

# Rear and Upper Floors of 122-124 High Street, Ruislip

Planning Statement

ON BEHALF OF GOLDS LEISURE LTD.

March 2026

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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 (Commercial, Business and Service) to Class C3 (Dwelling-houses) in order to create six residential dwellings alongside associated works.*

1.2 This planning application is a resubmission of a scheme previously submitted to the LPA in November 2024 and refused in January 2025 (ref. 11894/APP/2024/3030). That application similarly sought *“Change of use of part of the rear of the building and upper floors from Class E to Class C3 to create six residential dwellings alongside associated works”* and was refused for three reasons, which are discussed in Section 3 of this Planning Statement.

1.3 The Applicant appealed the decision (Appeal ref. APP/R5510/W/25/3369766). The appeal was dismissed on 29 October 2025, with the Inspector identifying the main issue as whether the proposed development would provide satisfactory living conditions for the future occupiers of Flats 1 and 4, particularly in relation to outlook. This concern arose from the proposed use of obscure glazing up to 1.7m above finished floor level on windows in these flats.

1.4 During the appeal process, a separate earlier appeal for a larger scheme at the Site (Appeal ref. APP/R5510/W/25/3362220) was also dismissed. However, in light of the Inspector’s findings on that application, the LPA confirmed in their Statement of Case, issued to the Planning Inspectorate on 03 September 2025, that they no longer wished to pursue two of its three refusal reasons, nor two of the three matters within the remaining reason for refusal. As a result, the sole outstanding issue for the Inspector to consider in Appeal ref. 3369766 related to the adequacy of outlook for two of the proposed six flats.

1.5 As part of both of the appeal submissions, the Applicant provided a Views from Windows technical note prepared by Planning for Sustainability, together with revised floor plans. The technical note demonstrated that removing the proposed obscure glazing from five of the six affected windows would not give rise to harmful overlooking of neighbouring properties. The previous Inspector for Appeal ref. 3362220 accepted both the technical note and the revised plans.

1.6 Notwithstanding this earlier acceptance, the Inspector determining the latest appeal (ref. 3369766) stated that they could not *“...be certain whether the window arrangement and associated obscure glass considered by the previous Inspector would be similar to that before me...”* and subsequently dismissed the appeal.

1.7 A full overview of the previous applications and appeals at the Site is provided in Section 3 of this Planning Statement, and all relevant documents associated with those applications and appeals are included within the supporting documents titled ‘122-124 High Street, Ruislip - Application ref. 11894APP20241734 Appeal ref. APPR5510W253362220 Relevant Plans and Documents’ and ‘122-124 High Street, Ruislip - Application ref. 11894APP20243030 Appeal ref. APPR5510W253369766 Relevant Plans and Documents’, which accompany this submission.

1.8 The wider scheme remains unchanged from that refused under application ref. 11894/APP/2024/3030, except for the revised glazing arrangements for the two flats. These revisions are consistent with the proposals submitted in both appeals and have previously been accepted by the Inspector under the first appeal (ref. 3362220).

1.9 As the most recent Inspector's concern related solely to whether the window arrangements and associated obscure glazing matched those previously considered, and as confirmation of this has now been clearly demonstrated through this submission, we trust that there should be no remaining uncertainty regarding the proposals, and that the application can therefore be approved.

1.10 This Planning Statement demonstrates that the proposed development delivers the following key benefits:

- The provision of high-quality two-bedroom residential units in a sustainable town centre location, contributing to meeting the housing needs within the Borough;
- A high-quality, sustainable design that enhances the performance and longevity of the existing building fabric;
- The provision of secure cycle parking to promote sustainable modes of transport;
- The enhancement of the character and appearance of the Conservation Area through façade improvements to the existing building;
- An excellent standard of amenity for future occupants, including adequate access to sunlight and daylight, protection from external sources of air pollution, and sufficient internal living space;
- The provision of usable external amenity space; and
- Convenient and well-designed storage facilities for refuse and recycling.

1.11 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 Demolition & Construction Management Statement by Pulsar Transport Planning;
- Outline Delivery & Servicing Plan by Pulsar Transport Planning;
- Air Quality Analysis by Aether;
- Views from Windows Technical Note by Planning For Sustainability;
- The London Plan 2021 Policy D12A – Fire Safety Supporting Statement by GIAD UK Architects;
- Daylight and Sunlight Report by Point 2 Surveyors;
- Design and Heritage Statement by Marcus Beale Architects;
- Sound Insulation Assessment by Anglia Consulting;
- 122-124 High Street, Ruislip - Application ref. 11894APP20241734 Appeal ref. APPR5510W253362220 Relevant Plans and Documents; and
- 122-124 High Street, Ruislip - Application ref. 11894APP20243030 Appeal ref. APPR5510W253369766 Relevant Plans and Documents.

## Structure of this Planning Statement

1.12 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) (2024) and the Development Plan.

1.13 The remainder of this Statement is set out as follows:

- Section 2 describes the Site, and its surroundings;
- Section 3 sets out the Site's planning history;
- Section 3 summarises the proposed development;
- Section 4 summarises the key national and Development Plan policies relevant to the proposals; and

- Section 5 sets out the key considerations and explains why planning permission should be granted.

