

Planning Statement
Bourne Court, South Ruislip

On behalf of
London Borough of Hillingdon

July 2018



hghconsulting.com

Contents

1.0	Introduction	3
2.0	Site Description and Planning History	6
3.0	Pre-Application Consultation	13
4.0	Development Proposal	16
5.0	Planning Policy Context	19
6.0	Planning Justification	34
7.0	Conclusion	48

1.0 Introduction

- 1.1 HGH Consulting have been instructed by LB Hillingdon to submit a full planning application for the redevelopment of the site known as Bourne Court, Ruislip ('the site'). The extent and location of the application site is identified on Figure 1 below.



Figure 1: Site boundary and location

- 1.2 The proposal is for:
- "Redevelopment to provide 109 residential units in two blocks, together with access, car and cycle parking, and communal and private amenity space."*
- 1.3 This Planning Statement and the supporting application documentation outlines the site history, the principle of development, and the context of the site within the wider locality. This Statement supports the proposed residential redevelopment justifying the design, layout and evolution of the scheme. The justification in this statement is set out in the context of the relevant adopted local, regional and national planning policy guidance.
- 1.4 This Statement should be read in conjunction with the accompanying plans, drawings, Design and Access Statement and technical reports outlined in Paragraph 1.8.
- 1.5 The proposal seeks to redevelop a disused and vacant site to provide much needed residential units in an already established residential area. This proposal also seeks to optimise the unit provision and provide a suitable mix of units with the relevant amenities.

The Applicant and Consultant Team

- 1.6 HGH Consulting are the appointed planning consultants and have been instructed to prepare this planning statement and submit the planning application in respect of this proposal. WAM architecture are the appointed architects for the scheme and have prepared the Design and Access Statement and application drawings.
- 1.7 The planning application submission will include the following documents:
- **Planning Application and CIL Forms**
 - **Design and Access Statement** (WAM)
 - **Drawings and 3D Visuals** (WAM)
 - **Planning Statement** (HGH Consulting)
 - **Transport Statement** (Paul Mew Associates)
 - **Flood Risk Statement** (Water Environment Limited)
 - **Drainage Statement** (Water Environment Limited)
 - **Arboricultural Implication Assessment** (Eight Associates)
 - **Arboricultural Method Statement** (Eight Associates)
 - **Tree Survey** (Eight Associates)
 - **Sustainability Statement** (Eight Associates)
 - **Energy Assessment** (Eight Associates)

Structure of Planning Statement

- 1.8 The remaining sections of this statement are set out as follows:
- **Section 2** provides a description of the site and local area and a summary of the relevant planning history;
 - **Section 3** provides a summary of the previously approved scheme on the site;
 - **Section 4** describes the pre-application process undertaken with the London Borough of Hillingdon;
 - **Section 5** provides a summary of the development proposal;
 - **Section 6** analyses the various national and local planning policies and guidance that will form a material consideration in the determination of this planning application;
 - **Section 7** justifies the proposed development within the context of the relevant planning policy and material considerations; and



- **Section 8** provides a summary and conclusion which demonstrates why planning permission should be granted for the proposed scheme.

2.0 Site Description and Planning History

Location and Surroundings

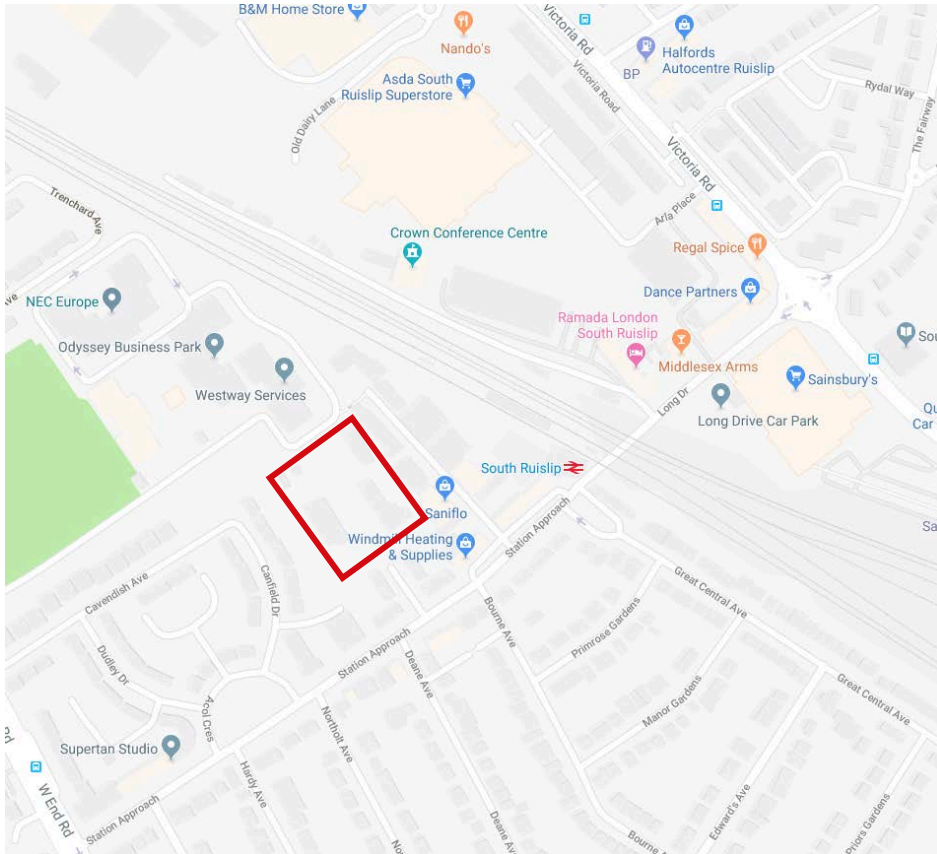


Figure 2: Site location surroundings map

- 2.1 The site, outlined in red in Figure 2, is located in South Ruislip, North West London at the end of Bourne Court which links onto Station Approach Road.
- 2.2 The site is in a developed area characterised by long established residential housing areas to the east, south and west of the site and commercial uses to the north and north-east. The site benefits from excellent transport links, located close to three nearby underground stations; South Ruislip (0.1 mi), Ruislip Gardens (0.5 mi), Ruislip Manor (1.2mi). South Ruislip station is less than a 5-minute walk from the site and access to the Central Line which provides regular services into central London and beyond, as well as National Rail services on the Chiltern Mainline. There are also several bus stops located a short walk away including Route E7 on West End Road and Route 114 on Victoria Road. There is also easy access to the A40 to the south of the site which becomes the M40 near Hillingdon.
- 2.3 The site is located in close proximity to a number of services, including three large supermarkets (Asda, Lidl and Sainsburys) (Figure 3) on the other side of the railway line, as well as the adjoining

South Ruislip Local Centre which benefits from a number of shops, restaurants, a post office and various other important services (Figure 4).



Figure 3: Image of the locations of large supermarkets close to the site



Figure 4: Shops and services on Victoria Road

- 2.4 The character of the surrounding areas is mixed, with the area to the south of Station Approach comprising predominantly of detached and semi-detached houses and bungalows with large rear gardens and characterised by a mix of architectural styles (Figure 5).



Figure 5: Houses on Canfield Drive adjacent to the site

- 2.5 The area to the north of Station Approach is generally comprised of denser and taller three storey blocks of flats and terraced dwellings, with reduced amenity space and parking (Figure 6).



Figure 6: View east along Station Approach towards South Ruislip Station showing the denser three storey development

The Site

- 2.6 The site is approximately 0.7 ha in size and comprises a broadly square shaped plot, located at the north west end of Bourne Court which is a no through road, accessed off Station Approach.
- 2.7 There were previously 3 detached buildings within the site. The Phoenix Centre and Wren Centre which were formerly used as a day care centre for adults with physical mobility and learning difficulties and Bourne Lodge which was formerly a care home facility. Bourne Lodge Care Home closed down due to outdated facilities and accommodation which did not meet current care home standards. The Phoenix and Wren Centres have been relocated to new purpose designed facilities. All buildings on the site have now been demolished.
- 2.8 The rear gardens of the terraced houses on Canfield Drive bound the site to the south west (Figure 5), with the commercial properties on The Runway and Odyssey Business Park bounding the site to the north and west.
- 2.9 A Council owned public path exists to the south west corner of the plot adjacent to the substation (to be retained) which leads to Station Approach.

Site Designations

- 2.10 Hillingdon are in the process of preparing the second part of their Local Plan titled the Local Plan: Part 2. The Local Plan: Part 2 was submitted to the Secretary of State on 18 May 2018 to undergo examination and includes an emerging Proposals Map and an emerging Site Allocations policy document.
- 2.11 The emerging Local Plan: Part 2 Site Allocations and Designations document allocates the site under allocation SA20 (Figure 7) which states that *"the council will support the provision of residential development on the site in accordance with the existing planning permission (11891/APP/2014/91)"*.

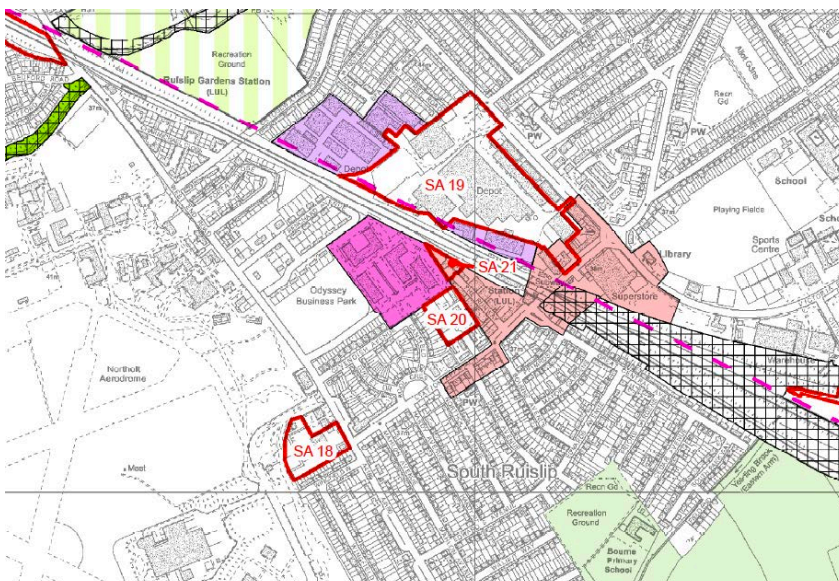


Figure 7: Extract from the Local Plan: Part 2 Proposals Map

- 2.12 The allocation includes a number of references to the existing planning permission on the site, although this has now been updated following a recently approved amendment to the original scheme. This is discussed further in the planning history section.
- 2.13 The Local Plan: Part 2 also includes an emerging Proposals Map, shown on Figure 7 above. The site is shown outlined in red as parcel SA20, as previously noted. The adjacent pink designation is a 'Locally Significant Employment Location' that covers Odyssey Business Park and the adjacent pale red designation is a 'Local Centre' that covers South Ruislip.
- 2.14 In addition, a search of the Historic England heritage list has been made to determine whether there are any notable heritage assets near to the application site. The search found no reference to any Listed Building on or near to the site.
- 2.15 The planning policy designations and implications are discussed in greater detail in Sections 6 and 7 of this Statement.

