

**PLANNING STATEMENT IN SUPPORT OF THE  
PLANNING APPLICATION FOR CONVERSION OF THE  
DWELLINGHOUSE INTO TWO FLATS**

**SITE AT 23 SKIPTON DRIVE, HAYES, UB3 1PL**

**APPLICANT: MR NEIL TOPPING**

**DRAFTED BY: Mr S S BASUTA MA DIP TP MRTPI**

## **1.0 DESCRIPTION OF THE SITE AND SURROUNDINGS**

The site, an extended semi-detached two storey house is situated within a long and rectangular plot on the east side of Skipton Drive within a mature urban area. The existing dwelling is finished in brick and pebble dash. The property is set back from the main road allowing for off street parking. To the rear, the garden of the property is rectangular and finished in lawn.

- 1.1 The surrounding area is residential in character. Skipton Drive comprised primarily of two storey semi-detached properties of uniform design finished in render and facing bricks. Many properties have been extended in some form to the rear, at roof level and with front porches. There are single storey outbuildings within the rear gardens of many properties in the locality.
- 1.2 The property has been recently extended at ground level and at roof level comprising single storey rear extension and hip to gable conversion and rear dormer. The site is neither Listed nor situated within a conservation area. Photographs / aerial and street views of the site and surroundings are included in the Design and Access Statement accompanying the application. The site has a PTAL rating of 1b.

## **2.0 CENTRAL GOVERNMENT ADVICE**

Paragraphs 10 and 11 of the National Planning policy Framework (NPPF) July 2023 aims to promote sustainable development. Section 2 of the NPPF indicates to promote sustainable development by improving economic, social and environmental development through plan making and implementation. It is noted in paragraph 10 of the NPPF that there is a presumption in favour of sustainable development. This is endorsed by paragraph 38 stating local planning authorities should approach decisions on proposed development in a positive and creative way. They should use the full range of planning tools available, including brownfield registers and permission in principle, and work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area. Decision-makers at every level should seek to approve applications for sustainable development where possible.

- 2.1 Paragraphs 47 and 48 indicate that applications for planning permission should be determined in accordance with the development plan, unless material considerations indicate otherwise. Decisions on applications should be made as quickly as possible, and within statutory timescales unless a longer period

has been agreed by the applicant in writing. LPA'S should use appropriate planning conditions and to take into account material planning conditions relevant to each planning application to promote sustainable development.

2.2 NPPF's paragraphs 60 to 69 indicate that government aims to boost significant number of homes (including affordable housing) to meet as much of an area's identified housing need as possible, including with an appropriate mix of housing types for the local community. Strategic policy-making authorities should establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan period.

2.3 It is also an objective of NPPF (Paragraphs 131 to 141) to create high quality, beautiful and sustainable buildings and places which are fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities. As this proposal does not involve operational development therefore, the proposal has no conflict with the objective of the NPPF.

2.4 Sections 38(6) of the Planning and Compulsory Purchase Act 2004 and 70(2) of the Town and Country Planning Act 1990 lay down the basic rules for determining planning applications. Section 38(6) states that:

*"If regard is to be had to the development plan for the purpose of any determination to be made under the planning Acts the determination must be made in accordance with the plan unless material considerations indicate otherwise".*

The government is committed to a plan led system of development control and this is given statutory force by section 54A of the 1990 Act. The objective of the plan led system is to ensure, among other things, rational and consistent decisions and reducing misconceived planning applications and appeals.

2.5 Planning Practice Guidance 2014 (revised 2018) aims to streamline the planning system and among other things provides detailed guidance about the use of conditions in planning and indicates that the reasons for refusal / enforcement should be justifiable and supported by local and national policies.

2.6 The Technical Housing Standards published by the Department of Communities and Local Government indicates that a 2 bed 3 person single and two storey houses should achieve gross internal floor space of 61 and 70 sqm respectively. These standards are similar to the London Plan standards incorporated in policy

3.1 and Housing Supplementary Planning Guidance. The proposal complies with the National and London plan's prescriptive standards.