## 2. The Site and the 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 an ancillary storage area and office space by the previous tenant, Woolworths. However, since the current tenant has leased the site, this ancillary storage area and office space has 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 had been in a significant state of disrepair, resulting in the building not being watertight, meaning that it was rendered unsuitable for storage or indeed any other purpose. However, in March 2025 an extensive Schedule of Dilapidations was undertaken, to improve the structural integrity of the building, and making it watertight. 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. 126-130 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 Site 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 The upper floor of No.120, which was previously used for residential purposes under Use Class C3, has remained vacant for several years, and the rear windows and doors of the property are currently secured with metal plates to prevent trespassing.
- 2.9 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.
- 2.10 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.
- 2.11 No planted vegetation currently exists on the Site.
- 2.12 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.
- 2.13 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.
- 2.14 The Site lies within Flood Zone 1, indicating the lowest risk of flooding from fluvial sources.

### 3. Planning History at the Site

- 3.1 This section of the Planning Statement outlines the previous planning applications submitted for the Site and the subsequent appeals that have been determined by the Planning Inspectorate. To date, two applications have sought the change of use of the upper and rear floors from Class E to Class C3 residential dwellings. Both applications were refused for a range of reasons and were later also dismissed at appeal.
- 3.2 However, as set out below, the most recent appeal decision indicates that the substantive issues of concern have now been resolved. The Inspector's remaining reservations related only to ensuring that the submitted plans matched those previously assessed and accepted by an Inspector.
- 3.3 As noted in Section 1 of this Planning Statement, all relevant documents relating to the Sites planning history have been submitted in support of this planning application. Full details are provided in the documents titled 'XXX' and 'XXX'.

#### Application ref. 11894/APP/2024/1734

- 3.4 In July 2024, application ref. 11894/APP/2024/1734 was submitted to the LPA 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.
- 3.5 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 and outlook for Flats 1 and 4;
  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.
- 3.6 Prior to the submission of this application, pre-application advice was sought from the LPA 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.
- 3.7 This refusal was Appealed to the Planning Inspectorate in March 2025.

#### Appeal ref. APP/R5510/W/25/3362220

- 3.8 In support of the appeal, an updated Delivery and Servicing Plan prepared by Pulsar, and a London Plan 2021 Policy D12A Fire Safety Supporting Statement prepared by GIAD UK Architects, were submitted to address refusal reasons 4 and 5. These documents had already been approved by the LPA as part of the second application on the Site (ref. 11894/APP/2024/3030, discussed later in this section), and the Inspector accepted that their submission adequately overcame both refusal reasons.
- 3.9 A technical note prepared by Planning for Sustainability which addressed sense of enclosure and loss of privacy was also submitted, alongside revised First and Second Floor Plans and Proposed Elevations by GIAD UK Architects, which included amended window glazing proposals. These amended plans were provided in response to part of refusal reason 3 (relating

to the outlook for Flats 1 and 4). While these revisions had not previously been before the LPA, the Inspector concluded that the proposed glazing amendments fell outside the scope of the 'Wheatcroft Principles' and the judgement in Holborn, and was satisfied in accepting these minor amendments.

- 3.10 Accordingly, when determining the appeal, the Inspector assessed the amended glazing proposals, which provided obscure glazing solely to Bedroom 1 of Flat 1, in contrast to the original scheme as determined by the LPA that proposed obscure glazing to both bedrooms in both Flats 1 and 4. The Inspector, in decision notice ref. 3362220, concluded that:

*"Flats 1 and 4 have partial aspect to the north, toward 120a High Street. The outlook from the rooms facing this direction is unlikely to offer a particularly inspiring view; however, there would be a reasonable outlook with opportunity for natural ventilation. Although these windows face north, these flats are set on a corner, therefore other outlooks would be available to the occupants. Accordingly, I find that these flats would afford the future occupants an acceptable standard of living conditions."*

- 3.11 For the remaining element of refusal reason 3, relating to private amenity space, the Inspector considered the proposed communal amenity area to be *"both unusual and welcome"* in this town centre location. Although the provision (176 sqm) fell below the policy requirement (215 sqm), the Inspector concluded that the opportunity to provide such a sizeable space in this context was positive. Flats 2 and 3 were proposed with small private terraces which also fell below policy standards; however, the Inspector accepted that while the screens to the terraces would somewhat limit outlook, they would also enhance privacy from both the communal area and the main building entrance. Balancing these elements, the Inspector found that the proposals would deliver an acceptable standard of living conditions overall.

- 3.12 Refusal reason 2, relating to overbearing impacts to adjoining residents, was also resolved through the appeal. The Inspector concluded that *"the proposal would not result in an intrusive or overbearing effect when viewed from neighbouring properties. Moreover, windows in the building would not result in a material increase in overlooking."* In reaching this view, the Inspector had regard to the existing relationship between the building and its surroundings, noting that there are no direct views from 12 and 14 Poplars Close, and only oblique, and largely unchanged, views from 8 and 10 Poplars Close.

- 3.13 However, the appeal was ultimately dismissed in August 2025. The Inspector concluded that the proposal would neither preserve nor enhance the character or appearance of the conservation area, and that the increased height arising from the third-storey extension would result in less than substantial harm, aligning with the LPA's first refusal reason. In addition, as no Section 106 agreement securing the required air quality contribution had been provided, the Inspector found that the development failed to mitigate its impact on air quality, consistent with the LPA's sixth refusal reason.

### Application ref. 11894/APP/2024/3030

- 3.14 In November 2024, application ref. 11894/APP/2024/3030 was submitted to the LPA seeking the "Change of use of part of the rear of the building and upper floors from Class E (Commercial, Business and Service) to Class C3 (Dwelling-houses) to create six residential dwellings, together with associated works" at the Site.

