

DELEGATED DECISION

- Please select each of the categories that enables this application to be determined under delegated powers
 - Criteria 1 to 5 or criteria 7 to 9 must be addressed for all categories of application, except for applications for Certificates of Lawfulness, etc.

APPROVAL RECOMMENDED: GENERAL

Select Option

- | | |
|--|--------------------------|
| 1. No valid planning application objection in the form of a petition of 20 or more signatures, has been received | ☐ |
| 2. Application complies with all relevant planning policies and is acceptable on planning grounds | ☐ |
| 3. There is no Committee resolution for the enforcement action | ☐ |
| 4. There is no effect on listed buildings or their settings | ☐ |
| 5. The site is not in the Green Belt (but see 11 below) | ☐ |

REFUSAL RECOMMENDED: GENERAL

- | | |
|--|--------------------------|
| 6. Application is contrary to relevant planning policies/standards | ☐ |
| 7. No petition of 20 or more signatures has been received | ☐ |
| 8. Application has not been supported independently by a person/s | ☐ |
| 9. The site is not in Green Belt (but see 11 below) | ☐ |

RESIDENTIAL DEVELOPMENT

- | | |
|--|--------------------------|
| 10. Single dwelling or less than 10 dwelling units and/or a site of less than 0.5 ha | ☐ |
| 11. Householder application in the Green Belt | ☐ |

COMMERCIAL, INDUSTRIAL AND RETAIL DEVELOPMENT

- | | |
|--|--------------------------|
| 12. Change of use of retail units on site less than 1 ha or with less than 1000 sq m other than a change involving a loss of A1 uses | ☐ |
| 13. Refusal of change of use from retail class A1 to any other use | ☐ |
| 14. Change of use of industrial units on site less than 1 ha or with less than 1000sq.m. of floor space other than to a retail use. | ☐ |

CERTIFICATE OF LAWFULNESS

- | | |
|---|--------------------------|
| 15. Certificate of Lawfulness (for proposed use or Development) | ☐ |
| 16. Certificate of Lawfulness (for existing use or Development) | ☐ |
| 17. Certificate of Appropriate Alternative Development | ☐ |

CERTIFICATE OF LAWFULNESS

- | | |
|---|--------------------------|
| 18. ADVERTISEMENT CONSENT (excluding Hoardings) | ☐ |
| 19. PRIOR APPROVAL APPLICATION | ☐ |
| 20. OUT-OF-BOROUGH OBSERVATIONS | ☐ |
| 21. CIRCULAR 18/84 APPLICATION | ☐ |
| 22. CORPSEWOOD COVENANT APPLICATION | ☐ |
| 23. APPROVAL OF DETAILS | ☐ |
| 24. ANCILLARY PLANNING AGREEMENT (S.106 or S.278) where Heads of Terms have already received Committee approval | ☐ |
| 25. WORKS TO TREES | ☐ |
| 26. OTHER (please specify) | ☐ |

The delegation powers schedule has been checked. Director of Residents Services can determine this application.

Case Officer

Signature:

Date:

A delegated decision is appropriate and the recommendation, conditions/reasons for refusal and informatives are satisfactory.

Team Manager:

Signature:

Date:

The decision notice for this application can be issued.

Director / Member of Senior Management Team:

Signature:

Date:

NONE OF THE ABOVE DATES SHOULD BE USED IN THE PS2 RETURNS TO THE ODPM

Item No.	Report of the Head of Planning, Transportation and Regeneration
Address	2 MIDCROFT RUISLIP
Development:	Erection of a part 3 storey, part 4 storey building to provide 1 x 1-bed, 3 x 2-bed and 5 x 3-bed self-contained flats with associated parking, amenity space, refuse and cycle storage following demolition of existing petrol filling station/car wash
LBH Ref Nos:	4918/APP/2021/1103
Drawing Nos:	MRH/EX/100 MRH/PL/100 Design and Access Statement Phase I Geo-Environmental Report Archaeological Desk-Based Assessment Transport Statement Flood Risk Assessment Planning and Heritage Statement MRH/EX/400 Rev. A MRH/PL/101 Rev. A MRH/PL/102 Rev. A MRH/PL/103 Rev. A MRH/PL/104 Rev. A MRH/PL/105 Rev. A MRH/PL/200 Rev. A MRH/PL/201 Rev. A MRH/PL/202 Rev. A MRH/PL/203 Rev. A

Date Plans received : 19/03/2021

Date(s) of Amendment(s):

Date Application Valid: 19/03/2021

1. SUMMARY

This application proposes the demolition of an existing petrol station building and the erection of a three storey building to create 1 x 1-bed, 3 x 2-bed, and 4 x 3-bed self contained flats with associated parking, amenity space, refuse and cycle storage.

It is considered that the proposed development would have a detrimental impact on the character and appearance of the surrounding area. It would fail to appear as a well-integrated development along Midcroft or respect its unique location between the High Street and residential Area of Special Local Character. The proposed layout also raises highway safety concerns and the residential amenity of the proposed ground floor units is not considered to be acceptable as set out in this report.

Therefore, the application is recommended for refusal.

2. RECOMMENDATION

REFUSAL for the following reasons:

1 NON2 Non Standard reason for refusal

The proposed development by reason of its size, scale, bulk and design would be an

inappropriate development of the site that would be detrimental to the character, appearance and visual amenities of the street scene and would fail to either preserve or enhance the character or appearance of the surrounding Ruislip Village Conservation Area and the adjacent Area of Special Local Character. The proposal is therefore contrary to Policies BE1 and HE1 of the Hillingdon Local Plan: Part One - Strategic Policies (November 2012), Policies DMHB 1, DMHB 4, DMHB 5, DMHB 11 and DMHB 12 of the Hillingdon Local Plan Part Two - Development Management Policies (January 2020), Policy HC1 of the London Plan (2021) and the National Planning Policy Framework (2019).

2 NON2 Non Standard reason for refusal

The proposal, fails to demonstrate that that sufficient manoeuvring and access arrangements for service delivery vehicles and car parking would be maintained for adjoining premises which would result in driver confusion and unexpected vehicle movements for other highway users and deliveries and parking taking place from the road. The development is therefore considered to be detrimental to highway and pedestrian safety and prejudicial to the free flow of traffic on the adjoining highway, including access by service delivery vehicles to the adjacent buildings at 53 - 61 High Street Ruislip, contrary to Policy DMT 1 of the Local Plan: Part 2 Development Management Policies (2020) and Policy T4 of the London Plan (2021).

3 NON2 Non Standard reason for refusal

The proposed development by reason of its siting, layout and design would result in the provision of a habitable rooms on the ground floor with very limited levels of natural lighting, outlook and privacy that would result in a substandard form of living accommodation and reliance upon artificial means of lighting which would fail to satisfy sustainability and energy efficiency objectives and would be to the detriment of the amenity of future occupiers, contrary to Policies DMHB 11 of the Hillingdon Local Plan: Part Two - Development Management Policies (2020) and Policies D6 and SI2 of the London Plan (2021).

INFORMATIVES

1 I52 Compulsory Informative (1)

The decision to REFUSE planning permission has been taken having regard to all relevant planning legislation, regulations, guidance, circulars and Council policies, including The Human Rights Act (1998) (HRA 1998) which makes it unlawful for the Council to act incompatibly with Convention rights, specifically Article 6 (right to a fair hearing); Article 8 (right to respect for private and family life); Article 1 of the First Protocol (protection of property) and Article 14 (prohibition of discrimination).

2 I53 Compulsory Informative (2)

The decision to REFUSE planning permission has been taken having regard to the policies and proposals in the Hillingdon Local Plan Part 1 (2012) and Part 2 (2020) set out below, including Supplementary Planning Guidance, and to all relevant material considerations, including The London Plan - The Spatial Development Strategy for London consolidated with alterations since 2011 (2016) and national guidance.

DMTC 1	Town Centre Development
DMEI 2	Reducing Carbon Emissions
DMEI 9	Management of Flood Risk
DMEI 12	Development of Land Affected by Contamination
DMEI 14	Air Quality
DMH 2	Housing Mix

DMHB 1	Heritage Assets
DMHB 4	Conservation Areas
DMHB 11	Design of New Development
DMHB 12	Streets and Public Realm
DMHB 14	Trees and Landscaping
DMHB 16	Housing Standards
DMHB 18	Private Outdoor Amenity Space
DMT 2	Highways Impacts
DMT 6	Vehicle Parking
LPP SD7	(2021) Town centres: development principles and Development Plan Documents
LPP GG2	(2021) Making the best use of land
LPP GG4	(2021) Delivering the homes Londoners needs
LPP HC1	(2021) Heritage conservation and growth
LPP D2	(2021) Infrastructure requirements for sustainable densities
LPP D3	(2021) Optimising site capacity through the design-led approach
LPP D4	(2021) Delivering good design
LPP D5	(2021) Inclusive design
LPP D6	(2021) Housing quality and standards
LPP D7	(2021) Accessible housing
LPP D8	(2021) Public realm
LPP SI2	(2021) Minimising greenhouse gas emissions
LPP SI3	(2021) Energy infrastructure
LPP SI12	(2021) Flood risk management
LPP SI13	(2021) Sustainable drainage
LPP T6	(2021) Car parking
LPP T6.1	(2021) Residential parking
NPPF- 2	NPPF-2 2018 - Achieving sustainable development
NPPF- 5	NPPF-5 2018 - Delivering a sufficient supply of homes
NPPF- 7	NPPF-7 2018 - Ensuring the vitality of town centres
NPPF- 11	NPPF-11 2018 - Making effective use of land
NPPF- 12	NPPF-12 2018 - Achieving well-designed places
NPPF- 16	NPPF-16 2018 - Conserving & enhancing the historic environment

3 I71 LBH worked applicant in a positive & proactive (Refusing)

In dealing with the application the Council has implemented the requirement in the National Planning Policy Framework to work with the applicant in a positive and proactive way. We have made available detailed advice in the form of our statutory policies from the Local Plan Part 1, Local Plan Part 2, Supplementary Planning Documents, Planning Briefs and other informal written guidance, as well as offering a full pre-application advice service.