### **3.0 HILLINGDON LOCAL PLAN**

Local plan for the borough consists of the Hillingdon Local Plan Part 1 (Strategic Policies) adopted in 2012 and local plan part 2 adopted in 2020 consisting of Development Management Policies and Site allocation Plan. Strategic policies are primarily applicable to large developments, new estates and residential neighbourhoods.

- 3.1 This proposal aims to address the reasons for the refusal of the previous application. Refusal reasons rely on policies DMH1, DMH2, DMHB 16 of Local Plan 2 and policies H10 and D6 of the London Plan 2021. These policies would be discussed in detail and reference would also be made to other policies supporting the amended proposal.
- 3.2 Policies H1 and H2 of the Local Plan 1 aim to promote housing and affordable houses at appropriate locations to meet strategic housing targets. Borough's housing targets referred to in the plan has been revised by the London Plan 2021 to 10830 for the plan period (figure 4.1 of the London Plan) for net completions. The LPA aims to achieve strategic targets by promoting higher densities and effective use of land. The proposal accord with these policies and would help in meeting the borough's strategic housing targets.
- 3.3 Paragraph 4.4 of the Local plan 2 indicates that "In addition to resisting the net loss of residential accommodation, proposals to combine separate flats within an original house or purpose-built block to create family sized housing (3+ bedrooms) will be supported as this does not result in the net loss of residential floorspace and provides much needed family sized accommodation". It is obvious that there is no outright presumption against conversion of existing houses to flats and the proposal accord with the objective of the local plan.
- 3.4 Policy DMH 1: Safeguarding Existing Housing of local plan 2 indicates:-
  - The net loss of existing self-contained housing, including affordable housing, will be resisted unless the housing is replaced with at least equivalent residential floorspace.
  - The Council will grant planning permission for the subdivision of dwellings only if:
    - car parking standards can be met within the curtilage of the site
  - without being detrimental to the street scene;

- all units are self-contained with exclusive use of sanitary and
- kitchen facilities and provided with individual entrances and
- internal staircases to serve units above ground floor level;
- adequate amenity space is provided for the benefit of residents;
- and (iv) adequate living space standards are met.

As can be seen the proposal fully complies with this policy and there is no impediment to the proposal for the conversion.

3.5 Similarly, Policy DMH 2: Housing Mix indicates:-

“The Council will require the provision of a mix of housing units of different sizes in schemes of residential development to reflect the Council’s latest information on housing need”.

As the proposal provides a mix of two dwellings for occupation of 3 and 4 person units, it complies with the policy.

3.6 Local Plan 2 paragraph 4.11 (policy DMH 4) accepts “The conversion of single dwellings into more dwellings or the redevelopment of dwellings into new blocks of flats can enable more effective use of sites to be achieved. However, this type of development must seek to enhance the local character of the area. In recent years, large concentrations of flats have resulted in a range of problems, including increased on-street parking and resultant congestion on roads, the loss of front gardens, reductions in privacy, significant changes to the street scene, and loss of family accommodation”.

3.7 Policy DMH 4: Residential Conversions and Redevelopment Residential conversions and the redevelopment of dwellings into new blocks of flats will only be permitted where:

- i) it is on a residential street where the proposal will not result in more than 10% of properties being redeveloped into flats;
- ii) On residential streets longer than 1km the proposed redevelopment site should be taken as the midpoint of a 1km length of road for assessment purposes;
- iii) the internal floor area of the original building to be converted is at least 120 sqm; and
- iv) units are limited to one unit per floor for residential conversions.

There is no outright presumption against conversion and the proposal meets the criteria for conversion and complies with this policy.

3.8 The site is situated in a suburban part of Hillingdon having public transport accessibility level (PTAL 1b). The standard indicates that flats and houses with

and without individual curtilages would need to provide 2 and 1.5 spaces per dwelling respectively. In this case parking would be provided within the curtilage, the proposal would require 2 parking spaces to accord with this standard. London plan aims to restrict use of cars.