- 3.15 This application did not include the previously proposed third-floor extension. Instead, it sought only the change of use of the existing rear and upper floors to residential use, along with improvements to the external amenity space. Flats 1 and 4 were proposed with obscure glazing in all habitable rooms, which was proposed in response to the LPA's initial concerns regarding overlooking.

- 3.16 The application was submitted following the refusal of the initial application, but prior to submitting the appeal against that refusal to the Planning Inspectorate.

3.17 The LPA refused the application in January 2025 for three reasons:

1. Loss of privacy to neighbouring residents;
2. Inadequate private amenity space and outlook for Flats 1 and 4; and
3. No Section 106 planning obligation (in respect of air quality) was secured.

3.18 It was positive that three of the original six refusal reasons had been resolved through this revised application. However, several matters remained in dispute, including the potential loss of privacy to neighbouring residents arising from the introduction of a residential use within the previously vacant building and from the proposed use of the large roof area as private amenity space. Concerns also persisted regarding the quality of the private amenity space and the outlook for Flats 1 and 4. The final refusal reason, relating to the absence of a Section 106 planning obligation for air quality, would have been addressed had the LPA been minded to approve the application.

3.19 The Applicant submitted an appeal against this refusal to the Planning Inspectorate in July 2025.

#### Appeal ref. APP/R5510/W/25/3369766

3.20 When preparing this appeal, the primary focus was to address the LPA's concerns relating to loss of privacy for neighbouring residents in response to Refusal Reason 1. Through this process, it was confirmed that a reduction in the extent of proposed obscure glazing was appropriate and effectively responded to part of Refusal Reason 2. This conclusion was informed by the Technical Note prepared by Planning for Sustainability, submitted to the Planning Inspectorate, which assessed the degree of potential overlooking and loss of privacy from a number of existing and proposed windows at the Site.

3.21 The remaining element of Refusal Reason 2, concerning the quality of the proposed private amenity space, was considered largely subjective and a matter for the Inspector's planning judgement, taking into account the site's context and the wider benefits of the scheme.

3.22 In relation to potential overlooking from the north elevation towards Nos. 8 and 10 Poplars Close, the Technical Note concluded that only a limited view of the side elevation of No. 8 is possible from Bedroom 1 of Flat 1, and only from positions very close to the window. No significant views are available from the majority of the room. Views from the Living and Dining Rooms of Flats 1 and 4 towards Nos. 8 and 10 were found to be minimal, and overall, the Technical Note concluded that the privacy impacts arising from these windows would be negligible.

3.23 With respect to Nos. 12 and 14 Poplars Close, the Technical Note found that potential overlooking from the three proposed rear elevation windows would be minimal, resulting in a negligible impact on privacy. It also observed that these properties are not currently free from overlooking as the existing stairwell window on the Appeal Site already overlooks their rear gardens, and the first- and second-floor windows of Nos. 8 and 10 directly overlook the front elevations of Nos. 12 and 14.

3.24 On the basis of these findings, the Applicant submitted revised First and Second Floor Plans and Proposed Elevations by GIAD UK Architects as part of the appeal, incorporating the amended window glazing proposals to include one window that is obscurely glazed up to 1.7m from finished floor level in Bedroom 1 Flat 1.

3.25 At the time this appeal was submitted, the Planning Inspectorate had not yet issued a decision on the first appeal, and therefore the findings from that appeal could not inform the case for this appeal. However, the first appeal decision was released before the LPA submitted its Statement of Case for Appeal ref. 3369766. In light of the Inspector's conclusions in Appeal ref. 25/3362220, as discussed above, the Applicant wrote to both the Planning Inspectorate and the LPA requesting

that the LPA withdraw its reasons for refusal, as each had been resolved through the findings of the first appeal. A signed Unilateral Undertaking was also provided with this correspondence to address Refusal Reason 3.

- 3.26 In their September 2025 Statement of Case, the LPA confirmed that they would no longer be pursuing Refusal Reasons 1 or 3, nor two of the three elements of Refusal Reason 2. As a result, the only remaining matter for the Inspector to consider in Appeal ref. 3369766 was the adequacy of outlook for Flats 1 and 4. The Applicant was confident this matter would not be found unacceptable, given the previous Inspector's acceptance of the additional evidence and their conclusions that *"these flats would afford the future occupants an acceptable standard of living conditions"* and that *"windows in the building would not result in a material increase in overlooking."*
- 3.27 Nevertheless, Appeal ref. 3369766 was dismissed on 29 October 2025. In determining the appeal, the Inspector stated that they could not *"be certain whether the window arrangement and associated obscure glass considered by the previous Inspector would be similar to that before me"* which it was and subsequently dismissed the appeal.
- 3.28 Ultimately, the Inspector was unwilling to accept the revised glazing scheme through the appeal process to make their own assessment, noting that it is important that schemes considered at appeal are essentially the same as that assessed by the LPA and by interested parties at application stage. In assessing whether the amended scheme could be accepted, the Inspector had regard to the Wheatcroft principles and the judgment in Holborn.
- 3.29 Although the Inspector had acknowledged that the proposed amendments would not materially alter the overall design of the development, contrary to the views, and acceptance, of the previous Inspector, they considered that the changes could give rise to a different pattern of views from the windows. As a result, the Inspector concluded that the amendments were substantive and that it could not be assured that all interested parties had been given an adequate opportunity to comment on them or on the associated supporting information.
- 3.30 During the appeal, an interested party also raised concerns regarding the ownership certificates submitted with the application, asserting that they did not accurately reflect the Site's ownership. The Inspector confirmed, however, that this was a procedural matter of limited consequence to the determination of the appeal. In any event, this issue has now been resolved.
- 3.31 In light of this, although the appeal was dismissed, it appears that, had the Inspector been satisfied that the glazing proposals before them were consistent with those accepted by the previous Inspector, a different outcome may have been possible.
- 3.32 Accordingly, this planning application, to which this Planning Statement relates, is submitted to the LPA having regard to both Inspectors' decisions, enabling the revised plans and supporting technical evidence to be formally consulted upon and reviewed by all interested parties through the LPA's standard consultation procedures.

