15, and it presents a planted front garden of approximately 9.9m depth to the footpath. That relationship — a dwelling addressing and fronting South Walk — is already established on the eastern side of the footpath by the semi-detached pair at Nos. 2 and 4, whose entrances and front gardens face South Walk. The proposal accords with Policies BE1, DMHB 11, DMHB 12 and DMHB 15, with London Plan Policies D3 and D4, and with national Policy DP3.

7. Impact on Neighbouring Amenity

No. 1 South Walk. Permission has been granted at No. 1 for a 3.6m rear extension under reference 14892/APP/2026/675, and the rear building line of the proposed dwelling aligns with it. In that scenario — the lawful fallback which the applicant is entitled to and intends to implement — there is no projection beyond the rear

wall of the host dwelling, no breach of a 45-degree line taken from any habitable room window at No. 1 as built out, and therefore no material overshadowing, loss of outlook or sense of enclosure. No. 1 also retains a fully compliant 60 sqm rear garden, an improvement on the approximately 45 sqm previously proposed. The proposal accords with Policy P3 of the Framework, which requires acceptable daylight and sunlight for neighbours, with London Plan Policy D3 and with Policy DMHB 11.

Nos. 2 and 4 South Walk. Separation from the front elevation of No. 2 remains 5.7m, the distance at which officers concluded that "with the 5.7m separation distance remained, the extent of such impact would not be unacceptable and warrant objection to the proposal itself". The current proposal is materially less impactful than the scheme to which that conclusion related, being two storeys rather than three with a lower ridge.

Properties fronting Wood End Green Road. A separation of more than 7m is maintained from the southern boundary. There are no habitable room windows facing these properties at first floor level; any window serving a non-habitable room and facing the boundary will be obscure glazed and non-opening below 1.7m, which can be secured by condition.

Privacy. The flank to South Walk contains no habitable room windows at first floor. The dwelling is dual aspect, with principal windows to the front and rear. The front windows overlook the public footpath, which is a surveillance benefit rather than a privacy concern, and do not afford views into any neighbouring private garden.

Construction. The site lies within the Hillingdon Air Quality Management Area. A Construction Management Plan addressing hours of work, deliveries, dust suppression, wheel washing, Non-Road Mobile Machinery requirements and protection of the pedestrian route along South Walk can be secured by condition and is offered by the applicant. All construction access will be taken via the existing site entrance on South Walk, in accordance with section 4.7 of the Arboricultural Method Statement.

8. Living Conditions for Future Occupiers

8.1 Internal space standards

Standard	Requirement	Proposed	Compliant
GIA (NDSS, 2 bed / 3 person / 2 storeys)	70 sqm	76 sqm	Yes
Double bedroom floor area	11.5 sqm	18 sqm (Bedroom 1)	Yes
Single bedroom floor area	7.5 sqm	9 sqm (Bedroom 2)	Yes
Combined living / dining / kitchen (3 person)	25 sqm	25 sqm	Yes
Floor to ceiling height over at least 75% of GIA	2.5 m	2.5 m or greater throughout	Yes
Built-in storage	2.0 sqm	Ground floor store and first floor walk-in wardrobe	Yes

Bedroom 2 requires particular comment. The Nationally Described Space Standard requires a single bedroom to have a floor area of at least 7.5 sqm and a width of at least 2.15m. Bedroom 2 provides 9 sqm, comfortably exceeding the area standard, and achieves a width in excess of 2.15m across the majority of the room, as dimensioned on the submitted floor plans. The room narrows to 1.85m only at its southern end, where the plot itself tapers. The usable area of the bedroom, taken as the part of the room at or above the 2.15m width, exceeds the 7.5 sqm minimum in its own right, and the narrowing tail provides additional useful floor space rather than

substituting for it. The room accommodates a single bed, wardrobe and desk without difficulty and provides a good standard of accommodation.

8.2 Outlook, daylight and aspect

The dwelling is dual aspect. The open-plan kitchen, living and dining space is served by full-height glazed doors to the rear garden, Bedroom 1 by a window in the rear gable and Bedroom 2 by the front bay window. All habitable rooms have openable windows, adequate natural light, outlook and ventilation, in accordance with London Plan Policy D6 and Policy DMHB 16. Officers reached the same conclusion on the earlier scheme, finding that it "would provide a reasonable living conditions to the future occupants".

8.3 Private amenity space

Table 5.3 of Policy DMHB 18 requires a two-to-three bedroom house to provide at least 60 sqm of private outdoor amenity space. The new dwelling provides 55 sqm — a shortfall of 5 sqm, or approximately 8%. The applicant does not minimise that shortfall but invites the Council to weigh it in context. Five points are relevant.

