

122 – 124 High Street, Ruislip

Planning Statement

ON BEHALF OF GOLDS LEISURE LTD

November 2024

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1. Introduction

1.1 This Planning Statement has been prepared by Nexus Planning on behalf of Golds Leisure Ltd. (the “Applicant”) in support of a full planning application submitted for residential development at the rear and upper floors of 122 – 124 High Street, Ruislip (the “Site”). The existing ground floor use of the site as Tesco Express is to be retained. The application is submitted to the London Borough of Hillingdon (“LB Hillingdon”) as the Local Planning Authority (“LPA”) for the following development:

“Change of use of part of the rear of the building and upper floors from Class E to C3 to create six residential dwellings alongside associated works.”

1.2 This planning application is a resubmission of a previously refused planning application for *“Change of use of part of the rear of the building and upper floors from Class E to Class C3, and erection of an additional storey to create nine residential dwellings, alongside associated works”*, LPA ref. 1894/APP/2024/1734. The proposal was refused for six reasons, which are set out within Section 2 of this Planning Statement. In order to overcome the previous reasons for refusal, the design of the proposal has been significantly modified with the removal of one storey and a reduction by three dwellings. Concurrently, all relevant technical reports have been updated in response to the reasons for refusal.

1.3 As demonstrated through this report, the development proposal has the following key benefits:

- Provision of high-quality two-bed residential units in a sustainable town centre location to meet housing need within the Borough;
- Providing a high-quality sustainable design and improving the sustainability of the existing building fabric;
- Provision of cycle parking to encourage sustainable transportation;
- Preserving and enhancing the Conservation Area;
- Providing an excellent amenity outcome for future occupants, with regard to access to sunlight/daylight, protection from external air pollution sources, and an adequate provision of internal space;
- Providing useable external amenity space where practical; and
- Providing convenient and practical storage areas for refuse and recycling.

1.4 The following documents are submitted in support of this application:

- Application forms;
- Ownership Certificate;
- Community Infrastructure Levy forms;
- Application drawings by GIAD UK Architects;
- Outline Construction Management Statement by Pulsar Transport Planning;
- Outline Delivery & Servicing Plan by Pulsar Transport Planning;
- Air Quality Analysis by Aether;
- The London Plan 2021 Policy D12A – Fire Safety Supporting Statement by GIAD UK Architects;
- Daylight and Sunlight Report by Point 2 Surveyors; and
- Design and Heritage Statement by Marcus Beale Architects.

Structure of this Planning Statement

- 1.5 The purpose of this Planning Statement is to appraise the scheme within the context of the allocations that apply to the Site and the policies set out in the National Planning Policy Framework (NPPF) (2023) and the Development Plan.
- 1.6 The remainder of this Statement is set out as follows:
- Section 2 describes the Site, surroundings, planning history and proposed development;
 - Section 3 summarises the key national and Development Plan policies relevant to the proposals; and
 - Section 4 sets out the key considerations and explains why planning permission should be granted.

2. Site Context

The Site and Surrounding Area

- 2.1 The Site comprises a single building known as 122-124 High Street (Use Class E) and is approximately 0.05 ha in size.
- 2.2 The whole building is currently leased by Tesco Express, with the ground floor operating as the shop floor which fronts onto the High Street. The upper floors were used as ancillary storage areas for the previous tenant, Woolworths. However, since the current tenant has leased the site, these ancillary storage areas have been vacant and are surplus to the requirements of the existing tenant. Therefore, this application seeks the redevelopment of the rear and upper floors of the building which are vacant, with the Tesco Express store remaining as is, and lies outside of the red line boundary.



Figure 2.2.1 Location of the Site

- 2.3 The rear and upper floors of 122-124 High Street are in a significant state of disrepair and the building is not currently watertight, rendering it unsuitable for storage or indeed any other purpose. The state of the building has also resulted in it attracting antisocial behaviour, creating a nuisance to the occupiers and increasing vandalism and the security risk to the Site. The façade of the building at first floor level is “false” with a flat roof behind it and no accommodation serves the first-floor windows which can be seen from street level. The building appears tired in comparison to many of the surrounding buildings.
- 2.4 The Site is situated within Ruislip Town Centre, which comprises predominantly retail and commercial units at ground floor level. To the north, west and south of the Site are residential properties, with further residential dwellings surrounding Ruislip Town Centre.
- 2.5 The Site is located within Ruislip Village Conservation Area, however the Site itself is not statutorily or locally listed, and there are no listed buildings within close proximity to the Site.

- 2.6 The western side of the High Street comprises predominantly two storey buildings with retail and office uses at ground floor and ancillary uses and residential at first floor. From the High Street, No. 122-124 adjoins No. 126-128 which is more modern in materiality and is architecturally distinct from the Art Deco style façade of No. 122-124.
- 2.7 An alleyway separates the building from No. 120 High Street to the north, which is again of a different architectural style. The alleyway which runs along the northern boundary and joins with Poplars Close to the west, suffers from poor lighting and natural surveillance and is the primary pedestrian access to the Site. The Site can also be accessed from the rear via Princess Lane, which runs along the back of the southernmost section of the High Street.
- 2.8 To the eastern side of the High Street, the architectural style is more consistent, with three storey Art Deco terraces and retail uses at ground floor.
- 2.9 Immediately to the rear of the Site are two single storey dwellings, known as Nos. 12 and 14 Poplars Close. To the north of these (northwest of the Site), are two further residential dwellings known as Nos. 8 and 10 Poplars Close.
- 2.10 No planted vegetation currently exists on the Site.
- 2.11 The Site is well served by public transport and has a PTAL rating of 4. Ruislip Underground Station is located 200 metres south of the Site, which is approximately a five-minute walk. There are also multiple bus stops located along High Street.
- 2.12 The Site is also well-located for local services including employment, shopping areas, schools, health care, and outdoor and indoor leisure facilities, and is considered to be an excellent location for residential development.
- 2.13 The Site lies within Flood Zone 1, indicating the lowest risk of flooding from fluvial sources.