This is a reminder that Under the terms of the Planning Act 2008 (as amended) and Community Infrastructure Levy Regulations 2010 (as amended), should an application for appeal be allowed, the proposed development would be deemed as 'chargeable development' and therefore liable to pay the London Borough of Hillingdon Community Infrastructure Levy (CIL) and the Mayor of London's Community Infrastructure Levy (CIL). This would be calculated in accordance with the London Borough of Hillingdon CIL Charging Schedule 2014 and the Mayor of London's CIL Charging Schedule 2012. For more information on CIL matters please visit the planning portal page at: www.planningportal.gov.uk/planning/applications/howtoapply/whattosubmit/cil

3. CONSIDERATIONS

3.1 Site and Locality

The site is located within Ruislip Town Centre, Ruislip Village Conservation Area, and within an archaeological priority area. It is also adjacent to an Area of Special Local Character and located opposite a locally listed building at No. 63 High Street.

There is a public park and a cemetery to the north of the site (Church Field Gardens public open space). It is therefore a sensitive context in which to bring forward redevelopment. The site currently comprises of a petrol filling station that is not currently operational and a car wash facility that does not benefit from planning permission as a planning unit operating in isolation.

The site fronts onto Midcroft, a residential street comprising good quality two storey suburban housing. It is positioned immediately to the rear of Jebson House Nos. 53 - 61 High Street. This comprises a 1970s three storey building (including mansard roof) that has commercial/retail units at ground floor with office use above. This building has Prior Approval consent for a change of use to residential (22 x studio units) under application reference 38567/APP/2016/869. Surface car parking lines its rear courtyard area, immediately abutting the site. To its east lies an important pedestrian route, leading into the expansive open space of Church Field Gardens, with good quality two storey family houses lining Midcroft beyond. The nearest house, No 4 Midcroft, abuts the pedestrian route and is a two storey single family dwelling with flank windows at ground and first floor level together with a long and large rear garden (all of which are sensitive to issues of overlooking). To the more immediate north of the site lie a series of service yards associated with businesses in 43-51 High Street. These uses have considerable parking and servicing associated with them and which are accessed via the road/right of way that forms the site's eastern edge. On the south side of Midcroft the site faces onto the return two storey flank and service yard of the locally Listed Building at No 63 High Street.

The site is on the border of PTAL score areas of 3 & 4 and within a developed area as designated by the policies contained within the Hillingdon Local Plan.

3.2 Proposed Scheme

The proposed development relates to the demolition of the existing petrol station and the construction of a three storey building to create 1 x 1-bed 2 person, 3 x 2-bed 4 person, and 4 x 3-bed 6 person self contained flats with associated parking, amenity space, refuse and cycle storage. The internal unit sizes would vary between 61.15m² and 98.23m² as follows:

Ground Floor:

Flat 1 - 1 bed 2 person - 61.2m²

Flat 2 - 2 bed 4 person - 70.4m²

1st Floor:

Flat 3 - 2 bed 3 person - 65.1m²

Flat 4 - 3 bed 5 person - 89.5m²

Flat 5 - 3 bed 6 person - 98.2m²

2nd Floor:

Flat 6 - 2 bed 3 person - 65.1m²

Flat 7 - 3 bed 5 person - 89.5m²

Flat 8 - 3 bed 6 person - 98.2m²

Also proposed is a car park with 6no. spaces, including one blue badge space. Cycle parking and bin storage are located at ground floor level. The ground floor is proposed to be a smaller area than the first floor of the building to allow access to parking spaces to the rear of 53-61 High Street which are not within the ownership of the applicant. The access route to the rear yards of properties further down the high street would remain open as it is at present.

The original application proposed 9 units with a flat roofed design and different architectural style, however the scheme has been amended during the course of the application process following comments received from the Council's Conservation and Design Officer.

3.3 Relevant Planning History

4918/APP/2001/482 Midcroft Self Service Midcroft Ruislip

INSTALLATION OF A 10,000 LITRE ABOVE GROUND DIESEL TANK TO THE REAR OF THE SERVICE STATION

Decision: 17-07-2001 Approved

4918/APP/2014/1274 2 Midcroft Ruislip

Demolition of existing petrol station with tanks and erection of a four storey building comprising 14 residential, an office unit at ground floor level plus associated access, underground car parking and cycle storage.

Decision: 20-11-2014 Refused

Appeal: 25-01-2016 Withdrawn

4918/APP/2018/4227 2 Midcroft Ruislip

Erection of four storey building with undercroft to create 2 x 1-bed, 3 x 2-bed, and 4 x 3-bed self contained flats with associated parking, amenity space, refuse and cycle storage

Decision: 29-03-2019 Refused

Comment on Planning History

The site has been subject to a number of applications relating to its former use as a petrol station, such as the installation of fuel tanks. In relation to the current proposal an application was made in 2008 (ref. 4918/APP/2008/805) for a 60 bedroom hotel. This application was withdrawn however prior to a determination on the schemes acceptability being made.

In 2014 an application was submitted to demolish the garage and build in its place a four storey block of flats with office space on the ground floor (4918/APP/2014/1274). This application was presented to planning committee who determined that the application be refused. One of the reasons given for refusal was the view that the siting, scale and height

was felt to be unduly intrusive and the design would be out of character with the conservation area and ASLC. However the applicant withdrew this application before a decision was issued.

In 2018 plans were submitted (4918/APP/2018/738) but these were subsequently withdrawn due to Jebson House (53-61 High Street) gaining consent via the prior approval process for conversion into residential flats (adjacent property Jebson House: 38567/APP/2016/869 - Change of use of 1st and 2nd floors from offices (Use Class B1) to provide 22 x studio units (Use Class C3) (Prior Approval) - Prior Approval not Required - 27.05.16).

A later application submitted in 2018 (application reference 4918/APP/2018/4227) was also refused for the following reasons:

1. The proposed development by reason of its size, scale, bulk and design represents an overdevelopment of the site that would be detrimental to the character, appearance and visual amenities of the street scene and would fail to either preserve or enhance the character or appearance of the surrounding Ruislip Village Conservation Area. The proposal is therefore contrary to Policies BE1 and HE1 of the Hillingdon Local Plan: Part One - Strategic Policies (November 2012), Policies BE4, BE13, BE15, BE19 and BE26 of the Hillingdon Local Plan: Part Two - Saved UDP Policies (November 2012), Policies 7.4 and 7.8 of the London Plan (2016), the adopted Supplementary Planning Document HDAS: Residential Layouts and the NPPF.

2. The proposal, fails to demonstrate that that sufficient manoeuvring and access arrangements for service delivery vehicles and car parking would be maintained for adjoining commercial premises which would result in driver confusion and unexpected vehicle movements for other highway users and deliveries and parking taking place from the road. The development is therefore considered to be detrimental to highway and pedestrian safety and prejudicial to the free flow of traffic on the adjoining highway, including access by service delivery vehicles the adjacent buildings at 53 - 61 High Street Ruislip, contrary to Policy AM7 of the adopted Hillingdon Local Plan: Part Two Saved UDP Policies (November 2012) and Policy 6.3 of the London Plan (2016)

3. The proposed development by reason of its layout and design, including a large basement that covers mostly the entire site, fails to demonstrate how it would prevent an increased flood risk. As such the application is not in accordance with Policy EM6 Flood Risk Management in Hillingdon Local Plan: Part 1- Strategic Policies (Nov 2012), Policy DMHD 3: Basement Development in emerging Hillingdon Local Plan Part 2 Development Management Policies, Policy 5.12 Flood Risk Management of the London Plan (March 2016), and National Planning Policy Framework (March 2012), and the Planning Practice Guidance (March 2014).

4. The proposed development by reason of its layout and design fails to provide sufficient outlook and privacy for occupants of existing and the proposed building resulting in a development that is detrimental to the amenity of existing and future occupiers of the site and adjacent buildings. The development would therefore be contrary to Policy BE1 of the Hillingdon Local Plan: Part 1 - Strategic Policies (Nov 2012), Policies BE20, BE21 and BE24 of the Local Plan: Part 2 (November 2012) and Policy 7.1 of the London Plan (2016).

4. Advertisement and Site Notice

4.1 Advertisement Expiry Date:- 23rd April 2021

4.2 Site Notice Expiry Date:- Not applicable

5. Comments on Public Consult

18 neighbouring occupiers were consulted on the proposed development on the 24/03/21. By the end of the consultation period no letters of objection had been received from neighbouring occupiers. Due to the applicant amending the proposed scheme a second round of consultation was undertaken which expired on 25/06/21, again no letters of objection have been received from neighbouring occupiers.

An objection has been received from a local Cllr stating that the proposed building would conflict with the Conservation Area, the features of which any application should seek to preserve and enhance, and it would fail to harmonise with the streetscene.

RUISLIP VILLAGE CONSERVATION PANEL

We are writing to clarify that we are not opposed to the site at 2 Midcroft being redeveloped. However, it is really important that proposals for this site take full account of planning policies and that the site is within the Ruislip Village Conservation Area (RVCA) and is near to the Midcroft Area of Special Local Character (MASLC).