- The shortfall arises from prioritising the existing occupiers. The layout deliberately allocates the full 60 sqm to No. 1 South Walk. An even split would have left both dwellings at approximately 57 sqm and both non-compliant. The applicant has chosen the arrangement which fully protects the amenity of the existing residents.
- The garden is genuinely usable. Policy DMHB 18 requires amenity space which is good quality, useable, well-located and well-designed. The 55 sqm garden is a regularly shaped, level, directly accessed rear garden with an open aspect, comfortably accommodating seating, drying, planting and the cycle store.
- Access to public open space is exceptional. As set out at Section 3.2, six publicly accessible open spaces lie within a fifteen-minute walk, including Park Road Green with children's play equipment and outdoor fitness equipment at approximately 400–450m, Hayes End Park and Recreation Ground at approximately 500m, Barra Hall Park at approximately 770m and Lake Farm Country Park at approximately 1.25km. Future occupiers will have access to a range and quality of outdoor space far exceeding what a further 5 sqm of private garden could offer.
- The Council has taken this approach before. In determining application 39409/APP/2025/818, officers accepted a flat with no dedicated external amenity space at all, concluding that "there are substantial areas of public open space within relatively close proximity to the site" and that "it is therefore considered on balance that not providing external amenity space for Flat 2 would be acceptable". The present proposal provides 92% of the required standard, in a location with a comparable or better level of access to public open space. Consistency of decision-making supports the same conclusion here.
- Recent appeal practice supports it. In appeal reference 6007122 (58–60 Ocean Street, Plymouth), allowed by Inspector Nick Davies on 4 September 2026, a scheme was permitted where the usable outdoor amenity space was around half the figure indicated by the local guidance. The Inspector relied on the character of the surrounding area and on public open space at Alexandra Park, Keyham Green Places and North Downs Park Sports Field being within approximately 250–300m, finding the limited on-site space sufficiently mitigated by location and access to public green space. The principle is that a numerical amenity standard is a guideline to be applied to the circumstances of the site, and that where private space is restricted, good access to public green space is a legitimate mitigation.

Policy DM3 of the Framework requires the decision-maker to identify a real and unresolved harm before refusing. An 8% shortfall, in a usable garden, in this location, does not amount to such a harm.

8.4 Accessibility and Building Regulation M4(2)

The applicant confirms openly that the proposed dwelling does not achieve Building Regulation requirement M4(2) "accessible and adaptable dwellings", and does not ask the Council to proceed on any other basis. The reasons are physical and are inherent to this site.

The plot is a triangular remnant of side garden which tapers from approximately 4.43m at its widest to 1.85m at the front. M4(2) requires, among other things, an approach route of defined width and gradient, an entrance and hallway of defined clear widths, turning and manoeuvring zones at the entrance level, and a WC and washing facility with clear access zones alongside. On a plot of this width and geometry those clear zones cannot be delivered without either widening the footprint or reducing the accommodation to the point where the dwelling is no longer a viable two-bedroom home. Widening the footprint is precisely what the pre-application response asked the applicant not to do: officers found the earlier scheme to be an overdevelopment and required a significant reduction in scale and a form more intimate in mass than the frontage properties, as Policy DMH 6(iii) requires.

There is a further and more fundamental point. South Walk is a pedestrian footpath with no vehicular access, and none can be created. M4(2) is predicated on an approach from a parking space or a point of vehicular arrival within reasonable distance of the entrance. No such point exists here, and none exists for the host dwelling or for any of Nos. 1–5 South Walk. Full M4(2) compliance on this plot would therefore deliver an accessible dwelling which could not be reached by an accessible route from a vehicle, which is not a meaningful accessibility outcome.

The applicant makes four points in mitigation, and invites the Council to weigh the matter rather than treat it as determinative.

- The dwelling nevertheless delivers a real accessibility benefit. The ground floor contains a bedroom, a shower room and the principal living space, so that the home can function on a single level throughout an occupier's lifetime. For a house of this size that is a more valuable practical outcome than many nominally compliant two-storey dwellings achieve.
- Policy HO5 of the NPPF (2026), which sets the 40% M4(2) expectation, is a plan-making policy directed at major development. It is not a national decision-making policy which applies mechanically to every application, and its application to any particular proposal depends on the adopted development plan, the transitional position and any applicable exemption.
- The Framework restricts local plan standards which duplicate the Building Regulations, permitting accessibility requirements only within defined limits. Compliance with Part M is in any event a matter for the Building Regulations regime, and Policy DM7 requires decision-makers to assume that other regulatory regimes will operate effectively rather than duplicating them without good reason.
- Policy DM3 requires that, before refusing, the decision-maker identify a real and unresolved planning harm and consider whether a condition or obligation could make the proposal acceptable. The shortfall here is a consequence of an irreducible site constraint — the width of the plot and the absence of any vehicular access — and cannot be designed out without abandoning either the two-bedroom accommodation or the reduction in scale which officers themselves required.