### Other Relevant Planning Applications Within Ruislip Village Conservation Area

- 3.33 There is no further planning history relating to the site. The following applications outlined in Figure 2.46.1 below, are in respect of relevant applications within Ruislip Village Conservation Area:

Site	LPA ref.	Description	Decision	Relevance to the Proposal
47-49 High Street	46454/APP/2016/427	First and second floor rear extension to create 4 x 2-bed and 1 x 1-bed self contained flats with associated cycle spaces.	Refused February 2017. Appeal allowed December 2017.	The application has utilised an unused area above a retail unit along High Street to provide dwellings, as well as changing the use of Class E office space to accommodate the proposals.
63 High Street	3317/APP/2024/2048	Change of use of from Office/Storage (Class E) and internal alterations to provide 1 x studio, 1 x 1 bed and 1 x 2 bed residential units (Class C3) (revised description 14.08.24)	Approved October 2024	The application was approved, despite no private amenity space being approved as part of the development.
69 High Street	1983/APP/2022/2930	Extension at the front of the property above the shopfront to provide 1 x self-contained flat (Use Class C3) at second floor level and erection of a new two storey building at the rear of the property to provide 1 x self-contained flat (Use Class C3) above an open loading bay with associated bin and cycle store.	Refused November 2022. Appeal allowed 1 August 2023.	The application repurposed an unused first-floor area at the rear of the site to create new dwellings, and added a single-storey extension facing the High Street. Most windows overlook rooftops, while those in the rear block face only the service road.
178-182 High Street	28388/APP/2016/3332 <i>Appeal ref.</i> APP/R5510/W/17/3173 139	First and second floor rear extension, conversion of roofspace to habitable use to include 3 x front dormers, 4 x side dormers and change of use from Use Class A1 (Retail) to Use Class C3 (Residential) to create 6 x 2-bed and 3 x 1-bed self-contained flats, balustrade to rear to communal terrace and alteration to bin/cycle storage.	Refused January 2017 Appeal allowed July 2017	Change of use from A1 to C3, to accommodate dwellings at the existing premise, as well as utilising an unused first floor level to the rear of the site to provide dwellings within a first and second floor extension. The application also dealt with overlooking commercial rooftops and the placement of dormer windows.
	28388/APP/2017/1447	First and second floor rear extension, extension and conversion of roofspace to habitable use to include 3 front dormers, 4 side dormers and change of use from retail (Use Class A1) to create 6 x 2-bed and 3 x 1-bed self-contained flats, balustrade to rear to form communal terrace and alteration to bin/cycle storage (Use Class C3).	Approved October 2017.	

3.36 These examples demonstrate acceptance by both the LPA and the Planning Inspectorate of proposals involving the re-use of underutilised upper floors and rear areas along the High Street for residential development, supporting the case that the Appeal Proposal is in keeping with precedents in the area.

## 4. Development Proposals

- 4.1 This section provides an overview of the proposals. Full details of the proposals are contained within the drawings and technical supporting information which accompany this planning application (set out in Paragraph 1.11 above).
- 4.2 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.
- 4.3 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

- 4.4 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.
- 4.5 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 160m<sup>2</sup> 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.
- 4.6 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.
- 4.7 The window serving Bedroom 1 of Flat 1 is pre-existing at the Site, however is proposed to be obscure glazed up to 1.7m above finished floor level. This approach has previously been accepted by the Planning Inspectorate in the determination of Appeal ref. 3362220, as discussed in Section 3 of this Planning Statement. It is intended that the obscure glazing will mitigate the limited view of the side elevation of No. 8 that was identified, as confirmed in the Views from Windows Technical Note prepared by Planning for Sustainability (11 December 2025), as being possible from this room, but only from positions very close to the window.
- 4.8 As the bedroom will not form the primary amenity space of the flat, which would be achieved in the living and dining room, the use of obscure glazing to this window is not considered to have a detrimental impact on internal amenity, nor would it result in unsatisfactory living conditions for future occupants.
- 4.9 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

- 4.10 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.
- 4.11 Given the highly sustainable location, the development is proposed to be car-free.

## Landscaping

- 4.12 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.

## 5. Planning Policy

5.1 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

5.2 The National Planning Policy Framework (NPPF) (2024) 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.

5.3 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"*.

5.4 Paragraph 90 of the NPPF sets out that planning policies and decisions should support the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management and adaptation. Further, paragraph 90(f) seeks to ensure that planning policies recognise that residential development plays an important role in ensuring the vitality of centres.