Flood Zone

- 2.16 The site is located within Flood Zone 1, as defined on the Environment Agency Flood Map for planning (Figure 8). This indicates that the site is not at risk of flooding, and nor is there a requirement for a Flood Risk Assessment (FRA) to support the application as the site is under 1ha in area.

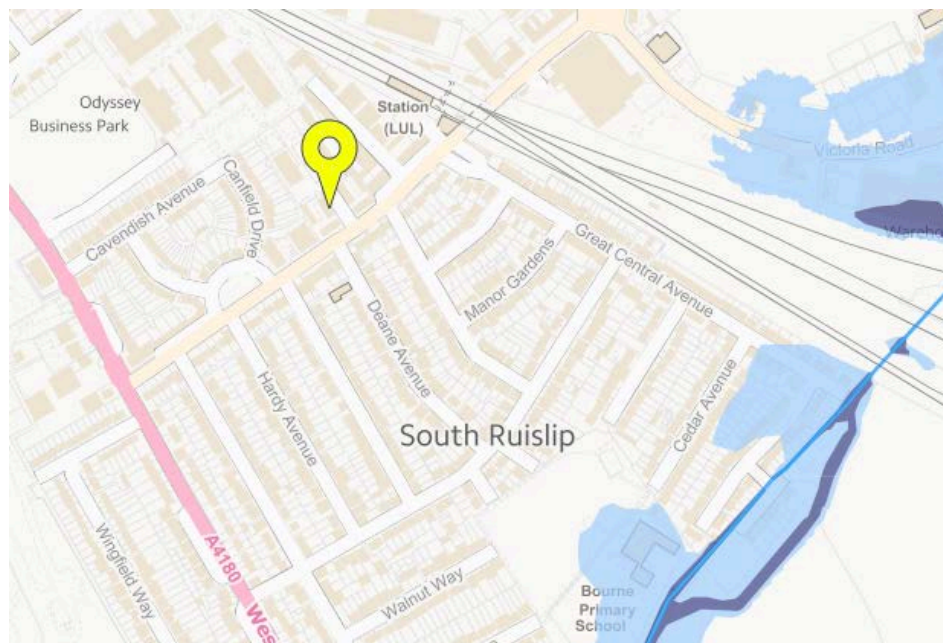


Figure 8: Extract from the Environment Agency Flood Risk Map

Public Transportation Rating

- 2.17 The application site has a Public Transportation Accessibility Level (PTAL) of 3 (Figure 9). As previously stated, the site is in very close proximity to South Ruislip Station which provides a frequent service into Central London and beyond and is close to several bus routes.

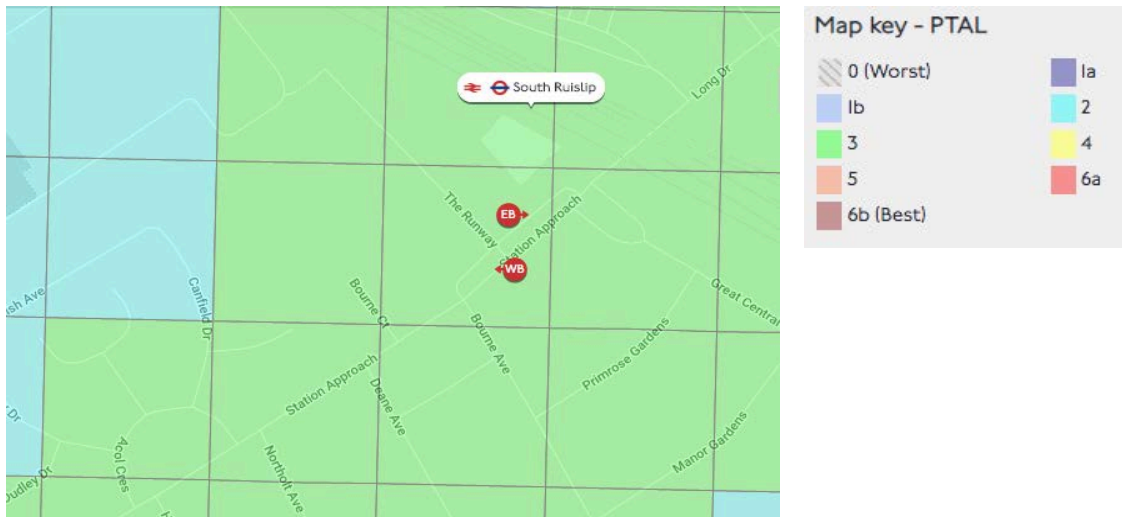


Figure 9: Extract from the TfL Transport Accessibility Map

Planning History

- 2.18 The site has been subject to two previous applications for the proposed demolition of existing buildings and construction of a number of dwellings.

Application reference: 11891/APP/2014/91

- 2.19 Hillingdon Council submitted a planning application on the land for the following development on the 10th January 2014:

“Demolition of all existing single/two storey buildings including outbuildings within the site and construction of residential development comprising of 49 residential units and 64 car parking spaces and associated works”

- 2.20 The planning application was approved on the 29th August 2014.

Application reference: 11891/APP/2016/3583

- 2.21 Another planning application was submitted on the 28th September 2016 with the following description of development:

“Demolition of all existing single/two storey buildings including outbuildings within the site and erection of residential development comprising 69 residential units, 115 car parking spaces and associated works.”

- 2.22 The planning application was approved on the 13th July 2017.
- 2.23 This full planning application was submitted as a revision to the extant permission and related to an increase in the number of residential units from 49 to 69, through the replacement of the previously proposed dwelling houses for an additional block of flats (Block C), including 9 three-bedroom flats, which are all located within block C. There are three on each floor, and the layout in this block is the same on each floor.
- 2.24 The outside space comprises a mix of shared amenity space and private amenity space. The 3 three bed units on the ground floor have access to the 604m² shared garden amenity space and, the 6 three bed units on the upper floors have their own 6m² balconies.

3.0 Pre-Application Consultation

- 3.1 This section should be read in conjunction with the supporting DAS pages 17 -22 which sets out the evolution of the pre-application schemes.
- 3.2 In the preparation of this revised application scheme HGH Consulting and scheme architects WaM, met on several occasions with senior planning officer Mandip Malhotra, alongside various officers including Jonathan Webb (Principal Design & Conservation Officer), Alan Tilley (Highways) and Robert Reeves (Senior Landscape Officer).
- 3.3 The extensive pre-application consultation exercise sought a wholly new design approach to the form and layout of the proposed scheme compared with the extant approved scheme, and subsequently refined through a series of amendments in response to officer comments.
- 3.4 A summary of the schemes and amendments proposed are set out below.

1st Pre-Application Meeting – 3rd May 2018

- 3.5 The first pre-application meeting took place on the 3rd May 2018. The scheme included the following principles:
- **Revised architectural approach** - traditional warehouse and courtyard-style concept accessed through a feature arch, which was welcomed by officers and considered to be "*a more appropriate design for the site*" and supported in principle and form.
 - **Layout** - simplifying the form of development layout into two main blocks with a central parking area allowed for an improved open appearance and visual outlook for those residents to the south (Canfield Drive)
 - **Height** - improved architectural design over three storeys with a set back roof level was broadly the same as the approved scheme and considered to be acceptable by officers.
 - **Officer Comments:**
 - Very supportive of the overall redesign
 - Increase the quality of family sized units on ground floor with private terrace areas
 - Revise the layout of the scheme to design-out indiscriminate parking opportunities
 - Seek to provide a central amenity space
 - Reduced parking to 0.8 spaces would necessitate a financial infrastructure / parking management / highway enhancement contribution but a 1:1 parking layout should be considered
 - Introduce more entrances, separate cores and daylight into the ends of the long corridors in rear block
 - Provide window / natural surveillance to archway
 - Relocate the refuse store

2nd Pre-Application Meeting – 15th May 2018

- 3.6 The first pre-application was followed up by a second meeting at which the scheme had been further refined and evolved in response to officer comment. The second pre-application scheme included:

- Total number of units 109 in two blocks;
- Provision of all family sized units on ground floor with private terrace areas;
- Re-siting of the blocks to provide a revised scheme layout to:
 - a) design-out indiscriminate parking opportunities;
 - b) create a central amenity space; and
 - c) accommodate access to and retention of on-site sub-station (SE corner)
- Increase the level of parking to 95 spaces (0.87:1) as an enhanced provision compared with the original pre-application scheme;
- Revised floorplans introduced more entrances, separate cores and extended corridors to allow for maximisation of daylight on the first and second floors;
- Archway: Provision of pedestrian access (open footway and internal corridor) on both sides, windows and openings to provide enhanced natural surveillance (secure by design);
- Relocate the refuse store in Block B (centrally under archway) to allow for an amendment to provide a ground floor front facing entrance; and
- Removal of third floor amenity space.

3rd Pre-Application Meeting – 23rd July

- 3.7 In response to the continued support for the scheme with the central amenity space, the scheme was further refined to a third pre-application scheme which proposed 109 units (37 x 1B, 11 x 2B 3P, 53 x 2B 4P, 1 x 3B 4P, 7 x 3B 5P including 10 accessible flats). This scheme provided a mix of units across the site for first time buyers to family sized households.
- 3.8 The larger 3 bed units all located on the ground floor in both blocks and provide access to an external private garden amenity space. The upper floor flats all have the benefit of an inset / recessed private balcony.
- 3.9 Access to the development is via a central and focal feature archway from Bourne Court, which opens out onto an open and landscaped courtyard.
- 3.10 The scheme proposed a further increase to 100 vehicles (0.92:1), and improved layout for associated refuse storage / collection and cycle parking, in accordance with the Council's waste standards and London Plan respectively.
- 3.11 Following the 3rd pre-application meeting, several further amendments were made to the scheme:
- **revised parking layout** - increase in number of spaces to 101 with the removal of space 86 (fire escape obstruction) and 2 spaces to the west of the main arched entrance. The layout of the disabled spaces was enhanced to provide transition zones to side and rear; and a number of tandem spaces for the three bed units with dedicated footpaths to (Nos. 13 / 68 / 72 and rear access to Block B);
 - **enhanced planting** in central amenity space and a feature tree on the approach vista to the east side of the arched entrance; and
 - **reduction in the number of courtyard trees** following comments on the number and root growth issues by the landscape and urban design officer, favouring a reduction in the number

of trees but with new feature trees at key locations, the majority marking entrances to the proposed building with appropriate planting / root growth area.

