



PROGRESS PLANNING

23A Frays Avenue, West Drayton, UB7 7AF.

Addition of First Floor to Existing Bungalow, and Addition of Cantilevered Bay Window to Ground Floor.

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INTRODUCTION

- 1.1 This Statement accompanies a Full Planning Application submitted to the Local Planning Authority (the 'LPA') The London Borough of Hillingdon relating to the addition of a first floor to a bungalow, and addition of a cantilevered bay window to ground floor, at 23A Frays Avenue, West Drayton, UB7 7AF (the application 'site').
- 1.2 This application follows the withdrawal, on 16th May 2022, of application 820/APP/2021/4418. That application sought consent for the demolition of 23A and the erection of a two-storey detached dwelling in lieu of the same. Concerns were raised by the LPA and others regarding both the dwelling design proposed, and in relation to matters concerned with drainage & flooding. The Applicant determined that to address these concerns, it would be prudent to withdraw the application, reappraise the design and resubmit.
- 1.3 This application has therefore been proceeded by extensive redesign work within the project team to 3realise a proposal which addresses design and drainage concerns. This submission entails the addition of a first floor installed atop the retained / strengthened ground floor walls, thereby ensuring there would be no increase in building footprint within the site (also ensured with the use of a cantilevered, rather than full-height, bay window on the north-east flank elevation) which is crucial given the site's location within both Flood Zone 2 and 3. The first-floor addition sits atop the entire footprint of the ground floor and would be set beneath a hipped roof form with single ridgeline. The previously proposed Dutch-Gable house design has been replaced with a simple rectangular dwelling format.
- 1.4 The proposed bay window will be cantilevered and located on the north flank elevation. The window is cantilevered and therefore does not increase the amount of development footprint associated with the dwelling.
- 1.5 The revised design is considered a compatible form of development which would assimilate more appropriately that the previous design, with the suburban form of residential development that is prevalent within the locale. Further, there being no increase in development footprint, no drainage considerations arise – the accompanying Flood Risk Assessment confirms – and the proposal will not give rise to an increase in flooding either on-site or within the surrounding area.
- 1.6 Being built atop the ground floor (or cantilevered in the case of the bay window), the enlarged dwelling will be in the same part of the curtilage, and therefore no nearer to the nearest neighbouring property (no.23 Frays Avenue to the north) than the dwelling in situ. Further, whilst higher, by reason of intervening landscaping, built form, physical separation, and the absence of 1st floor windows in the front elevation facing towards no.23, there would be no loss of amenity experienced by the nearest residential occupiers.
- 1.7 The enlarged dwelling would not be readily visible from the public realm as 23A occupies a tandem plot located behind no.23. This set-back coupled with the narrow aperture available between 21/21A to the left of the shared driveway, and 23 to the right, coupled with boundary landscaping, renders public views of 23A from Frays



Avenue, fundamentally unavailable.

- 1.8 The proposal will relocate the 4-bedroom crowded together towards the southern end of the dwelling, across the new first floor to realise 3 larger bedrooms, with the ground floor reorganised to realise an improved habitable room layout. The bay window will provide an attractive sitting place / vantage point to view the garden area.
- 1.9 This report begins by providing a description of the site and surrounding area, including a review of the planning history. An analysis of relevant planning policy and guidance is then undertaken. This includes an assessment of other material considerations, such as the Floor Zone 2/3 siting, and the form of local development generally. Conclusions are set out at the end of the report.



ASSESSMENT

2.1 This section of the Statement assesses the site's immediate and wider context in terms of environmental, social and economic characteristics.

Environmental

2.2 The site is located to the south side of Frays Avenue set behind 23 Frays Avenue with which it shares a shared driveway. The site occupies a unique position being bordered to 3 sides by Fray's River and to the 4th by no.23. The site is 'L-shaped' with the dwelling located at the southern end of the site with the driveway forming the stem of the 'L' to the north to Frays Avenue. The property is a single storey bungalow with simple gable ended built form, a rectangular footprint and aligned on a north/south axis with the front door on the north elevation. The dwelling is located centrally within the plot with garden area to 3 sides and a forecourt to the 4th / north where, until recently, a detached prefabricated garage stood. An application to erect an ancillary office outbuilding atop the retained slab of that garage has been submitted in parallel to this application.