Planning History

- 2.14 In July 2024, application ref. 11894/APP/2024/1734 was submitted to the council for *“Change of use of part of the rear of the building and upper floors from Class E to Class C3, and erection of an additional storey to create nine residential dwellings, alongside associated works”* at the site.
- 2.15 The application was subsequently refused in September 2024, for the following six summary reasons:
1. Incongruous bulk, scale, massing and overall design;
 2. Overbearing impacts to the adjoining residents;
 3. Inadequate private amenity space;
 4. Refuse and recycling facilities;
 5. No fire statement was submitted; and
 6. No Section 106 planning obligation (in respect of air quality) was secured.
- 2.16 Prior to the submission of this application, pre-application advice was sought from the London Borough of Hillingdon in August 2023, and written advice was subsequently issued in February 2024 (LPA ref. 11894/PRC/2023/145). The written advice positively helped to shape the submission of the application, however the advice given now does not directly pertain to the development proposal which this planning statement relates to due to revisions that have been made to the scheme.

How the Revised Scheme has been Designed to Respond to the Reasons for Refusal

2.17 The application represents a revised scheme of application ref. 1894/APP/2024/1734, which was refused by the Council on 13th September 2024.

2.18 Below we have outlined the six reasons for refusal and how this revised submission has addressed them.

Refusal Reason 1 – Incongruous Bulk, Scale, Massing and Overall Design

“The proposed development, by reason of its bulk, scale, massing and overall design would result in an incongruous visually prominent form of development that would fail to harmonise with the character and architectural composition of the surrounding properties, resulting in a visually dominant building which would be detrimental to the character, appearance and visual amenity of the street scene and the setting of Ruislip Village Conservation Area. The proposal therefore conflicts with Policies BE1 and HE1 of the Hillingdon Local Plan: Part One - Strategic Policies (2012), Policies DMHB 1, DMHB 4, DMHB 11 and DMHB 12 of the Hillingdon Local Plan: Part Two - Development Management Policies (2020), Policies HC1, D1, D3 and D4 of the London Plan (2021) and the NPPF (2023)”.

Response to Refusal Reason 1

The revised scheme has omitted the third-floor extension, meaning that the massing of proposed development will be visually unchanged from the existing property. Façade improvements will improve the buildings overall appearance which will enhance the harmonisation with the character and architectural composition of the surrounding properties, thereby offering clear planning benefit.

Refusal Reason 2 – Overbearing Impacts to the Adjoining Residents

“Due to its scale, bulk and overall design, the proposed development would have an overbearing impact on the adjoining residents leading to a harmful sense of enclosure and loss of privacy to the residents of Nos 8, 10, 12 and 14 Poplars Close. The proposal would therefore be contrary to Policy BE1 of the Hillingdon Local Plan: Part One - Strategic Policies (2012), Policy DMHB 11 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020) and the National Planning Policy Framework (2023)”.

Response to Refusal Reason 2

As the revised scheme has omitted the third-floor extension, the sense of enclosure and loss of privacy will be largely mitigated as the massing of the site will remain unchanged from the current situation, and there will be no additional windows at third floor level. Windows are to be introduced into the existing building in order to provide acceptable living standards, but where this is the case, obscured glazing will be introduced in order to retain privacy for occupants of the existing neighbouring properties, as well as future occupiers of the flats.

Refusal Reason 3 – Inadequate Private Amenity Space

“The private amenity space provide is not adequate in terms of quantity and quality and would be overlooked. In addition, due to the use of boundary treatment to demarcate private amenity occupiers of Flat 2 and Flat 3 would experience a loss of outlook given the proximity to the proposed 1.8m high patio fence. Further, Flat 1, bedroom 2 and Flat 4, bedroom 1 and 2 would not benefit from adequate outlook. Therefore, the development would fail to provide a high quality internal amenity space and external usable amenity space resulting in harm to residential amenity and unsatisfactory living conditions for the occupiers. The development therefore conflicts with Policies

DMHB 11 and DMHB 18 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020) and Policy D3 of the London Plan (2021)".

Response to Refusal Reason 3

The revised scheme includes a thoughtful reconfiguration of the private amenity spaces. The patio for Flat 2 has been enlarged to 25 sqm and is surrounded by a 1.5-meter-high fence topped with 300mm trellis, providing a softer outlook for residents. Although the patio for Flat 3 remains at 11 sqm due to space constraints, its boundary treatment has been enhanced with the same fence and trellis design as Flat 2. While options for expanding or removing this patio were considered, it was determined that having an outlook onto a fence and trellis is preferable to an uninterrupted view of the roof at 126-128 High Street. Additionally, the inclusion of this small patio area improves privacy for Flat 3's future occupants, shielding them from the communal garden without necessitating obscured glazing on the east-facing windows.

The communal garden area on the first-floor roof has been reconfigured to enhance privacy and now spans 160 sqm. In line with Policy DMHB18: Private Outdoor Amenity Space of the Hillingdon Local Plan Part 2: Development Management Policies, the total private amenity space required for six flats is 150 sqm, due to minimum of 25 sqm per two-bedroom flat required. Notwithstanding the private amenity spaces for Flats 2 and 3, the communal garden exceeds the minimum requirements for six flats. Moreover, with the inclusion of the private amenity space for Flats 2 and 3, only four flats will rely solely on this shared area. Therefore, the proposed private amenity space is plentiful in terms of quantity.

To further enhance privacy, a 1.8-meter-high hedge is proposed along the northern boundary of the shared amenity space, providing natural screening from No. 120 High Street. The reconfiguration of the communal garden has also introduced designated seating areas, with the central seating area strategically positioned to reduce the potential for overlooking the south-facing windows of 120 High Street. This thoughtful design creates a private amenity space that is not only functional but also of high quality.

Refusal Reason 4 – Refuse and Recycling Facilities

"Insufficient supporting information to demonstrate that the proposed development would offer a convenient location for refuse and recycling facilities, given the pull distance of over 60m which fails to accord with Policy DMHB11 part (d) of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020)".

Response to Refusal Reason 4

The Outline Delivery & Servicing Plan, prepared by Pulsar has been updated in response to Refusal Reason 4, and submitted in support of this application. In summary, it is proposed that refuse collections for the development will be combined with existing collections that already take place adjacent to the gate on Princess Lane. It is understood that two existing weekly refuse collections (one for recycling waste and one for general waste) are undertaken from this bin storage area.

