

TOWN AND COUNTRY PLANNING ACT 1990

SECTION 78 APPEAL STATEMENT

IN SUPPORT OF AN APPEAL AGAINST A REFUSAL OF
PLANNING PERMISSION
IN RESPECT OF:

Raising of roof to add 2 x studio flats, ground floor infill extension,
single storey front extension and conversion of 2 x 1 bed flats to 2 x
studio flats, (Revised Application)
at:

128D & 130D MANOR WAY RUISLIP



MAY 2022

INTRODUCTION:

This Section 78 appeal relates to a recent refusal of Planning Permission in respect of a REVISED Planning Application which related to the erection of a ground floor in fill extension between the two existing ground floor rear extensions/projections and a first floor extension above and to the rear of 128 and 130 Manor Way. The proposed development would convert the existing ground floor and provide 2 additional studio flats at first floor level, making 4 flats in total. It also follows a previous application of a similar description (**73728/APP/2018/2718**), which was determined as a Delegated application and subsequently refused on 25th October 2018, and an appeal against that refusal was dismissed, as discussed in greater detail below.

So, this revised application was submitted in order to overcome those reasons for refusal.

We recognise that the London Borough of Hillingdon is a large predominantly urban borough which covers a large part of North West London, including Manor Way, Ruislip. We are also aware that the National Planning Policy Framework (NPPF) refers to such changes of use and new dwellings such as that proposed here, so we will refer to this National guidance, where relevant, plus refer to more local – Hillingdon Adopted Planning Policies too.

The Agent who has submitted this application was Gary Pottle, a long established and locally Ruislip based and experienced Building Surveying Company, with many years experience in London Boroughs, in particular the London Borough of Hillingdon, and is also cognisant with Lifetime Homes, DDA compliant elements and also Listed Buildings.

In the meantime, as a Planning Consultant, we have been asked to prepare this supporting Appeal Statement in support of this REVISED application for the extensions, to create additional flats here, to the rear of Manor Way Commercial premises, with typical residential flats above. Importantly, the previous refusal was challenged via the Appeal process, and an appeal was dismissed, as discussed in greater detail below.

So, the starting point for this revised Appeal are that the main issues contained within the Councils Decision Notice, dated 4th March 2022:

Hillingdon File Ref: 73728/APP/2021/3884

We have therefore appended a copy of the Councils full Decision Notice as **Appendix A**.

THE SITE and the PROPOSALS:

So, the frontage of these properties is towards Manor Way, as shown below:



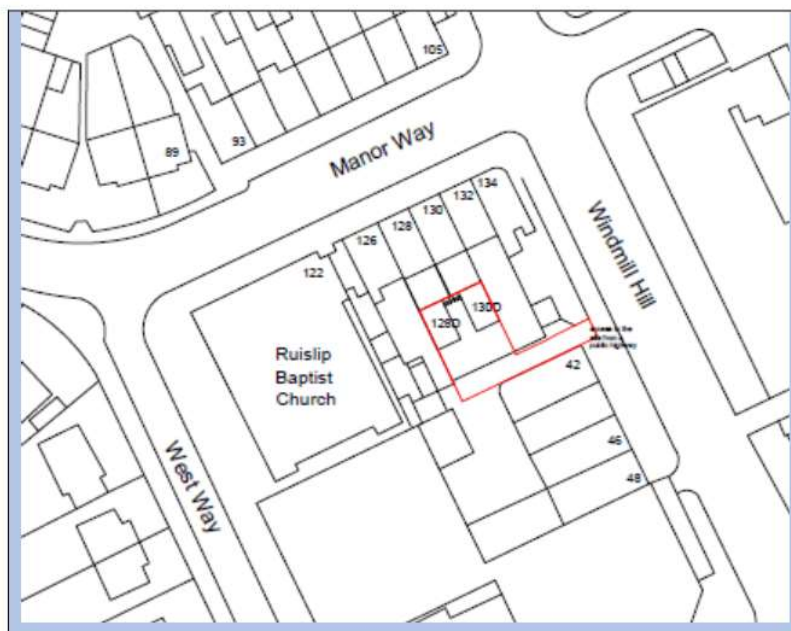
No126 to 134 Manor Way are shown above and are a terrace of mainly two storey typical London 'parade' of Commercial ground floor premises, with residential and offices above. The main Commercial area of Windmill Hill and Victoria Road are located just to the south, whilst Ruislip Manor Tube Station is located on Victoria Road, less than 5 minutes walk to the south east of the property, both of which are in Travelcard Zone 5, with a connection to central London via both the Metropolitan line and Piccadilly line, between Eastcote and Ruislip Manor stations, 40 minutes away.

The area generally therefore enjoys an excellent sustainable location, so close to Ruislip Manor Station and therefore with easy access to Central London, whilst at the same time Hillingdon itself is located on the north western "fringe" – edge of North West London, where space for new homes remains extremely limited, and much of London is clearly surrounded by Metropolitan Green Belt or includes Metropolitan Open Land, where new development prevented.