5.5 The Site is an urban brownfield site as it is located within a town centre, so in this respect, Chapter 11 of the NPPF (2024) *'Making effective use of land'* needs to be considered. According to paragraph 125 of the NPPF, of relevance, planning policies and decisions should:

- c. *"give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, proposals for which should be approved unless substantial harm would be caused, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land;*
- d. *promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively (for example converting space above shops, and building on or above service yards, car parks, lock-ups and railway infrastructure); and*
- e. *support opportunities to use the airspace above existing residential and commercial premises for new homes. In particular, they should allow upward extensions – including mansard roofs – where the development would be consistent with the prevailing form of neighbouring properties and the overall street scene, is well-designed (including complying with any local design policies and standards), and can maintain safe access and egress for occupiers. A condition of simultaneous development should not be imposed on an application for multiple upward extensions unless there is an exceptional justification."*

5.6 Paragraph 129 seeks for planning policies and decisions to support development that makes efficient use of land, taking into account:

- a. *"the identified need for different types of housing and other forms of development, and the availability of land suitable for accommodating it;*
- b. *local market conditions and viability;*
- c. *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;*

- d. the desirability of maintaining an area's prevailing character and setting (including residential gardens), or of promoting regeneration and change; and*
- e. the importance of securing well-designed, attractive and healthy places"*

5.7 Paragraph 131 encourages the creation of high quality, beautiful and sustainable buildings. Paragraph 135 further states that planning decisions should ensure that developments:

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

5.8 Paragraph 219 requires Local Planning Authorities to look for new development within Conservation Areas, and within the setting of heritage assets, to enhance or better reveal their significance. Paragraph 219 further states that proposals which preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably.

### **Draft National Planning Policy Framework (December 2025)**

5.9 On 16 December 2025, the Government published a consultation on proposed updates to the NPPF until 10 March 2026, which will amount to the most significant update to the NPPF since its introduction in 2012.

5.10 The draft consultation document summarises the 12 most pertinent changes that are seen, and of relevance to this application are the following changes:

- A permanent presumption in favour of suitably located development: establishes a rules-based approach to make development on suitable urban land acceptable by default, with a revised presumption in favour of sustainable development.
- Building homes around stations: Supports housing and mixed-use development around train stations, with minimum density requirements of 40 dwellings per hectare for stations within settlements and 50 dwellings per hectare for well-connected stations outside settlements.
- Driving urban and suburban densification: encourages higher density development in urban and suburban areas through redevelopment of low-density plots, upward extensions, and infill development, with clear expectations for minimum densities in well-connected locations.

- Supporting small and medium sites: intends to streamline the development on sites of up to 49 homes to increase the provision of SME-led housing delivery.

5.11 Although this consultation draft of the NPPF has not yet been adopted, it remains a material consideration in the determination of this planning application. Notwithstanding this, the proposals are considered acceptable in their own right when assessed against the policies of the currently adopted NPPF.

## The Development Plan

5.12 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.

5.13 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

5.14 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

5.15 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

5.16 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.

5.17 The Appeal Site is not identified as an allocated site.

### The London Plan

5.18 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 S11: Improving air quality
- Policy S14: Managing heat risk
- Policy S112: Flood risk management
- Policy S113: 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

5.19 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.

## 6. Planning Consideration

6.1 In this section, we assess the proposal against relevant policies identified in the local development framework above. The key planning considerations, as identified in pre-application discussions with the LPA and considered 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

- 6.2 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, 2024). Paragraph 125 (c) requires LPA's to give substantial weight to the value of using suitable brownfield land within settlements for homes. 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.
- 6.3 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.
- 6.4 The proposal to provide six additional residential units on a small brownfield site will make a meaningful contribution towards the LPA's strategic housing targets in a sustainable location and should therefore be favourably considered.
- 6.5 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.
- 6.6 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.

- 6.7 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, and support the vitality and viability of Ruislip Town Centre by retaining the existing commercial unit at ground floor level.
- 6.8 Furthermore, the principle of providing residential development at the Site has already been accepted by the LPA through the determination of planning application refs. 11894/APP/2024/1734 and 11894/APP/2024/3030, and this matter was not disputed by the Planning Inspectorate in their consideration of appeal refs. 3362220 and 3369766.

### Employment Site

- 6.9 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.
- 6.10 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).
- 6.11 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.
- 6.12 Furthermore, the principle of re-using the surplus Class E floorspace, to provide Class C3 residential development at the Site has already been accepted by the LPA through the determination of planning application refs. 11894/APP/2024/1734 and 11894/APP/2024/3030, and this matter was not disputed by the Planning Inspectorate in their consideration of appeal refs. 3362220 and 3369766.

### Housing Land Supply and Delivery

- 6.13 Paragraph 78 of the NPPF requires LPAs to maintain a supply of specific deliverable sites sufficient to provide five years' worth of housing (and appropriate buffer) against a housing requirement set out in adopted strategic policies, or against a local housing need figure, using the standard method, as appropriate. This is required 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.
- 6.14 It has now been more than 5 years since the Hillingdon Local Plan (Part 2) was adopted, meaning that this requirement is particularly emphasised now.
- 6.15 Additionally, from March 2026, when the London Plan reaches 5 years old, the Council must calculate its five-year housing supply position using the Standard Method housing requirement. Using the Standard Method, as set out in the Planning Practice Guidance (PPG), the housing requirement for Hillingdon currently stands at 2,292 dwellings per annum.