The site management team of the proposed development will move a total of two general waste bins and two recycling waste bins on their respective collection days from the proposed site storage point on the southern side of the building to the collection point. This arrangement means that minimal pull distances are required, and most importantly the arrangements have already been deemed acceptable and are in use by the flats of 130 High Street, which accords with Policy DMHB11 part (d) of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020).

When considering deliveries and other servicing at the proposed development, it is proposed that delivery vehicles will utilise the existing loading bay provided on High Street if available and walk to the residential lobby by using the existing public footpath to the north of the site. An alternative option to the loading bay is stopping on the kerbside of Poplars Close, as used for delivering and servicing by the residential units in the vicinity of the site on Poplars Close, and use the public footpath to the north of the site to access the residential lobby. Small mailboxes will be provided in the residential lobby to reduce dwell time of delivery vehicles, when delivering smaller items.

Refusal Reason 5 – Fire Statement

“The proposal fails to demonstrate through a comprehensive fire statement how the development would achieve the highest standards of fire safety in regard to its design in incorporating appropriate features which reduce the risk to life in the event of a fire, its construction methods, means of escape, strategy of evacuation and providing suitable access and equipment for firefighting appropriate for the size and residential nature of the development. The proposal would therefore be contrary to Policies D5 and D12 of the London Plan (2021) and the National Planning Policy Framework (2023)”.

Response to Refusal Reason 5

A London Plan 2021 Policy D12A – Fire Safety Supporting Statement has been prepared by GIAD UK Architects in support of the revised scheme. The statement assesses the criteria of The London Plan (2021) Policy D12A and provides supporting information in response. The statement also details the fire escape route, and assembly point which will be on Princess Lane, to the rear of the site.

Refusal Reason 6 – S106 (Air Quality)

“The applicant has failed to secure Section 106 planning obligations required to mitigate the harm and demands created by the proposed development (in respect of air quality). The scheme therefore conflicts with Policy DMCI 7 of the Hillingdon Local Plan: Part 2 (2020); the adopted Planning Obligations Supplementary Planning Document (2014); Policy DF1 of the London Plan (2021); and paragraphs 55-58 of the National Planning Policy Framework (2023)”.

Response to Refusal Reason 6

As the previous application had been recommended for refusal, negotiations had not yet begun regarding a S106 Agreement. There is no action required at this stage to overcome this refusal reason, and it will be subject to this application being recommended for approval.

Development Proposals

- 3.1 Having considered the above refusal reasons, an overview of the new proposed development is provided below. Full details of the proposals are contained within the drawings and technical supporting information which accompany this planning application (set out in Paragraph 1.4 above).
- 3.2 The proposed scheme consists of the conversion of the rear floors to provide six new residential dwellings, alongside associated works. The existing convenience supermarket (Tesco Express) on the ground floor will be retained and does not form part of this application.
- 3.3 The proposed scheme has been designed to optimise the use of the Site, while delivering a high-quality architecturally-led scheme that respects the heritage of the wider Ruislip Village Conservation Area.

Residential Proposals

- 3.4 The residential element of the proposal relates to the provision of six self-contained two-bedroom flats. These will be positioned over the first and second floor levels.
- 3.5 Two of the six units will enjoy private outdoor amenity space in the form of private patios on the first floor, which back onto the communal amenity space. These two private outdoor amenity space standards each meet or exceed the London Plan minimum space requirements. Private communal amenity space of 160m² is proposed and can be enjoyed by residents all flats. The communal amenity space is in excess of Local Plan requirements for a six-dwelling development.
- 3.6 All the flats will either be double or triple aspect, and access to natural daylight is maximised through the positioning of windows and incorporation of skylights where practical. Windows for the residential units have been positioned to ensure a high level of privacy is achieved for both adjoining dwellings and future occupants of the new units. Where required, some windows are obscured to restrict any perception of overlooking.
- 3.7 Access to the residential units will be provided via a staircase which can be accessed via a secure lobby located to the rear of the site. The existing fire escape will be retained to the side of the Site and will connect to the communal amenity space.

Parking proposals

- 3.8 The scheme incorporates 12 bicycle parking spaces within a secure ground floor storage area, in line with the requirements of the London Plan. These spaces will be exclusively for the use of the occupiers of the residential units and will be accessed from the service road to the east of the Site.
- 3.9 Given the highly sustainable location, the development is proposed to be car-free.

Landscaping

- 3.10 Currently the Site has no existing landscaping. Soft landscaping is proposed at ground floor level, around the entrance to the secure cycle store, and landscaping will also be provided at the first-floor communal area and within the private outdoor amenity space proposed for flats 2 and 3.

3. Planning Policy

- 4.1 This section of the Planning Statement provides an overview of the key planning policies and other material considerations relevant to the Proposed Development.

National Planning Policy Framework

- 4.2 The National Planning Policy Framework (NPPF) (2023) represents a material planning consideration in the assessment of planning applications. The NPPF sets out the Government's planning policies and how these are expected to be applied.
- 4.3 At paragraph 11, the NPPF outlines a presumption in favour of sustainable development. For decision-taking this means 'approving development proposals that accord with an up-to-date development plan without delay'.
- 4.4 Paragraph 60 sets out the Government's objective to significantly boost the supply of housing.
- 4.5 Paragraph 76 of the NPPF requires local planning authorities to annually identify and update, as a minimum, a five year supply of housing at specific deliverable sites unless the adopted plan is less than 5 years old and it has identified at least a five year supply of specific, deliverable sites at the conclusion of the examination.
- 4.6 Paragraph 90 of the NPPF provides that planning policies and decisions should support the role that town centres play at the heart of local communities. Further, paragraph 86(f) seeks to ensure that planning policies recognise that residential development plays an important role in ensuring the vitality of centres.
- 4.7 Paragraph 123 of the NPPF seeks to ensure that planning policies and decisions promote an effective use of land in meeting the need for homes and other uses, using brownfield land where possible. Further, at Paragraph 124(c) it states that planning policies and decisions should give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs.
- 4.8 Paragraph 124(e) of the NPPF supports opportunities to use the airspace above existing residential and commercial premises for new homes.
- 4.9 Paragraph 128 of the NPPF encourages development that takes into account the identified need for different types of housing, viability, availability of infrastructure services, maintaining the prevailing character, and the design of attractive places.
- 4.10 Paragraph 131 of the NPPF encourages the creation of high quality, beautiful and sustainable buildings.
- 4.11 Paragraph 131 of the NPPF seeks to ensure developments will function well and add to the quality of the area, are visually attractive, are sympathetic to local character, establish a strong sense of place- and optimise the potential of the Site to accommodate a mix of development.
- 4.12 Paragraph 139 of the NPPF considers that significant weight should be given to development that demonstrates outstanding or innovative designs which promote high levels of sustainability while fitting in with the overall form and layout of their surroundings.
- 4.13 Paragraph 212 of the NPPF encourages opportunities for new development within Conservation Areas, to enhance or better reveal their significance.

