

106 PEMBROKE ROAD, RUISLIP
LONDON, HA4 8NW

PLANNING, DESIGN & ACCESS STATEMENT



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REVISION SCHEDULE					
Rev	Date	Details	Prepared by	Reviewed by	Approved by
1	24/10//2020	For Review	R Redford MTCP MRTPI	Paul Clarke Director	
2					

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1.0 INTRODUCTION

- 1.1. This planning, design and access statement has been produced by **heritage** unlimited on behalf of the applicant to support a planning application, and associated Listed Building Consent application, for the demolition of two outbuilding and the installation of a security gate and fence at Alexander House, 106 Pembroke Road, Ruislip HA4 8NW which falls within the London Borough of Hillingdon.
- 1.2. The proposal has been brought together in light of improving the external areas of the application site and by association the setting of the adjacent graded II listed building known as Windmill Hall.
- 1.3. In support of the proposal this statement should be read in conjunction with the following submitted documents: -
 - Drawings: -

○ FLU.1228.2.01	Location Plan
○ FLU.1228.5.02 Revision E	Existing Ground Floor Plan
○ FLU.1228.5.03 Revision A	Existing Roof Plan
○ FLU.1228.5.04 Revision B	Existing Elevations Sheet 1
○ FLU.1228.5.05 Revision A	Existing Elevations Sheet 2
○ FLU.1228.5.06 Revision A	Existing Elevation Sheet 3
○ FLU.1228.5.07 Revision B	Proposal Ground Floor Plan
○ FLU.1228.5.08 Revision A	Proposed Roof Plan
○ FLU.1228.5.09 Revision B	Proposed Elevations Sheet 1
○ FLU.1228.5.10 Revision B	Proposed Elevations Sheet 2
○ FLU.1228.5.11 Revision A	Boundary Treatment Details
○ FLU.1228.5.12	Existing Sections
○ FLU.1228.5.13	Boundary Treatment Details 2
 - Heritage Statement by Heritage Unlimited



2.0 DEVELOPMENT PROPOSAL

- 2.1. The proposal is seeking to remove two wooden lean-to outbuildings which are within the external areas relating to the application property and install a security gate. This would create a more useable open space in relation to the application property and provide a clear access to the associated parking, to the west of Windmill Hall, and to the rear of the property.