We would also point out this scheme is very similar to a scheme where Planning Permission was secured at the rear of 26 to 28 Victoria Road, via an application and subsequent approval in 2016. Hillingdon file reference for this is: 71956/APP/2016/3451, granted on 10th November 2016. We will refer to this shortly, under the Appeal considerations below.

So, as background to this Appeal and the principle of new development – homes here, we remain of the view that it is considered the scheme would clearly provide 2 new homes in north west London, where as we suggest new homes are not readily available, and clearly it would make considerably better use of this site than the current vacant under-utilised condition of the site currently, also in this sustainable location.

It would also meet more modern sustainable Building Regulations standards, and essentially would be much more eco – friendly – sustainable properties, which will ensure they meet current and emerging sustainable standards, as advocated by both Central and Local Government, in its sustainable mandates – documents, including Lifetime Homes for example. The Ordnance Survey extract below shows the site:



APPEAL CONSIDERATIONS:

So, there were clearly several main material considerations for the Local Planning Authority (LPA) to consider, and now we will also address the TWO reasons for refusal, outlined shortly:

- (1) the principle of residential re-development in this urban location, and creating two additional dwellings in this sustainable location;*
- (2) Design issues, and the Appeal decision;*
- (3) Highways and the accessible location;*
- (4) Amenity Space, and any other issues.*

1. Principle of Development:

So the National Planning Policy Framework (NPPF), amended July 2018, states there is a presumption in favour of sustainable development.

“As a core planning principle the effective use of land is encouraged by re-using land that has been previously developed (brownfield land).”

The site currently comprises of an open yard, accessed via a service road to the rear of the main Manor Way frontage units, alongside a Motor bike retail unit fronting Windmill Hill (No42). So, essentially the “Carbon footprint” of the new dwellings would be considerably lower than that of the existing flat, as they would have to be to more onerous current Building Regulations exacting standards, and we must again reiterate that, an important consideration is the sustainable location of the property, as discussed earlier, and discussed in greater detail below.

NATIONAL GUIDANCE – THE NPPF:

So, on the principle of new residential development in our towns and cities, the recently amended and updated NPPF again reiterates its views upon design, (in the form of the National Planning Policy Framework (NPPF) (Amended JULY 2018), at Paragraphs 127 and 130 stating respectively:

“.. Planning policies and decisions should ensure that developments:

- a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;*
- b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;*
- c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);*
- d) establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;*
- e) optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and*
- f) create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users...”*

In addition, Paragraph 130 also states:

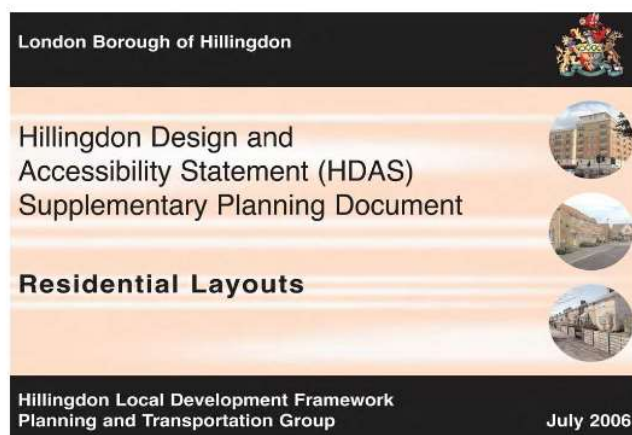
“Permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions, taking into account any local design standards or style guides in plans or supplementary planning documents.

Conversely, where the design of a development accords with clear expectations in plan policies, design should not be used by the decision-maker as a valid reason to object to development.”

So in this case, the planning application would represent good design, in terms of the visual – impact (design) of the new homes, as they would replicate the design of the numerous new flats permitted elsewhere within Hillingdon, as referred to in greater detail under the ‘Precedents’ section below. Their design with a brick facade, slate roof and traditional window proportions all reflect the typical house types in London.

LOCAL GUIDANCE – THE ADOPTED SPD:

The more specific local policy documents is the Hillingdon Residential Design Guide Supplementary Planning Document (SPD) July 2006. This includes various types of residential developments that may be acceptable within Hillingdon:



Paragraph 3.2 of this SPD specifically refers to '*Commercial or institutional sites*', such as this, indicating that the redevelopment of 'brownfield' sites for infill development is particularly common in the northern part of the Borough, where housing densities are generally much lower and there is greater room for new housing on 'brownfield' land such as this. This scheme would have made much better use of this under-utilised site, which currently contains just one modest flat.