- 4.14 The NPPF is supported by the Government’s Planning Practice Guidance (PPG), which provides further detail and context to the Framework.

The Development Plan

- 4.15 Section 38 (6) of the Planning and Compulsory Purchase Act 2004 requires that planning applications are determined in accordance with the Development Plan unless material considerations indicate otherwise.

- 4.16 The adopted Development Plan for the London Borough of Hillingdon comprises:

- Hillingdon Local Plan Part 1: Strategic Policies (November 2012);
- Hillingdon Local Plan Part 2: Development Management Policies (January 2020);
- Hillingdon Local Plan Part 2: Site Allocations and Designations (January 2020); and
- The London Plan (March 2021).

Hillingdon Local Plan Part 1: Strategic Policies

- 4.17 The Hillingdon Local Plan Part 1 is the key strategic planning document for Hillingdon and will support the delivery of the spatial elements of the Sustainable Community Strategy. The key policies from the Local Plan Part 1 which are considered to be relevant to the proposal include:

- Policy E5: Town and Local Centres
- Policy H1: Housing Growth
- Policy H2: Affordable Housing
- Policy HE1: Heritage
- Policy BE1: Built Environment
- Policy EM1: Climate Change Adaptation and Mitigation
- Policy EM6: Flood Risk Management
- Policy EM8: Land, Water, Air and Noise
- Policy EM11: Sustainable Waste Management
- Policy T1: Accessible Local Destinations

Hillingdon Local Plan Part 2: Development Management Policies

- 4.18 The Local Plan Part 2: Development Management Policies) seeks to provide detailed policies that will form the basis of the Council’s decisions on individual planning applications. The key policies from the Local Plan Part 2: Development Management Policies which are considered to be relevant to the proposal include:

- Policy DMTC 1: Town Centre Development
- Policy DMTC 2: Primary and Secondary Shopping Areas
- Policy DMTC 3: Maintaining the Viability of Local Centres and Local Parades
- Policy DMTC 4: Amenity and Town Centre Uses
- Policy DMH 2: Housing Mix
- Policy DMH 7: Provision of Affordable Housing
- Policy DMHB 1: Heritage Assets
- Policy DMHB 2: Listed Buildings
- Policy DMHB 3: Locally Listed Buildings
- Policy DMHB 4: Conservation Areas

- Policy DMHB 11: Design of New Development
- Policy DMHB 14: Trees and Landscaping
- Policy DMHB 15: Planning for Safer Places
- Policy DMHB 16: Housing Standards
- Policy DMHB 17: Residential Density
- Policy DMHB 18: Private Outdoor Amenity Space
- Policy DMEI 1: Living Walls and Roofs and Onsite Vegetation
- Policy DMEI 2: Reducing Carbon Emissions
- Policy DMEI 7: Biodiversity Protection and Enhancement
- Policy DMEI 10: Water Management, Efficiency and Quality
- Policy DMEI 14: Air Quality
- Policy DMCI 7: Planning Obligations and Community Infrastructure Levy
- Policy DMT 1: Managing Transport Impacts
- Policy DMT 2: Highways Impacts
- Policy DMT 5: Pedestrians and Cyclists
- Policy DMT 6: Vehicle Parking

Hillingdon Local Plan Part 2: Site Allocations and Designations

4.19 The Hillingdon Local Plan Part 2: Site Allocations and Designations sets out sites for development to meet the Borough's needs to 2026, based on the level of growth and general locations set out in the Local Plan Part 1.

4.20 The Site is not identified as an allocated site.

The London Plan

4.21 The London Plan sets out an integrated economic, environmental, transport and social framework for the development of London over the next 20-25 years. The key policies from the London Plan which are considered to be relevant to the proposal include:

- Policy GG2: Making the best use of land
- Policy GG4: Delivering the homes Londoners need
- Policy GG6: Increasing efficiency and resilience
- Policy SD6: Town centres and high streets
- Policy D3: Optimising site capacity through the design-led approach
- Policy D4: Delivering good design
- Policy D5: Inclusive design
- Policy D6: Housing quality and standards
- Policy D7: Accessible housing
- Policy D11: Safety, security and resilience to emergency
- Policy D12: Fire safety
- Policy D13: Agent of change
- Policy D14: Noise
- Policy H1: Increasing housing supply
- Policy H2: Small sites
- Policy H10: Housing size mix
- Policy HC1: Heritage conservation and growth

- Policy G5: Urban greening
- Policy SI1: Improving air quality
- Policy SI4: Managing heat risk
- Policy SI12: Flood risk management
- Policy SI13: Sustainable drainage
- Policy T1: Strategic approach to transport
- Policy T4: Assessing and mitigating transport impacts
- Policy T5: Cycling
- Policy T6: Car parking
- Policy T6.1: Residential parking
- Policy T7: Deliveries, servicing and construction
- Policy DF1: Delivery of the Plan and Planning Obligations

Supplementary Planning Documents

4.22 Supplementary Planning Documents (SPDs) provide detailed advice to support the delivery of the local development plan. SPDs relevant to the proposed development include the following:

- Planning Obligations SPD (July 2014); and
- Hillingdon's Sustainable Community Strategy.