- 3.9 The car parking standards have been reviewed in the draft Local Plan 2 (submitted for EIP in 2018). Policy DMT 6 and Appendix C of the draft Local Plan Part 2 sets out the parking standards for residential and other uses in the borough. The residential car parking standards (Local Plan 2) takes account of the London Plan car parking standards. Proposed car parking standards are less onerous. Two parking spaces have been proposed on the forecourt. Highway Engineer has no objection to the proposed parking provision.
- 3.10 Section 4 of the SPD – Hillingdon Design and Accessibility Statement (HDAS) - Residential Layout adopted in 2006 provides detailed guidance about design of new residential developments. It sets out the various development standards such as density, unit sizes, day light / sun light, privacy, garden amenity space, design criteria and parking for new residential development. The amount of two parking spaces is therefore sufficient to support the development.

#### **4.0 RELEVANT POLICIES OF LONDON PLAN 2021**

Policy H1 of the London Plan 2021 sets out annual target (Table 4.1) of 1083 dwelling units and overall provision of 10830 units within the borough over the plan period. Policy H2 supports development of small sites for housing development. Policy H3 promoted effective use of land for housing development. Similarly, policy H8 resists loss of existing housing accommodation. Higher density should be promoted within town centres and along major transport nodes.

- 4.1 The London Plan 2021 policy H10 (Housing Mix and Size) aims to promote housing schemes that generally consist of a range of unit sizes to meet local need and to achieve housing potential of a site. Mayor of London's Housing SPG's internal and external standards for new housing developments are highly relevant and the appeal development accords with the standards laid out in the SPG.
- 4.2 Policy D6 of the London Plan indicates that housing development should be of high-quality design and provide adequately-sized rooms with comfortable and functional layouts which are fit for purpose and meet the needs of Londoners without differentiating between tenures. Table 3.1 (part of policy D6) lays down the internal floor space standards for new housing developments. The proposed

residential units comply with the internal floor space standards and amenity space criteria. This would be further discussed in the assessment of the proposal.

## 5.0 RELEVANT PLANNING HISTORY

<u>Application Ref:</u>	<u>Date</u>	<u>Proposal</u>	<u>Decision</u>
9462/APP/2024/2 453	07/11/24	Conversion of a single dwellinghouse into 1 x 2-bed flat and 1 x 2-bed flat, to include installation of a vehicle crossover, and associated parking, waste and cycle spaces	Refused
9462/APP/2024/1 674	04/09/24	Erection of a single storey rear extension, following the demolition of existing store, with the retention of boundary wall/gate. (Application for a Certificate of Lawful Development for a Proposed Development) (Amended Description)	Approved
9462/APP/2024/3	02/02/24	Erection of outbuilding to rear garden (Application for a Certificate of Lawful Development for a Proposed Development)	Approved
9462/APP/2024/4	23/02/24	Erection of a single storey rear extension (Application for a Certificate of Lawful Development for a Proposed Development)	Refusal
9462/APP/2024/5	23/02/24	Conversion of existing roof space to habitable use to include a rear dormer, 3 x front roof lights, and conversion of roof from hip to gable end.(Application for a Certificate of Lawful Development for a Proposed Development)	Approved

## **6.0 THE PROPOSAL (REVISED APPLICATION)**

This application is being submitted following the refusal of the planning application ref 9462/APP/2024/2453 on 07 November 2024, involving “Conversion of a single dwellinghouse into 1 x 2-bed flat and 1 x 2-bed flat, including installation of a vehicle crossover, and associated parking, waste and cycle spaces”.