These latest plans fail to address fundamental issues raised before, or in Planning Officer's reports for the previous applications in 2014 and 2018.

Reasons for refusal

1. The site links the commercial High Street with the domestic houses of Midcroft. Any development on the 2 Midcroft site should create an acceptable transition between the three storey building at No 61 High Street above the Halifax Bank, the locally listed building across the road at 63 High Street and the two storey houses in the Croft Gardens Estate. So, a new development should step down in height and scale and be unintrusive.

Currently, the mansard roof at No 53-61 High Street reduces the impact of the third floor on the street scene. Similarly, at No 63 High Street above Nat West Bank the upper floor is contained within the roof space and the rear of the building reduced to two storeys in height and so suitably fits appropriately with the two storey houses in Midcroft.

In contrast to this a major part of the proposed building will not be significantly lower than the adjacent building at No 61/63 High Street. It will be four storeys high at the centre, (not even more to the west side) with a flat roof and present a monolithic slab-like appearance to Midcroft. This would create a major conflict between the mansard and pitched roofs of the adjacent buildings at No 61/63 High Street and 4 Midcroft respectively.

2. The size, height and style of the proposed building would be over dominant on the area and would not:

- "preserve and enhance local features"
- "harmonise" with the buildings at Nos 61 & 63 High Street or the two storey houses in Midcroft"
- "harmonise" with the street scene

3. The design of the proposed building is out of character with the High Street, which generally provides a pleasing townscape of low-rise buildings in brick, characterised by hipped roofs and gables, many with Arts and Crafts details, or the style of the two storey houses in the Croft Gardens Estate that are characterised by vernacular forms and materials such as pitched roofs, brick tile, timber framing with rendered infill, timber sash

windows and leaded timber casements. The style of the proposed building will not conserve or enhance surrounding heritage assets.

4. The plans suggest that the west facing wall of 2 Midcroft is still 4.86 metres from the rear of Jebson House, and about 4.8 metres from the projecting bay windows, thus providing very little improvement upon the plans in 2014 and 2018 that were refused. The upper floors at Jebson House have been deemed consent to convert to residential. So these plans remain totally unacceptable to future residents.

At the time plans were being considered in 2018 "the ownership of the parking spaces and access road behind Jebson House" was unclear. See Page 10 of the planning report for Re:4918/APP/2018/4227:

"There is however an element of concern with how the site envelope interacts with the adjacent parking area affiliated to the neighbouring commercial building i.e. Jebson House which fronts Ruislip High Street. As presented the red site boundary denoting the extent of the site envelope abuts against the 8 parking spaces provided for Jebson House hence the function and use of these bays is reliant on the encroachment onto what is third party land (the proposed site envelope). As proposed it would appear there would be an open boundary which would allow unencumbered access by vehicles using the said parking bays. However this facility could be withdrawn in the future by way of boundary treatment such as fencing which would sterilise the use of these bays in perpetuity. Such an arrangement is therefore considered unacceptable given the potential parking related detriment to a neighbouring address. The above concern would also apply to vehicular servicing arrangements linked to Jebson House as access would be dependent on third party land encroachment which could lead to undesirable and injudicious parking on the nearby highway network as such vehicles are forcibly displaced onto the highway network".

5. In addition the plans still involve building the development on stilts located along the edge of the parking spaces above the service road imposing a height clearance of less than 2.4 metres. Thus, large vans and lorries using the service road to access the rear of the commercial premises at Jebson House will have to be of restricted height in order to drive under the 2.4m undercroft below first floor of the proposed building. See below typical heights of FORD vans that exceed 2.5metres:

Ford - L3 H2 VAN (LWB) 2.54m, Ford- L4 H3 (JUMBO XLWB) 2.77m, Ford- TRANSIT LUTON BOX VAN 3.3m, Ford -7.5 TONNE BOX TRUCK 3.5m

6. Vehicles using the parking spaces behind Jebson House will have reduced access for manoeuvring in and out of the parking spaces due to the inclusion of pillars / stilts that are anticipated to support the building above.

7. The parking spaces currently have a slight slope down from west to east but the plans suggest that the parking spaces will be on a steeper slope. This will add further complications to access and egress these parking spaces. See planning refusal for Re:4918/APP/2018/4227:

"The proposal, fails to demonstrate that that sufficient manoeuvring and access arrangements for service delivery vehicles and car parking would be maintained for adjoining commercial premises which would result in driver confusion and unexpected vehicle movements for other highway users and deliveries and parking taking place from the road. The development is therefore considered to be detrimental to highway and pedestrian safety and prejudicial to the free flow of traffic on the adjoining highway, including access by service delivery vehicles the adjacent buildings at 53 - 61 High Street Ruislip, contrary to Policy AM7 of the adopted Hillingdon Local Plan: Part Two Saved UDP Policies (November 2012) and Policy 6.3 of the London Plan (2016)".

8. Contamination - See Planning and Heritage Statement

"Contamination A contamination report prepared by Syntegra has been submitted alongside this application. Given the sites previous use as a Petrol Filling Station there is likely to be some contamination of the land. This will need to be remediated and cleaned up to safeguard the future occupants of the site. A set of conditions relating to contamination would seem reasonable and have been recommended by Syntegra. Subject to appropriate conditions to secure further investigations and necessary remediation/mitigation if required, future occupiers/users will be safeguarded from contamination in accordance with the NPPF".

Should this application be approved please apply these conditions.

9. Flood Risk Assessment, See Flood Risk Assessment 14/07/2020 Version 1.0 RAB: 2519B

"6.0 Recommendations. It is recommended that finished ground floor levels are set 150mm above local ground level. "

It appears from the plans that the proposed development will be built at a lower level than the street level. Is this in conflict with the recommendations regarding flood risk assessment?

Conclusion

We strongly believe that for the above reasons this application is unsuitable for the site. It would fail to preserve or enhance the surrounding heritage assets. It will have an unacceptable impact on the street scene and character of the area and will have a detrimental impact upon the Ruislip Village Conservation Area, and so we trust that the plans will be refused.

RUISLIP, NORTHWOOD AND EASTCOTE LOCAL HISTORY SOCIETY

Although this latest application has addressed some of the concerns of earlier applications the Ruislip, Northwood & Eastcote Local History Society is still opposed to this development. The three/four storey building will be over dominant, bulky and obtrusive for the site. It will be detrimental to the Ruislip Village Conservation Area in which it is situated as well as being out of keeping with the neighbouring residential houses in an 'Area of Special Local Character'. The development is on too large a scale for the small enclosed site which overlooks the houses because of being on higher ground. it will also be unsympathetic to the locally listed bank building on the opposite corner of Midcroft. The site is also within an Archaeological Priority Area which needs to be taken into account. For these reasons the Society requests that the application is refused.

INTERNAL CONSULTEES

URBAN DESIGN AND CONSERVATION

Summary of comments: Objection

Historic Environment Designations

- Ruislip Village Conservation Area (RVCA)
- Adjacent to Midcroft, Ruislip Area of Special Local Character (ASLC) - non-designated heritage asset
- Setting of Locally Listed Building - Natwest Bank, 63 High Street
- Ruislip Motte and Bailey Archaeological Priority Area (APA)

Assessment - background/significance

The existing site is a former petrol station and car sales garage. Historically the land formed part of No61 as a rear garden area/yard. In the late 1970s it was redeveloped as a

garage.

As existing the structures on site are low-rise with a single storey built form located toward the rear and an open, deteriorating, canopy structure towards the front. The structures are of little architectural or historic merit. It is recognised that condition of the site detracts from the appearance of the conservation area, and that there is an opportunity for sensitive enhancement.

The site fronts onto Midcroft, a residential street, defined by attractive suburban housing. It is positioned to the rear of Nos53-61 High Street, which is a three-storey building dating from the 1970s. It has a small associated courtyard area to the rear, dominated by car parking provision, directly adjacent to the application site. The built form fronting onto the High Street is simple in appearance, with a brick exterior. The third storey is contained within the mansard roof form recessed behind a parapet. The architectural style of the building does not reflect the traditional character or quality of other buildings along the High Street, Nos53-61 has a neutral impact on the conservation area, quietly occupying the corner plot. It is not considered an appropriate design precedent

The eastern boundary of the site abuts a pedestrian route leading to the open green space to the north-east, Church Field Gardens. Adjacent to this is No4 Midcroft, a two-storey dwelling house which also forms part of the conservation area. Further to the north of the application site are service yards associated to the commercial units along the High Street alongside access to residential dwellings above.

The Ruislip area has grown over the 20th century from a small medieval village to a suburban town. This was due to the influence of Greater London and the railway, resulting in the 'Metroland development' of the area. The significance of Ruislip as a place relates to its early origins and 20th century development. Of particular significance is its association to the original 'Soutar plan' for the area, one of the earliest town planning schemes in the country.

The Ruislip Village Conservation Area comprises of three distinctive character areas relating to the historic development of the area. No2 Midcroft forms part of the High Street character area within the conservation area, predominantly defined by traditional buildings between 2-3 storeys in height. Many of the building along the High Street are well-detailed, characterised by a traditional design aesthetic, with a strong Arts and Crafts influence.