- 6.16 The latest publication of Hillingdon's 5 Year Supply of Deliverable Housing Sites in March 2023 calculates a five-year housing provision target for the Borough of 1,123 new dwellings per annum. Whilst this figure is now outdated, it has not been demonstrated that additional supply of specific deliverable sites has been brought forward to meet the required demand. As such, Hillingdon's housing supply is significantly below the housing requirement of 2,292 dwellings per annum, meaning the Council has a housing supply deficit.
- 6.17 As such, if an application were determined under the current NPPF, the 'tilted balance' as outlined at paragraph 11(d) would be engaged. This engages the presumption in favour of sustainable development, such that permission should be granted unless the adverse impacts would significantly and demonstrably outweigh the benefits

### Residential Unit Mix

- 6.18 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 LPA's latest information on housing needs. The LPA's current information on housing need indicates a borough-wide requirement for larger affordable and private market units, particularly three-bedroom properties.
- 6.19 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%)
- 6.20 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.
- 6.21 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.
- 6.22 The unit mix for a six dwelling development at the Site has also already been accepted by the LPA through the determination of planning application ref. 11894/APP/2024/3030, and this matter was not disputed by the Planning Inspectorate in their consideration of appeal ref. 3369766.

### Design and Heritage

- 6.23 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.
- 6.24 The NPPF addresses design of new developments at Paragraphs 131 and 135, 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.
- 6.25 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.

- 6.26 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.
- 6.27 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.
- 6.28 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.
- 6.29 Policy DMHB4 of the Local Plan Part 2 sets out that the LPA 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.
- 6.30 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.
- 6.31 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.
- 6.32 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.
- 6.33 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.
- 6.34 Furthermore, it is important to highlight that the design of this proposal has already been accepted by the LPA through the determination of planning application ref. 11894/APP/2024/3030, and this matter was not disputed by the Planning Inspectorate in their consideration of appeal ref. 3369766.
- 6.35 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

- 6.36 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.
- 6.37 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.
- 6.38 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.
- 6.39 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.
- 6.40 This has been supported by Technical Note which has been prepared by Planning for Sustainability (dated 11 December 2025) to assess the potential of overlooking from the Site to No. 8, 10, 12, and 14 Poplars Close. This Technical Note has submitted to the LPA in support of this planning application.
- 6.41 Regarding the potential for overlooking from the north elevation of the Site to No. 8 and 10 Poplars Close, the Technical Note has found that a limited view of the side elevation of 8 Poplars Close is possible from Flat 1, Bedroom 1, but only from positions very close to the window, and not from a majority of the room. The views from the Living and Dining Rooms in Flat 1 and Flat 4 to No. 8 and 10 Poplars Close are considered to be minimal by all accounts, and privacy impacts to the properties as a result of the windows is negligible.
- 6.42 With respect to No. 12 and 14 Poplars Close, the Technical Note concludes that the potential for overlooking from the three proposed windows in the rear elevation is minimal, and the privacy impact on these properties is likewise negligible. The Technical Note also notes that the properties at Nos. 12 and 14 Poplars Close are not currently free from overlooking, as the existing stairwell window at the Site already overlooks the rear gardens of these properties. Additionally, the first- and second-floor windows of No. 8 and 10 Poplars Close directly overlook the front of No. 12 and 14 Poplars Close.
- 6.43 In light of the conclusion set out in the Technical Note, Flat 1 Bedroom 1 is proposed to be obscure glazed up to 1.7m above finished floor level. This approach at the Site has previously been accepted by the Planning Inspectorate in the determination of Appeal ref. 3362220, as discussed in Section 2 of this Planning Statement. It is intended that the obscure glazing will mitigate the limited view of the side elevation of No. 8 that was identified, as confirmed in the Technical Note, as being possible from this room, but only from positions very close to the window.
- 6.44 As the bedroom will not form the primary amenity space of the flat, which would be achieved in the living and dining room, the use of obscure glazing to this window is not considered to have a detrimental impact on internal amenity, nor would it result in unsatisfactory living conditions for future occupants.

6.45 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.

6.46 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

6.47 This approach has previously been considered acceptable by the LPA 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.

6.48 Furthermore, the external private amenity space proposals at the Site have already been accepted by the Planning Inspectorate in their determination of Appeal ref. 3362220. The LPA also confirmed, in their Statement of Case for Appeal ref. 3369766 (relating to the refusal of planning application ref. 11894/APP/2024/3030), that they agreed with the Inspector's conclusions on this matter.

### Daylight and Sunlight

6.49 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.

6.50 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.

- 6.51 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.
- 6.52 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. This position has been confirmed by the LPA in their decision application ref. 11894/APP/2024/3030 at the Site, and no issues were later raised by the Planning Inspectorate in their determination of Appeal ref. 3369766.

### Sustainability and Air Quality Management

- 6.53 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.
- 6.54 With specific regard to air quality, Paragraph 199 of the NPPF (2024) 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.
- 6.55 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 DMEI14 (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.
- 6.56 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.
- 6.57 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).
- 6.58 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.
- 6.59 In accordance with the relevant planning policy outlined above, the proposed development will make a strong and positive contribution to mitigating and adapting to climate change, reducing emissions of local air quality pollutants, and protecting future occupants from existing sources of pollution. These benefits would be further supported through the securing of a Section 106 planning obligation in respect of air quality, should the LPA be minded to approve the application.

- 6.60 The obligation is sought as the proposed development lies within the Ruislip Town Centre Focus Area, where additional and appropriate mitigation is required in accordance with the LBH Air Quality Local Action Plan 2019-2024. A signed Unilateral Undertaking to secure this contribution was previously submitted to the Planning Inspectorate and the LPA as part of Appeal Ref. 3369766 and was accepted to address the earlier reason for refusal relating to air quality, as set out in the LPA's decision on Application Ref. 11894/APP/2024/3030.
- 6.61 The Applicant will endeavour update the Unilateral Undertaking for the purposes of this current planning application, subject to confirmation of the required contribution from the LPA.