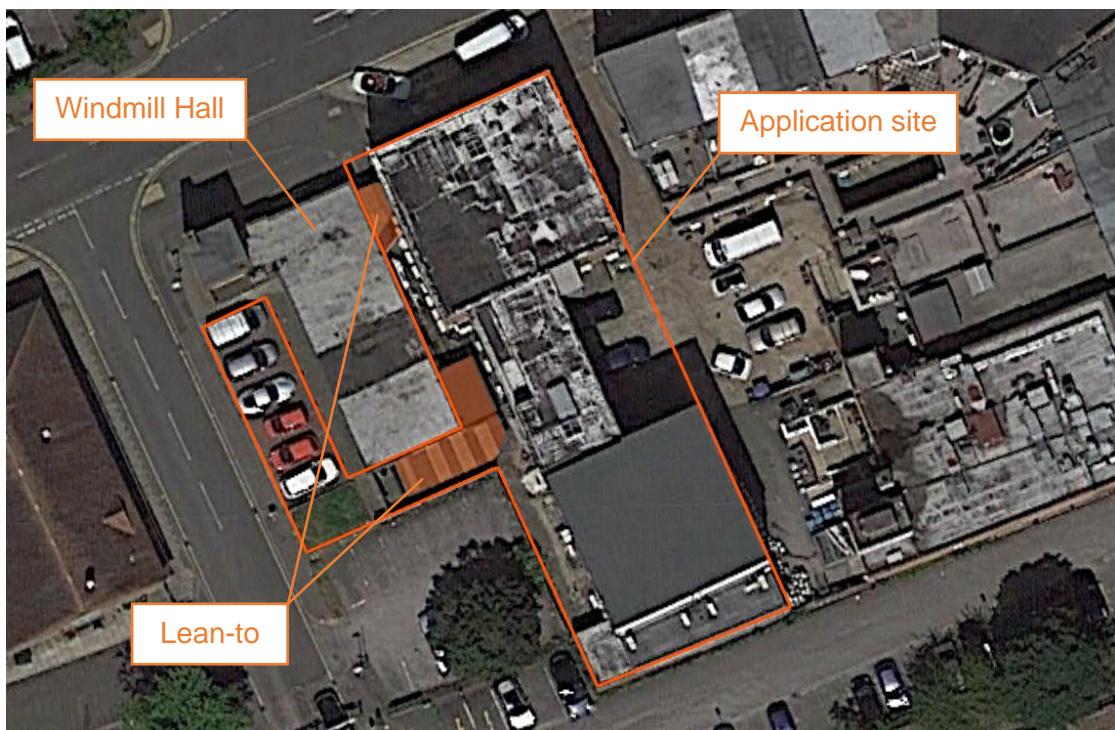


Fig. 1: Aerial photograph of site downloaded from Google Earth at 11:00 24/10/2020

- 2.2. The first wooden lean-to wraps the south-east corner of Windmill Hall. It is single-storey and somewhat informally built out of timber boarding with a part corrugated panel / part felt, mono pitched roof. The building appears to be physically attached to Windmill Hall by wooden framework as well as internal cupboard fixtures and fittings. The proposal is to remove this building in its entirety and make good any damage to the wall of Windmill Hall.

- 2.3. The second wooden lean-to is situated at the north-west corner of the building filling the gap between the west elevation of the application property and the adjacent Windmill Hall, with a door in the north elevation facing Pembroke Road. It is flat roofed, single-storey and also informally built with an angled rear elevation. It is accessed by a door from the application property's ground floor and also by a door from Windmill Hall. The proposal is to remove this building in its entirety, make good any damage to the wall and doorway of Windmill Hall, remove the door into the application property and install a new metal gate in place of the front (north) elevation to secure the outdoor space.
- 2.4. Therefore, to summaries, the schedule of works would be as follows: -
 - Remove the L-shaped lean-to building;
 - Remove the joining lean-to building;
 - Make good any damage to the walls of Windmill Hall;
 - Block up the access door into the application property; and
 - Install a security gate between the application property and Windmill Hall to secure the open space from Pembroke Road.
- 2.5. The applicant contacted the Council to seek their opinion on this proposal and the following was issued in an email from the Principle Conservation & Urban Design Officer in October 2020: -

"The timber extension is not considered to be of any architectural or historic interest and there would be no objection to its demolition in principle.

To remove the structure you will need to apply for listed building consent as its removal will affect the character and special interest of the building. It will also be necessary make good and repair any scarring etc to the building once it has been removed so that it is returned back to its original state."



3.0 THE APPLICATION SITE

- 3.1. Alexander House is a three-storey building with 2 retail units on the ground floor and offices above. It is flat roofed with decorative metal rail in place of the brick parapet on the north, front, elevation. It has a near fully glazed frontage with brick side and rear elevations. The west elevation is predominantly brick with some functional windows in at upper levels. It over looks the outdoor space related to this side of Alexander House which is broadly T-shaped and surrounded Windmill Hall, the property to the west, on the east, south and west side. This outdoor area includes the two lean-to outbuildings as previously discussed and is largely poorly maintained and used for informal storage, bins and access to the designated car parking to the west side of Windmill Hall.
- 3.2. The application site is not within a conservation area but Windmill Hall is a grade II listed building from the 1940s. It was listed in March 2000 and is a former air raid precautions building. The submitted heritage statement further explains the significance of this building and its relationship to the application property but it is fair to consider that, although in different ownership, the two lean-to outbuildings are physically attached to Windmill Hall, therefore their removal would also require listed building consent.
- 3.3. The site is within Flood Zone 1 and does not have any risk of surface water flooding accordingly to the Government's Flood Warning Information Service.
- 3.4. There is no known contamination on site and the proposal will have no impact on the existing parking, access into the site.
- 3.5. The site is also not considered to be ecologically or landscape sensitive.