Whilst it forms part of the RVCA, its location along Midcroft means it contributes to such street scene. To the east of the site is the Midcroft, Ruislip ASLC. The area is defined by Metroland development, comprising of a mix of detached and semi-detached dwelling houses. They are set on modest sized plots, set back from the road allowing for a pleasant, verdant street scene and off-street parking. Whilst properties vary in appearance, they maintain a traditional aesthetic and similar design approach, giving the area a distinctive garden suburb aesthetic. The use of traditional materials and neutral tones contributes to the cohesive aesthetic of the street scene and allows for greenery to stand out. Front boundary treatment predominantly comprises of low-rise brick walls, mature hedging or simple timber fences, typical of a garden suburb. This positively contributes to the character and appearance of the area.

The unique location of the site between two different character areas (commercial and residential) defines it as an important transition site. Its prominent appearance along Midcroft and from the junction with the High Street is important to considered when considering the future of the site.

To the south of the application site is No63 High Street, a Locally Listed Building. As a

non-designated heritage asset, it is recognised for its local historic and architectural merit. It is a 1930s building, three storeys in height with a mansard roof form, built for use as a bank. The suburban setting of the building contributes to its significance and how the heritage asset is experienced. It would need to be noted that its corner location allows the building to be seen in context with the application site.

The planning history of the site is fairly extensive with previous applications refused or withdrawn. It is understood the schemes proposed were smaller in scale when compared to the current development proposal.

Assessment - impact

Demolition

As per previous comments for this site and comments made under point 3.2, there would be no objections to the demolition of the existing structures.

Proposed development

The positioning of the built form would fail to respect the established residential building line along Midcroft. Whilst it is proposed to be set back from the road the building, the 3-storey block form would be set forward of No4 Midcroft and the houses to the east within the ASLC.

The building would be highly visible when viewed from the ASLC, with its height further emphasised due to the incline of the road towards the High Street. The 4th storey and terrace would be unacceptably prominent, rising above the 2-storey houses.

It would also need to be noted that the building would also be highly visible from the open green space known as Church Field Gardens, to the north of the site and within the context of the adjacent Locally Listed Building (No63).

The substantial built form would dominate the appearance of the site and entrance into Midcroft. Built form would extend across the full width of the site, and up to the rear site boundary. More than 60% of the site area would be occupied by built form. This has limited the amount of green space to the site.

As described under point 3.8 the site is a key transition point from the commercial character of the High Street into the low-rise residential area to the east. The design, scale, bulk and massing of the building fails to respect the transition between the two character areas and the varying heights of the buildings surrounding the site.

The building has a singular, monolithic block form appearance. The centrally positioned 4th storey, contained within the mansard form would be considered an incongruous feature. Mansard roofs are not considered to be a characteristic feature of the conservation area and to simply copy an existing inappropriate precedent would be unacceptable. The 4th storey would appear as an isolated add on form, rather than a well-integrated feature.

The western side of the built form has a semi-floating appearance with the floors above, supported by brick columns. Whilst this results in a gap at ground floor, this does little to break up the overall built mass of the building.

The site's immediate context does not feature 4-storey buildings. Whilst the height is depicted as 11.1m on plan, lower than the adjacent three storey building, there would be serious concerns that this would not be the true height once constructed. A detailed cross-section of the proposed built form should be submitted.

The design and appearance of the building would fail to relate to the traditional aesthetic of the surrounding area, lacking any interest or design quality. The articulation of the elevations to the building are elementary and flat.

The inclusion of terraces along the front and rear elevations would introduce uncharacteristic features to the site within the conservation area and more importantly the Midcroft street scene. The railings would inevitably be evident, the plans do not accurately depict the reality of the design. The use of vegetation to soften or disguise inappropriate design features would be unacceptable as vegetation is not considered to be a permanent solution. It can be removed or lost, due to natural causes or human interventions.

Whilst the site may be located within the Ruislip Village Conservation Area boundary, it is important to recognise that street scene does not have a boundary. As a residential development the design of the building should be responsive to Midcroft rather than entirely focussing on the inappropriate commercial character of the building to the west of the site.

Harm

The proposed development would be considered significantly harmful to the character and appearance of the surrounding area. It would fail to appear as a well-integrated development along Midcroft or respect its unique location between the High Street and residential ASLC. The development would be overly urban in appearance, diminishing the suburban setting of the heritage assets including No63's setting.

The proposal would result in less than substantial harm to the conservation area, therefore, paragraph 196 of the National Planning Policy Framework (NPPF, 2019) would need to be considered in this instance.

The Planning (Listed Buildings and Conservation Areas) Act 1990, places a statutory duty upon the decision maker to pay special attention to the desire of preserving or enhancing the conservation area. From a historic environment perspective, the proposal would have a negative impact on the conservation area, failing to preserve or enhance it.

Conclusion: Objection

Case Officer comments:

The above comments were provided to the applicant and as a result the proposed development was amended in terms of the loss of a 9th flat on the 3rd floor and its architectural design, including the introduction of a pitched roof.

URBAN DESIGN AND CONSERVATION 2nd comments

Amended proposal

The amended proposal would not fundamentally address previous comments. Therefore, the initial assessment and objection would remain.

The addition of the pitched roof form increases the height, scale and bulk of the proposed built form across the entire site. The proposal would have an even more pronounced appearance within its context. The lack of massing in terms of the height creates a stark difference between the proposed development and two-storey residential dwellings along Midcroft.

Whilst not proposed at present, due to the scale of the roof form, it could allow for additional units to be placed within the roof space, increasing the occupation of the site.

Harm

The proposed development would still be considered significantly harmful to the character

and appearance of the surrounding area. It would fail to appear as a well-integrated development along Midcroft or respect its unique location between the High Street and residential ASLC. The development would be overly urban in appearance, diminishing the suburban setting of the heritage assets including No63's setting.

The proposal would result in less than substantial harm to the conservation area, therefore, paragraph 196 of the National Planning Policy Framework (NPPF, 2019) would need to be considered in this instance.

Duties under section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990, would need to be considered by the decision maker. From a historic environment perspective, the proposal would have a negative impact on the conservation area, failing to preserve or enhance it.

Conclusion: Objection

HIGHWAYS

The site is located off the main High Street in Ruislip District Town centre in Midcroft - a designated local residential side road. It consists of a former petrol station which is now utilised as a car wash/car sales facility.

The surroundings consist of mainly commercial and some residential uses and the site is in proximity to Ruislip LU Station. The locality is comprehensively covered by parking controls operating Monday to Saturday between 8am and 6.30pm integrated with the presence of double yellow lines and the address exhibits a public transport accessibility level (PTAL) of 4 which is considered as good and therefore reduces dependency on the use of private motor transport.

This application proposes a new block consisting of 9 flats incorporating 5x3,3x2 and 1x1 bedroom residential units with 6 surface level on-plot parking spaces. The previous basement component has now been abandoned. A comparable application for 9 flats with 14 on-plot basement parking spaces at this address was refused in 2019 (4918/APP/2018/4227) for several reasons including a 'highway' related aspect (reason 2) reprised as follows:

"The proposal, fails to demonstrate that that sufficient manoeuvring and access arrangements for service delivery vehicles and car parking would be maintained for adjoining commercial premises which would result in driver confusion and unexpected vehicle movements for other highway users and deliveries and parking taking place from the road. The development is therefore considered to be detrimental to highway and pedestrian safety and prejudicial to the free flow of traffic on the adjoining highway, including access by service delivery vehicles the adjacent buildings at 53 - 61 High Street Ruislip, contrary to Policy AM7 of the adopted Hillingdon Local Plan: Part Two Saved UDP Policies (November 2012) and Policy 6.3 of the London Plan (2016)."

Parking Provision

It is proposed to provide a new 4 -storey build containing 9 flats consisting of 5x3,3x2 and 1x1 bedroom residential units.

Local Plan: Part 2 Policy DMT 6 requires that new development will only be permitted where it accords with the Council's adopted parking standards unless it can be demonstrated that a deviation from the standard would not result in a deleterious impact on the surrounding road network.

In order to comply with the maximum parking standard there is a requirement for 1-1.5 on-plot spaces per unit to be provided for units up to 2 bedrooms in scale with 2 spaces for the 3- bedroom provisions. This would result in a total maximum requirement ranging between 14 to 16 spaces. As 6 spaces are proposed, the quantum falls below the

standard.

However, in comparison for a PTAL rating of 4, the London Plan (2021) parking standard demands up to 0.5 - 0.75 spaces per unit which would result in a lesser total requirement of 4-7 spaces indicating broad compliance. On this basis, the 6-space provision is deemed acceptable.

Disabled Compliant Parking Provision

In accord with the parking standard - 10% of parking spaces should be disabled compliant equating to 1 space. The quantum is indicated within the total quantum which is considered acceptable. There are no further observations.

Electric Vehicle Charging Point (EVCP) Provision

With specific reference to the London Plan (2021), within any final parking quantum there is a requirement for a minimum 20% 'active' EVCP provision with all remaining spaces (80%) being designated as 'passive'. Within the proposed quantum, 1 space should therefore be an 'active' provision with all of the remaining 5 spaces designated as 'passive'. The applicant has proposed a single 'active' and 'passive' space. The latter therefore requires uplift via imposition of a suitable planning condition.

Cycling Provision

In terms of cycle parking there should be a provision of 1 secure and accessible space for each of the 1-2 bedroom dwelling units with 2 spaces for the 3 bedroom provisions in order to conform to the adopted borough cycle parking standard equating to a total of 14 spaces. 18 suitably located spaces within a designated communal area at ground floor level are proposed which therefore satisfies the standard. It is expected that the spaces would be appropriately allocated to the relevant residential units.