Clearly Ruislip is located in the northern part of the London Borough of Hillingdon. The SPD states:

"Commercial or institutional sites"

"The Council will look favourably at proposals involving the sympathetic reuse of existing commercial or institutional buildings and sites on brownfield locations, having regard to UDP/LDF policies. These include vacant industrial land and buildings near roads, railway lines and waterways; derelict areas within or adjacent to town centres and land previously occupied and owned by public agencies.

A detailed site investigation should be carried out to establish if the site is contaminated. Details of appropriate measures to prevent pollution of groundwater and surface water, including provisions for monitoring, must be submitted and approved by the local authority..."

So, in this case, the creation of two additional modest flats from this site would accord with the general objectives of the SPD and the NPPF, creating two new homes.

DESIGN: THE NPPF GUIDANCE

On the question of design, the NPPF also includes a Chapter (No12) regarding design: ***“Achieving well designed places”*** and this recognizes that design is an important consideration, but that:

“Permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area...taking into account any local design standards or style guides...Conversely, where the design of a development accords with clear expectations in plan policies, design should not be used by the decision maker as a valid reason to object to a development.”

So, given the National guidance, in the form of the NPPF (as amended), then there should be no ‘in-principle’ objections to the new homes, by demolishing an unsustainably constructed dwelling, with two brand new homes which meet much more onerous Building regulations, Lifetime Homes and other sustainable attributes/requirements.

Essentially, the “Carbon footprint” of the two new dwellings would be considerably lower than that of the existing property, and the sooner it can be demolished to create two new sustainable homes the better.

THE REVISED SCHEME:

So, the recent Inspectors decision in respect of the previous appeal, as attached at Appendix B had absolutely no issue with regards to the fundamental principle of residential development here, presumably as it was demonstrated the location is indeed an extremely sustainable one, where new homes should be encouraged, as is our view.

However, the more recent refusal of Planning Permission again 3728/APP/2021/3884 was due to:

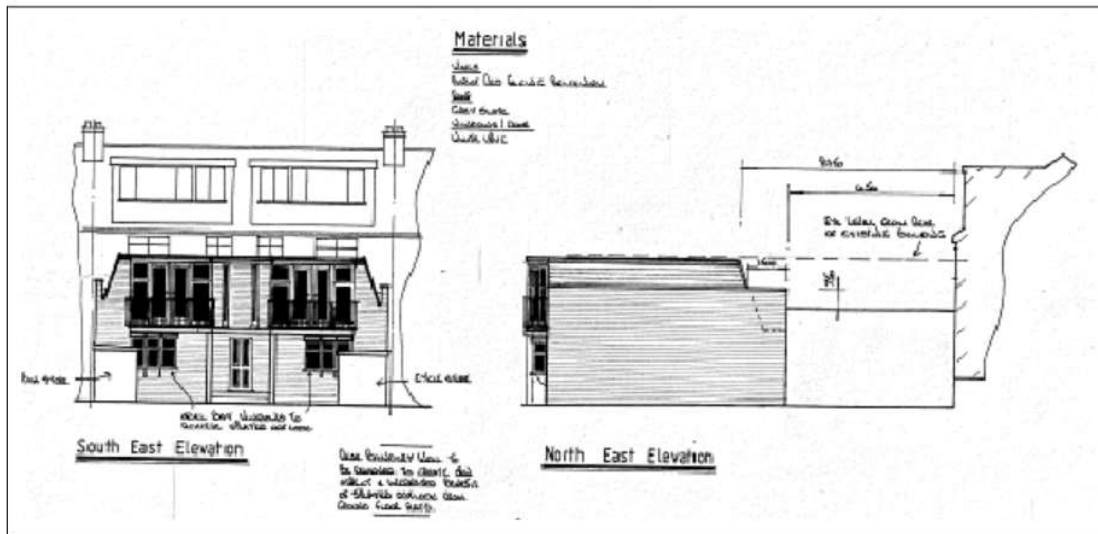
- 1. The proposed development, by virtue of the position of the front habitable windows and Juliet balcony of Flats 2 and 4 and their close proximity to the blank facade side wall at number 42 Windmill Hill, would result in poor outlook, overbearing impact and an oppressive living environment for the future occupants of these flats. The proposal would therefore result in substandard forms of residential accommodation...*
- 2. The proposed development, by virtue of the position of the front habitable windows serving Flats 1 and 2 in relation to the existing service road and proposed cycle/refuse stores together with the proposed demolition of the existing boundary wall, would result in poor outlook, a loss of privacy and unacceptable noise and disturbance for the future occupants of these flats. The proposal would therefore result in substandard forms of residential accommodation...*

THE REVISED PLANS:

So, in order to address the Inspectors previous specific comments regarding these new flats, then the revised application incorporated some important fundamental design changes:

1. The rear boundary wall was been completely removed, thereby improving the 'outlook' from the ground floor flat, (Flat 2) whilst;
2. The rear elevation had also been completely re-designed to introduce Bay windows to the ground floor flats, much larger full depth windows, plus a pair of doors to the upper two flats, with Juliet balconies to these first floor flats too.