4th Pre-Application Scheme – September 2018

- 3.12 In further consultation with officers and the Head of Planning, a final iteration of the revised scheme was proposed, and which now forms the basis of the revised planning application submission.
- 3.13 The 4th pre-application / subject application scheme proposes:
- 115 car parking spaces meeting the 1:1 requirement through the use of a stacker system to the units in the undercroft part of Block A, as approved in other schemes in the Borough, including the redevelopment of Waterloo Wharf in Yiewsley;
 - Retention of the central amenity space;
 - An increase in the number of passive (23) and active (23) ECP spaces;
 - Revised layout for several of the disabled spaces; and
 - An increase in the number of cycle parking spaces (182) to meet London Plan 2017 standards for residential development.

4.0 Development Proposal

The Vision

- 4.1 The vision is to create a high-quality development offering a good mix of residential housing with substantial private amenity.
- 4.2 The Design and Access Statement has set out the following 4 objectives for the proposed development:
- *The proposal will make the cul-de-sac of Bourne Court a destination and focal point. One of the residential blocks will be aligned perpendicular to the road by utilising an archway to create a sense of both destination and entrance;*
 - *To maximise the benefit of the sun path this proposal creating a courtyard of development who open side faced south. In this way the courtyard would benefit from a considerable amount of daylight and impact on neighbours would be reduced;*
 - *The development presents the maximum possible sized courtyard to house both car-parking, a turning head and landscaping in front of the proposed new apartments. This again would present a green outlook to those properties to the south; and*
 - *A unit design which means each and every unit would benefit from an integrated oversized balcony to provide high quality private amenity space.*

The Proposal



Figure 10: Proposed site block plan (Dwg No: 303-PL-100-00)

- 4.3 Following the demolition of the various buildings on the site, the proposal is for the redevelopment of 109 residential units in two blocks of flats, including all associated parking and landscaping. The scheme will comprise a mixture of 1, 2 and 3-bedroom units all with well-designed and integrated private amenity built around a courtyard with a large green space at its heart.

- 4.4 The scheme has been innovatively designed in collaborative consultation with Council Officers (planning, highways, urban design, trees) to enhance the appearance, to optimise the quantum of development and to make the most efficient use of land on this sustainable brownfield site. The design concept to the scheme is justified in the accompanying Design and Access Statement which also notes the influence of the previously accepted scheme on the design.
- 4.5 A summary of the key characteristics of the proposed development is provided below:

The Proposed development

- 109 residential units comprising:
 - 37 x 1 bed units;
 - 64 x 2 bed units; and
 - 8 x 3 bed units.

Access and Parking

- 115 car parking spaces;
- 11 disabled parking units located within close proximity to entrance options; and
- 181 secure and sheltered long-stay cycle parking spaces and 3 short stay visitor cycle parking spaces.

Amenity Provision

- 9 private garden amenity spaces on ground floor level;
- Private amenity in the form of balcony's; and
- A central courtyard with a large green communal amenity space.

Landscaping

- New boundary planting (NW boundary);
- New/Central communal amenity space;
- Shrub planting and patio space leading from the primary living areas;
- Bulb planting to provide seasonal temporary interest to the amenity grass;
- Semi-mature fastigate trees to define entrances and setting to the new building;
- 4 number Feature Copper Beech trees with their contrasting foliage offering a pleasant link to the material palette on the main buildings; and
- A variety of permeable paving in a tone complementary to the main building architecture.

Refuse/Recycling Provision

- Refuse vehicle being able to enter and exit the site in a forward gear; and
- Bin stores conveniently located for residents with a central store in each building.

Accessibility

- All units designed to Lifetime Homes Standards;
- 11 Accessible units;
- Lift from ground floor to third floor; and
- Both buildings have a defined main entrance as well as secondary access points and secondary access cores.

5.0 Planning Policy Context

- 5.1 Planning law requires that applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise. The following section summarises the relevant local, regional and national planning policies that will be material to considering the proposed development.
- 5.2 The current Development Plan for LBH comprises:
- The London Plan (2016);
 - The Hillingdon Local Plan: Part 1 – Strategic Policies (2012); and
 - The Saved Policies of the Unitary Development Plan (Saved 2007).
- 5.3 The National Planning Policy Framework (NPPF) was updated in 2018 and forms one of the key material considerations in the planning process.
- 5.4 LBH are in the process of preparing a new Local Plan called ‘The Hillingdon Local Plan: Part 2’ which would complement and assist in the delivery of the Local Plan Part 1: Strategic Policies (2012) but will replace the Saved Policies of the Unitary Development Plan (UDP). The Local Plan Part 2 was submitted for examination in May 2018 and includes the following documents:
- Site Allocations and Designations;
 - Development Management Policies; and
 - Policies Map.
- 5.5 Other material planning policy and guidance which are relevant to this application are set out below:
- The Mayor’s Housing Supplementary Planning Guidance (2016);
 - The Hillingdon Design and Accessibility Statement SPD (2017);
 - Hillingdon Residential Design; and
 - The Draft New London Plan (2018).

National Planning Policy Framework (2018)

- 5.6 At the centre of the revised NPPF, which sets out Central Government’s overarching national strategic planning objectives, is a presumption in favour of sustainable development:
- “For decision-taking this means: approving development proposals that accord with the development plan without delay.” (para. 11)*
- 5.7 Paragraph 62 states that where a need for affordable housing is identified, planning policies should expect it to be met on-site unless:
- a) off-site provision or an appropriate financial contribution in lieu can be robustly justified; and
 - b) the agreed approach contributes to the objective of creating mixed and balanced communities.

- 5.8 Paragraph 64 sets out that where major developments involving the provision of housing is proposed, planning policies and decisions should expect at least 10% of homes to be available for affordable home ownership, unless this would exceed the level of affordable housing required in the area.
- 5.9 Paragraph 68 states:
- “Small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly”*
- 5.10 In planning for new developments, the Framework promotes the access to high quality open spaces and opportunities for sport and physical activity for the health and well-being of communities (para. 96).
- 5.11 Developers should ensure there is safe and suitable access to the site which can be achieved for all users (para. 108)
- 5.12 NPPF policy is committed to promoting sustainable development by maximising the re-use of previously developed and under-utilised land:
- “Planning policies and decisions should*
- encourage multiple benefits from both urban and rural land, including...opportunities to achieve net environmental gains—such as developments that would enable new habitat creation;*
 - give substantial weight to the value of using sustainable brownfield land within settlements for homes;*
 - promote and support the development of under-utilised land...especially if this would help to meet identified needs for housing where land supply is constrained, and available sites could be used more effectively.” (para. 118)*
- 5.13 Planning decisions should support development that makes efficient use of land, taking into account:
- “The identified need for housing and other forms of development, and the availability of land suitable for accommodating it;*
 - local market conditions and viability;*
 - the availability and capacity of infrastructure and services – both existing and proposed – as well as their potential for further improvement and the scope to promote sustainable travel modes that limit future car use;*
 - the desirability of maintaining an area’s prevailing character and setting (including residential gardens), or promoting regeneration and change; and*
 - the importance of securing well designed, attractive places.” (para. 122).*

5.14 In terms of density, paragraph 123 advises:

“Where there is an existing or anticipated shortage of land for meeting identified housing needs, it is especially important that planning policies and decisions avoid homes being built at low densities and ensure that developments make optimal use of the potential of each site. In these circumstances:

- a) plans should contain policies to optimise the use of land in their area and meet as much of the identified need for housing as possible;*
- b) the use of minimum density standards should also be considered for other parts of the plan area. It may be appropriate to set out a range of densities that reflect the accessibility and potential of different areas, rather than one broad density range; and*
- c) local planning authorities should refuse applications which they consider fail to make efficient use of land, taking into account the policies in this Framework. In this context, when considering applications for housing, authorities should take a flexible approach in applying policies or guidance relating to daylight and sunlight, where they would otherwise inhibit making efficient use of a site.”*

5.15 In terms of achieving well-designed places, paragraph 124 states:

“Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.”

5.16 Paragraph 127 goes on to state:

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 mixed 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; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience”.*

- 5.17 Paragraph 130 states that design should not be used as a valid reason to object to development if it accords with plan policies and Paragraph 131 affords great weight to outstanding or innovative designs that help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings.
- 5.18 The NPPF policy Framework sets out that development plans:
- “should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating from rising temperatures.” (para. 149)*
- 5.19 Paragraph 151 sets out that *“to help increase the use and supply of renewable and low carbon energy and heat plans should:*
- a) provide a positive strategy for energy from these sources, that maximise the potential for sustainable development, while ensuring that adverse impacts are addressed satisfactorily;*
 - b) consider identifying suitable areas for renewable and low carbon energy sources, and supporting infrastructure, where this would help to secure their development; and*
 - c) identify opportunities for development to draw its energy from decentralised, renewable or low carbon energy supply systems and for co-locating potential heat customers and suppliers.”*

The London Plan (2016)

- 5.20 The London Plan is the overall strategic plan for London, setting out an integrated economic, environmental, transport and social framework for development up to 2036.

Housing

- 5.21 **Policy 3.3** sets out the Mayor’s plans to significantly increase London’s housing supply in order to meet identified need. Table 3.1 stipulates that the annual monitoring target for housing completions across London as a whole from 2015 to 2025 is 42,389 dwellings per year. The London Plan sets Hillingdon an annual target of 559 dwellings. **Policy 3.3** Section Da states that boroughs are obligated to augment their Local Development Framework housing targets where possible with extra housing capacity. Section E of **Policy 3.3** states that additional development capacity should be sought to supplement the housing targets.
- 5.22 **Policy 3.4** (Optimising Housing Potential) sets out the density for requirements for new residential development within London (Table 3.2 below).

Setting	Public Transport Accessibility Level (PTAL)		
	0 to 1	2 to 3	4 to 6
Suburban	150–200 hr/ha	150–250 hr/ha	200–350 hr/ha
3.8–4.6 hr/unit	35–55 u/ha	35–65 u/ha	45–90 u/ha
3.1–3.7 hr/unit	40–65 u/ha	40–80 u/ha	55–115 u/ha
2.7–3.0 hr/unit	50–75 u/ha	50–95 u/ha	70–130 u/ha
Urban	150–250 hr/ha	200–450 hr/ha	200–700 hr/ha
3.8–4.6 hr/unit	35–65 u/ha	45–120 u/ha	45–185 u/ha
3.1–3.7 hr/unit	40–80 u/ha	55–145 u/ha	55–225 u/ha
2.7–3.0 hr/unit	50–95 u/ha	70–170 u/ha	70–260 u/ha
Central	150–300 hr/ha	300–650 hr/ha	650–1100 hr/ha
3.8–4.6 hr/unit	35–80 u/ha	65–170 u/ha	140–290 u/ha
3.1–3.7 hr/unit	40–100 u/ha	80–210 u/ha	175–355 u/ha
2.7–3.0 hr/unit	50–110 u/hr	100–240 u/ha	215–405 u/ha

5.23 Table 3.2 defines a suburban setting as:

“areas with predominantly dense development such as, for example, terraced houses, mansion blocks, a mix of different uses, medium building footprints and typically buildings of two to four storeys, located within 800 metres walking distance of a District centre or, along main arterial routes”

5.24 **Policy 3.8** (Housing Choice) ensures that a range of housing choice is available and states that new developments should offer a range of choices in terms of the mix of housing sizes and types, taking account of the housing requirements of different groups and the changing roles of different sectors in meeting these.