Vehicular Access

The 'shared' vehicular crossing immediately to the rear of Jebson House is to remain to serve the existing surface parking facilities to the rear of the commercial premises and the proposed 6 parking spaces within the site envelope. If however, any minor adjustments to the access point is deemed necessary at a later stage of proceedings, these would need to be undertaken to an appropriate council standard under a S278/184 (Highways Act 1980) agreement (or suitable alternative arrangement) at the applicant's expense. In safety terms there is conformity to the relevant mutual inter-visibility sight-line requirements, as per MfS guidance, between vehicles leaving the site and extraneous vehicles/pedestrians on Midcroft. To assist with maintaining these sight-lines at the site entrance for both vehicles and pedestrians it is recommended that a front boundary height condition on Midcroft is applied to maintain a lower height of frontage wall for at least one metre on either side of the access point. Ideally the wall height should not exceed 0.6m to achieve the aim of satisfactory visibility.

Ground Floor Surface Parking Layout

The proposed internal parking and road layout arrangement broadly conforms to the Department for Transport's (DfT) - Manual for Streets (MfS) (circa 2007) best practice for road and parking layouts as there is an operational and safety benefit derived from a site arrangement which allows all vehicles using the site to enter and leave in a forward gear without hindrance resulting from an inadequate road layout design (or other obstructions such as parked vehicles). This is the recommended best practice on operational and highway safety grounds which is also applicable to servicing/delivery, emergency and refuse collection vehicles.

Notwithstanding the above, refusal reason 2 applied to the previous application (4918/APP/2018/4227) has not been addressed as the site red-line boundary denoting the extent of the site envelope remains unaltered and excludes the allocated parking area affiliated to Jebson House (51-63 High Street, Ruislip).

This leads to the following reprised comments made on this specific issue as part of the

appraisal of the 2018 application as they remain relevant to this new application:-

"As presented the site red-line boundary denoting the extent of the site envelope abuts directly against the parking bays provided for Jebson House hence the function and use of these bays is reliant on the encroachment onto what is third party land (the proposed site envelope). As proposed, it would appear there would be an open boundary which would allow unencumbered access by vehicles using the said parking bays. However, this facility could be withdrawn in the future by way of boundary treatment such as fencing which would sterilise the use of these bays in perpetuity. Such an arrangement is therefore considered unacceptable given the potential parking related detriment to a neighbouring address. The above concern would also apply to vehicular servicing arrangements linked to Jebson House as access would be dependent on third party land encroachment which could lead to undesirable and injudicious parking on the nearby highway network as such vehicles are forcibly displaced onto the highway network."

Vehicular Trip Generation

Local Plan: Part 2 Policies DMT 1 and DMT 2 require the Council to consider whether the traffic generated by proposed developments is acceptable in terms of the local highway and junction capacity, traffic flows and conditions of general highway or pedestrian safety. In comparison to the previous petrol station/car wash use at full flight, the proposal would reduce the overall level of vehicular activity to and from the site with peak period traffic movement into and out of the site is expected to rise by up to 2-3 additional vehicle movements during the most crucial peak morning and evening hours hence this uplift is considered marginal in generation terms and therefore can be absorbed within the local road network without notable detriment to traffic congestion and road safety.

Operational Refuse Requirements

Refuse collection would continue via Midcroft. A specific bin store location within the new build and in proximity of the highway has been depicted.

In order to conform to the Council's 'waste collection' maximum distance collection parameter of 10m i.e. distance from a refuse vehicle to the point of collection, arrangements should ensure that waste bin storage is positioned at a collection point within this set distance. In addition, the maximum carrying distance from each flat should not exceed 30m. An internal bin store is to be provided within the new build hence the 10m distance parameter from the highway is broadly met. There are no further observations.

Conclusion

The application has been reviewed by the Highway Authority who are concerned that the proposal would potentially prejudice access to allocated parking and servicing arrangements for neighbouring Jebson House (51-63 High Street, Ruislip).

Refusal on these grounds is recommended as follows:-

"The proposal, fails to demonstrate that that sufficient manoeuvring and access arrangements for service delivery vehicles and car parking would be maintained for adjoining commercial premises which would result in driver confusion and unexpected vehicle movements for other highway users and deliveries and parking taking place from the road. The development is therefore considered to be detrimental to highway and pedestrian safety and prejudicial to the free flow of traffic on the adjoining highway, including access by service delivery vehicles the adjacent buildings at 53 - 61 High Street Ruislip, contrary to Policy contrary to Local Plan: Part 2 Development Plan Policy DMT 1 and Policy T4 of the London Plan (2021)."

FLOOD AND WATER MANAGEMENT

A Flood Risk Assessment has been produced by RAB consultants. The site is in Flood Zone 1 but on the edge of a Critical Drainage Area in an area known to suffer from

groundwater issues. The FRA includes reference to a basement which appears to no longer be part of the application. It considers groundwater but does not undertake any site specific groundwater assessment, but with the removal of the basement this is no longer required. The report recommends SuDs should be integrated within the application. As the site is on the edge of a CDA appropriate SuDs condition should therefore be applied to water is captured on site and all surfaces are permeable. it is noted that Green Roof also appear to be included on plans.

6. Local Plan Designation and London Plan

The following Local Plan Policies are considered relevant to the application:-

Part 1 Policies:

PT1.BE1 (2012) Built Environment

PT1.HE1 (2012) Heritage

Part 2 Policies:

DMTC 1 Town Centre Development

DMEI 2 Reducing Carbon Emissions

DMEI 9 Management of Flood Risk

DMEI 12 Development of Land Affected by Contamination

DMEI 14 Air Quality

DMH 2 Housing Mix

DMHB 1 Heritage Assets

DMHB 4 Conservation Areas

DMHB 11 Design of New Development

DMHB 12 Streets and Public Realm

DMHB 14 Trees and Landscaping

DMHB 16 Housing Standards

DMHB 18 Private Outdoor Amenity Space

DMT 2 Highways Impacts

DMT 6 Vehicle Parking

LPP SD7 (2021) Town centres: development principles and Development Plan Documents

LPP GG2 (2021) Making the best use of land

LPP GG4 (2021) Delivering the homes Londoners needs

LPP HC1 (2021) Heritage conservation and growth

LPP D2 (2021) Infrastructure requirements for sustainable densities

LPP D3 (2021) Optimising site capacity through the design-led approach

LPP D4 (2021) Delivering good design

LPP D5 (2021) Inclusive design

LPP D6 (2021) Housing quality and standards

LPP D7 (2021) Accessible housing

LPP D8 (2021) Public realm

LPP SI2 (2021) Minimising greenhouse gas emissions

LPP SI3 (2021) Energy infrastructure

LPP SI12	(2021) Flood risk management
LPP SI13	(2021) Sustainable drainage
LPP T6	(2021) Car parking
LPP T6.1	(2021) Residential parking
NPPF- 2	NPPF-2 2018 - Achieving sustainable development
NPPF- 5	NPPF-5 2018 - Delivering a sufficient supply of homes
NPPF- 7	NPPF-7 2018 - Ensuring the vitality of town centres
NPPF- 11	NPPF-11 2018 - Making effective use of land
NPPF- 12	NPPF-12 2018 - Achieving well-designed places
NPPF- 16	NPPF-16 2018 - Conserving & enhancing the historic environment

In addition: Development Plan

Planning law requires that applications for planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise.

The Development Plan for the London Borough of Hillingdon currently consists of the following documents:

The Local Plan: Part 1 - Strategic Policies (2012)
The Local Plan: Part 2 - Development Management Policies (2020)
The Local Plan: Part 2 - Site Allocations and Designations (2020)
The West London Waste Plan (2015)
The London Plan (2021)

Material Considerations

The National Planning Policy Framework (NPPF) (2019) is also a material consideration in planning decisions, as well as relevant supplementary planning documents and guidance.

Paragraph 17 of the National Planning Policy Framework states that one of the core principles of the document is the "effective use of land by reusing land that has been previously developed (brownfield land)."

The site is located in a conservation area and the building is not listed. There are no policies which prevent the redevelopment of the site, in principle. The principle for redevelopment of the site is thus accepted.

Redevelopment of the site is not opposed and the opportunity to enhance the Conservation Area, support the town centre, and upgrade the quality of the pedestrian entrance to the park in this location would be welcomed. Given the site is located in a town centre the Council's first preference in policy terms would be for a mixed use development with ground floor commercial units and residential above, however there would be no objection to a well designed purely residential scheme in this location.

The development is considered an acceptable reuse of a brownfield site and would represent an increase in residential accommodation, in accordance with the NPPF. Therefore, the development is considered acceptable in principle.

7. MAIN PLANNING ISSUES

7.1 Impact on the amenities of the occupiers of neighbouring residential properties

Policy DMHB 11 of the Hillingdon Local Plan: Part 2 (2020) states that:

B) Development proposals should not adversely impact on the amenity, daylight and sunlight of adjacent properties and open space.

Paragraph 5.38 of the Hillingdon Local Plan: Part 2 (2020) states: "The Council will aim to ensure that there is sufficient privacy for residents and it will resist proposals where there is an unreasonable level of overlooking between habitable rooms of adjacent residential properties, schools or onto private open spaces. A minimum of 21 metres separation distance between windows of habitable rooms will be required to maintain levels of privacy and to prevent the possibility of overlooking. In some locations where there is a significant difference in ground levels between dwellings, a greater separation distance may be necessary."

Paragraph 5.40 of the Hillingdon Local Plan: Part 2 (2020) states: "For the purposes of this policy, outlook is defined as the visual amenity enjoyed by occupants when looking out of their windows or from their garden. The Council will expect new development proposals to carefully consider layout and massing in order to ensure development does not result in an increased sense of enclosure and loss of outlook."