4. Planning Considerations

5.1 In this section, we assess the revised development proposal against relevant policies identified in the local development framework above, in light of the revised scheme at the Site that responds to the previous refusal reasons, as discussed in Section 2. The key planning considerations that are looked at in further detail within this chapter, comprise the following:

- Principle of Development;
- Residential Unit Mix;
- Design and Heritage;
- Residential Amenity;
- Sustainability and Air Quality Management;
- Transport and Highways;
- Servicing, Refuse and Recycling;
- Contamination; and
- Biodiversity Net Gain (BNG).

Principle of Development

Residential

5.2 Planning policies at national and local levels seek to ensure that developments make the most effective use of land, consistent with guidance in the National Planning Policy Framework (NPPF, 2023). **Paragraph 60** of the NPPF aims to significantly boost the supply of homes, and **Paragraph 124** expands on this, requiring Local Planning Authorities (LPAs) to give substantial weight to the value of using suitable brownfield land within settlements for homes, including making the most of opportunities to use the airspace above existing residential and commercial premises. Similarly, **Policy H1** of the London Plan seeks to optimise the potential for housing delivery on all suitable and available brownfield sites, and **Policy H2** provides that Boroughs should pro-actively support well-designed new homes on small sites. Further to this, **Policy GG2** and **Policy D3** seeks to ensure development makes the best use of land by following a sustainable and design-led approach that optimises the capacity of sites. **Policy GG4** of the London Plan also seeks to ensure that more homes are delivered.

5.3 The Site is situated within the Ruislip 'Town Centre', with a PTAL rating of 4. Ruislip Underground Station is a four-minute walk to the south and bus services along the High Street provide easy access to Uxbridge, Heathrow Airport and West Drayton. The proposal for six additional residential units aligns with the purpose of the Town Centre as we are using floorspace which is surplus to the requirements of the ground floor use, and will contribute to meeting the strategic dwelling requirement in line with **Policy H1** of the Local Plan Part 1.

5.4 The proposal to provide six additional residential units on a small brownfield site will make a meaningful contribution towards the LB Hillingdon strategic housing targets in a sustainable location and should therefore be favourably considered.

5.5 Being within Ruislip Town Centre, the Site presents an exceptional opportunity for residential growth as it has excellent accessibility to local amenities and public infrastructure, which will cater for everyday shopping needs, community services and recreation grounds. Residential uses on upper floors are encouraged within local centres as this provides opportunities for sustainable living.

5.6 The proposal implements a design-led approach which carefully considers the design and form of the existing building as well as the character of the streetscape and Conservation Area. In line with **Policy GG2** and **D3** of the London Plan, the proposal optimises the capacity of the Site and makes the best use of unused land in a sustainable and sensitive manner.

5.7 As such, it is evident that there is a wealth of policy support for the principle of residential development in this location, insofar as it would add to Hillingdon and Ruislip's housing stock, actively contribute towards borough housing targets, and support the vitality and viability of Ruislip Town Centre by retaining the existing commercial unit at ground floor level.

Employment Site

5.8 **Policy DME 2** of the Local Plan Part 2 protects employment sites outside designated employment areas. Specifically, proposals which involve the loss of employment will be permitted if at least one of the following apply:

1. The existing use negatively impacts on local amenity, through disturbance to neighbours, visual intrusion or has an adverse impact on the character of the area; or
2. The site is unsuitable for employment reuse or development because of its size, shape, location, or unsuitability of access; or
3. Sufficient evidence has been provided to demonstrate there is no realistic prospect of land being reused for employment purposes; or
4. The new use will not adversely affect the functioning of any adjoining employment land; or
5. The proposed use relates to a specific land use allocation or designation identified elsewhere in the plan.

5.9 The adopted Development Plan was written with the previous Use Class Order in mind. Whilst the Use Class Order has now been amended and the building's lawful use is Use Class E, the building should still be considered as a retail unit (formerly Use Class A1).

5.10 Despite the Site having a ground floor commercial use, the development proposals utilise floorspace, which is surplus to the requirements of the ground floor use. As such, the proposal is not in conflict with any of the criteria of **Policy DME 2**.

Residential Unit Mix

5.11 **Policy H10** of the London Plan outlines that schemes should generally consist of a range of unit sizes, and notes that well-designed one- and two-bedroom units in suitable locations which are closer to town centres or public transport have the ability to free up existing family homes. Further to this, **Policy DMH2** of the Local Plan Part 2 requires the provision of a mix of housing units of different sizes to reflect the Council's latest information on housing needs. The Council's current information on housing need indicates a borough-wide requirement for larger affordable and private market units, particularly three-bedroom properties.

5.12 In line with the policy objectives outlined above, the scheme proposes a tenure and unit breakdown as outlined as follows:

- 3 x 2-bed, 3 person unit (50%)
- 3 x 2-bed, 4 person unit (50%)

5.13 The Site is located within a Town Centre and is within walking distance of services and infrastructure including multiple modes of public transport, that will meet the everyday needs of residents. As previously mentioned, the

Site also has a PTAL rating of 4, which is classified as being of good accessibility and which the London Plan outlines is appropriate for incremental intensification.

- 5.14 It is therefore considered that the Site is appropriately located, and the proposed provision of two-bedroom units is deemed acceptable given the town centre location of the Site.