5.25 Part C. of the policy requires the need for:

“ninety percent of new housing meets Building Regulation requirement M4 (2) accessible and adaptable dwellings” and Part D. requires the need for “ten per cent of new housing meets Building Regulation requirement M4 (3) ‘wheelchair user dwellings’, i.e. is designed to be wheelchair accessible, or easily adaptable for residents who are wheelchair users”.

Design

5.26 The quality and design requirements of housing developments are set out in Policy 3.5. As summarised in Part A, the highest quality is needed both externally and internally and in relation to the development’s context and the wider environment. In addition, London’s residential environment and attractiveness as a place to live should be protected and enhanced.

5.27 Part B states that the design of new development should enhance the quality of local places by taking into account their physical context, local character, density, tenure and land use mix. Part C adds that new homes should have adequately sized rooms with layouts that are convenient, efficient and fit for purpose. The minimum space standards for new dwellings are set out in Table 3.3 of the London Plan. For this scheme, the appropriate minimum floorspace for each dwelling is 50sqm (GIA) for one bed (two person) apartments, 61sqm (GIA) for two bed (three person) and 70sqm (GIA) for two bed (four person) apartments.

5.28 **Policy 7.1** regards ‘lifetime neighbourhoods’ and requires the design of new buildings to help reinforce or enhance the character of the neighbourhood.

5.29 **Policy 7.2** (An inclusive environment) requires the specific needs of older and disabled people to be integrated into the proposed development.

5.30 **Policy 7.4** outlines objectives for enhancing the local character of places in further detail. Part A states that development should have regard to the form, function and structure of a street or area and the scale, mass and orientation of surrounding buildings. When making planning decisions, part B advises that development that provides high quality design should be positively regarded. Characteristics of high quality developments include those that have regard to the pattern and grain of the existing street in orientation, scale, proportion and mass. Also included are those that make a positive contribution to the character of a place to influence the future character of the area.

- 5.31 **Policy 7.6** states that architecture should make a positive contribution to the streetscape and should incorporate the highest quality materials and design appropriate to its context. In this way, buildings should:
- *“be of the highest architectural quality;*
 - *be of proportion, composition, scape and orientation that enhances, activates and appropriately defines the public realm;*
 - *comprise details and material that complement, not necessarily replicate, the local architectural character;*
 - *not cause unacceptable harm to the amenity of surrounding land and buildings, particularly residential buildings, in relation to privacy, overshadowing, wind and microclimate;*
 - *provide high quality indoor and outdoor spaces and integrate well with the surrounding streets and open spaces;*
 - *be adaptable to different activities and land uses;*
 - *meet the principles of inclusive design; and*
 - *optimise the potential of sites.”*
- 5.32 **Policy 7.15** (Reducing and Managing Noise) requires development proposals to seek to manage noise by avoiding significant adverse noise impacts on health and quality of life as a result of new development and mitigate and minimise the potential adverse impacts of noise as a result of new development.
- 5.33 **Policy 7.21** (Trees and Woodlands) advises that wherever appropriate, the planting of additional trees should be included in new developments.
- Sustainability*
- 5.34 **Policy 5.2** (Minimising Carbon Dioxide Emissions) confirms that development proposals should make the fullest contribution to minimising carbon dioxide emissions in accordance with the following energy hierarchy.
- 5.35 **Policy 5.3** (Sustainable Design and Construction) advises that the highest standards of sustainable design and construction should be achieved in London to improve the environmental performance of new developments and to adapt to the effects of climate change over their lifetime.
- 5.36 **Policy 5.13** requires development to utilise sustainable urban drainage systems (SUDS) and aim to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible in line with the drainage hierarchy.
- 5.37 **Policy 5.15** (Water use and supplies) requires development to minimise the use of mains water by designing residential development so that mains water consumption would meet a target of 105 litres or less per head per day.
- 5.38 **Policy 5.21** (Contaminated Land) requires that appropriate measures should be taken to ensure that development on previously contaminated land does not activate or spread contamination.

Transport

- 5.39 **Policy 6.1** (Transport – Strategic Approach), in respect of car parking, encourages development that reduces the need to travel by car. The Parking Addendum to Chapter 6 confirms a maximum parking standard of less than one space for one and two bedroom units, up to 1.5 spaces per 3 bed units and up to 2 spaces per 4 bed units.
- 5.40 **Policy 6.9** (Cycling) requires developments to provide secure, integrated, convenient and accessible cycle parking facilities in line with the minimum standards set out in Table 6.3. Table 6.3 requires a minimum of one space per one-bedroom unit and two spaces for all other dwellings. Developments in all parts of London must ensure that 1 in 5 spaces (both active and passive) provide an electric charging point.
- 5.41 **Policy 6.13** (Parking) confirms that the Mayor wishes to see an appropriate balance being struck between promoting new development and preventing excessive car parking provision that can undermine cycling, walking and public transport use.

The Draft New London Plan (2017)

- 5.42 The Draft New London Plan, still in material consideration, is a draft replacement plan for the previous London Plans setting out an integrated economic, environmental, transport and social framework for development up to 2050.
- 5.43 **Draft Policy H1** (Increasing Housing Supply) sets the ten-year targets for net housing completions in each borough between 2019/20 and 2028/29. This is to meet the need for 66,000 additional homes per year across London. The ten-year target for Hillingdon is 15,530, with an annual monitoring target of 1,553 homes per annum. This is a significant increase from the annual target of 559 homes per annum in the adopted London Plan.
- 5.44 Part B of the policy sets out that to ensure that ten-year housing targets are achieved boroughs should prepare delivery-focused Development Plans which encourage development on other appropriate windfall sites not identified in Development Plans through the Plan period. Part B2 of the policy requires boroughs to optimise the potential for housing delivery on all suitable and available brownfield sites through planning decisions especially through small housing sites (criteria e).
- 5.45 Supporting text in paragraph 4.1.3 states:
- “To achieve these housing targets the overall average rate of housing delivery on both large and small sites will need to approximately double compared to current average completion rates.”*
- 5.46 **Draft Policy H5** (Delivering affordable housing) sets a target for 50 per cent of all new homes delivered across London to be genuinely affordable.
- 5.47 **Draft Policy H6** (Threshold approaches to application) sets out a threshold approach for developments capable of delivering more than 10 units of a combined floor space greater than 1,000sqm:

“The threshold level of affordable housing on gross residential development is initially set at:

- 1) a minimum of 35 per cent; or
- 2) 50 per cent for public sector land where there is no portfolio agreement with the Mayor; or
- 3) 50 per cent for strategic Industrial Locations, Locally Significant Industrial Sites and Non-Designated Industrial Sites appropriate for residential uses (in accordance with Policy E7 Industrial intensification, co-location and substitution), where the scheme would result in a net loss of industrial capacity

5.48 **Draft Policy D1** (London's form and characteristics) requires the form and layout of development proposals to use land efficiently by optimising density, connectivity and land use patterns; deliver appropriate outlook, privacy and amenity; and achieve safe and secure environments.

5.49 Development design should:

Form and layout

- 1) use land efficiently by optimising density, connectivity and land use patterns;
- 2) enhance local context by delivering buildings and spaces that positively respond to local distinctiveness through their layout, orientation, scale, appearance and shape, with due regard to existing and emerging street hierarchy, building types, forms and proportions
- 3) be street-based with clearly defined public and private environments
- 4) facilitate efficient servicing and maintenance of buildings and the public realm, as well as deliveries, that minimise negative impacts on the environment, public realm and vulnerable road users.

Experience

- 5) achieve safe and inclusive environments
- 6) provide active frontages and positive reciprocal relationships between what happens inside the buildings and outside in the public realm to generate liveliness and interest
- 7) deliver appropriate outlook, privacy and amenity
- 8) provide conveniently located green and open spaces for social interaction, play, relaxation and physical activity

Quality and character

- 12) respond to the existing character of a place. By identifying the special and valued feature that are unique to the locality and respect, enhance and utilise the heritage assets and architectural features that contribute to the local character.
- 13) be of high quality, with architecture that pays attention to detail, and gives thorough consideration to the practicality of use, flexibility, safety and building lifespan through appropriate construction methods and the use of attractive, robust material which weathers well.

5.50 Paragraph 3.1.2B states:

“Buildings should be of high quality and enhance, activate and appropriately frame the public realm. Their massing, scale and layout should help make public spaces coherent and should complement the existing streetscape and surrounding area. Particular attention should be paid to the design of the parts of a building or public realm that people most frequently see or interact with in terms of its legibility, use, detailing, materials and location of entrances”

5.51 **Policy D3** (Inclusive design) seeks to deliver an inclusive environment and meet the needs of all Londoners, development proposals are required to achieve the highest standards of accessible and inclusive design.

5.52 **Policy D4** (Housing quality and standards) sets out a number of minimum standards that new development must meet including:

- Private internal space— The minimum standards for a 2 person 1 bed flat is 50sqm, a 3 person 2 bed flat 61sqm, a 4 person 2 bed flat 70sqm, a 4 person 3 bed flat 74sqm and 5 person 3 bed flat 86sqm. Other standards relate to bedroom sizes and room heights.
- Private outside space- Where there are no higher local standards in the borough development plan documents, a minimum of 5 sqm of private outdoor space should be provided for 1-2-person dwellings and an extra 1sqm should be provided for each additional occupant.
- Residential development should maximise the provision of dual aspect dwellings.

5.53 **Policy D5** (Accessible housing) requires at least 10 per cent of dwellings to meet Building Regulation requirement M4(3) ‘wheelchair user dwellings’, i.e. designed to be wheelchair accessible, or easily adaptable for residents who are wheelchair users and all other new build dwellings meet Building Regulation requirement M4(2) ‘accessible and adaptable dwellings’.

5.54 Paragraph 3.4.5D goes on to state that Private outside space should be practical and:

“All dwellings should have level access to one or more of the following forms of private outside spaces: a garden, terrace, roof garden, courtyard garden or balcony. The use of roof areas, including podiums, and courtyards for additional private or shared outside space is encouraged.”