4.0 PLANNING HISTORY

4.1. The planning history for the application site is as follows: -

- 10744/A/83/0186 – Change of use from service training demonstration centre to Class II office – **Approved** 09.02.1983
- 10744/D/86/0825 – Alterations to elevation (P) – **Approved** 07.05.1986
- 10744/F/87/2259 – Erection of second floor extension to offices – **Refused** 17.11.1987
- 10744/H/90/1571 – Erection of extensions to existing offices at ground, first and second-floors including car parking facilities – **Approved** 13.09.1990
- 10744/J/92/3508 – Installation of internally illuminated fascia sign and two gable end signs – **Approved** 03.02.1992
- 10744/APP/2001/724 – Erection of a second floor addition to an existing head office building – **Approved** 04.04.2001
- 10744/APP/2016/2533 – Change of use from Use Class B1 (Offices) to Use Class C3 (Residential Units) to form 23 self-contained flats (Prior Approval) – **Refused** 28.06.2016
- 10744/APP/2016/3615 – Change of use from offices (Use Class B1) to provide 23 x 1 bed self-contained flats (Use Class C3) (Prior Approval) – **Allowed by appeal** 21.08.2017
- 10744/APP/2019/1278 – Addition of a third floor to create 1 x 3-bed and 3 x 1-bed self-contained flats in addition to alterations to the existing building – **Undecided no date**
- 10744/APP/2020/230 – Addition of a third floor to create 1 x 3-bed and 2 x 1-bed self-contained flats in addition to alterations to the existing building – **Dismissed by appeal** 13.10.2020
- 10744/APP/2020/929 – Change of use from Use Class B1(a) to Use Class C3 to form 23 flats (Prior Approval) – **Prior approval not required** 17.03.2020
- 10744/APP/2020/2240 – Change of use from offices (Use Class B1a) to



residential (Use Class C3) to accommodate 23 residential units (Class O, 56 day Prior Approval Application) – **Prior approval not required** 20.07.2020

- 10744/APP/2020/2542 – Changes to the external facade of the building including replacement shopfront, adding/rearranging/replacing openings, rendering, additions at second floor level and to the roof to the rear projection and external alterations – **Approved** 13.08.2020

4.2. Is it noted that there is no history on Windmill Hall referring to the two outbuildings in question.



5.0 PLANNING POLICY

- 5.1. The application site is within the London Borough of Hillingdon; therefore, development is controlled by policy at a national, regional and local level. Planning applications must be determined in accordance with the Development Plan unless considerations indicate otherwise (Section 38(6) of The Planning and Compulsory Purchase Act 2004).
- 5.2. At all levels planning policy is supported by various guidance and supplementary documents which provide more detail relating to specific issues or policies.

National Policy

- 5.3. The National Planning Policy Framework 2019 (NPPF) sets out the guiding principles for policy making and decision taking and should form the basis of all strategic or local plan making. The relevant paragraphs are as follows: -
 - Para 39 - importance of early engagement
 - Para 47 - determination in accordance with the development plan
 - Paras 54-57 - use of planning conditions and obligations
 - Para 95 - safe communities and security
 - Para 127 - achieving well-designed spaces
 - Paras 184-202 - protecting heritage assets

Regional Policy

- 5.4. The London Plan is an overarching regional strategic plan for the London area setting out an economic, environmental, transport and social framework for development. The current version was adopted in March 2016.
- 5.5. It is considered that the relevant adopted and emerging London Plan policies are in accordance with the NPPF.
- 5.6. As the proposal is not considered strategic in its content, the requirements the London Plan have limited impact, however the relevant policies from the Adopted London Plan are: -
 - Policy 7.3 - Designing out crime
 - Policy 7.4 - Local character
 - Policy 7.8 - Heritage assets and archaeology