Design and Heritage

- 5.15 **Policy D3** of the London Plan states that development must make the best use of the land by following a design-led approach that optimises the capacity of sites. **Policy D4** supports this by stipulating that the design of development proposals must be thoroughly scrutinised by the LPA throughout the planning process to ensure high quality design.
- 5.16 The NPPF addresses design of new developments at **Paragraphs 131 and 139**, and encourages the creation of high quality, beautiful and sustainable buildings that demonstrates outstanding or innovative design while fitting in with the overall form and layout of their surroundings.
- 5.17 Similarly, **Policy BE1** of the Hillingdon Local Plan Part 1 requires that all new development improves and maintains the quality of the built environment in order to create successful and sustainable neighbourhoods. In order to achieve this, the Policy provides that new developments should enhance the area's local distinctiveness and contribute to community cohesion, as well as fit in with the context of Hillingdon's buildings and townscapes.
- 5.18 Further to this, **Policy DMHB11** of the Local Plan Part 2 requires that all development is designed to the highest standards and incorporates principles of good design, while ensuring the amenity of adjoining properties and open space is not adversely impacted.
- 5.19 The design of the proposal has been carefully considered with regard to the Site's context, to ensure it contributes to street beautification and is appropriate within its neighbourhood character context. The proposed building alterations are of high quality providing an additional six dwellings and simultaneously improving the street scene. As only façade works are proposed to the existing building, there will be no additional visual impact from the street. As such, the proposal optimises the capacity of the Site in line with **Policy D3** of the London Plan.
- 5.20 **Policy D6** of the London Plan (2021) requires housing development to maximise the provision of dual aspect dwellings and normally avoid the provision of single aspect dwellings. All proposed dwellings will be dual aspect with Flats 4 and 7 will being triple aspect.
- 5.21 **Policy DMHB4** of the Local Plan Part 2 sets out that the Council expects new development within Conservation Areas (including alterations and extensions to existing buildings) to preserve or enhance the character or appearance of the area. At present, the buildings upper-floor uses are not utilised, and these proposals represent an opportunity to utilise the space, whilst enhancing the Site's appearance within the conservation area. The proposed development is of high-quality design and will restore the tired "false" façade, incorporating it into the development. Materials have been chosen to reflect the predominant character of the Ruislip Village Conservation Area.
- 5.22 The Ruislip Village Conservation Area Appraisal (July 2010) notes at paragraph 6.21 that the areas to the rear of the shops are "of concern" with the rear elevations often being unattractive. As such, this proposal represents an opportunity to enhance the materiality of the building when viewed from the rear through sympathetic façade improvements to the existing structure.

- 5.23 In addition, the Conservation Area Appraisal notes the importance of the façades to the local streetscape and as previously noted, this will be retained and restored which weighs in favour of the proposal.
- 5.24 It is recognised that the alleyway to the north suffers from poor lighting and there is minimal natural surveillance, making it an undesirable route for pedestrians at present. The proposals will introduce residential properties in this location, with windows overlooking the alleyway, which will increase natural surveillance. It is important to note that where flats are located along High Street, their access is typically to the rear of the buildings, and often do not benefit from improved lighting to make access safer. To this effect, the development proposals are considered to make a positive contribution to public safety around the site.
- 5.25 In line with **Policy BE1** of Hillingdon Local Plan Part 1, and **Policies BMHB4** and **DMHB11** of Hillingdon Local Plan Part 2, as discussed above, the proposed design will provide an overall improvement to the built environment and streetscape character along High Street, enhancing the street harmony and improving local distinctiveness thorough improvements to the currently ‘false’ façade. The materials, as detailed in the Design and Access Statement, submitted in support of this application have sought to be sympathetic to locally used materials, and the additional windows to the ‘false’ façade replicate those already there.
- 5.26 Please refer to the submitted Design and Heritage statement for further information on the design details and proposed materials. In addition, the proposed design is respectful of the Site’s context within the Ruislip Village Conservation Area.

Residential Amenity

- 5.27 London Plan **Policy D6** states that housing development should provide adequately sized rooms in line with the nationally described minimum internal space standards, with comfortable and functional layouts which are fit for purpose. It states that development should maximise the provision of dual aspect dwellings and avoid single aspect unless it can be demonstrated to have adequate ventilation, daylight and privacy.
- 5.28 The above is supported by **Policy DMHB16** of the Local Plan Part 2, which seeks to ensure all housing development has an adequate provision of internal space in order to provide an appropriate living environment. This includes meeting the national space standards for minimum floorspace. Further to this, **Policy DMHB18** requires that all new residential development provides good quality and useable private outdoor amenity space which should be provided in accordance with the standards.
- 5.29 **Policy DMHB 11** of the Local Plan Part 2 requires that development proposals should not adversely impact the amenity, daylight and sunlight of adjacent properties and open spaces. Development is also required to ensure that the design safeguards the satisfactory re-development of any adjoining sites which have development potential.
- 5.30 The design of the proposals has carefully considered the potential impacts on neighbouring amenity, particularly in relation to the existing properties at 8 and 10 Poplars Close, 12 and 14 Poplars Close and the residential properties on the upper floors of the adjacent buildings. The design has carefully considered the positioning of windows to avoid overlooking to the private neighbouring amenity space, and where windows could not be positioned differently, privacy screening is proposed to ensure daylight can enter the dwellings, without comprising the privacy of the neighbouring dwellings.
- 5.31 In respect of 8 and 10 Poplars Close, concerns had been raised about the views into the gardens of these properties. A large tree is present in the garden of 8 Poplars Close, which will provide substantial screening from Flat 1, however further screening has been provided in Bedroom 1 up to 1.7m from floor level. No screening has been proposed for the Living & Dining Room Window in Flat 1, as the views to 8 Poplars Close from that window are very

oblique and impact is considered to be minimal. The Living & Dining Room window for Flat 4, on the second floor is positioned the same as below in Flat 1. As such, the view to 8 Poplars Close from it is considered to be very oblique, with minimal impact.

5.32 Considering the views to 12 and 14 Poplars Close, there will only be impact as a consequence of the development to the front of the properties and none to the rear as the elevation that faces the rear has the staircore and lift shaft.

5.33 The windows facing towards 12 and 14 Poplars Close from Flat 2 on the first floor will remain in the existing locations. The window in Bedroom 2 will be obscured up to 1.7m above floor level, and the window in the Bathroom will remain obscured, as existing. The positioning of the windows in respect of the massing of 12 Poplars Close will mean there will be only very skewed views to the front of the dwelling. In Flat 4, on the second floor, the windows in Bedroom 1 and Bedroom 2 will be obscured up to 1.7m above floor level, and the window in the Bathroom will be obscured. From Flat 4, the views to the front amenity areas of 12 and 14 Poplars Close will be further obscured by the massing of these dwellings, reducing negative impacts. To this effect, it has been demonstrated above that there are no detrimental concerns with overlooking that would result as part of the development, and to this effect the development is considered acceptable in terms of overlooking.