5.55 **Policy D6** (Optimising Housing Density) states:

“Development must make the most efficient use of land and be designed at the optimum density. The processes required by parts A and B of Policy D2 Delivering good design set out how a design-led approach will inform the evaluation of a site’s context and help to identify its capacity for growth. Particular consideration should be given to the following evaluation criteria to determine optimal development density:

- 1) the site context, including surrounding built form, uses and character;*
- 2) the sites connectivity and accessibility by walking and cycling, and existing and planned public transport to jobs and services (including both PTAL and access to local services); and*
- 3) the capacity of surrounding infrastructure.”*

Housing Supplementary Planning Guidance (2016)

- 5.56 The Mayor's Housing SPG has been developed to provide guidance on the implementation of housing policies in the 2015 London Plan.
- 5.57 Paragraph 1.3.18 sets out that schemes should be designed to maximise tenure integration and affordable housing units and:
- "All entrances will need to be well integrated with the rest of the development and meet the Mayor's housing standards in terms of entrance and approach, accessibility and active frontages." (para. 1.3.1.8)*
- 5.58 Paragraph 2.2.6. relating to good design states:
- "In order to promote healthy living and active travel at the neighbourhood scale it is important that streets and spaces within larger developments are planned in such a way as to encourage residents to walk and cycle"*
- 5.59 Adding to this, paragraph 2.2.9. states that where public, communal and private spaces should be protected and enhanced, and where possible new open spaces should be created.
- 5.60 The SPG also sets out that open space should be designed to be safe, accessible and well used and designed at the outset to minimize ongoing management and maintenance costs.
- 5.61 Paragraph 2.2.22 states that development proposals should seek to ensure they provide an adequate mix of dwelling sizes and tenures to reflect local and strategic demand.
- 5.62 The 'arrival' at a building, the design of shared circulation and lift access, car parking provisions and areas for cycle storage are important factors in making housing safe and secure, welcoming and accessible for all. The standards recognise that many new homes in London will be flats, and that the design of the shared circulation areas will be critical to the success of new developments (para. 2.3.2)
- 5.63 The design of parking is important for ensuring that provision complements the development as a whole (para. 2.3.16)
- 5.64 There should be suitable waste and recycling storage facilities in new developments, and refuse, green waste, food waste and recycling should be understood and identified in the early design stage (para. 2.3.19).
- 5.65 Private open space standards have been established in the same way as the internal space standards. This is a minimum of 5sqm of private outdoor space for 1-2-person dwellings and an extra 1sqm for each additional occupant. The minimum depth and width for all balconies and other private external spaces should be 1500mm.

Hillingdon Local Plan

- 5.66 Hillingdon's Local Plan is made up of Part 1- Strategic Policies (previously known as the Core Strategy) which was adopted in November 2012. Saved policies from the Unitary Development Plan (2007) make up the remainder of the currently adopted policies. The emerging Local Plan Part 2- Development Management Policies, Site Allocations and Designations and the Proposals Map has been submitted for examination in March 2018. The consultation versions of these documents were published in October 2015. The following sections review the relevant policies from the Local Plan

The Hillingdon Local Plan: Part 1 – Strategic Policies (2012)

- 5.67 The Local Plan: Part 1 sets out a target of a minimum 6,375 dwellings between 2011 and 2026.
- 5.68 **Policy H1** relates to Housing Growth with the Council seeking to meet and exceed its minimum strategic dwelling requirement of 4,250 dwellings, annualised at 425 dwellings per year, for the ten-year period between 2011 and 2021. By 2026 this target equates to 6,375 dwellings.
- 5.69 Table 6.4 presents the proposed units to be delivered from large and small SHLLA sites.

	Number of units 2011-2021
Units predicted from large sites (over 0.25 hectares)	3,097
Units predicted from small sites (under 0.25 hectares)	700
Subtotal	3,797
Total number of units to be delivered per annum (Predicted)	380

- 5.70 Paragraph 6.23 of this policy relates to design and density and outlines that high-quality design for new homes will continue to be a priority and that the density of residential development should take into account the need to optimise the potential of site compatible with local and historic context. It goes on to state:

“High quality design for new homes will continue to be a priority for the Council and the type of dwellings provided should reflect housing needs identified in the borough, particularly the need to provide more family homes with adequate garden space”

- 5.71 This should be implemented while respecting the quality, character and amenity of surrounding uses with higher densities most appropriate in sustainable locations with high levels of public transport accessibility.
- 5.72 **Policy H1** sets out that to achieve higher density, developers should ensure development makes the most efficient use of brownfield land.
- 5.73 In terms of Design, Paragraph 7.7. states that maintaining design is of critical importance to the attractive character and identity of Hillingdon, and development must respond positively to its context while contributing positively to the environment. Paragraph 7.10 goes on to states that all buildings 10 dwellings or over should achieve a satisfactory Building for Life assessment rating.

- 5.74 Paragraph 7.15 requires 10% of all housing units on major applications (10 units or more) to be wheelchair access
- 5.75 **Policy BE1** relating to the Built Environment requires all new development to improve and maintain the quality of the built environment in order to create successful and sustainable neighbourhoods, where people enjoy living and working and that serve the long-term needs of all residents. All new developments should:
- *“Achieve a high quality design in all new buildings, alterations, extensions and the public realm which enhances the local distinctiveness of the area, contributes to community cohesions and a sense of place;*
 - *Be designed to be appropriate to the identity and context of Hillingdon’s buildings townscapes, landscapes and views, and make a positive contribution to the local area in terms of layout, form, scale and materials and seek to protect the amenity of surrounding land and buildings, particularly residential properties;*
 - *Be designed to include ‘Lifetime Homes’ principles so that they can be readily adapted to meet the housing need of those with disabilities and the elderly, 10% of these should be wheelchair accessible or easily adaptable to wheelchair accessibility encouraging places of work and leisure, streets, neighbourhoods, parks and open spaces to be designed to meet the needs of the community at all stages of people’s lives;*
 - *Improve the quality of the public realm and provide for public and private spaces that are attractive, safe, functional, diverse, sustainable, accessible to all, respect the local character and landscape, integrate with the development, enhance and protect biodiversity through the inclusion of living walls, roofs and areas for wildlife, encourage physical activity and where appropriate introduce public art;*
 - *Create safe and secure environments that reduce crime and fear of crime, antisocial behaviour and risks from fire and arson having regard to Secure by Design standards and address resilience to terrorism in major development proposals.”*
- 5.76 **Policy EM1** relating to Climate Change Adaptation and Mitigation states the Council will ensure that climate change mitigation is addressed at every stage of the development process by:
- *“Prioritising higher density development in urban and town centres that are well served by sustainable forms of transport.*
 - *Promoting a model shift away from private car use and requiring new development to include innovative initiatives to reduce car dependency”.*
- 5.77 **Policy EM6** considers Flood Risk Management requiring new development to be directed away from Flood Zones 2 and 3 in accordance with the principles of the National Planning Policy Framework (NPPF). The current site falls within Flood Zone 1 according to the Environment Agencies maps and is therefore considered to be of lower risk of river or coastal flooding.

The Saved Policies of the Unitary Development Plan (Saved 2007)

- 5.78 The most relevant ‘saved’ Unitary Development Plan policies adopted currently ad the ‘Hillingdon Local Plan: Part Two’ are set out below.
- 5.79 **Policy BE13** relates to the layout and appearance of new development, which will not be permitted if it fails to harmonise with the existing street scene or other features of the area, which the local planning authority considers it desirable to retain or enhance.
- 5.80 **Policy BE19**, relating to new development within residential areas, states that the local planning authority will seek to ensure that new development within residential areas complements or improves the amenity and character of the area.
- 5.81 Daylight and Sunlight considerations are set out by **Policy BE20** which states that buildings should be laid out so that adequate daylight and sunlight can penetrate into and between them and the amenities of existing houses are safeguarded.
- 5.82 **Policy BE21** relates to the siting of new buildings and states planning permission will not be granted for new buildings or extensions which by reason of their siting, bulk and proximity, would result in a significant loss of residential amenity.
- 5.83 **Policy BE24** considers the design of new buildings which should protect the privacy of the occupiers and their neighbours.
- 5.84 **Policy OE8** on flooding states that planning permission will not be granted for new development or redevelopment of existing urban areas which would result in an increased flood risk due to additional surface water run-off, unless the proposed development includes appropriate attenuation measures to a standard satisfactory to the Council.
- 5.85 **Policy H7** states that the conversion of residential properties into more units will be acceptable in principle provided that this can be achieved without causing demonstrable harm to the residential amenities or character of the area.
- 5.86 **Policy AM14** considers car parking standards and states that new development will only be permitted where it is in accordance with the council’s adopted car parking standards. These standards set a maximum of 1.5 spaces per dwelling for flats with communal parking areas, albeit the London Plan now supersedes this guidance.
- 5.87 **Policy AM15** outlines that all car parks provided for new development shall contain conveniently located reserved spaces for disabled persons.

The Hillingdon Design and Accessibility Statement SPD (2006)

- 5.88 The Hillingdon Design and Accessibility Statement (HDAS) SPD, albeit over 10 years old as a planning document and out-of-date with the latest government objectives, the document is still used for the determination of planning proposals. It provides codes of practice pertinent to the design of inclusive environments. It offers practical and technical best practice guidance to enable a realistic approach to inclusive design.

- 5.89 Guidelines for separation distances are provided, this includes that the distance should not be less than 21m, between facing habitable room windows. From windows above ground floor an angle of 45 degrees each side of the normal is assumed in determining facing, overlooking distances.
- 5.90 Table 2 of the document sets out recommended standards relating to residential floorspaces. 2 bed flats are recommended to be 63sqm and 3 bed flats 77sqm.
- 5.91 Paragraph 3.3 is similar to Policy DMH4 of the Hillingdon Local Plan Part 2 and states that *“the redevelopment of more than 10% of properties on a residential street is unlikely to be acceptable, including the houses which have been converted into flats or other forms of housing”*.
- 5.92 Paragraphs 4.17 to 4.22 detail the guidelines for garden amenity space provision for new flats. 2-bed flats should have 25sqm per flat. The requirement for 3-bed flats is 30sqm. Private balconies count towards the amenity space recommendations, as stated in paragraph 4.18 of the SPD.

The Local Plan Part 2: Development Management Policies (2015)

- 5.93 **Policy DMH1** states that adequate living standards should be met.
- 5.94 In terms of housing mix paragraph 4.6. states that the 2011 Consensus shows that 60% of households contain only one or two persons.
- 5.95 **Policy DMH4** states that the redevelopment of dwellings on a residential road into flatted developments will only be permitted where the proposal will not result in more than 10% of properties on the road being redeveloped into flats.
- 5.96 **Policy DMHB11** Design of New Development requires all development to be designed to the highest standard and incorporate principles of good design. This includes; harmonising with the local context; ensuring the use of high quality building materials and finishes; ensuring that the internal design and layout of development maximises sustainability and is adaptable to different activities; protecting features of positive value; providing landscaping and planting; not adversely impacting on the amenity, daylight and sunlight of adjacent properties and open space; and, providing sufficient space for internal and external storage space for general, recycling and organic waste, with suitable access for collection.
- 5.97 **Policy DMHB 16** on Housing Standards requires that all housing developments should have an adequate provision of internal space in order to provide an appropriate living environment. To achieve this all residential development should meet or exceed the most up to date internal space standards, as set out in National Guidance.