2.3 Frays Avenue is characterised by a mixed palette of built form primarily dating from the 1940s onwards, with the over-riding character being residential and, generally, detached. Architecturally, the Avenue is defined by medium to large mostly detached dwellings which are located, certainly along much of the south side of the Avenue, on elongated plots with the dwellings sited towards the front of the same. There are exceptions to this pattern including no.23A and its neighbour no.21A to the northeast, both of which are tandem properties located behind their sibling frontage neighbours at nos. 21 and 23, and which are accessed via shared driveways. The predominant built form is two-storey detached dwellings with bungalows being evident in amongst the same. 21/21A and 23 are chalet bungalows, with 21A having a larger gabled ended roof massing with prominent eyebrow dormer to the front. The proposed dwelling would assimilate suitability within this built-form context

2.4 The host property is not listed nor within or adjacent to a heritage asset.

2.5 The site accommodates 23A, and is surrounded by residential usage of varying scales, tenure, architectural style, and massing. The site is bordered to the east/south/west by Fray's River which forks to the north close to the junction of Coldham Mill Road / Weirside Gardens and Frays Avenue, and encompassing circa 25 dwellings including 23A, before it re-joins to the south of 23A from which it flows to the River Colne circa 200m to the southwest. The immediately surrounding roads are residential in nature, and there are numerous examples of residential development within the same including on land within Flood Zones 2 and 3.

2.6 The site is level and L-shaped and has well-established landscaping mostly to the flank and rear boundaries. None of the trees within/adjacent to the site are subject to a Tree Preservation Order. No trees need to be removed to realise the proposal.



2.7 The entire site lies within Flood Zone 2 and partially within Flood Zone 3. A concern raised in relation to the withdrawn application was that in that proposal entailing a replacement dwelling, it was necessary to assess the suitability of the same post application of a sequential test. Whilst potentially the proposal could have been found acceptable against such a test, in the current scheme entailing an extension to realise the enlarged dwelling rather than a direct replacement, the need to undertake a sequential test falls away. That the bay window will be cantilevered and therefore not add to the amount of development at ground level, assists maintain the status quo in terms of site coverage development.

Social

2.8 The site is located approximately 625m from West Drayton train station (National Rail / Elizabeth Line / bus services) and commercial/retail services lining Station Road to the south of the same. The site has a poor Public Transport Accessibility Level rating - being in Zone 1B and forecast to remain so to at least 2031 - albeit the site is within 100m of properties in PTAL Zones 2 3.

2.9 Along Station Road, some 500m from the site, are convenience and comparative retail opportunities alongside other traditional suburban town-centre uses including West Drayton Post Office, food shops, a pubs, takeaways and hairdressers / beauticians, banking facilities and hotel accommodation.

2.10 The proposal will not increase the density of residential development on the site. Indeed, in realising 3 bedrooms over the current 4 bedrooms, there would be a theoretical reduction in the intensity of usage and occupancy levels within the site.

Economic

2.11 The site is located within a residential area and will make efficient use of previously developed land which is not significantly distanced from local transport and retail facilities irrespective of the PTAL 1B rating.

2.12 The proposal would provide job opportunities during the build process.



POLICY

3.1 Section 54(a) of the Town and Country Planning Act (1990) as amended by Section 38(6) of the Planning and Compulsory Purchase Act 2004, states that Local Planning Authorities should determine planning applications in accordance with the development plan, unless material considerations indicate otherwise.

3.2 The Development Plan and Supporting Documents includes:

- The National Planning Policy Framework (2021)
- The London Plan (2021)
- Hillingdon Local Plan Part 1 – Strategic Policies (2012)
- Hillingdon Local Plan Part 2 - Development Management Policies (2020)
- Hillingdon Local Plan Part 2 – Site Allocations and Designations (2020)

3.3 The current NPPF was adopted in 2021 and provides the principal policy background to the consideration of the proposal. As with the 2012 NPPF, Annex 1 again sets out guidance on the implementation of the NPPF and reinforces the importance of up to date plans. However, paragraph 219 confirms that the relevance of policies adopted prior to the NPPF will continue to carry weight '*according to their degree of consistency*' with the Framework – the closer the Plan policies align with the Framework the greater the weight that may be given to them in considering applications. To this end, it is evident that considering Part 1 of the Local Plan being over 5 years old, that to all intents and purposes it is Part 2 and the NPPF which are the principal Policy document with the weight attributable to Part 2 and other local policies being secondary depending on their degree of consistency with the NPPF. This submission proceeds on this basis.