Weighed against that, the proposal delivers a new home in a sustainable settlement location to which Policies S4 and L2 attach positive weight, on a site where no dwelling of any kind could be built to M4(2) standards. Refusing permission on this ground would mean that this site, and others like it, could never contribute to housing supply, which is not the outcome that London Plan Policy D7 or the Framework intends.

9. Access, Parking, Cycle and Refuse Storage

Access to the new dwelling is taken directly and independently from South Walk, within the application site, and does not pass through land remaining in the curtilage of No. 1. This addresses the point raised at Section 5 of the pre-application response and follows the pattern of the host dwelling, the wider terrace and the semi-detached pair opposite, all of which are accessed on foot from South Walk.

No off-street car parking is proposed. The site has no vehicular access and none can be created. The pre-application response identified the route to acceptability: "if the applicant can provide an independent parking survey to demonstrate that the local highway network would have capacity to accommodate the additional parking demand without compromising highways and pedestrian safety, the absence of off-street parking provision may be acceptable." An independent parking stress survey has been commissioned and the results will be submitted during the determination period. The reduction from three bedrooms to two also reduces the standard applicable under

Policy DMT 6. London Plan Policy T6.1 sets maximum rather than minimum standards, and a car-free dwelling in a location with approximately 23.5 buses per hour within a 430m walk accords with London Plan Policies T2, T4 and T6 and with national Policy TR3, which requires a vision-led approach to transport. The applicant is willing to enter into a planning obligation restricting future occupiers' entitlement to on-street parking permits should a controlled parking zone be introduced.

Cycle parking exceeds the London Plan Policy T5 minimum of two spaces: a secure, weatherproof, ground-anchored store for three cycles is provided in the rear garden, accessed directly from the garden and screened from public view. Refuse and recycling storage is provided in a timber enclosure near the frontage, set within planting, accommodating a general waste bin, a recycling bin and recycling boxes with provision for food waste. Bins will be presented at the junction of South Walk with Middleton Road on collection days, as existing residents do. The development generates no vehicular movements and has no impact on highway or pedestrian safety.

10. Trees, Landscaping and Biodiversity

The Arboricultural Report prepared by Harper Tree Consulting (ref. 2026057 v1.0, survey 25 August 2026) surveyed four trees in accordance with BS5837:2012.

Ref.	Species	Category	Condition	Proposal
T1	Prunus avium (Wild Cherry)	C1 — low quality	Poor; low vitality	Remove
T2	Salix x chrysocoma (Weeping Willow)	U — unretainable	Dead	Remove; stump ground out
T3	Ilex aquifolium (Holly)	C1 — low quality	Fair but stunted	Remove
T4	Fraxinus excelsior (Ash)	B3 — moderate quality	Good; previously pollarded	Retain and protect

No tree on or adjacent to the site is subject to a Tree Preservation Order, the site is not within a Conservation Area, and there are no ancient or veteran trees. The only tree of moderate quality, T4, is retained; the report confirms no incursion into its Root Protection Area, no pruning requirement and no need for engineered foundations. The three trees to be removed are Category C or U and are not, in BS5837 terms, a material constraint on development. The report assesses the impact of their removal on the character of the local area as low for T1 and T3 and none for T2, concludes at section 3.6 that no compensatory planting is technically required, and concludes at section 3.7 that the residual arboricultural impact is acceptable subject to compliance with the Arboricultural Method Statement.

In relation to criterion (iv) of Policy DMH 6, a new tree is proposed within the rear garden as annotated on the Proposed Site Plan and Proposed Floor Plans, and approximately 71% of the site is retained as garden and soft landscaping. A detailed hard and soft landscaping scheme, including planting to the South Walk boundary and to the front and rear gardens, can be secured by condition, as can compliance with the Arboricultural Method Statement and the tree protection measures around T4.

As set out at Section 2.11 the proposal is exempt from mandatory Biodiversity Net Gain under the 0.2 hectare small site exemption which came into force on 6 August 2026, no priority habitat being present on or adjacent to the site. Notwithstanding that exemption, and consistent with Policy N2 of the Framework, the applicant offers the following voluntary enhancements, which can be secured by condition: integrated swift bricks within the new brickwork, an integrated bat box or bat brick, a bee brick, hedgehog gaps at the base of new timber boundary fencing, and native and pollinator-friendly species within the landscaping scheme.