The Local Plan Part 2: Site Allocations (2015)

- 5.98 The Site Allocations document forms part of Hillingdon’s Local Plan Part 2 with the purpose of identifying sites that will deliver growth in Hillingdon.
- 5.99 **Policy 3** (Identifying sites for new homes) identifies suitable available and deliverable sites in context of Local Plan Part 1 Policy H1 which states:

“The Council will meet and exceed its minimum strategic dwelling requirement, where this can be achieved, in accordance with other Local Plan policies”

5.100 Paragraph 3.13. states that:

“Taking account of residential units already completed since the start of the plan period, the Council is required to deliver an average 414 units per annum to meet the London Plan target up to 2026.”

5.101 Table 3.3 (Proposed Site Allocations) sets out that Bourne Court, South Ruislip has the potential capacity to deliver 49 units between 2016 and 2021.

5.102 **Policy SA 20** (Borne Court, South Ruislip states that:

“The Council will support the provision of residential development on this site in accordance with the existing planning permission”

6.0 Planning Justification

6.1 This section sets out the justification and assessment of the proposed scheme within the context of the relevant national and local planning policy and guidance and other material considerations. The following matters are likely to be key issues in the determination of the planning application:

- Principle of development;
- Housing Mix;
- Amenity;
- Design;
- Impact on neighbours;
- Transport and Highways;
- Drainage and SuDS;
- Trees;
- Energy and Sustainability; and
- Ecology.

1. Principle of Development

- 6.2 The site is currently vacant following the demolition of the various buildings, and the application seeks permission for the redevelopment of the site with a mixed residential scheme.
- 6.3 The NPPF, London Plan and LBH's Local Plan are relevant and support the provision of residential development in appropriate locations. The NPPF advises that LPA's should give great weight to the benefits of reusing previously developed sites. It upholds the presumption in favour for sustainable development and reiterates the Government's ongoing commitment to boosting housing supply.
- 6.4 The proposed development of a mix of residential housing with substantial private amenity is considered to be fully in accordance with Paragraph 118 of the revised NPPF and would be considered to make efficient use of the previously developed brownfield land that is well served by public transport and local shops and services. Furthermore, Hillingdon's housing target in the London Plan is 559 per annum. The Draft New London Plan seeks to increase this target by 178% to 1,553 homes per annum. Thus, the provision of 109 residential units would make a positive contribution towards meeting the housing targets set in the adopted London Plan and the revised targets in the Draft New London Plan. The draft Hillingdon Local Plan Part 2: Site Allocations document has also allocated the site under allocation SA20 which designates the site for residential redevelopment. It is therefore considered that the proposal is fully compliant with local, regional and national planning policy.
- 6.5 Furthermore, a previous planning application (Ref: 11891/APP/2014/91) for the residential redevelopment of the site was approved in August 2014 which included the demolition of all buildings on site and the erection of 49 residential units. This scheme was subsequently amended through the

approval of a second planning application which (Ref: Ref: 11891/APP/2014/91) increased the number of units to 69. The principle of residential redevelopment is therefore already clearly established through the granting of these planning applications in 2014 and 2017 and, on this basis, it is considered that the residential principle of the current proposal is therefore also acceptable.

2. Housing Mix

- 6.6 The proposal provides a total of 109 residential flats, comprising 37 one-bed units and 64 two-bed units and 8 three-bed units. It is noted that whilst the overall number of three-bed units has decreased from the approved scheme, the revised scheme proposes that all three-bed units are located at ground level therefore allowing all of the larger family units to enjoy their own individual large private gardens facing a private boundary rather than a shared amenity space. One of the key objectives of the scheme was to maximise the provision of private amenity space for every unit, and it is therefore considered that the location of the family units on the ground floor with large private gardens is the most suitable proposal and a qualitative enhancement compared with the previous scheme.
- 6.7 The mix of units comply with the London Plan Policy 3.8, the Draft New London Plan Policy D3, and the Mayor's Housing SPG's requirement of inclusive design which suggest a range of housing choice should be available; new developments should offer a range of choices in terms of the mix of housing sizes and types, taking account of the housing requirements of different groups.

Accessible Units

- 6.8 The NPPF Paragraph 108 reinforces the importance of safe and suitable access to the site for all users. Hillingdon's Local Plan Part 1 requires 10% of all housing units on major applications to be wheelchair accessible and 90% of housing units to be adaptable. The proposed scheme is designed to be accessible and inclusive. The Design and Access statement sets how the development seeks to satisfy the relevant legislation and criteria. This again complies with Policy 3.8 in the London Plan, Policy D3 in the Draft New London Plan and the Mayor's Housing SPG.

3. Amenity Space

Internal standards

- 6.9 Policy D4 of the London Plan sets out the minimum internal space standards for new residential development and are set out in the Figure 11. As demonstrated in the Design and Access Statement and schedule of accommodation, all units meet and exceed these standards. The scheme will comprise high quality and useable space and will adequately serve the needs of future occupiers in accordance with current policies and guidance.

Table 3.3 Minimum space standards for new dwellings⁷

Number of bedrooms	Number of bed spaces	Minimum GIA (m ²)			Built-in storage (m ²)
		1 storey dwellings	2 storey dwellings	3 storey dwellings	
1b	1p	39 (37)*			1.0
	2p	50	58		1.5
2b	3p	61	70		2.0
	4p	70	79		
3b	4p	74	84	90	2.5
	5p	86	93	99	
	6p	95	102	108	
4b	5p	90	97	103	3.0
	6p	99	106	112	
	7p	108	115	121	
	8p	117	124	130	
5b	6p	103	110	116	3.5
	7p	112	119	125	
	8p	121	128	134	
6b	7p	116	123	129	4.0

*Figure 11: Minimum internal space standards**External Amenity Space*

- 6.10 The scheme provides an appropriate balance of external communal and private amenity space to ensure that the scheme provides suitable living conditions for future occupiers. External amenity space is provided in the form of private balconies and terraces for the units on the upper floors, private gardens for the ground floor units, and communal green amenity space for shared use.
- 6.11 This accords with Policy D4 in the Mayor's Draft New London Plan which requires a minimum of 5sqm of private outdoor space to be provided for one to two-person dwellings and an extra 1sqm provided for each additional occupant. The proposed scheme therefore generates an amenity requirement of 685 sqm.
- 6.12 The proposed scheme provides 2,341.36sqm of private outdoor amenity space.
- 6.13 All balconies and private amenity spaces comply with the Mayor's Housing SPD minimum width and depth measurements of 1500mm.
- 6.14 The proposal is therefore considered to be in accordance with the relevant planning policy and guidance in this regard.
- 6.15 In addition to the private amenity space for each resident, the scheme provides enhances provision with the central amenity space (Figure 12). The central communal garden serves as a green lung to the development and an improved outlook for residents.



Figure 12: CGI of the shared amenity space in the internal courtyard

4. Design

- 6.16 LBH's Local Plan Part 1 Policy H1, the London Plan Policy 3.5. (b), the Draft New London Plan Policy D1 and the NPPF all attach great importance to design which is considered a key aspect of sustainable development. Policies state that new developments need to be of the highest quality design, to enhance the built environment of local places by taking into account their physical context, local character, density, tenure and land mix. Developments are required to make a positive contribution to streetscape and should incorporate high quality materials and landscaping appropriate to its context.
- 6.17 The NPPF also established that the Government gives great importance to the design of the built environment and recognise that it is a key aspect of sustainable development.
- 6.18 The Design and Access Statement sets out the evolution and justification of the design of the scheme. The design has sought to reflect features of surrounding buildings which would be in keeping with the character and appearance of surrounding properties. The materials are of high quality, albeit and consist of a simple pallet with the main brickwork proposed as a medium buff brick with an element of multi in its tone (Figure 14). This seeks to echo the finish of the older stock London brick that may have been seen in an old factory on the site (Figure 13).



Figure 13: CGI image showing the material design of the buildings



Figure 14: Proposed materials of the buildings

- 6.19 The surrounding area consists of buildings which vary in scale from single to three storey buildings. Therefore, the proposed buildings have been designed to be in keeping with the height of the three storey flats within Bourne Court and to the north east along Station Approach. While the proposed development is a storey higher than the approved scheme on the site, the overall height increase is minimal and is mitigated by the setback of the top floor from the edge of the building (Figure 15). The bulk, massing and scale of the proposed development is therefore not considered to be out of character with the surrounding area or dominate the setting to an unacceptable degree that they would appear incongruous in their surroundings.



Figure 15: Detailed elevation of the proposal, with the outline of the approved scheme in a blue dotted line demonstrating that the marginal increase in height and bulk of the proposal is minimal

- 6.20 A copy of the proposed scheme has been sent to National Air Traffic Services (NATS) and Northolt Airport Safeguarding Division (NASD) to ensure that the revised proposal is similarly acceptable as was the approved scheme to which no safeguarding objection was raised.
- 6.21 The sense of arrival and destination at the main access point of the scheme has been improved. The entrance façade that meets you as you travel down Bourne Court is now punctured by a large archway which creates a focal point for the scheme and follows the old factory works concept (Figure 16).



Figure 16: CGI image showing the proposed entrance archway

- 6.22 Once inside the courtyard there are a number of entrances into the buildings which maximises the permeability of the scheme. The courtyard will accommodate a level of car parking to meet the requirements of residents and the good accessibility of the site (1:1). A new green communal amenity space, with the landscaping of the shared spaces is a key priority that will provide not just a visual benefit but will be an accessible and usable amenity space for all.
- 6.23 Accordingly, the proposed development achieves a high quality of urban design and is therefore in line with the Policy 3.5 and 7 in the London Plan, Policy H1 in LBH's Local Plan, Policy D1 in the Draft New London Plan Policy and the NPPF requirements.

5. Impact on Neighbours

- 6.24 In assessing the previously approved scheme, the Council acknowledged that the application site falls within a predominantly residential area. In line with this, Policies BE20, BE21 to BE24 of the Hillingdon Local Plan: Part 2 and Policy D1 in the Draft New London Plan require the safeguarding of residential amenity and appropriate outlook, privacy and amenity for future and neighbouring occupants. The Council's SPD on Residential Layouts seeks that a minimum of 15m should be maintained between adjoining two or more storey buildings and a distance of 21m should be retained to ensure there is no overlooking.