3.4 Planning permission is required for the proposal due to not being Permitted Development by virtue of provisions within Class AA, Schedule 2, Part 1 to the General Permitted Development Order (2015 as amended 1st July 2022) which confirms at AA.1 F (i) that following the addition of an additional storey atop a single storey dwelling, the resultant dwelling would be more than 3.5m higher than previously – which would be the case in this instance.

National Planning Policy Framework (2021)

3.5 At the heart of the NPPF is a presumption in favour of sustainable development – paragraph 11 sets out the approach to how plan and decision making should apply a presumption in favour of sustainable development. For decision-taking this means approving development proposals that accord with the development plan without delay (paragraph 11 c and 11d).

3.6 The NPPF states at paragraph 38 that Authorities should approach decision making in a positive and creative way. Authorities are encouraged to work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area in which the development is to be located. Decision makers are encouraged to approve applications for sustainable



development where possible – in other words Authorities should look for solutions rather than problems. To this end the LPA are encouraged to engage with the Applicant should the accompanying proposal be found wanting.

- 3.7 Paragraph 119 advises that Policies promote the effective use of land to meet the need for new homes '*and other uses*' while safeguarding and improving the environment and ensuring safe and healthy living conditions. Strategic Policies should ensure that local objectively assessed needs are identified in a way that makes as much use as possible of previously developed or 'brownfield' land. The site qualifies as PDL having reference to the definition of the same in the NPPF. In this instance the enlarged dwelling would be built atop the footprint / walls of the dwelling in situ.
- 3.8 Paragraph 126 and Section 12 of the NPPF sets out the Government's approach to Design in the round. This NPPF raises the bar set by the 2012 NPPF confirming that the '*creation of high quality buildings and places*' is fundamental to what the planning and development process should be striving to achieve. Indeed '*good design is a key aspect of sustainable development*'. Paragraph 130 notes proposals which are of poor design and fail to improve the character and quality of an area, should be refused.
- 3.9 The proposal accords with the thrust of 130 by entailing a simple architectural form with enhanced external appearance compared to the stained timber-clad dwelling in situ and resulting in an improved visually attractive dwelling with sound and very simple architecture, improved functional internal layout and a vastly enhanced energy efficient and inherently improved habitable dwelling. Further, the design would maintain the 'sense of place' of the site siting perfectly comfortably within the same, having no visual impact on the appearance of the street scene, being physically and visually separated from 23 (and 21A) Frays Avenue and maintain the amount of footprint coverage within the site.
- 3.10 The NPPF states LPAs should approve all individual proposals wherever possible unless the adverse impacts of the proposals would significantly and demonstrably outweigh the benefits when assessed against the NPPF. It is contended that the proposal accords with the Development Plan in the round.
- 3.11 Applicable London Plan Policies include D1, D4, D6, D11, H1, H2, H8, H10, G7, SI 12, SI 13, T6 and T6.1.
- 3.12 Applicable Part 1 Policies include BE1 (Built Environment) and EM6 (Flood Risk Management).
- 3.13 Applicable Part 2 Policies include DMHB 5 (Areas of Special Local Character), DMHB 11 (Design of New Development), DMHB 14 (Trees and Landscaping), DMHB 15 (Planning for Safer Spaces), DMHB 18 (Private Outdoor Amenity Space); DMT 5 (Pedestrians and Cyclists); DMT 6 (Vehicle Parking), DMHD1 (Alterations and Extensions to Residential Dwellings), DME1 8 (Waterside Development), DME1 9 (Management of Flood Risk) and DME1 10 (Water Management, Efficiency and Quality).