So, despite this further refusal, we maintain these fundamental design changes considerably improved the outlook of all flats, and these fundamental changes to the design are shown below:



In this case, then the simple design solution, had taken on board the Inspectors previous conclusions, by:

- A. the removal of the rear boundary wall;
- B. the introduction of Bay windows to both existing ground floor flats, thereby considerably increasing the light to and outlook from the existing Ground floor flats;
- C. the introduction of full height doors and windows to the two upper flats, which would provide vastly improved outlook for those two new flats, which the Inspector was particularly concerned regarding.
- D. The introduction of a roof light within the flat roof over the stairwell, introducing natural daylight into this shared area too, again adding to the improved outlook for occupants of the new flats.

In our view, these revisions would specifically address the Inspectors comments:

"I conclude that the proposed development would not provide adequate living conditions for future occupiers of Flats 2 and 4, with regard to outlook."

So, the revised scheme in our view took on board the above National Planning Policy Framework (NPPF) guidance too, and the more local planning policy stance, as set out in **Policies DMHB11** and **DMHD1**, shown below at Appendix B and C respectively, which we will now refer to in greater detail below.

Paragraph 4.4(i) refers to density, and requires new development to reflect the;

‘...form, height, scale, massing and layout (plot ratio) in relation to the character of the area and the surrounding buildings, having regard to the provisions of this guidance. The location of the site, the context and quality of the area. Where brownfield sites are located in sensitive locations, such as Conservation Areas or Areas of Special Local Character, new housing developments should take into account the context of the site, including the proximity to historic and Listed Buildings.

The accessibility of the site in relation to public transport, shops, services and community infrastructure. The Public Transport Accessibility Level (PTAL) method (as set out in the London Plan) provides a consistent framework for assessing public transport accessibility of larger sites across London. In assessing application proposals over 10 units and applications which propose a significant intensification of density, the Council will consider the PTAL index and the findings of the Transport/Accessibility Assessment submitted with the proposal.

The ability of schemes to provide a satisfactory environment across all tenures. Where a mix of tenures are proposed, they should be properly integrated into the layout and design of a scheme. It will not be appropriate for certain tenures to be developed in a way which cannot provide good living conditions for future occupiers...

In this case, we genuinely believe this under-utilised rear ‘yard’ and two modest flats are still not making the best use of this sustainable site, particularly as it is so close to shops,

employment, leisure and religious uses/buildings and Public transport, as demonstrated earlier.

DEVELOPMENT TO REAR OF 42 – 48 WINDMILL HILL:

In addition, we now also note that the site directly opposite has clearly been granted Planning Permission and is currently under construction, as shown below. (LBH File No 74574/APP/2019/431) which was refused but we understand was subsequently allowed at appeal.

That development and Permission is still Extant, and involves a much larger part two storey/part 5 storey development at 42-48 Windmill Hill Motor cycle building. Their development comprises of two floors of warehouse/storage and a further part two storey element incorporating two studio flats and roof garden.

We note that the Inspector concluded in respect of that appeal:

“The main aspect from these windows would predominantly be towards the rear of existing buildings on Manor Way and Pembroke Road respectively. However, it is not uncommon for dwellings to have views towards the rear of neighbouring buildings. The buildings surrounding the site appeared to me to be fairly unremarkable, and not unattractive.

With regard to their scale, the spacing provided would also be sufficient to avoid their appearing overbearing or oppressive and they would not give rise to an undue sense of enclosure for occupiers of the development. Moreover, views from the front of the upper flat would largely be over the top of the two-storey buildings on Manor Way...”

It is also noted the approved plans for the above appeal scheme show the dimension between the front of the flats and our current (Manor Way) appeal site (at 15m) as being acceptable, so we assume that the relationship back towards the flats (and the side of Windmill Hill) from our scheme, (when combined with the important changes to window

sizes/design) on our scheme, would have ensured our development would now be acceptable.

So the development at the rear of 42 to 48 Windmill Hill is shown below:



We do feel there are distinct similarities between that approval and our scheme and in particular the Inspectors conclusions that:

“It is not uncommon for dwellings to have views towards the rear of neighbouring buildings. The buildings surrounding the site appeared to me to be fairly unremarkable, and not unattractive...With regard to their scale, the spacing provided would also be sufficient to avoid their appearing overbearing or oppressive and they would not give rise to an undue sense of enclosure for occupiers of the development...”

We genuinely believe the revisions made, as discussed earlier, would indeed overcome any concerns regarding a poor outlook or amenities for occupiers, and would provide two much needed new flats, at a time when pressure for new homes in and around London is increasing daily from immigrants from Europe and war torn countries.

So, this sustainable ‘Brownfield’ property and two potential new flats, at first floor level of the style, scale, massing, height and depth would not dominate the street-scene, being located to the rear of Manor Way, whilst the site also is NOT located within a designated

Conservation Area or other local designation, such as an Area of Special Local Character, (a local Hillingdon designation) where indeed 'design' is much more critical.