This statement aims to address the refusal reasons of the previously refused application. Previous application was refused for the following reasons:-

1. The conversion of the three-bedroom dwelling into 2 x 2-bedroom substandard flats would result in the loss of a residential unit that is suitable and appropriately sized for a family. The proposal would therefore unacceptably undermine the supply of family housing within the Borough for which there is an identified need, contrary to Policies DMH 1 and DMH 2 of the Hillingdon Local Plan: Part Two - Development Management Policies (2020), Policy H10 of the London Plan (2021) and the National Planning Policy Framework (2023).
2. Due to its substandard internal floor layout, both of the proposed flats would provide their future residents with poor and unacceptable living accommodation to the detriment of their amenities. The proposal would therefore be contrary to Policy DMHB 16 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020), Policy D6 of the London Plan (2021) and paragraph 135 (f) of the National Planning Policy Framework (2023)

6.1 The purpose of this revised planning application is to justify that the reasons for the refusal of the previous application are not sustainable. It is expected the revised application would be considered favourably obviating the need for an appeal. This application is being accompanied by the following documents:-

- Location Plan
- Block Plan
- Existing Floor plans
- Proposed floor plans
- Existing Elevations
- Proposed Elevations
- Design & Access Statement

- Planning Supporting Statement

6.2 As noted in the planning history of the site, the house has been extended single storey at ground level and roof level. The extended house is proposed to be converted into two flats. There would a 2 bed (3 person) flat at ground level and a 2 bed (4 person) flat on upper floors. The gross internal floor space of the ground and upper floor's flat would be 61 sqm and 79 sqm respectively. Two parking spaces with a vehicular access have been proposed on the forecourt. Provision for refuse storage and cycle parking has also been made within the site. Sufficient exclusive amenity space would be available for use of the potential occupiers of the site.

## 7.0 PLANNING ASSESSMENT

### Principle of the Conversion

As can be seen from the planning history the dwellinghouse has been extended following the grant of planning permissions for the rear ground floor extension and the roof conversion. Dealing with the refusal reason no. 1 of the previous application, the original house has been extended and capable of conversion. There is, no outright presumption against the conversion of the extended house into flats in the local plan part 2. The proposal complies with the internal floor space standards, amenity space and parking requirements. The other consideration in this case is that no more than 10% of the houses in the street should be converted into flats. The LPA has already accepted that the current conversions in the street are well below this figure.

7.1 The proposal would involve a 3P (1 double and 1 single bed) flat on the ground floor and a 4P ( 2 double beds) flat on upper floors of the house. There would be no loss of residential accommodation as result of the conversion. The level of occupancy of the existing house would be similar to the occupancy of the converted flats. The proposal does not represent any material over-intensification of the use of the site.

7.2 One of the key strategic objectives of the London Plan policies H1 and H10 and the NPPF discussed previously, is to promote quality housing and increase the housing supply by developing brownfield sites and previously developed land. These policies aim to ensure that development proposals achieve the optimum potential use of land and compatible within local context. The site is situated in a mature built-up area in a sustainable location close to local amenities and a bus route thus providing an ideal location for the proposed conversion. The proposal

accords with this objective of these policies and would augment the supply of housing in the borough. There is therefore no objection to the principle of the conversion into flats as the proposal complies with policies H1 and H2 of local plan 1, policies DMH1, DMH2, DMH 4 of Local Plan 2.

7.3 The aim London plan policies H1, and H2 is to promote majority of the housing on brownfield sites and within existing urban areas in a sustainable location. There is an unmet demand and the need to increase housing supply in the borough. Hillingdon has a strategic target (set by London Plan) of achieving 1083 dwellings per year to meet the target of 10830 dwellings over the plan period. The appeal scheme would help to augment the housing stock in the borough to meet the strategic housing target in accordance with London plan policies. The principle of development is therefore supported by the London plan policies.