- 6.25 The assessment of the previous scheme noted that the nearest elevation of the development would be located approximately 25m from the rear elevations of properties in Canfield Drive to the south. Officers did not consider that this would appear unduly dominant or overbearing when viewed from these properties or result in any unacceptable overlooking or overshadowing that would justify a refusal.
- 6.26 As demonstrated in Figures 17 and 18, the current proposal is for a revised form with two buildings that would leave the south-east boundary of the site with an increased open gap, which substantially improves the relationship of the proposed development to these properties on Canfield Road mitigating any adverse overlooking or overbearing relationship. The residential amenities for these residents will be enhanced compared with the approved scheme.
- 6.27 These properties will now have a view out into the shared open space area proposed in the centre of the development which should be considered an improvement. In addition, the height of the proposed building remains broadly similar to the existing approved scheme, despite the addition of an extra storey. Given that this represents an improvement over the existing approved scheme, it should be considered there is no unacceptable impact on the Canfield Road properties.
- 6.28 The north west and north east of the site are commercial properties and given the nature of these sites, no objection was raised by Council in terms of loss of outlook when assessing the approved scheme. The current proposal retains a broadly similar bulk and form along these boundaries and does not result in a significant increase in height. There will therefore be no additional impact on the properties along these boundaries.



Figure 17: Previously approved site plan



Figure 18: Proposed new site plan

- 6.29 It was noted during the assessment of the previous approved scheme that despite the fact that there are no principle habitable windows on the side of the existing buildings and occupiers on Bourne Court, the approved development did encroach on the 45-degree line of the buildings. However, no objections were raised at the time on the grounds of impact on amenity and it was not considered that refusal could be easily considered on these grounds.

- 6.30 The proposed scheme retains a similar bulk and form along this frontage, albeit with the addition of the raised bridge over the access, with the height also remaining broadly the same. In addition, a screen of large trees is proposed along this boundary that would assist in further minimising any impact on the adjacent properties. There should therefore be no additional impact on the existing buildings on Bourne Court and the proposal is therefore considered acceptable in this regard.

Daylight and Sunlight

- 6.31 The Council's Local Plan Part 2 Policy BE20 also requires that buildings should be laid out so that adequate daylight and sunlight can penetrate into and between them and the amenities of existing houses are safeguarded. The Council's Supplementary Planning Document (SPD) on Residential Layouts sets out more detailed guidance aimed at avoiding developments which are over dominant, or which cause unacceptable levels of overlooking or overshadowing. Due to the low-rise nature of the development and the distance from surrounding properties, it was agreed with the Council that a Daylight and Sunlight Assessment would not be required, as per the previous applications.
- 6.32 The layout in the proposed scheme has been amended to maximise the benefit of the sun path by creating an open courtyard which will maximise on solar gain. In this way the courtyard would benefit from a considerable amount of daylight. The proposal is therefore acceptable in daylight and sunlight terms.

6. Transportation and Highways

Public Transport Accessibility

- 6.33 A Transport Statement (TS) has been prepared by Paul Mew Associates in support of this application and considers the transport and highway matters related to this proposal. The TS confirms that the site is well connected to a range of local services and within reasonable walking distance of a wide variety of shops, services and amenities which will be readily accessible to future residents of the scheme and thus reduce the need to travel. In particular, the closest amenities include a small convenience store on Station Approach to the west of the site, a parade of local shops and restaurants adjacent to South Ruislip Railway Station, and a large Sainsbury's supermarket on Long Drive to the east of the site.
- 6.34 With regards to transport links the TS notes that the site has a PTAL rating of '3' which is a 'moderate' accessibility rating as defined by TFL. However, despite this, the area adjoining the application site is well served by public transport. There are two bus services with high hourly service frequencies which can be accessed from stops within 400 metres of the application site. The closest bus stop to the site is on West End Road to the west of the site which serves bus route 114 running between Ruislip Station. Mill Hill Broadway Station can also be accessed from stops on Victoria Road to the east of the site. South Ruislip station is within around 200 metres to the east of the site and provides access to both National Rail and London Underground services.

Trip Generation

- 6.35 The TS uses the Trip Rate Information Computer System (TRICS) database to estimate the likely trip generation rates. A review of the database indicates that the number of vehicle trips generated is

expected to be fairly evenly spread throughout a typical day. As set out in Section 3 of the TS, the development is expected to generate an additional net increase of 338 vehicle trips per day compared with 19,271 vehicle movements on Station Approach on a typical weekday. This would in a worst-case scenario have a 1.7% increase on existing traffic which is considered to be negligible on the local highway network, falling within the day-to-day variation in traffic flow during a typical day on Station Approach.

- 6.36 The TS therefore concludes that the cumulative impact of the proposed development will have no material impact on the adjoining highway network and the proposal is therefore considered acceptable in highways terms.

Car Parking

- 6.37 Policy 6.1 of the London Plan sets out the Mayors approach to transport. The Parking Addendum to Chapter 6 confirms a maximum standard of less than one space for one and two-bedroom units, and up to 1.5 spaces per 3 bed units.
- 6.38 The TS notes that the Hillingdon Local Plan Part 1 retains the parking standards set out in the Saved Policies of the UDP. Annex 1 of the Saved Policies states that the maximum standards for car parking is 1.5 spaces per dwelling.
- 6.39 A total of 115 parking spaces are proposed, which equates to a provision of just over 1:1. The TS states that in accordance with the Council's parking standards, the development would require up to a maximum of 164 off-street car parking spaces, however this would conflict with the London Plan maximum standards. As this level of provision is within the maximum standards, it is therefore considered to be acceptable. The TS also notes that a residential parking ratio of one space per flatted dwelling was recently approved by the Council on a nearby planning consent (Ref: 66819/APP/2014/1600) and the proposals are therefore broadly in line with local precedent.
- 6.40 The 115 spaces represent a slight increase from the earlier proposals presented at pre-app. This increase is predominantly through the provision of car stackers which could be utilised in the undercroft parking as shown on the proposed site plan. It is proposed to use a system similar to the Woehr Parklift 340 or Combilift 551 which would allow for two cars to be parked simultaneously.
- 6.41 A total of 11 wheelchair accessible parking spaces are also provided as part of the proposals in accordance with London Plan's requirement of for at least 10% disabled persons parking for developments over 10 units.

Cycle Parking

- 6.42 The London Plan Policy 6.9 states that the minimum cycle provision for residential development should be one space for one-bedroom flats and two spaces for all other dwellings. On this basis, the scheme should provide a minimum of 181 cycle spaces plus 3 short-stay visitor cycle spaces.
- 6.43 The revised scheme provides a total of 181 long-stay cycle spaces a 3 secure and sheltered short-stay cycle spaces all at ground level.
- 6.44 The proposed level of cycle parking is therefore compliant with the adopted London Plan.

7. SuDS / Drainage

- 6.45 A Drainage Assessment has been prepared by Water Environment Limited in support of the application.
- 6.46 In addition to this, London Plan policy 5.13 states that development proposals should use sustainable urban drainage systems (SUDS) unless there are good reasons for not doing so.
- 6.47 The report states that the site is located within the jurisdiction of the London Plan, the proposals must ensure that runoff rates post-development are no larger than three times the greenfield runoff rate of the site. It was found that the 1 in 100 year greenfield runoff rate was 9.97 l/s and therefore the limiting discharge rate for the 100-year plus climate change event is 29.9 l/s. Proportional limited runoff rates are also proposed for the 1-year, 30-year and 100-year events.
- 6.48 The drainage strategy for the site is to attenuate runoff from roofs and hardstanding within a permeable paving sub-base that covers the area of the access roads and parking bays. Infiltration is not viable at the site due to the presence of London Clay which is impermeable and does not allow effective percolation and infiltration of surface water.
- 6.49 The management and maintenance of the proposed SuDS strategy is detailed in the report and will be carried out in accordance with the guidance and specification at detailed design.
- 6.50 The report notes that the site does not lie in a CDA, known to suffer from surface water volume issues and is not served by a public sewer that experiences tide locking. It is therefore considered that the restriction of post-development runoff rates will be sufficient to mitigate any potentially negative impacts of this increase in runoff volume and will not increase flood risk.
- 6.51 The report concludes by stating that the SuDS strategy is considered compliant with the DEFRA SuDS guidance, issued in March 2015, the revised NPPF, London Plan and LBH policies.

8. Trees

- 6.52 A Tree Survey, Arboricultural Method Statement (AMS) and Arboricultural Implication Assessment (AIA) has been prepared by Eight Associates to the British Standard 5837: 2012 'Trees in relation to design, demolition and construction' in support of this application. A plan of the trees to be retained and removed, as well as the Root Protection Areas (RPA) has been outlined on a separate plan submitted with this application (Figure 19).
- 6.53 The AIA states that of the fifteen individual trees and five groups of trees surveyed, six individual trees and three groups would be lost as a result of the proposed development. Three of the trees or group that would be lost are low value 'C' category specimens and six are moderate value 'B' category. No high value 'A' category trees are present. Eight trees have been classified as poor 'U' category which will need to be removed regardless of the proposed development table. The LBH website indicates that there are no TPOs located on the site.
- 6.54 The report considers that the loss of the trees can be mitigated through the planting of new good quality specimens, and notes that where there is sufficient space, the existing soils should be protected from compaction by installing protective barriers.



- 6.55 The AIA proposed various mitigation to offset the impact of the development on the retained trees and their RPAs. It also notes that no ecological concerns have been raised in relation to the works on the trees on the site and none were noticed at the time of the survey.
- 6.56 The AMS is a methodology for the implementation of any aspect of the proposed development that has the potential to result in loss or damage to a tree identified as suitable to be retained and takes into account the construction operations undertaken on the site. The proposed methods and mitigation suggested in the report will be adhered during the construction of the development.

9. Ecology

- 6.57 Hillingdon Local Plan Part 1: BE1 requires new developments to enhance and protect biodiversity.
- 6.58 An Ecological Assessment of the site has been undertaken by CSA based on a desk survey and an extended Phase 1 habitat survey undertaken in August 2018. The assessment has identified confirmed and potential ecological constraints to residential development on the site.
- 6.59 The majority of the site is considered to be of negligible ecological importance. No overriding ecological constraints to the development have been identified.
- 6.60 Some losses to trees will be required to facilitate the development and as such compensatory planting will be provided as part of the new development. Overall tree cover present at the site will be increased above the present situation.

- 6.61 No internationally important statutory designations of nature conservation lie within 10km of the site and no nationally important statutory designation of nature conservation interest like within 3km of the site. There are 6 local statutory designations of nature conservation, but these are adequately buffered by distance to avoid any direct impacts arising from the proposed development.
- 6.62 Specific recommendations for the avoidance and mitigation of impacts and opportunities for enhancement have been incorporated including:
- Inclusion of native plant species and species of acknowledged benefit of wildlife within the landscape scheme;
 - New tree planting within shared amenity areas;
 - Provision of new bat roosting opportunities (minimum of 3 No. bat boxes);
 - Provision of new bird nesting opportunities (minimum of 5. No bird nesting boxes); and
 - New habitat creation for invertebrates.