5.34 Due to the constrained nature of the Site and the layout of the existing building, private amenity space has been provided in line with the Hillingdon Local Plan standards where feasible. As such, Flat 2 is provided with 25sqm of amenity space, and Flat 3 with 11sqm.

5.35 The Site is close to a number of parks and communal amenity spaces, as set out below:

Name	Distance from Site
Church Field Gardens Playground	3-minute walk north
Church Field Gardens and Tennis Courts	6-minute walk north
Ruislip Bowls Club	6-minute walk north
Celandine Rout along the River Pinn	11-minute walk north
Pinn Meadows / Kings College Athletics Track and Playing Fields	15-minute walk north
Eastcote Hockey Club	15-minute walk north
Park Wood and Ruislip Lido	25-30-minute walk north
Hill Lane Playground	15-minute walk west
Blenheim Crescent Children's Playground	15-minute walk southwest
Ruislip Rugby Football Club	8-minute walk south
Wealdstone Football Club	11-minute walk south
New Pond Playing Fields	21-minute walk south
Shenley Park	13-minute walk southeast
Pembroke Gardens	9-minute walk east
Park Way Park	14-minute walk east
Warrender Park and Highgrove Woods	20-minute walk east

5.36 This approach has previously been considered acceptable by the Council at Chelmsine Court (LPA ref. 890/APP/2020/763). Here, the planning officers noted that the proposals provided less amenity space than required under **Policy DMHB18**, however there was an area of public open space 115m to the south and additional communal amenity space in the local area. As such it was considered that it would be unreasonable to refuse the

proposals on this basis. As evidenced through the table above, there is a wealth of public open space within walking distance of the Site. Therefore, the level of private amenity space provision is considered to be appropriate in this location and to the scale of development.

Daylight and Sunlight

- 5.37 **Policy D6** of the London Plan stipulates that development should provide sufficient daylight and sunlight to new and surrounding housing that is appropriate for its context, whilst avoiding overshadowing and maximising the use of outside amenity space.
- 5.38 A Daylight and Sunlight Note, prepared by Point 2 is submitted in support of this application which assesses the impact of the scheme of both existing and future residents. It demonstrates that all surrounding properties meet the recommendation in respect of both daylight and sunlight reductions.
- 5.39 The Daylight and Sunlight Note also demonstrates that the scheme will achieve a good level of daylight and sunlight and will provide adequate natural light for future residents, with all rooms meeting target daylight illuminance (lux.) levels recommended for their room use within BRE Guidelines. Furthermore, all proposed flats will meet the recommendations for sunlight set out within the BRE Guidelines.
- 5.40 Overshadowing to the gardens of 8, 10, 12 and 14 is also considered to be unaffected by the proposal due to there being no additional massing proposed over and above what is currently at the site.

Sustainability and Air Quality Management

- 5.41 Point 10 of **Policy BE1** (Local Plan Part 1) sets out that all new developments should maximise the opportunities for new homes to contribute to tackling and adapting to climate change and reducing emissions of local air quality pollutants.
- 5.42 With specific regard to air quality, **Paragraph 192** of the NPPF (2023) states that planning decisions should take into account the presence of Air Quality Management Areas and Clean Air Zones, and the cumulative impacts from individual sites in local areas. Building on this, London Plan **Policy SI1** provides that development proposals should not lead to further deterioration of existing poor air quality, create any new areas that exceed air quality limits, or create unacceptable risk of high levels of exposure to poor air quality.
- 5.43 **Policy EM8** of the Local Plan Part 1 outlines that ‘all development should not cause deterioration in the local air quality levels and should ensure the protection of both existing and new sensitive receptors’. Further, **Policy DME14** (Local Plan Part 2) provides that development proposals should demonstrate appropriate reductions in emissions to sustain compliance with and contribute towards meeting EU limit values and national air quality objectives for pollutants.
- 5.44 The proposed development will contribute to sustainable housing growth and reducing emissions of local air quality pollutants. The Site is in an excellent location being within a Town Centre and within close walking distance of local shops and public infrastructure including multiple modes of public transport. The proposal, being for car-free residential units, will promote the use of sustainable transport modes which will result in a reduction of car dependence within the town centre and broader neighbourhood, and therefore contribute to improved air quality conditions. This aligns with action no. 16 and no. 25 of the Air Quality Action Plan 2019-2024. Additionally, the proposal makes efficient use of a currently underutilised site by repurposing part of an existing building and utilising its available airspace to accommodate much needed housing growth.

- 5.45 The materiality of the proposed building alterations have been carefully selected to ensure a sustainable development outcome. The existing fabric will be thermally lined to improve the existing conditions. In addition to contributing to a sustainable outcome, the implemented measures will ensure there is a reduced risk of exposure to poor air quality from the external environment (ie. the air quality along High Street).
- 5.46 As noted in the Outline Demolition and Construction Management Statement (DCMS) prepared by Pulsar, and submitted in support of this application, emissions resulting from construction will be minimised through encouraging staff to use sustainable transport to access the site where possible and mitigating unnecessary deliveries to the site, with the lowering of emissions being a key objective. This aligns with action no. 2 of the Air Quality Action Plan 2019-2024.
- 5.47 In line with the relevant planning policy outlined above, it is clear that the proposed development will provide an excellent contribution to tackling and adapting to climate change and reducing emissions of local air quality pollutants, as well as protecting future occupants from existing pollutants.