The Principle of Development

3.14 The principle of development is acceptable having reference to (in particular), policies DMHD 1, DMHB 5, and DMEI 9. To elaborate, whilst noting DMHD 1(e) commentary regarding roof extensions, the proposed upwards extension would realise a form of development quite typical of the locale i.e., a dwelling with two-storey form akin to some neighbours including 21A, whilst also in this instance, not being readily visible within the public realm. Further, the upwards projection would only fall short of comprising a Permitted Development 'additional storey' extension under Class AA, by just 0.8m above the 3.5m tolerance. It is opined that the comprehensive redevelopment of a complete 1st floor and roof atop that existing, rather than a partial upwards extension which would be quite out of place and also poor design, would realise an acceptable and comprehensive form of development. This is particularly the case given the variety of building heights, built form and heights evident locally.

3.15 That the proposal would retain a self-contained dwelling, would improve on the appearance of the Area of Special Character by aligning the development form with the two-storey massing prevalent on neighbouring sites, would, though also having a footprint no greater than that in situ, ensure there would be no increase in surface water flooding on / off site attributable to the proposal. The accompanying Flood Risk Assessment elaborates.

3.16 The on-site tree scape would not be affected by the proposal.

3.17 The site comprises previously developed land upon which development is encouraged in both Local and National planning policy. Further, and whilst within PTAL Zone 1B, the site is still considered sufficiently close to transport nodes, commercial facilities, and shopping frontages / services for residential enlargement development to take place. The principle of development is acceptable.

3.18 Given the built form, layout and appearance of the local built environment, the almost entirely residential form of the same and the siting of the enlarged dwelling set back behind frontage development thereby rendering the enlarged dwelling fundamentally entirely screened from the same by neighbouring properties, it is considered that the proposal would reflect the character of the area and its original layout thereby aligning with criteria A of DMHB 5 Area of Special Local Character.



RELEVANT PLANNING HISTORY

- 4.1 The site was the subject of a recent planning application seeking consent for the demolition of the existing dwelling and erection of a two-storey replacement, replacement garage and addition of a home office. The application (ref 820/APP/2021/4418) was withdrawn on 16th May 2022.
- 4.2 As noted above, the design and drainage (sequential test) issues associated with that application, could not be addressed without a full redesign to ensure that (a) the design better aligned with the site / local built-form and (b) did not amount to a new-build dwelling within Zone 2 / 3, and thereby needing to satisfy a sequential test which, whilst on paper possible, could be difficult. Accordingly, the application was withdrawn, the design comprehensively changed, and the development changed from a replacement dwelling to an extension to the same thereby negating the need for a sequential test.
- 4.3 As noted above, a householder application to replace a single concrete prefabricated garage with a home office, has been submitted in parallel to this application. That application is self-contained.
- 4.4 There are no current / recent applications on sites immediately bordering the application site. Further afield, consent was granted on 4th February 2020 for the replacement of a bungalow with 2 x 3 bed dwellings at 20 Frays Avenue to the north (ref: 17012/APP/2020/368), for the addition of an additional storey atop a bungalow at 56 Ferrers Avenue (ref: 27828/APP/2020/1693) to the east and the erection of a replacement dwelling at 45 Frays Avenue to the west (ref: 24351/APP/2016/1304). Evidently the LPA are content that, subject to detail, residential redevelopment and indeed upwards development atop retained structure, are acceptable forms of development in this area.



DESIGN

The Proposal

5.1 The scheme proposes the addition of an additional storey atop of the bungalow at 23A Frays Avenue. The extension would decant sleeping accommodation from the ground to the upper floor and the rearrangement of the ground floor to realise improved 'daytime' rooms. The enlarged dwelling would use stone cladding on the ground floor, white render with inset timber cladding on the 1st floor beneath a tiled hip-roofed single ridge roof.

5.2 The additional storey would be built up from the retained/strengthened ground floor walls thereby occupying the exact same footprint at 23A presently. The dwelling would retain its main entrance on the north facing frontage, with secondary openings to all 3 other elevations.

5.3 The proposed enlarged dwelling would have a massing, material palette and form which would realise an entirely Policy and Design compliant design form entirely in keeping with the built form of the local entirely residential environment, with the street scene and resulting in no loss of amenity to any adjacent occupiers.

5.4 Given applicable designations, Development Plan policies and the support for well-designed house extension through Policies such as DMHD 1, the proposal will safeguard the character and appearance of the area and align with all other Policy criteria. The proposal is acceptable by definition and does not raise matters other than ones confirming that the proposal is in accordance with the Development Plan.