11. Sustainability, Drainage and Air Quality

The most significant sustainability benefit of the proposal is its location: an established settlement within 430m of bus stops providing approximately 23.5 buses per hour, within walking distance of the Uxbridge Road district centre, schools, shops, allotments and six parks. This accords with London Plan Policies GG2, T2 and T4 and with national Policy TR3.

The dwelling will be designed to comply with the current Part L requirements of the Building Regulations, following a fabric-first approach with a well-insulated, airtight envelope and minimised thermal bridging, low-energy lighting, and water efficiency measures in accordance with London Plan Policy SI 5. Detailed energy and services strategies will be developed at Building Regulations stage. The compact scale of the dwelling is itself a benefit: a 76 sqm home has a materially lower embodied and operational carbon footprint than the 101.4 sqm dwelling previously proposed.

The site lies in Flood Zone 1 with a low risk of surface water flooding, so no sequential test is required. Surface water will be managed through permeable surfacing to hard areas and the retention of the substantial majority of the site as soft landscaping; foul drainage will connect to the existing public sewer; and all new underground service runs will be routed outside the Root Protection Area of the retained tree. The site lies within the Hillingdon Air Quality Management Area, and the proposal is air quality neutral in use, generating no vehicular movements and providing no parking. Construction impacts will be controlled through a Construction Management Plan secured by condition.

12. Conclusion

This application is the direct product of the Council's pre-application advice. Officers identified a route to acceptability — a one or two bedroom dwelling with a significant reduction in scale and detailing revised to match the existing nineteenth-century dwellings — and the applicant has followed it. The scheme has lost a storey and a bedroom, its ridge now sits below the host, its rear building line aligns with an approved extension at No. 1, its front garden has been restored to approximately 9.9m, its cycle store has moved to the rear, its detailing has been redrawn, and it is supported by the arboricultural evidence officers asked for. Section 2 addresses every point of the advice in turn.

The national policy context is also materially more supportive than it was in February 2026. Policy S4 of the NPPF (2026) provides that development within a settlement should be approved unless its benefits would be substantially outweighed by adverse effects. Policy L2 gives substantial weight to additional homes within residential curtilages, and this proposal complies with both national parameters which accompany it. Annex A directs that development plan policies materially inconsistent with national decision-making policy be given very limited weight. Policy DM3 requires a real and unresolved harm to be identified before refusal.

The benefits of the proposal are a new home in a sustainable settlement location; a material improvement in the amenity of the existing occupiers of No. 1 South Walk; an improved, actively overlooked and planted frontage to South Walk in place of a blank fence; the removal of a dead tree and two low-quality specimens, with a new tree proposed and tree protection secured for the one tree of value; a car-free dwelling in an Air Quality Management Area; and economic activity and CIL receipts.

Two matters fall short of an adopted standard. The 5 sqm, or 8%, shortfall in private amenity space arises from a deliberate decision to give the existing occupiers their full entitlement, relates to a genuinely usable garden, and is mitigated by six accessible open spaces within a fifteen-minute walk — an approach the Council has itself accepted in comparable circumstances and which recent appeal practice endorses. The dwelling does not achieve M4(2), for reasons which are inherent to the width of the plot and the absence of any vehicular access to South Walk, and which cannot be resolved without abandoning either the accommodation or the reduction in scale officers required; the ground floor bedroom and shower room nevertheless allow the home to be used on a single level.

Neither matter, alone or together, comes close to substantially outweighing the benefits of the scheme. The proposal accords with the development plan read as a whole and with the national decision-making policies of the

NPPF (2026). Planning permission is respectfully requested. The applicant remains willing to discuss any outstanding matter with officers and to accept conditions addressing materials, landscaping, tree protection, biodiversity enhancement, construction management, obscure glazing and parking permit restrictions.

Appendix — Submitted Drawings and Supporting Documents

Document	Reference
Existing Drawings	25102-01 Rev B
Proposed Site Plan	25102-02 Rev B
Proposed Floor Plans	25102-03 Rev B
Proposed Elevations and Section	25102-04 Rev B
Arboricultural Report, including tree survey schedule, impact assessment, method statement, tree constraints plan, tree removal plan and tree protection plan	Harper Tree Consulting, 2026057 v1.0
PTAL Report	TfL WebCAT, 2023, grid ID 85634
Planning, Design and Access Statement	This document
Independent parking stress survey	To follow during the determination period

Prepared by Circle-Z Architectural and Planning Consultants on behalf of Lotus Soft Ltd., September 2026.