7.4 **QUALITY OF ACCOMMODATION**

The second reason for refusal of the previous refused application alleges that the flats are substandard. The ground and first floor flats would have gross internal floor space of 61 sqm and 79 sqm respectively. Although the LPA considered the ground floor flat below standard, but following the refusal applicant's architect has re-surveyed the property and on that basis it can be confirmed that the GIA of the GF flat is 61 sqm. Both the ground and first floor flat comply with the floor space standards for 3 and 4 person flats as noted in Table 3.1 of the London Plan setting out the minimum floor space standards. In addition, the proposed conversion of highest quality internally and externally, and importantly in relation to their context and to the surroundings. The principle of the development is therefore supported by the London Plan policies H1, H10 and policy D6 of the London Plan and policies of the Hillingdon Local Plan.

7.5 **AMENITY OF FUTURE OCCUPIERS THE PROPOSED RESIDENTIAL UNITS**

Both residential units would be dual aspect providing appropriate outlook and light to potential occupiers of the site. Policy DMHB 18 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020) indicates that all new residential development and conversions will be required to provide good quality and usable private outdoor amenity space. Amenity space should be provided in accordance with the standards set out in Table 5.3 which requires one-bedroom flats to have at least 20 square metres of private amenity space and 25sqm for 2 beds. The amenity space provisions would exceed well above the requirements

(69sqm for flat 1 and 161sqm for flat 2). Future occupants of the flats would have the use of ample and satisfactory private external amenity space at the rear.

## **7.6 PROVISION OF PARKING**

The site is situated in a suburban part of Hillingdon having public transport accessibility level (PTAL 1b). The proposal would create two residential units. Vehicular access to the site would be gained over a footway crossover providing access to the forecourt. The proposed footway crossover would be constructed in accordance with London Borough of Hillingdon Domestic Vehicle Footway Crossover Policy (2022) and carried out under a s184 Highways Act 1980 agreement at the applicant's/ developer's expense.

7.7 Applications for planning permission be determined in accordance with the development plan unless material considerations indicate otherwise. The London Plan (2021) Table 10.3 - Maximum Residential Parking Standards allows all dwellings in outer London PTAL 0-1 to have a maximum 1.5no. spaces. London Plan advocates to provide no more than one space per dwelling in such situation. The proposed two parking spaces would therefore be sufficient for the proposal. The proposal is supported by London Plan indicating that Mayor wishes to see an appropriate balance being struck between promoting new development and preventing excessive car parking provision that can undermine cycling, walking and public transport use. Two parking spaces in addition to the cycle spaces in a covered parking have been provided within the site. Previously highway Engineer supported the application. If there is any concern this matter can be covered by an appropriate planning condition.

7.8 The area designated for soft landscaping is sufficient to incorporate evergreen planting to improve the visual amenity and character of the area. The proposed forecourt incorporating hard and soft landscaping strikes a balance between hard and soft landscaping. Any minor concerns could be addressed by appropriate planning conditions. Planning decisions are made considering all the relevant policies as a whole rather than one aspect of a policy.

## **8.0 CONCLUSION**

The key test applicable to the proposal would be whether the proposal would cause a material harm to amenity by scrupulous application of local plan policies and whether a proposal would comply with the development standards noted in the relevant policies. The proposal overwhelmingly accords with the relevant policies discussed in section of this statement.

- 8.1 The site is neither a listed building nor situated in a conservation area. No external operational development such as extensions are proposed therefore, the proposal would have no material effect on the amenity of any of the neighbouring occupiers. The proposed flats are spacious and would be built to comply with lifetime home standards. Overall, the proposal accords with the relevant policies. It would also accord with the sustainable design criteria advocated by NPPF and the local plan. The proposal is supported by the Council's Access Officer. Any other issues could be addressed by appropriate planning conditions.
- 8.2 The proposal is sustainable and accords with local and national policies. On balance, the proposal meets the relevant development criteria, and would have no material impact on amenity. Any minor concerns could be addressed by appropriate planning conditions.
- 8.3 As noted in sections 3 & 4 of this statement, there is no outright presumption against conversion of the dwellinghouse into flats. Having regard to the internal space standards the proposal layout of the flats complies with the Local Plan 2 and London Plan standards. Applications are decided on balance and therefore permission be granted for the proposed development.