Transport and Highways

- 5.48 **Policy T1** of the Local Plan Part 1 seeks to reduce the impact of development on the transport network by encouraging access by sustainable modes. Similarly, **Policy DMT1** of the Local Plan Part 2 requires that development proposals meet the transport needs of the development and address its transport impacts in a sustainable manner.
- 5.49 **Policy DMT2** requires development proposals to provide safe, secure and convenient access and facilities for cyclists and pedestrians. Further to this, **Policy DMT5** requires that safe, direct and inclusive access for pedestrians and cyclists is provided on the Site.
- 5.50 With regard to vehicle parking, **Policy DMT6** requires that development proposals comply with Council's adopted parking standards. The parking standards require a maximum provision of 1-1.5 car parking spaces and 1 bicycle parking space for each one- or two-bedroom unit. They also require that bicycle parking must be located in a safe, secure and accessible location.
- 5.51 In comparison, the London Plan car parking standards outlined at **Policy T6.1** require maximum provision of 0.5-0.75 spaces for units with 1 or 2 bedrooms which are in an outer London PTAL 4 rated area. Further, bicycle parking standards outlined at **Policy T5** require provision of 2 spaces per dwelling.
- 5.52 The proposal seeks approval for a car-free development, which is appropriate in its Town Centre (PTAL 4) context with the Site having excellent access to public transport, walking and cycling facilities. To support sustainable transport, the proposal provides 12 bicycle parking spaces within a secure ground floor storage area.
- 5.53 We note that previously issued pre-application advice issued by Council provides support for a car-free development as is the case for the existing unit.

Servicing, Refuse and Recycling

- 5.54 **Policy EM11** of the Local Plan Part 1 requires all new development to address waste management at all stages. Further to this, **Policy DMHB11** of the Local Plan Part 2 seeks to ensure development proposals make sufficient provision for well-designed internal and external storage space for general, recycling and organic waste, with suitable access for collection.

- 5.55 External storage space for general, recycling and organic waste is proposed to be provided to the rear of the Site, and adequate internal space has been provided in each dwelling for waste bins. As demonstrated in the Outline Delivery and Servicing Plan prepared by Pulsar Transport Planning and submitted in support of this application, it is proposed that refuse collections for the development will be combined with existing collections that already take place adjacent to the gate on Princess Lane. It is understood that two existing weekly refuse collections (one for recycling waste and one for general waste) are undertaken from this bin storage area.
- 5.56 The site management team of the proposed development will move a total of two general waste bins and two recycling waste bins on their respective collection days from the proposed site storage point on the southern side of the building to the collection point. This arrangement means that minimal pull distances are required, and most importantly the arrangements have already been deemed acceptable and are in use by the flats of 130 High Street, which accords with **Policy DMHB11** of Local Plan part 2.
- 5.57 Servicing for the proposed development is proposed to utilise the existing loading bay provided on High Street if available and deliveries will be walked to the residential lobby by using the existing public footpath to the north of the site. An alternative option to the loading bay is stopping on the kerbside of Poplars Close, as used for delivering and servicing by the residential units in the vicinity of the site on Poplars Close, and use the public footpath to the north of the site to access the residential lobby. Small mailboxes will be provided in the residential lobby to reduce dwell time of delivery vehicles, when delivering smaller items.

Contamination

- 5.58 As mentioned in the previously issued pre-application statement advice from the Council, the Site is located within an area that is identified as being potentially contaminated. Given that the works are predominantly focused on the roof level and conversion of the existing rear building, there is unlikely to be any significant concerns in respect of contamination.
- 5.59 However, it is likely that any landscaping works to the entrance, to make a more welcoming approach to the Site would require groundworks, and consideration needs to be given to potentially contaminated land. Soft landscaping is proposed at ground floor level, around the entrance to the secure cycle store. It is considered that given that the scale of these works is small, the provision of a Contamination Assessment can be secured via an appropriately worded condition.

Biodiversity Net Gain (BNG)

- 5.60 From 12 February 2024, under the Environment Act 2021, all planning applications for major developments in England were required to deliver at least 10% Biodiversity Net Gain ("BNG"). Following this, on 2 April 2024 10% BNG became mandatory for small sites. The regulations include a number of exemptions.
- 5.61 BNG is measured using Defra's biodiversity metric and all off-site and significant on-site habitats will need to be secured for at least 30 years from the completion of development.
- 5.62 The Site is sealed surface. Therefore, as there is less than 25sqm of non-priority habitat and less than 5m of non-priority linear habitat, the scheme benefits from the "de minimis" exemption. As such, a 10% BNG is not required to be demonstrated on the Site.
- 5.63 However, the development does propose soft landscaping at ground floor level, around the entrance to the secure cycle store and landscaping will also be provided at the first-floor communal area and within the private outdoor

amenity space proposed for flats 2 and 3. This makes a positive contribution to biodiversity, on a site which currently has no habitat value. This weighs favourably when considering the proposal.

5. Conclusion

- 6.1 This Planning Statement has been prepared by Nexus Planning on behalf of Golds Leisure Ltd. in support of a full planning application submitted for residential development at 122-124 High Street, Ruislip. The proposal comprises the following development:

“Change of use of part of the rear of the building and upper floors from Class E to C3 to create six residential dwellings alongside associated works.”

- 6.2 This development proposal represents a significantly modified scheme at the Site, positively responding to, and overcoming, the six refusal reasons of LPA ref. 1894/APP/2024/1734 through the removal of one storey and a reduction of three dwellings.
- 6.3 As we have demonstrated over the course of this Planning Statement, the proposal is in overall accordance with the Development Plan. The scheme would see the delivery, and net increase of six homes on the Site. The Site, which is well-located for most local services including employment, shopping areas, primary schools, public transport, GP surgeries, and outdoor and indoor leisure facilities, is considered to be in an excellent location for residential development, forming an appropriate, high-quality, and sustainable contribution to housing growth within Ruislip.
- 6.4 Through the development proposal, the Site will also maximise the sites use by converting the existing un-used areas of the building to the rear of the Site, as well as improving and enhancing the void roof-space along the frontage to the High Street.
- 6.5 The proposed development has been carefully designed by GIAD UK Architects to respond to the features of the Site and existing building fabric. The resulting layout and design respects the Ruislip Village Conservation Area, and does not impact views from High Street. Furthermore, the proposed development has carefully considered any potential overlooking to 8, 10, 12 and 14 Poplars Close, and where necessary, appropriate mitigation has been provided to ensure there is no impact to the privacy of existing residents.
- 6.6 The application is supported by various technical reports which demonstrate that local, regional and national policy, standards and guidance can be met. This proposal demonstrates that the works are consistent with all relevant planning policy and guidance.
- 6.7 Accordingly, we respectfully request that planning permission is granted for this application.

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