## Transport and Highways

- 6.62 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.
- 6.63 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.
- 6.64 With regard to vehicle parking, Policy DMT6 requires that development proposals comply with the LPA'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.
- 6.65 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.
- 6.66 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.
- 6.67 We note that previously issued pre-application advice issued by the LPA provides support for a car-free development as is the case for the existing unit, and the LPA confirmed that this position was retained in the decision of both Application Ref's. 11894/APP/2024/1734 and 11894/APP/2024/3030. The Planning Inspectorate, when determining Appeal Ref's 3362220 and 3369766, were also confident with the principle of a car free development at the Site.

## Servicing, Refuse and Recycling

- 6.68 Policy EM11 of the Local Plan Part 1 requires all new development to appropriately address waste management at all stages. In addition, Policy DMHB11 of the Local Plan Part 2 seeks to ensure that development proposals make adequate provision for well-designed internal and external storage space for general, recycling and organic waste, together with suitable access for collection.
- 6.69 External storage space for general, recycling and organic waste is proposed to the rear of the Site, with adequate internal storage provided within each dwelling. As set out in the Outline Delivery and Servicing Plan prepared by Pulsar Transport Planning and submitted in support of this application, refuse vehicles will stop on High Street to undertake collections. This would be undertaken by a private refuse collection company, with operatives collecting bins directly from the bin store and replacing them once the refuse collection is completed. This approach was largely accepted by the Planning

Inspectorate in the determination of Appeal Ref. 3362220, albeit with collections in that instance collections were proposed to take place from Poplars Close.

- 6.70 In considering the Appeal, the Inspector noted that serviced refuse collections are undoubtedly already in place for businesses along the High Street and upper-floor residential uses, given the town centre location of the Site, and that this approach *“represents a practical, and probably the only, viable solution in this scenario.”* The Inspector therefore concluded that they were *“satisfied that the refuse and recycling arrangements would be sufficient and that these could be secured through the appropriate use of planning conditions on any permission granted,”* such that the proposal could comply with Policy DMHB11 of the HLPDMP.
- 6.71 The Applicant proposes that refuse collections take place from the High Street rather than Poplars Close, reflecting the predominantly residential character of Poplars Close and the more commercial, accessible nature of the High Street.
- 6.72 In light of the Inspector’s decision, it is submitted that the Council should give due weight to the Inspector’s conclusions when determining this application, and that the refuse and recycling arrangements proposed are acceptable.
- 6.73 Servicing for the proposed development is also set 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.
- 6.74 As part of Application Ref. 11894/APP/2024/3030, the LPA approved the servicing arrangements as detailed above, along with the London Plan 2021 Policy D12(A) Fire Safety Supporting Statement prepared by GIAD UK Architects, both of which have been submitted in support of this Planning Application. As the Planning Inspectorate, in determining Appeal Ref. 3369766, raised no concerns regarding the content of these documents, it is considered that their previous approval remains applicable to this application.

## Contamination

- 6.75 As mentioned in the pre-application statement advice from the LPA, 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.
- 6.76 However, it is likely that any landscaping works to entrance, to make a more welcoming approach to the Site would require groundworks, and consideration needs to be given to potentially contaminated land. No groundworks are proposed for the construction of the additional floors. However, 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.
- 6.77 The LPA have raised no concerns regarding the risk of contamination at the Site, when considering the scope of works, through the determination of planning application refs. 11894/APP/2024/1734 and 11894/APP/2024/3030, and this matter was not disputed by the Planning Inspectorate in their consideration of appeal refs. 3362220 and 3369766.

## Noise

- 6.78 A Sound Insulation Assessment, prepared by Anglia Consultants (January 2026), has been submitted in support of this planning application. This assessment has been undertaken notwithstanding that no noise-related concerns have

previously been raised by either the LPA or the Planning Inspectorate, in order to further demonstrate the robustness of the proposed development.

- 6.79 The assessment evaluates the potential impact of noise from the Tesco warehouse area on the proposed residential development. Measurements were undertaken to determine the sound insulation performance of the first floor, as well as between the first and second floor areas proposed for residential use.
- 6.80 The assessment concludes that background noise levels within the ground floor warehouse did not change when the test sound source was activated. The sound source was imperceptible within the warehouse, indicating that the floor provides sound insulation in excess of the measured 44dB difference. By comparison, a typical concrete floor would be expected to achieve a sound reduction index of approximately 45–50dB.
- 6.81 The assessment recorded average activity and plant noise levels of 65dB within the warehouse, with peak levels of 76dB. Applying a conservative sound reduction of 44dB, this would result in average internal levels of approximately 21dB and peak levels below 32dB at first floor level. With the installation of finished floor coverings in the proposed flats, a further reduction of around 10dB is anticipated, such that noise is unlikely to be perceptible to future occupants.
- 6.82 The sound insulation performance between the first and second floors was measured at 23dB. To achieve full compliance with Part E requirements ( $DnTw + Ctr \geq 45dB$ ), mitigation measures will be incorporated, consisting of resilient floating floors at second floor level and suspended ceilings within the first floor flats. These measures will be secured and delivered through the detailed design stage of the development.
- 6.83 Full details are set out within the submitted Sound Insulation Assessment.

### **Biodiversity Net Gain (BNG)**

- 6.84 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.
- 6.85 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.
- 6.86 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.
- 6.87 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.