Paragraph 5.41 of the Hillingdon Local Plan: Part 2 (2020) states: "The Council will aim to minimise the impact of the loss of daylight and sunlight and unacceptable overshadowing caused by new development on habitable rooms, amenity space and public open space. The Council will also seek to ensure that the design of new development optimises the levels of daylight and sunlight. The Council will expect the impact of the development to be assessed following the methodology set out in the most recent version of the Building Research Establishments (BRE) "Site layout planning for daylight and sunlight: A guide to good practice".

The nearest dwellinghouse to the north, No 4 Midcroft, abuts the pedestrian route and is a two storey single family dwelling with flank windows at ground and first floor level together with a long and large rear garden, all of which are sensitive to issues of overlooking. The proposal incorporates units laid out in a manner that should a condition be attached for high level/obscure glazing only in the northern elevation, the units would still benefit from acceptable levels of outlook and natural daylight without detrimentally impacting on the amenity of adjacent occupiers.

The nearest consented residential properties to the south of the development site are located within Jebson House. Jebson House has Prior Approval consent for residential use and the approved layout plan has habitable room windows in the rear elevation overlooking the application site.

The proposed development at first and second floor as submitted includes a wall with high level windows located 4.2m away from this elevation which would be considered to prevent these properties having an acceptable level of outlook, and is therefore considered to result in a significant detrimental impact on the amenity of any adjacent occupiers in this property.

However, the applicant has stated that the prior approval has not been implemented and therefore the building remains in office use. Evidence has been provided to support this statement in the form of photographs of the external appearance of the building which show that it appears to remain in office use as no signs of residential use are visible. The case officer has checked the Council Tax records which indicate that there are no residential properties registered at this address. Given the evidence available it is

considered that the adjacent property Jebson House consent reference 38567/APP/2016/869 (Change of use of 1st and 2nd floors from offices (Use Class B1) to provide 22 x studio units (Use Class C3) dated 27.05.16 has not been implemented and as such has elapsed. There are no concerns therefore in relation to the impact on residential occupiers of this building.

7.2 Impact on Street Scene

Policy BE1 of the Hillingdon Local Plan: Part 1 (2012) requires all new development to improve and maintain the quality of the built environment in order to create successful and sustainable neighbourhoods.

Policy DMHB 11 of the Hillingdon Local Plan: Part 2 (2020) states that:

A) All development, including extensions, alterations and new buildings will be required to be designed to the highest standards and, incorporate principles of good design including:

- i) harmonising with the local context by taking into account the surrounding:

- scale of development, considering the height, mass and bulk of adjacent structures;
- building plot sizes and widths, plot coverage and established street patterns;
- building lines and setbacks, rooflines, streetscape rhythm, for example, gaps between structures and other streetscape elements, such as degree of enclosure;
- architectural composition and quality of detailing;
- local topography, views both from and to the site; and
- impact on neighbouring open spaces and their environment.

- ii) ensuring the use of high quality building materials and finishes;

- iii) ensuring that the internal design and layout of development maximises sustainability and is adaptable to different activities;

- iv) protecting features of positive value within and adjacent to the site, including the safeguarding of heritage assets, designated and un-designated, and their settings; and
- v) landscaping and tree planting to protect and enhance amenity, biodiversity and green infrastructure.

B) Development proposals should not adversely impact on the amenity, daylight and sunlight of adjacent properties and open space.

C) Development will be required to ensure that the design safeguards the satisfactory re-development of any adjoining sites which have development potential. In the case of proposals for major development sites, the Council will expect developers to prepare master plans and design codes and to agree these with the Council before developing detailed designs.

D) Development proposals should make sufficient provision for well designed internal and external storage space for general, recycling and organic waste, with suitable access for collection. External bins should be located and screened to avoid nuisance and adverse visual impacts to occupiers and neighbours.

The policies quoted above are supported by Policies D3 and D6 of the London Plan (2021).

Policy DMHB 1: Heritage Assets of the Hillingdon Local Plan Part Two - Development Management Policies (2020) states:

A) The Council will expect development proposals to avoid harm to the historic environment. Development that has an effect on heritage assets will only be supported where:

- i) it sustains and enhances the significance of the heritage asset and puts them into viable uses consistent with their conservation;

- ii) it will not lead to a loss of significance or harm to an asset, unless it can be demonstrated that it will provide public benefit that would outweigh the harm or loss, in

accordance with the NPPF;

- iii) it makes a positive contribution to the local character and distinctiveness of the area;
- iv) any extensions or alterations are designed in sympathy, without detracting from or competing with the heritage asset;
- v) the proposal would relate appropriately in terms of siting, style, scale, massing, height, design and materials;
- vi) buildings and structures within the curtilage of a heritage asset, or in close proximity to it, do not compromise its setting; and
- vii) opportunities are taken to conserve or enhance the setting, so that the significance of the asset can be appreciated more readily.

B) Development proposals affecting designated heritage assets need to take account of the effects of climate change and renewable energy without impacting negatively on the heritage asset. The Council may require an alternative solution which will protect the asset yet meet the sustainability objectives of the Local Plan.

C) The Council will seek to secure the repair and reuse of Listed Buildings and monuments and improvements to Conservation Areas on the Heritage at Risk Register, through negotiations with owners, the provision of advice and guidance, the use of appropriate legal action, and through bids for external funding for improvement works.

Policy DMHB 4: Conservation Areas of the Hillingdon Local Plan: Part 2 (2020) states that new development, including alterations and extensions to existing buildings, within a Conservation Area or on its fringes, will be expected to preserve or enhance the character or appearance of the area. It should sustain and enhance its significance and make a positive contribution to local character and distinctiveness. In order to achieve this, the Council will:

A) Require proposals for new development, including any signage or advertisement, to be of a high quality contextual design. Proposals should exploit opportunities to restore any lost features and/or introduce new ones that would enhance the character and appearance of the Conservation Area.

B) Resist the loss of buildings, historic street patterns, important views, landscape and open spaces or other features that make a positive contribution to the character or appearance of the Conservation Area; any such loss will need to be supported with a robust justification.

C) Proposals will be required to support the implementation of improvement actions set out in relevant Conservation Area Appraisals and Management Plans.

Policy DMHB 5: Areas of Special Local Character of the Hillingdon Local Plan: Part 2 (2020) states that:

A) Within Areas of Special Local Character, new development should reflect the character of the area and its original layout. Alterations should respect the established scale, building lines, height, design and materials of the area.

B) Extensions to dwellings should be subservient to, and respect the architectural style of the original buildings and allow sufficient space for appropriate landscaping, particularly between, and in front of, buildings.

C) The replacement of buildings which positively contribute to the character and local importance of Areas of Special Local Character will normally be resisted.

The site is located within Ruislip Town Centre, Ruislip Village Conservation Area, and within an archaeological priority area. It is also adjacent to an Area of Special Local Character and located opposite a locally listed building at No. 63 High Street.

The Council's Design and Conservation Officer has reviewed the proposals and raised an objection to the original details as submitted. The comments were provided to the applicant and as a result the proposed development was amended in terms of the loss of

a 9th flat on the 3rd floor and its architectural design, including the introduction of a pitched roof.

The Council's Design and Conservation Officer has reviewed the revised proposals and concluded that the application should be refused on the grounds that the development is inappropriate within the context of the local area, the heritage assets of the Ruislip Village Conservation Area and the Midcroft ASLC and would fail to preserve or enhance the surrounding heritage assets.

As such, the proposal would neither enhance nor preserve the character of the conservation area or be an appropriate form of development in the locality, as required by Policy BE 1 of the Hillingdon Local Plan: Part 1 (2012) and Policies DMHB 11, DMHB 1, DMHB 4 and DMHB 5 of the Hillingdon Local Plan: Part 2 (2020).

The proposed scheme is therefore considered to have an unacceptable impact on the street scene and character of the area.

Archaeology

Policy DMHB 7: Archaeological Priority Areas and Archaeological Priority Zones of the Hillingdon Local Plan: Part 2 (2020) states that the Council, as advised by the Greater London Archaeological Advisory Service, will ensure that sites of archaeological interest within or, where appropriate, outside, designated areas are not disturbed. If that cannot be avoided, satisfactory measures must be taken to mitigate the impacts of the proposals through archaeological fieldwork to investigate and record remains in advance of development works. This should include proposals for the recording, archiving and reporting of any archaeological finds.

NPPF paragraph 189 states applicants should provide an archaeological assessment if their development could affect a heritage asset of archaeological interest. In addition paragraph 199 of the NPPF says that applicants should record the significance of any heritage assets that the development harms. Applicants should also improve knowledge of assets and make this public.

The site is located within an archaeological priority area. A desk-based archaeological assessment has been submitted in support of the application which states:

'The construction of the existing filling station is almost certain to have resulted in a very high level of truncation of any archaeological remains, if present, caused by the installation of underground fuel tanks, pipes and drains. The proposed development comprises the construction of a four-storey building, which will be located in the eastern section of the site, albeit with overhanging first, second and third storeys. The foundations for the proposed development will therefore have the highest impact on the eastern section of the site, but the potential for the presence of archaeological remains appears very low.'

If recommended for approval, a condition would be attached to require that a record is made of any archaeological finds made during construction, which is deemed appropriate given the potential archaeological value of the site. Subject to such a condition, the proposal would accord with Policy DMHB 7 of the Hillingdon Local Plan: Part 2 (2020).