Local Policy

- 5.7. Local policy is set at borough level and should be specific to the physical, economic and social aspects of that particular jurisdiction. For the purposes of this application, local policy is set out in the Hillingdon Development Plan which comprises: -
 - The policies map;
 - The Local Plan Part 1 – Strategic Policies (adopted November 2012); and
 - The Local Plan Part 2 – Development Management Policies (adopted January 2020).
- 5.8. Neighbourhood plans should also form part of the local policy documents, however there is no neighbourhood plan for the area the application site is within.
- 5.9. On the policy map the site is within the built-up area of Ruislip within a designated 'Town Centre' which concentrates on the Pembroke Road / Parkway junction and extends south down Victoria Road.
- 5.10. Within the Local Plan Part 1 (LP1) the relevant policies are: -

- E5	- Town and local centres
- HE1	- Heritage
- BE1	- Building environment
- 5.11. Within the Local Plan Part 2 (LP2) the relevant policies are: -

- DMHB 1	- Heritage assets
- DMHB 2	- Listed buildings
- DMHB 15	- Planning for safer spaces
- 5.12. The Council has two supplementary planning documents, Accessible Hillingdon (September 2017); and Planning Obligations (July 2017). However due to the nature of the application it is not considered that these are relevant to this proposal.



6.0 DESIGN AND ACCESS MATTERS

- 6.1. In May 2006 the Government introduced changes to the planning application process, and in the circular dated 10th August 2009 'Guidance on changes to the development control system' these were set out and included a need for a concise report to accompany certain applications including those for listed building consent to demonstrate the analysis and details which underpin a specific development proposal.
- 6.2. It is clearly stated within paragraph 29 (revised 06.03.2014) of the National Planning Policy Guidance 'Making an application' that the "*level of detail in a Design and Access Statement should be proportionate to the complexity of the application, but should not be long.*"
- 6.3. This section sets out the design and access considerations pertinent to this proposal.
- 6.4. **Design Principle** – the proposal would remove two unsightly outbuildings from the outdoor space relating to the application property and connected to the grade II listed building Windmill Hall. The removal of these buildings will allow more efficient use of the open space, better reveal the form of the listed building and improve the character and appearance of the immediate area. The installation of a gate at the northern end of the open space will maintain its security for users of Alexander House and clearly delineate the public and private realm.
- 6.5. **Heritage** – the assessment of the proposal's design considerations in relation to its relationship with the designated heritage asset is fully explained and considered within the submitted Heritage Statement.
- 6.6. **Use and Amount** – the proposal would remove two outbuildings with a cumulative footprint of about 39sqm and an overall volume of approximately 78 cubic metres. This space has historically been used for storage for both Windmill Hall and the application property but currently it is very poorly used due to the buildings poor state of repair. The proposal will create a better proportioned open space in relation to the application property by removing these unwanted buildings.
- 6.7. **Layout** – the two outbuildings are attached to Windmill Hall along the east and south sides of the building visually altering these elevations and screening original window and door features. Their removal will better reveal the form and setting of Windmill Hall as well as providing more useable open space for the application property. The installation of the gate at the northern end would provide a clear delineation between



the public and private realm and allow the secure use of the open space for future users.

- 6.8. **Scale** – the outbuildings are out of scale with the open space they are in and with Windmill Hall. Their removal will allow a better balance of scale between the open space in relation to the application property and an improved relationship with Windmill Hall and its setting.
- 6.9. **Appearance** – the demolition of two unsightly and poorly maintained outbuildings will improve the overall character of this area and the well designed and sympathetic security gate will better delineate the separation between the application property and Windmill Hall, as well as between public and private realm within this town centre. The making good of the walls post demolition will enhance the appearance of Windmill Hall as well.
- 6.10. **Design matters not relevant to this proposal** – landscaping, drainage, waste management, access to utilities as these will not be affected by the proposal.
- 6.11. **Access** – the proposal will allow direct pedestrian access to the open area associated with the application property from Pembroke Road, where as the current outbuilding prevents this. This access will be secured by a suitable gate thus ensuring the security of the area for future users.