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## Planning Balance

- 6.88 The Applicant is proposing the delivery of six residential units on a brownfield site located above an existing retail unit in a highly accessible town centre location. This approach aligns squarely with paragraphs 125 and 129 of the NPPF (2024), which support the efficient use of land in sustainable urban settings, particularly where well-designed development can make a meaningful contribution to local housing supply.
- 6.89 The Applicant fully acknowledges that policy compliance does not permit a “free-for-all”; however, this is a carefully considered and contextually appropriate scheme. In contrast, the LPA appears to have given limited weight in their previous decisions at the Site to the pressing need for housing delivery in both London, and around England, focusing instead on rigid design expectations that are more characteristic of open, suburban sites, an approach that does not reflect the realities of compact town centre environments such as this.
- 6.90 Delivering housing in central urban locations inevitably requires a degree of compromise. Nonetheless, the Applicant has taken meaningful steps with the support of technical consultants to address the concerns that have historically been identified by the LPA while still bringing forward high-quality, well-located residential accommodation that offers opportunities for town centre living.
- 6.91 Fundamentally, it is a material consideration that the principle and detailed design of the proposed development has already been extensively scrutinised through the determination of Application Ref. 11894/APP/2024/3030, and the subsequent Appeal Ref. 3369766 which related to an almost identical scheme that was proposed for the Site. Furthermore, the findings of the Planning Inspectorate in determining the previous Appeal Ref. 3362220 (against the LPA’s refusal of Application Ref. 1189/APP/2024/1734), also directly relate to the principle, and aspects of the detailed design of this Planning Application.
- 6.92 Through the process of determining Appeal Ref. 3369766, the LPA expressly withdrew the majority of its refusal reasons, and the Inspector concluded that that scheme was acceptable in all respects other than a residual concern regarding certainty of the glazing details before them, where they were seeking reassurance that they matched those submitted, and approved by the Planning Inspectorate under Appeal Ref. 3362220.
- 6.93 The current application addresses that point directly and transparently, with the only changes to the previously refused scheme (Application Ref. 11894/APP/2024/3030/ Appeal Ref. 3369766) relating to the revised, and technically supported glazing arrangements for Flats 1 and 4. As such, the proposals now before the LPA reflect a scheme that has, in effect, already been found acceptable in planning terms.
- 6.94 Accordingly, it is submitted that the planning balance weighs strongly in favour of this Planning Application, and that permission should be granted by the LPA.

## 7. Conclusions

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

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

7.2 As demonstrated throughout this Planning Statement, the proposal is considered to be in overall accordance with the Development Plan. The scheme would deliver a net increase of six residential dwellings on the Site. The Site is well located in relation to local services and facilities, including employment opportunities, shopping areas, primary schools, public transport links, GP surgeries, and indoor and outdoor leisure facilities. As such, it represents an excellent and sustainable location for residential development and would make an appropriate, high quality contribution to housing provision within Ruislip.

7.3 The proposal would also optimise the use of the Site by bringing currently underutilised areas of the building at the rear into active use, alongside the enhancement of the existing void roof space along the High Street frontage.

7.4 The proposed development has been carefully designed by GIAD UK Architects to respond sensitively to the characteristics of the Site and the existing building fabric. The layout and design respect the significance of the Ruislip Village Conservation Area and would not adversely affect views from High Street. Potential overlooking of neighbouring properties at 8, 10, 12 and 14 Poplars Close has been carefully assessed, supported by the Views from Windows Technical Note prepared by Planning for Sustainability. Mitigation has been incorporated to the proposed development in the single instance where very limited overlooking was identified, and this is not considered to adversely impact the internal amenity space for future occupants of that flat.

7.5 The application is supported by a suite of technical reports which demonstrate that relevant national, regional and local planning policies, standards and guidance can be fully satisfied. Collectively, these submissions confirm that the proposed development accords with all relevant planning requirements.

7.6 As set out in Section 3 of this Planning Statement, this application is submitted following the refusal of Applications Ref. 11894/APP/2024/1734 and 11894/APP/2024/3030, and the subsequent dismissal of Appeals Ref. 3362220 and 3369766. Throughout this extensive planning history, including the recent consideration of proposals that closely mirror the current scheme, the vast majority of matters have been resolved between the Applicant and the LPA, with support from the Planning Inspectorate in certain respects.

7.7 The only outstanding matter in dispute related to the quality of outlook for proposed Flats 1 and 4.

7.8 This issue was previously accepted by the Planning Inspectorate in determining Appeal Ref. 3362220, following the submission through the appeal process of revised floor plans incorporating amended glazing arrangements, supported by a technical note prepared by Planning for Sustainability addressing sense of enclosure and privacy impacts.

7.9 The Inspector determining the subsequent Appeal Ref. 3369766 sought reassurance that the glazing arrangements before them were consistent with those previously considered and accepted, rather than raising substantive concerns regarding the principle or impacts of the revised approach.

7.10 This planning application addresses that outstanding matter directly and transparently. The only changes from the previously refused scheme (Application Ref. 11894/APP/2024/3030 / Appeal Ref. 3369766) relate to the clarified and

technically justified glazing arrangements for Flats 1 and 4. Accordingly, the proposals now before the LPA represent a scheme that has, in effect, already been found acceptable in planning terms.

- 7.11 Finally, and importantly, the presumption in favour of sustainable development is engaged given the Council's identified housing land supply deficit. In this context, planning permission should be granted unless any adverse impacts would significantly and demonstrably outweigh the benefits of the proposal.
- 7.12 For the reasons set out above, it is therefore respectfully requested that planning permission be granted for the proposed development.

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