7.3 Traffic Impact/Pedestrian Safety

Policy DMT 1 of the Hillingdon Local Plan: Part 2 (2020) states:

A) Development proposals will be required to meet the transport needs of the development and address its transport impacts in a sustainable manner.

Policy DMT 2 of the Hillingdon Local Plan: Part 2 (2020) states that proposals must ensure that safe and efficient vehicular access to the highway network is provided, schemes do not contribute to the deterioration of air quality, noise or local amenity or safety of all road users and residents. Also that impacts on local amenity and congestion are minimised and there are suitable mitigation measures to address any traffic impacts in terms of capacity and functions of existing and roads.

Policy DMT 5 of the Hillingdon Local Plan: Part 2 (2020) states that:

A) Development proposals will be required to ensure that safe, direct and inclusive access for pedestrians and cyclists is provided on the site connecting it to the wider network, including:

- i) the retention and, where appropriate, enhancement of any existing pedestrian and cycle routes;
- ii) the provision of a high quality and safe public realm or interface with the public realm, which facilitates convenient and direct access to the site for pedestrian and cyclists;
- iii) the provision of well signposted, attractive pedestrian and cycle routes separated from vehicular traffic where possible; and
- iv) the provision of cycle parking and changing facilities in accordance with Appendix C, Table 1 or, in agreement with Council.

Policy DMT 6 of the Hillingdon Local Plan: Part 2 (2020) requires that proposals comply with the Council's parking standards in order to facilitate sustainable development and address issues relating to congestion and amenity.

The National Planning Policy Framework (NPPF) (2019) states that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe. This is supported by Policy T4 of the London Plan (2021).

The local area is comprehensively covered by parking controls operating Monday to Saturday between 8am and 6.30pm integrated with the presence of double yellow lines and the address exhibits a public transport accessibility level (PTAL) of 4 which is considered as good and therefore reduces dependency on the use of private motor transport.

The application proposes a new block consisting of 8 flats incorporating 4x3,3x2 and 1x1 bedroom residential units with 6 surface level on-plot parking spaces. A comparable application for 9 flats with 14 on-plot basement parking spaces at this address was refused in 2019 (4918/APP/2018/4227) for several reasons including a 'highway' related aspect as follows:

"The proposal, fails to demonstrate that that sufficient manoeuvring and access arrangements for service delivery vehicles and car parking would be maintained for adjoining commercial premises which would result in driver confusion and unexpected vehicle movements for other highway users and deliveries and parking taking place from the road. The development is therefore considered to be detrimental to highway and pedestrian safety and prejudicial to the free flow of traffic on the adjoining highway, including access by service delivery vehicles the adjacent buildings at 53 - 61 High Street Ruislip, contrary to Policy AM7 of the adopted Hillingdon Local Plan: Part Two Saved UDP Policies (November 2012) and Policy 6.3 of the London Plan (2016)."

Parking Provision

It is proposed to provide a new 3-storey build containing 8 flats. Local Plan: Part 2 Policy DMT 6 requires that new development will only be permitted where it accords with the Council's adopted parking standards unless it can be demonstrated that a deviation from

the standard would not result in a deleterious impact on the surrounding road network.

In order to comply with the maximum parking standard there is a requirement for 1-1.5 on-plot spaces per unit to be provided for units up to 2 bedrooms in scale with 2 spaces for the 3- bedroom provisions. This would result in a total maximum requirement ranging between 12 to 14 spaces. As 6 spaces are proposed, the quantum falls below the standard. However, in comparison for a PTAL rating of 4, the London Plan (2021) parking standard demands up to 0.5 - 0.75 spaces per unit which would result in a lesser total requirement of 4-7 spaces indicating broad compliance. On this basis, the 6-space provision is deemed acceptable.

Disabled Compliant Parking Provision

In accord with the parking standard - 10% of parking spaces should be disabled compliant equating to 1 space. The quantum is indicated within the total quantum which is considered acceptable.

Electric Vehicle Charging Point (EVCP) Provision

With specific reference to the London Plan (2021), within any final parking quantum there is a requirement for a minimum 20% 'active' EVCP provision with all remaining spaces (80%) being designated as 'passive'. Within the proposed quantum, 1 space should therefore be an 'active' provision with all of the remaining 5 spaces designated as 'passive'. The applicant has proposed a single 'active' and 'passive' space. The latter therefore requires uplift via imposition of a suitable planning condition that would be attached should the application be determined for approval.

Cycling Provision

In terms of cycle parking there should be a provision of 1 secure and accessible space for each of the 1-2 bedroom dwelling units with 2 spaces for the 3 bedroom provisions in order to conform to the adopted borough cycle parking standard equating to a total of 12 spaces. 18 suitably located spaces within a designated communal area at ground floor level are proposed which therefore satisfies the standard.

Vehicular Access

The 'shared' vehicular crossing immediately to the rear of Jebson House is to remain to serve the existing surface parking facilities to the rear of the commercial premises and the proposed 6 parking spaces within the site envelope. If however, any minor adjustments to the access point is deemed necessary at a later stage of proceedings, these would need to be undertaken to an appropriate council standard under a S278/184 (Highways Act 1980) agreement (or suitable alternative arrangement) at the applicant's expense. In safety terms there is conformity to the relevant mutual inter-visibility sight-line requirements, as per MfS guidance, between vehicles leaving the site and extraneous vehicles/pedestrians on Midcroft. To assist with maintaining these sight-lines at the site entrance for both vehicles and pedestrians it is recommended that a front boundary height condition on Midcroft is applied to maintain a lower height of frontage wall for at least one metre on either side of the access point. Ideally the wall height should not exceed 0.6m to achieve the aim of satisfactory visibility. This could be secured by condition should the application be determined for approval.

Ground Floor Surface Parking Layout

The proposed internal parking and road layout arrangement broadly conforms to the Department for Transport's (DfT) - Manual for Streets (MfS) (circa 2007) best practice for road and parking layouts as there is an operational and safety benefit derived from a site arrangement which allows all vehicles using the site to enter and leave in a forward gear without hindrance resulting from an inadequate road layout design (or other obstructions

such as parked vehicles). This is the recommended best practice on operational and highway safety grounds which is also applicable to servicing/delivery, emergency and refuse collection vehicles.

Notwithstanding the above, the refusal reason applied to the previous application (4918/APP/2018/4227) has not been addressed as the site red-line boundary denoting the extent of the site envelope remains unaltered and excludes the allocated parking area affiliated to Jebson House (51-63 High Street, Ruislip).

This leads to the following reprised comments made on this specific issue as part of the appraisal of the 2018 application as they remain relevant to this new application:-

"As presented the site red-line boundary denoting the extent of the site envelope abuts directly against the parking bays provided for Jebson House hence the function and use of these bays is reliant on the encroachment onto what is third party land (the proposed site envelope). As proposed, it would appear there would be an open boundary which would allow unencumbered access by vehicles using the said parking bays. However, this facility could be withdrawn in the future by way of boundary treatment such as fencing which would sterilise the use of these bays in perpetuity. Such an arrangement is therefore considered unacceptable given the potential parking related detriment to a neighbouring address. The above concern would also apply to vehicular servicing arrangements linked to Jebson House as access would be dependent on third party land encroachment which could lead to undesirable and injudicious parking on the nearby highway network as such vehicles are forcibly displaced onto the highway network."

Vehicular Trip Generation

Local Plan: Part 2 Policies DMT 1 and DMT 2 require the Council to consider whether the traffic generated by proposed developments is acceptable in terms of the local highway and junction capacity, traffic flows and conditions of general highway or pedestrian safety.

In comparison to the previous petrol station/car wash use at full flight, the proposal would reduce the overall level of vehicular activity to and from the site with peak period traffic movement into and out of the site expected to rise by up to 2-3 additional vehicle movements during the most crucial peak morning and evening hours hence this uplift is considered marginal in generation terms and therefore can be absorbed within the local road network without notable detriment to traffic congestion and road safety.

The application has been reviewed by the Council's Highways Officer who has raised concerns that the proposal would potentially prejudice access to allocated parking and servicing arrangements for neighbouring Jebson House (51-63 High Street, Ruislip).

The proposal therefore fails to demonstrate that that sufficient manoeuvring and access arrangements for service delivery vehicles and car parking would be maintained for adjoining premises, which would result in driver confusion and unexpected vehicle movements for other highway users and deliveries and parking taking place from the road. The development is therefore considered to be detrimental to highway and pedestrian safety and prejudicial to the free flow of traffic on the adjoining highway, contrary to Policy DMT 1 of the Local Plan: Part 2 Development Management Policies (2020) and Policy T4 of the London Plan (2021).

7.4 Carparking & Layout

See above.

7.5 Urban Design, Access and Security Considerations

INTERNAL AMENITY SPACE:

Policy D6 of the London Plan (2021) sets out the minimum internal floor space standards required for residential developments in order to ensure that there is an adequate level of amenity for future occupants.

Policy DMHB 16 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020) states that all housing development should have an adequate provision of internal space in order to provide an appropriate living environment.

The DCLG's Technical housing standards - nationally described space standard (2015) requires double bedrooms to have a floor area of at least 11.5 square metres.

The proposed dwellings would have a gross internal areas that would meet the minimum floor space requirements set out in Policy D6 of the London Plan (2021). All of the proposed bedrooms would exceed the minimum floor area standards set out in the Technical housing standards - nationally described space standard (2015) when en-suites are included.

OUTLOOK AND PRIVACY FOR FUTURE OCCUPIERS

The supporting text to Policy DMHB 11 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020) states that the Council will expect new development proposals to carefully consider layout and massing in order to ensure development does not result in an increased sense of enclosure and loss of outlook. Single aspect dwellings should be avoided. This is supported by Policy D6 of the London Plan (2021).