So, with regards the specific design considerations in respect of these two new flats, also in accordance with the above SPD, their style with a brick elevation and attractive, yet sustainable (in terms of light influx) then the full height windows, doors and Juliet balconies.

This will also improve the typical unkempt 'service road' nature and character and appearance such service road, as it is located to the rear of Manor Way, however in our view the usual question is whether indeed it would '*seriously detract*' from the broader character of the wider area? We would suggest not.

So, as discussed, the revised window and door details and removal of the rear boundary wall would have created a vastly improved outlook which would address the Inspectors previous specific concerns and the Councils more recent concerns once again.

With regards design, then in terms of the overall scale and appearance, this scheme would still not detract or fail to harmonise with the wider street scene, and the development would not conflict with Policies DMHB11 or DMHD1 of the Adopted UDP, or result in a development that would not be in keeping with the architectural style of the area – which does indeed contain a broad pallet of two storey flatted developments.

So, in this respect, we remain of the view that the two additional flats at first floor level would be visually attractive as a result of good architecture, layout and indeed design. As such, then we do not believe the two new flats would detract from the character and visual amenities or openness of the location, and therefore would meet the ***Hillingdon Design and Accessibility Statement (HDAS) Supplementary Planning Document (SPD) "Residential Layouts"*** in relation to new dwellings.

3: HIGHWAYS and ACCESSIBILITY:

Clearly, there were no highways safety or parking issues with regards the previous –

appeal scheme, however the **National Planning Policy Framework (NPPF)**, as amended, states there is a presumption in favour of sustainable development...

...as a core planning principle the effective use of land is encouraged by re-using land that has been previously developed (brownfield land), OR making better use of land in our villages, towns and cities, such as here in 'sub-urban' West London, so entirely in accordance with this National guidance.

As discussed above, Manor Way is located in this extremely sustainable location, close to Ruislip Manor Tube Station to the south west, which connects the area to central London, just 40 minutes away by train, and Windmill Hill and Victoria Road contain a broad range of commercial, retail, leisure, religious and other uses.

On this aspect the National Planning Policy Framework (As amended) does indeed suggest to Councils throughout the UK and refer to '*Making more effective use of land*' and suggests that Planning Policies and decisions should:

c) "...give substantial weight to the value of using suitable brownfield land within settlements for homes...

d) promote and support the development of under-utilised land and buildings, especially if this would help meet identified needs...where land supply is constrained and available sites could be used more effectively..."

So, with the above National guidance in mind, then this application would create two new – additional flats, and as discussed above they would be positioned in this excellent sustainable location.

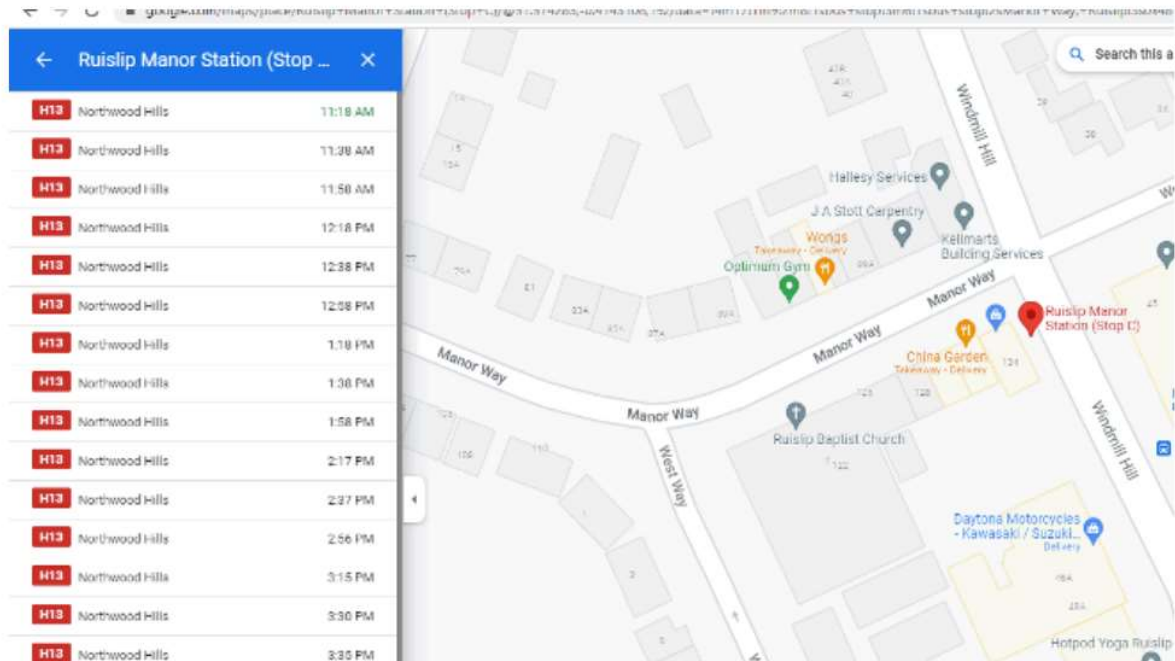
More locally, the recently Adopted Local Development Plan for Hillingdon is the 2020 Adopted Local Plan Policies, as set out below, which we will refer to shortly in support of this application:

- ❖ ***Policy DMH6 Garden and Backland Development;***
- ❖ ***Policy DMHB11: Design of new development;***
- ❖ ***Policy DMHD1: Alterations and Extensions to Residential Dwellings***

So with regards to Highways and Accessibility as Hillingdon often refer to, Section 4 of the SPD, then also (as quoted above), Hillingdon will assess sites in relation to their “accessibility” in relation to Public transport, shops, services and community infrastructure. They use what is termed a “**Public Transport Accessibility Level**” or PTAL.

Clearly in this case, as discussed earlier the site is in an extremely sustainable location, less than 5 minutes walk from Ruislip Manor, which connects the area with Central London 40 minutes away, whilst Field End Road and the surrounding area contains all the local shops, leisure and commercial uses necessary for two additional homes and their occupants.

With regards parking, then there is no requirement for parking in such sustainable locations, given the proximity to Public transport – buses and trains (underground) so near the application site. As shown below there is indeed a Bus Stop in Windmill Hill, right next to the access road to the site, with Bus H13 stopping every 15 minutes:



Consequently, once again it is contended that the proposed dwellings here would accord with both National (the NPPF) guidance, offering new homes in an extremely sustainable

location where other (non car) modes of transport are available and also in accordance with more local (SPD) guidance too, as outlined and discussed earlier.

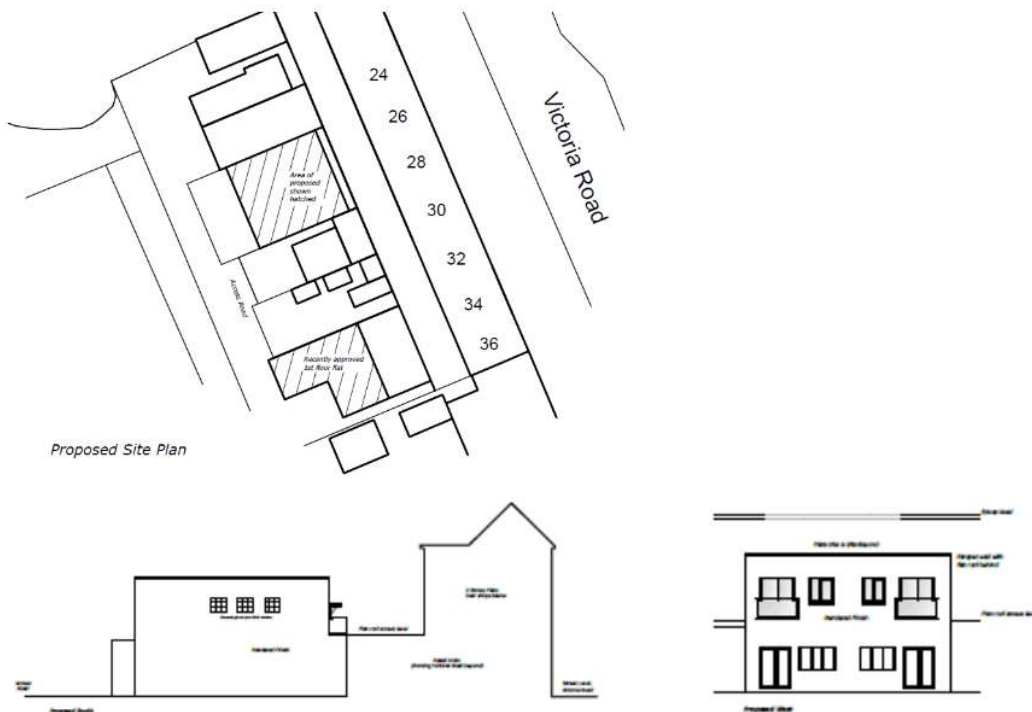
4. AMENITY Space and other issues:

Finally, as part of the previous appeal and this revised application, there were no issues relating to flooding, and with regards to amenity space provision, the properties are by their very nature devoid of amenity space, but typically are also close to local Parks including Shenley Park and Kings College playing field and Church Field Gardens.