10. Energy and Sustainability

Energy

- 6.63 Policies 5.1 to 5.8 of the London Plan seek to reduce an overall reduction in London's carbon dioxide emissions. Policy 5.2 requires development proposals to make the fullest contributions to minimising carbon dioxide emissions in accordance with the strategy to use less energy, supply energy efficiently and use renewable energy.
- 6.64 A detailed Energy Assessment (EA) has been prepared by Eight Associates in support of this application which considers the energy matters related to this proposal which incorporates a full Energy Strategy that has been prepared in accordance with the London Plan policies 5.2, 5.6 and 5.7. This concludes that:
- The baseline carbon emissions for the development are 127.79 Tonnes CO₂/yr;
 - Be Lean: demand reduction measures have reduced the scheme's potential carbon emissions by 4.6% over the minimum Part L 2013 Building Regulations baseline;
 - Be Clean: the EA notes that a review of the London Heat Map demonstrates that there are no existing networks present within connectable range of the scheme, therefore a connection is not possible. The London Plan policy 5.6 requires Energy Strategy to consider the use of localised decentralised energy systems and onsite Combined Heat and Power (CHP). However, the EA states that it would not be suitable for this scheme; and
 - Be Green: renewable energy technology has been considered for the scheme in line with Policy 5.7 of the London Plan. The EA states that a biomass boiler, a standalone solar water heating system, wind energy, ground source heat pump, air source heat pump, were not feasible for the scheme.

- 6.65 Photovoltaic systems have been deemed the most feasible and therefore have been considered to be the optimum balance of sustainable and economic objectives (Figure 20). A photovoltaic panel system of 144kWp has been specified for the development to help achieve carbon emissions by at least 35%.

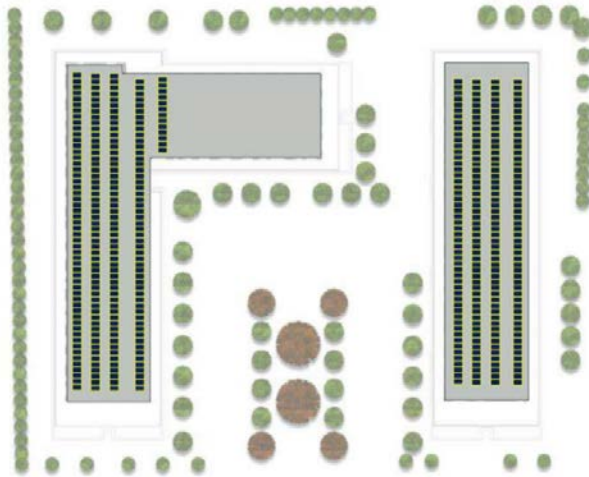


Figure 20: Proposed Photovoltaic system

Sustainability

- 6.66 London Plan Policy 5.3. advises that the highest standards of sustainable design and construction should be achieved in London to improve the environmental performance of new developments and to adapt to the effects of climate change over their lifetime.
- 6.67 In regard to sustainability, a detailed Sustainability Statement prepared by Eight Associates has been prepared in support of the application, which advises that sustainable design principles have been integrated into the scheme from the outset through a holistic approach. This has been prepared in accordance with London Plan policies 5.2 to 5.21.
- 6.68 The holistic approach ensures that the building will adapt to climate change, promote health and wellbeing and minimise environmental impacts. In summary the scheme adopts the following features:
- Reduce the total carbon emissions by at least 49.4% over Building Regulations. PV panels will be installed within the development.
 - Minimise embodied carbon through efficient design and the procurement of materials from a local source, or with a high-recycled content.
 - Be of high build quality, surpassing the minimum Building Regulations for water use fittings.
 - Ensure all materials are responsibly sourced and of low environmental impact.
 - Implement a site waste management plan.
 - Protect and enhance the ecological value where feasible.
 - Promote sustainable transport, including access to public transport and the installation of cyclist storage and facilities.
 - Follow best practice policies in terms of air, water and ground pollution and appoint a contractor who will register for the Considerate Constructors Scheme.

- Incorporate health and wellbeing measures through design and operational procedures including optimum indoor air quality and thermal comfort.

6.69 The proposed development is considered to be compliant with the relevant sustainability policies and acceptable in sustainability terms, with NPPF, the London Plan, the Draft London Plan sustainability policies and LBH Local Plan Policies EM1, EM6.

11. RAF Northolt Safeguarding

6.70 The site is located in close proximity to RAF Northolt which is an active airfield and as a result, the applicant has been in consultation with both the Defence Infrastructure Organisation (DIO) and the National Air Traffic Services (NATS) to determine whether the building heights of the proposed scheme are acceptable.

6.71 It should be noted that the previous scheme was also subject to consultation with the MOD who raised no objection to the heights of the buildings but requested a condition for a crane management plan to be attached to any planning permission.

6.72 Following the preparation of the new scheme, the DIO were contacted with plans and elevations of the proposal to understand whether there would be any objection from the MOD. The plans show that despite the new scheme comprising of four storeys rather than the previous three, the actual building height is only a very minor increase of 0.35 AOD.

6.73 The DIO responded and noted that due to the very slight increase it was unlikely that there would be any issues, however, they have requested an Obstacle Limitation Surface Infringement Analysis assessment to be undertaken to be certain and the crane management plan condition would be retained. It was also noted that the development would not result in an increase to bird strike risk to aircraft as green roofs and bodies of water are not part of the scheme. However, it was stated that the PV panels on the roof could have the potential to provide suitable nesting and roosting habitat for larger gull species which may increase the risk of bird strike and therefore a commitment to prevent breeding on the roof space would be desirable within a bird management plan.

6.74 In addition, a response from NATS noted that there were unlikely to be any issues with aviation infrastructure or operations from this proposal but recommended that the MOD would need to be consulted to be certain. Considering the DIO have stated they have no objection to the proposed scheme subject to the two conditions, there is not considered to be a safeguarding issue.

7.0 Conclusion

- 7.1 HGH Consulting have been commissioned by LB Hillingdon to advise on a revised scheme for the redevelopment of the Bourne Court site.
- 7.2 Over the past months working with an external architectural practice, WaM, a completely new concept and architectural approach has been taken to the form and layout of the proposed scheme which has been positively supported by the council's senior planning, urban design, highways and landscape officers, who have all been extensively involved in a collaborative pre-application process.
- 7.3 The proposed warehouse wharf-style court yard approach has sought to simplify the built form from three buildings into two buildings. A frontage building with a feature arched entrance will be a focal point at the end of Bourne Court opening up into a courtyard, with a central communal amenity space, parking and a second 'L' shaped building to the rear of the site. With clean and simple elevational treatment with a limited palette of materials with a principal facing brick, recessed windows and balconies and a set-back top floor, the proposed scheme will be of high-quality design and create a new community with a mix of units for single through to family sized households.
- 7.4 The proposed scheme for **109 units**, provides all the larger three bed family sized units on the ground floor with private garden space, being an improvement to the scattered location of the three bed units in the approved scheme, providing a qualitative enhancement to the revised scheme. All other units on the upper floors will have a private balcony which exceeds London Plan standards and all units meet or exceed national space standards.
- 7.5 In terms of parking the site is well located to local shops and South Ruislip Underground Station with a PTAL 3 rating. The scheme provides for just over 1:1 parking with a total of **115 vehicle spaces, 23 passive and 23 active electronic charging points, and 182 cycle spaces and 3 visitor cycle spaces** wholly in accordance with the adopted London Plan standards. This level of parking is considered to be at an appropriate level for this location, whilst still encouraging non-vehicular modes of travel (walking and cycling) to work and local shops and recreational activities.
- 7.6 The application is supported by technical assessment work on drainage, SUDS, ecology, energy and trees / landscaping which in combination reinforces the sustainable credentials of this redevelopment scheme, in support of national housing and design objectives and policies in the NPPF 2018, the London Plan, Draft New London Plan, Mayoral Housing SPG, Mayoral Housing Strategy, as well as adopted LBH policies.
- 7.7 The proposed development will make efficient and positive use of an existing brownfield site in a highly sustainable and accessible urban area.
- 7.8 In the context of the recently published NPPF and housing delivery, the designated site is **deliverable**, in accordance with the definition in the glossary of the NPPF, in that it is immediately available, offers a suitable location for development, as reinforced by the previous and extant residential planning permissions, and is achievable with a realistic prospect that housing will be delivered on the site within five years.
- 7.9 This Statement has sought to comprehensively demonstrated that the revised proposal is an enhancement on the previous permissions and will deliver 40 additional residential units in a sustainable and high-quality environment, in accordance with the requirements of the London Plan

policies 7.4, 7.6 and 7.21, draft New London Plan policy DB.1 and LBH emerging planning policies, as well as the Council's Supplementary Residential Design Guide.

- 7.10 The proposed development will deliver contributions towards off-site affordable housing, local infrastructure improvements through CIL, community, employment and housing benefits, and complies with the three roles of sustainable development as follows:

Social

- 7.11 The proposed high-quality residential units will make a large and positive contribution towards achieving the boroughs ambitious housing target in the Draft New London Plan. The proposed development results in an increase in the number of units on the site from the approved alternative schemes with an enhanced design solution. The proposed dwellings will be of a high quality and meet or exceed the design and accessibility standards in the London Plan and Mayor's Housing SPG.
- 7.12 The enhanced CIL payment will ensure that the proposed development contributes towards the provision of local infrastructure and services.

Economic

- 7.13 The proposed development will create employment and supply chain benefits during the construction period and during the management of the proposed development.

Environmental

- 7.14 The proposed development will make optimal use of this brownfield site and its location in a residential and highly accessible area is appropriate in line with the Mayor's Housing SPG.
- 7.15 The former buildings and site is now vacant and a visual eyesore for local residents in the area. The proposed development will greatly improve the appearance of the site in the local area, making a positive contribution to the local street scene.
- 7.16 The site is in a sustainable location with good access to local shops, recreational facilities and South Ruislip Underground and local bus network on Station Approach.
- 7.17 The proposals include the introduction of a high quality central communal amenity space, private gardens, new focal tree planting and reinforcement of planting on the site boundaries. The proposed landscaping will complement and enhance the appearance of the site and quality of the proposed development for the benefit of the future residents and those properties neighbouring the site.
- 7.18 A negligible increase in trip generation compared with the former use of the site is anticipated from the proposed development which will be absorbed into the daily traffic flows on Station Approach.

- 7.19 To conclude, the planning benefits of this high quality sustainable form of development combined with the enhanced design quality of the scheme will wholly accord with the principle of sustainable development, and the housing delivery and design quality objectives central to the recently published NPPF 2018, the London Plan, new draft London Plan and the emerging draft policies of LB Hillingdon for which planning permission should be granted.



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