The proposed dwellings on the first and second floors would be dual aspect, thus providing an adequate level of natural light and outlook. However occupiers of the ground floor units (plan ref. MRH/PL/101 Rev A) would have minimal privacy due to the location of windows to bedrooms adjacent to their terrace, or require such privacy screening to external areas as to lose any appropriate level of outlook. It is therefore considered that the proposal would not provide a satisfactory level of amenity for future occupiers, and therefore fails to accord with Policy DMHB 11 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020) and Policy D6 of the London Plan (2021).

EXTERNAL AMENITY SPACE PROVISION:

Policy DMHB 18 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020) states that all new residential development and conversions will be required to provide good quality and usable private outdoor amenity space. Table 5.3 of the Hillingdon Local Plan: Part 2 Development Management Policies (2020) states that 1 bedroom flats should have a minimum of 20 square metres of private usable amenity space, 2 bedroom flats should have a minimum of 25 square metres and 3+ bedroom flats should have a minimum of 30 square metres of private usable amenity space.

The proposed plans indicate that the units, in particular units 2, 3 and 6 would be provided with a shortfall of private external amenity space. However, the application site is within close proximity to the adjacent Church Field Gardens public open space and each proposed unit does benefit from private amenity of between 12.7m² and 28.6m². As such the shortfall in provision is not considered sufficiently detrimental to residential amenity as to warrant a reason for refusal of the application.

SECURITY

Policy DMHB 15 of the Hillingdon Local Plan: Part 2 (2020) states that the Council will

require all new development to ensure safe and attractive public and private spaces by referring to the Council's latest guidance on Secured by Design principles. Where relevant, these should be included in the Design and Access Statement. Development will be required to comprise good design and create inclusive environments whilst improving safety and security by incorporating the following specific measures:

- i) providing entrances in visible, safe and accessible locations;
- ii) maximising natural surveillance;
- iii) ensuring adequate defensible space is provided;
- iv) providing clear delineations between public and private spaces; and
- v) providing appropriate lighting and CCTV.

If recommended for approval, a secure by design condition would be attached to achieve appropriate accreditation. Subject to such a condition, the proposal would accord with Policy DMHB 15 of the Hillingdon Local Plan: Part 2 (2020).

ACCESSIBILITY

If Members were minded to recommend this application for approval, conditions would be attached securing the details to demonstrate that the proposed dwelling would comply with Category M4(2) of Approved Document M to the Building Regulations (2010) 2015. Subject to such conditions, the proposal would accord with Policy D7 of the London Plan (2021).

WASTE

Policy DMHB 11 of the Hillingdon Local Plan: Part 2 (2020) states that:

D) Development proposals should make sufficient provision for well designed internal and external storage space for general, recycling and organic waste, with suitable access for collection. External bins should be located and screened to avoid nuisance and adverse visual impacts to occupiers and neighbours.

Refuse collection would continue via Midcroft. A specific bin store location within the new build and in proximity of the highway has been depicted.

In order to conform to the Council's 'waste collection' maximum distance collection parameter of 10m i.e. distance from a refuse vehicle to the point of collection, arrangements should ensure that waste bin storage is positioned at a collection point within this set distance. In addition, the maximum carrying distance from each flat should not exceed 30m. An internal bin store is to be provided within the new build hence the 10m distance parameter from the highway is broadly met.

ENERGY

Policy DMEI 2 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020) requires all developments to make the fullest contribution to minimising carbon dioxide emissions in accordance with London Plan targets (these targets relate to the 2016 London Plan).

Policy DMEI 10 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020) states that applications for all new build developments (not conversions, change of use, or refurbishment) are required to include a drainage assessment demonstrating that appropriate sustainable drainage systems (SuDS) have been incorporated in accordance with the London Plan Hierarchy.

If planning permission were to be granted, a condition would be secured requiring the proposed dwelling to achieve the appropriate energy efficiency standard.

Also, a condition would be secured requiring the proposed dwellings to achieve as a minimum, a water efficiency standard of no more than 110 litres per person per day maximum water consumption (and to include a fixed factor of water for outdoor use of 5 litres per person per day in accordance with the option requirement defined within Approved Document G of the Building Regulations).

Subject to the above conditions, the proposal would be compliant with Policies DMEI 2 and DMEI 10 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020) Policy GG6 of the London Plan (2021).

FLOODING

Policy SI 12 of the London Plan (2021) requires that development proposals ensure that flood risk is minimised and mitigated. Policy SI 13 of the London Plan (2021) also requires that development proposals utilise sustainable urban drainage systems (SuDS) unless there are practical reasons for not doing so, and should aim to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible. This is supported by Policy EM6 of the Hillingdon Local Plan: Part 1 (2012) and Policies DMEI 9 and DMEI 10 of the Hillingdon Local Plan: Part 2 (2020). Notably, proposals that fail to make appropriate provision of flood risk and surface water flooding mitigation will be refused.

A Flood Risk Assessment has been produced by RAB consultants. The site is in Flood Zone 1 but on the edge of a Critical Drainage Area in an area known to suffer from groundwater issues. The Council's Flood and Water Management Officer has reviewed the FRA which includes reference to a basement that is no longer be part of the proposed scheme. It considers groundwater but does not undertake any site specific groundwater assessment, but with the removal of the basement this is no longer required. The report recommends SuDs should be integrated within the application. As the site is on the edge of a Critical Drainage Area an appropriate SuDs condition should therefore be applied should the application be determined for approval.

7.6 Other Issues

DENSITY

It should be noted that the density matrix found in the 2016 London Plan does not form part of the new London Plan (2021). Policy D3 of the London Plan (2021) states that all development must make the best use of land by following a design-led approach that optimises the capacity of sites.

Policy DMHB 17 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020) states that all new residential development should take account of the Residential Density Matrix contained in Table 5.2, which recommends a density range of 200-510 habitable rooms per hectare or 80-170 units per hectare for sites within a Town Centre setting and that have a Public Transport Accessibility Level of 2-3.

The application site is located within the Ruislip Town Centre and has a Public Transport Accessibility Level (PTAL) of 3/4. Based on a total site area of 0.099 hectares, the proposed scheme would have a density level of 272.7 habitable rooms per hectare or 80.8 units per hectare. The proposed density level falls within the recommended density range set out in Policy DMHB 17 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020).

Notwithstanding the above, it is considered that what is of greater significance to the determination of this application is the local contextual factors. The key consideration is

therefore whether the development sits comfortably within its environment rather than a consideration of the density of the proposal. It has already been established that the principle of residential development is acceptable.

NOISE

The National Planning Policy Framework (NPPF) provides the Government's guidance on noise issues and paragraph 182 states that planning decisions should ensure that new development can be integrated effectively with existing businesses and that existing businesses and facilities should not have unreasonable restrictions placed on them as a result of development permitted after they were established. Where the operation of an existing business could have a significant adverse effect on new development (including changes of use to residential) in its vicinity, the applicant (or 'agent of change') should be required to provide suitable mitigation before the development has been completed. Policy 7.15 of the London Plan seeks to reduce noise and minimise the existing and potential adverse impacts of noise on, from, within, or in the vicinity of, development proposals.

The proposed development is for a residential use within a predominantly residential area and as such does not raise any significant noise concerns. Should the application be determined for approval a condition requiring the submission of a Construction Environmental Management Plan to protect adjacent residential amenity would be recommended.

AIR QUALITY

Policy EM8 of the Hillingdon Local Plan: Part 1 - Strategic Policies (November 2012) states that the Council will seek to safeguard and improve all land, water, air and noise quality. All development should not cause deterioration in the local air quality levels and should ensure the protection of both existing and new sensitive receptors. Policy 7.14 of the London Plan (March 2016) further supports this.

Policy DMEI 14 of the Hillingdon Local Plan: Part 2 (2020) requires that development proposals should, as a minimum:

- i) be at least "air quality neutral";
- ii) include sufficient mitigation to ensure there is no unacceptable risk from air pollution to sensitive receptors, both existing and new; and
- iii) actively contribute towards the improvement of air quality, especially within the Air Quality Management Area.

The application site is located within the Ruislip Town Centre Air Quality Focus Area. Although these areas are sensitive in terms of air quality, the scale and nature of the proposed change of use is not considered to have a notably impact on air quality.

CONTAMINATION

Policy EM8 of the Hillingdon Local Plan: Part 1 - Strategic Policies (November 2012), Policy DMEI 12 and Policy DMEI 13 of the Hillingdon Local Plan: Part 2 Development Management Policies (January 2020) seek to control the risk from contamination. Policy DMEI 12 (Development of Land Affected by Contamination) of the Local Plan: Part 2 - Development Management Policies (2020) in particular states that the Council will support planning permission for development of land which is affected by contamination where it can be demonstrated that contamination issues have been adequately assessed and the site can be safely used through remediation.

A Phase 1 Geo-environmental Report prepared by Syntegra has been submitted alongside this application. Given the sites previous use as a Petrol Filling Station there is likely to be some contamination of the land. This will need to be remediated to safeguard

any potential future occupants of the site. Should the application be determined for approval then conditions relating to contamination would be recommended to be attached to safeguard future occupiers from contamination.

8. Reference Documents

National Planning Policy Framework (February 2019)

The London Plan (March 2021)

Hillingdon Local Plan: Part 1 - Strategic Policies (November 2012)

Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020)

Contact Officer: Ed Laughton

Telephone No: 01895 250230