7.0 PLANNING JUSTIFICATION

- 7.1. Every planning application needs to ensure it addresses the material planning considerations related to the specifics of that site and the proposal.

Principle of Development

- 7.2. The application site is within the built-up area of Ruislip within a town centre where **Policy E5** seeks to improve, protect and enhance these areas. This proposal will not alter the uses of the application site but will improve the appearance of the space between the application property and Windmill Hall. Therefore, it is considered the principle of the development would be acceptable and in accordance with **Policy E5**.

Design

- 7.3. **Policy BE1** requires new development to improve and maintain the quality of the built environment. It sets out 11 tests which all new development should achieve. Tests 3, 4, 5, 9, 10 and 11 relate specifically to residential developments or areas of the district in which the application is not situated.
- 7.4. Test 1 and 2 seek high quality design appropriate to the context of the proposal, and in both cases the removal of the unsightly outbuildings and the installation of a new in keeping gate will ensure that on a very minor level the proposal will contribute to the sense of place and make a positive contribution to the immediate area surrounding it.
- 7.5. Tests 6, 7, and 8 seek to ensure good accessibility and quality public and private realms which create safe and secure environments and this same ethos is picked up in policy **DMHB 15**. The proposal would improve the accessibility of the open space related to the application property by providing a direct pedestrian access from Pembroke Road; it would improve the quality of the public and private realm by the removal of the unsightly outbuildings and ensure the security of, and clear delineation between, both with the installation of the gate.
- 7.6. It is therefore considered that the proposal would be of a design that is compliant with all relevant policies specifically **Policy BE1** and **DMHB 15**.

Heritage

- 7.7. **Policy HE1** seeks to strategically conserve and enhance the historic landscape of Hillingdon district in general, with specific focus on listed buildings and other heritage assets; whereas policy **DMHB 1** sets out the specific tests for development affecting



heritage assets and **DMHB 2** sets out the tests specific to listed buildings.

- 7.8. **DMHB 1** requires that any development effecting heritage assets should sustain and enhance the significance of the heritage asset, not lead to significant lost or harm and make a positive contribution to the local character. Whilst **DMHB 2** specifically set out the requirement for a Heritage Statement for all applications effecting a listed building and that any proposal retains the significance and value of the listed building and its setting.
- 7.9. This application is submitted with a full Heritage Statement which clearly sets out the impact of the proposal on the listed building 'Windmill Hall' and its settings and concludes that the proposal would better reveal the listed building without detriment to its significant and value and will therefore enhance a heritage asset and its place within the historic landscape of this part of Hillingdon district in compliance with **Policy HE1**, **DMHB 1** and **DMHB 2**.



8.0 CONCLUSIONS AND PLANNING BALANCE

- 8.1. Drawing all the above threads together leads to the following conclusions.
- 8.2. Having regard to the development plan and the requirement imposed by section 38(6) of the Planning and Compulsory Purchase Act 2004, the application proposal is considered to accord with all relevant local policy therefore, in accordance with the London Plan and the NPPF, should be positively encouraged as appropriate development.
- 8.3. The proposal is considered to improve the overall design and use of the application property's open space as well, on a small scale, improve the immediate public realm and ensure the security and positive delineation between private and public space.
- 8.4. It would also enhance a listed building and its setting by better revealing its physical form without detriment to its significance or value.
- 8.5. It is considered to be in total compliance with all relevant local polices and therefore it is respectfully requested that planning permission be granted, subject to the imposition of suitably worded planning conditions that meet the NPPF paragraph 206 tests.
- 8.6. There are a number of planning conditions that may be necessary to make the proposed development acceptable. In particular conditions covering the following matters may be required:
 - Materials
 - Details of how the walls and doorways will be made good
 - Details relating to the security of the proposed gateThis list is not intended to be exhaustive.