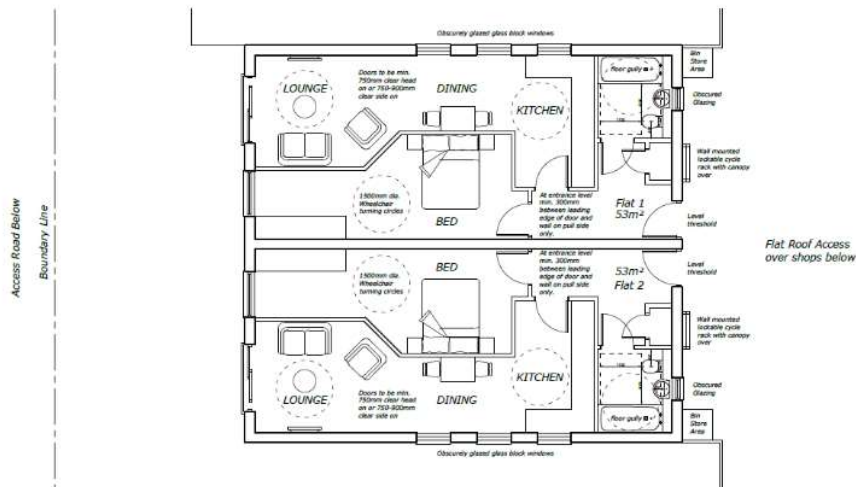
We also note cycle stores and bins presentations points will be provided too.

PRECEDENTS:

Finally, in addition to the development of the rear 'yard' now on-going opposite, we are aware a very similar scheme to the rear of 26 to 28 Victoria Road, Ruislip, involving raising the roof of similar rear units to the rear of that road, to create 2 x 1bed flats was also approved (LBH Ref: 71956/APP/2016/3451), approved on 10th November 2016:



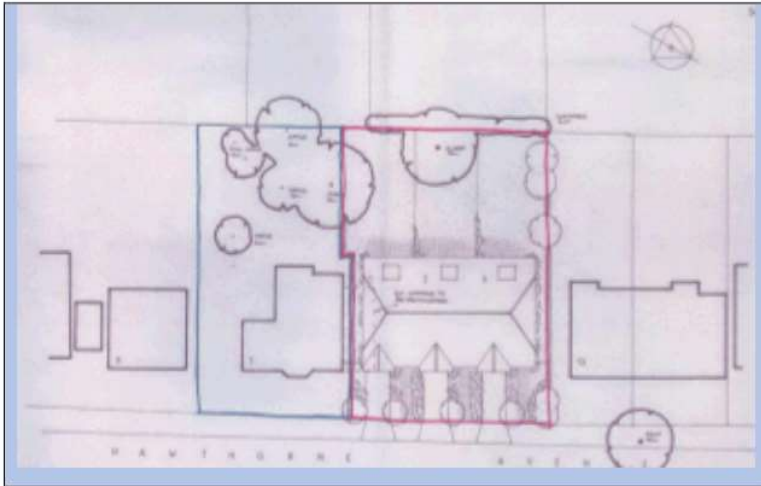
So the above scheme is very similar, formed by extending upwards, within a similar rear service area, to create two new flats, again in a sustainable location, as here at Manor Way. We note that two much needed 1 bed flats are proposed, as here at Manor Way:



Whilst appreciating the precedents below are not directly comparable to our scheme or Victoria Road, we would still like to refer to several other local recent precedents, where new infill housing has been permitted, which is in accordance with the broader National NPPF objectives, which is to try and locate the majority of new homes on *'previously developed – urban sites/land'*

No7 to 9 Hawthorne Avenue:

The two sites below are also 'urban infill' sites, between existing dwellings either side, so a development of land between No7 and 9 Hawthorne Avenue, which was approved in 2005/2006. These were approved under the following file references 61379/APP/2005/3356 and 2006/2030 respectively. The 2006 plans are not available but the 2005 Block plan is shown below, and clearly shows an infill development between existing frontage properties either side:



53 Hawthorne Road:

Another similar infill development is here at 53 and 53A Hawthorne Road, approved more recently in 2018, under LBH Planning file reference: 15248/APP/2018/3353:





We note that this approval in 2018 had the recommendation of the Case Officer who stated:

“Policy BE1 of the Hillingdon Local Plan: Part One requires all new development to improve and maintain the quality of the built environment in order to create successful and sustainable neighbourhoods. Policies BE13 and BE19 of the Hillingdon Local Plan: Part Two - Saved UDP Policies (November 2012) states that new development should complement or improves the character and amenity of the area whilst safeguarding the design of existing and adjoining sites.

In addition, Policy BE22 states that buildings of two or more storeys in height should be set back a minimum of 1 metre from the side boundary of the property for the full height of the building. The proposed dwellings would be located 1 metre from the Northern and Southern side boundaries by 1 metre. In addition there would be a gap of two metres between the detached and semi-detached properties. The proposed replacement dwelling at No.53 would now be set further away than the existing bungalow.