Amount

5.5 The proposal comprises an additional storey adding much needed residential accommodation within the site, and realising a modern, energy efficient and attractive form of development. Further, whilst reducing the number of bedrooms by 1, in improving the overall accommodation offer within the building, the proposal effectively adds to the stock of larger 'family' accommodation within the Borough thereby marginally improving the availability of available larger dwellings. Whilst the scale of the dwelling would logically double in terms of floorspace, this is achieved without harm to issues of acknowledged importance including building footprint.

Density

5.6 The proposal does not give rise to considerations relating to increased housing density.

Affordable Housing

5.7 The proposal does not give rise to considerations relating to the provision of affordable housing not being a major development as defined in the NPPF.

Amenity Space

5.8 The proposal would not reduce the amount of amenity space available within the site.



Layout, Scale and Overlooking

5.9 The enlarged dwelling would be fundamentally screened from the nearest residential dwelling, no.23A Frays Avenue, by landscaping, that properties large outbuilding and by reason of both physical separation and that no upper floor windows would face toward no.23A. This situation negates any concerns relating to a potential loss of amenity for no.23 - or indeed to any other adjacent occupiers including, in particular, 21A Frays Avenue.

5.10 The dwelling would not be of a scale out of keeping with its setting, nor out of scale with its own curtilage. Indeed, with reference to 21A and the curtilage associated with that dwelling, the enlarged no.23A, would occupy a larger site than the two-storey form of its neighbour at 21A.

5.11 That the enlarged dwelling would have the same footprint as the dwelling in situ, the dwelling would be implication be no closer to neighbouring properties than existing. The new upper-level windows would not provide overlooking opportunities of concern in relation to other neighbouring properties to the west, south or indeed east.

Appearance

5.12 Chapter 12 of the NPPF elaborates upon the need for development to achieve well-designed places, and indeed how the creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve.

5.13 The design would have a material palette, fenestration design, roof form, massing and design which would be entirely complementary to the site and its' locale.

5.14 It is contended that given the adjacent built context, which exhibits dwellings of various built forms, vintages, and designs, that the enlarged dwelling would sit entirely comfortably within the local architectural palette evident.

Landscaping

5.15 The proposal does not necessitate change to the landscaping stock within the site.

Access / Parking / Cycle Storage / Refuse & Recycling

5.16 Vehicular access and egress to the site / to the building will continue to be attained directly from Frays Avenue via the shared driveway with no.23.

5.17 The dwelling would continue to be served by sufficient on-site parking space for 3 vehicles and associated turning space.

5.18 Secure cycle storage would be provided within the outbuilding the subject of the parallel planning application for the new outbuilding to the north of the dwelling.

5.19 The proposal does not give rise to considerations relating to the provision of refuse & recycling storage. Existing facilities would continue to be used by the Applicant.

5.20 The proposal does not give rise to considerations relating to the provision of electrical charging points.



Drainage

- 5.21 The site is partially within Flood Zone 3 and 2, with the dwelling itself located within the Zone 2 part of the site. With reference to DMEI 9, there is considered no more suitable site for the positioning of the development within the site, than atop the footprint of the existing dwelling. This positioning will ensure – as the accompanying Flood Risk Assessment confirms – that the proposal would not increase the risk or consequences of flooding on site or indeed off-site.
- 5.22 The cantilevered bay window would sit above ground level, and therefore not increase the amount of development footprint within the site.



CONCLUSION

- 6.1 The bulk, massing, overall volume / spread and ridge height of the enlarged dwelling, and modest addition of a bay window, is considered commensurate against all assessment criteria in relation to the Area of Special Local Character, the street scene and to all matters of amenity generally including all applicable considerations under Policy DMHD 1.
- 6.2 That the proposal would maintain the status quo in terms of drainage and flooding owing to not increasing the amount of development footprint within the site, further compounds the acceptability of the proposal. The design is therefore considered acceptable in the round and is commended accordingly.
- 6.3 LPAs should approve all individual proposals wherever possible unless the adverse impacts of the proposals would significantly and demonstrably outweigh the benefits when assessed against the NPPF. The proposal is deemed in line with National, Local and London Plan Policy in the round. It is contended that the scheme is of a form able to receive a positive response which it is hoped the LPA will recognise and respond proactively and positively too.