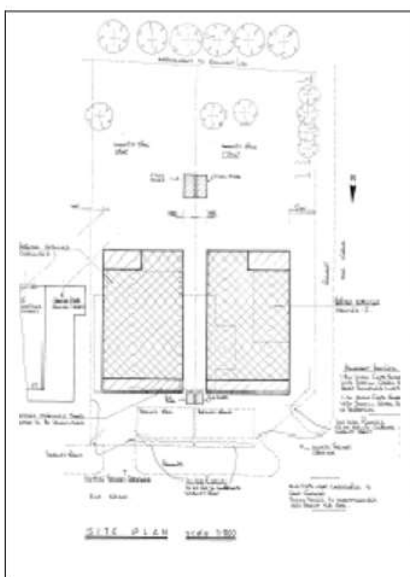
Although the neighbouring property at No.51 is a bungalow there would be a distance of 3 metres from the side boundary of 51 due to the public footpath. The replacement dwelling at No.53A would be closer to the boundary than the existing, however, No.55 is a two storey property and the 1 metre set in is still maintained. Therefore, it is considered that on balance the proposal is acceptable and would not appear as an over-dominant or cramped on site. The open character and appearance of the surrounding area and the visual amenities of the street scene are therefore maintained.

In addition, the proposed would be set back from the main road and the prevailing building line to the front thereby reducing their presence on the overall street scene. Hawthorne Avenue consists of properties of varying design and sizes with a mix of one and two storey properties. It is considered that the erection of two storey dwelling houses in the replacement of bungalows would not have a detrimental impact on the street scene...

It is also noted that the design of the proposed dwellings has taken inspiration from these neighbouring properties with a mock tudor frontage and front roof forms, and a similar overall massing and scale. The two storey projected bays set under the modest gable pitched roofs appear subordinate and would not appeal out of character within the general street scene."

59 ELM AVENUE:

Finally, whilst appreciating this example is corner plot, I can confirm we acted on behalf of a previous application – applicant at 59 Elm Avenue, which was a similar detached bungalow fronting Elm Avenue, but positioned on the corner of Oak Grove. We appealed a refusal of Planning Permission here at 59 Elm Avenue, (Hillingdon Ref:60130/APP/2019/1369), refused on 23rd April 2019, however the appeal was allowed:



We lodged the appeal as it was considered better utilising this similar plot also containing a large bungalow, and providing two 3-4 bedroom houses would also accord with both National (NPPF) and local Development plan and SPD guidance too, as outlined above. We note that the Inspector did indeed agree with our case and in allowing the appeal confirmed:

“The proposed dwellings would be modest in size and would be in keeping with the scale of built development in the area. Whilst the proposed properties would appear prominent on the corner plot, they would not be visually intrusive due to the separation with neighbouring properties. The highway junction and surrounding verges maintains visual relief within the built form.

The proposal, due to its size and positioning would not encroach on this visual gap and would not have a detrimental effect on openness. The proposed dwellings are sensitive in scale and would not appear as cramped or dominating features within the street scene or surrounding area.

...the proposed development would not have a harmful effect on the character and appearance of the surrounding area. These matters would not result in the proposal having a harmful effect on the surrounding environment including the living conditions of neighbouring occupiers. For the reasons set out above, the proposed development would accord with the development plan and therefore having had regard to all other matters raised the appeal should be allowed.”

Importantly, we hope that the above examples demonstrate to the Inspector that new development in urban areas are common place in Hillingdon, without detriment to the wider street – scene.

CONCLUSION:

So, in our view, the proposed dwellings (as amended) would overcome the Inspectors specific concerns with regards to the outlook from these four flats, as well as improving the outlook from the other flats too, with the removal of the rear boundary wall, and improved – increased window sizes, doors, light well to the entrance lobby and Juliet

balconies to the upper flats.

This would accord with both National policy guidance in the form of the **National Planning Policy Framework (NPPF)**, the more local Adopted Development plan and the guidance set out in The London Borough of Hillingdon in **The Hillingdon Supplementary Planning Document (SPD), Design and Accessibility Statement (HDAS), Residential Layouts** .

To reiterate, we consider this particular site is also in an extremely sustainable location, as it is so close to Bus Stop H13 and Ruislip Manor Tube Station which in turn offers a short trip to get into central London, whilst we are on top of a main designated (in the Local Plan) Shopping core area, so with retail, leisure, religious and other uses.

Therefore, also in accordance with the NPPF, this slightly more intense – density of residential development makes much better use of this urban site, where other “non – car” modes of (Public) transport are available.

Finally, we note the CIL contributions and ultimately we can confirm that the Applicant would agree to such CIL contributions as necessary, and those necessary and enforceable planning conditions, relating to such matters as the approval of materials, and this would accord with the advice contained in the Circular 11/95, *‘The use of Planning Conditions’*.

We therefore respectfully request that the Inspector accepts our views that the revision made do indeed overcome the Councils and Inspectors previous concerns, and grants Planning Permission for this modest, much needed infill – Brownfield development, in this extremely sustainable location.