



PLANNING STATEMENT

In respect of

LAND OFF LONG DRIVE, SOUTH RUISLIP, HA4 0HG

On behalf of

HOTEL TOP LIMITED

QUALITY MANAGEMENT

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TABLE OF CONTENTS

1. INTRODUCTION	4
2. SITE CONTEXT	6
3. PRE-APPLICATION ENGAGEMENT	9
4. PROPOSED DEVELOPMENT	15
5. PLANNING POLICY CONTEXT	18
6. PLANNING ASSESSMENT	21
7. PLANNING BENEFITS	39
8. CONCLUSION	40

1. INTRODUCTION

- 1.1 This Planning Statement has been prepared on behalf of Hotel Top Limited ('the Applicant') in support of a full planning application for the redevelopment Of Land Off Long Drive, South Ruislip, HA4 0HG ('the Site').
- 1.2 The application seeks planning permission for the following development ('the proposed development'):

"Partial demolition of existing buildings and erection of three buildings comprising residential apartments, plus extension to existing hotel, along with access, car parking, servicing, landscaping, and other associated works."

Planning Application Submission

- 1.3 This Statement assesses the Proposed Development against relevant national, regional and local planning policy, guidance and material considerations.
- 1.4 It should be read and considered in conjunction with the other documents, planning drawings and technical studies submitted in support of this planning application as set out below:
 - Cover Letter, prepared by ROK Planning;
 - Planning Application Form, prepared by ROK Planning;
 - Community Infrastructure Levy (CIL) Form, prepared by ROK Planning;
 - Site Location Plan, prepared by Oak and Prosper;
 - Pre-Existing and Proposed Drawings, prepared by Oak and Prosper;
 - Biodiversity Net Gain Assessment, prepared by Syntegra;
 - Drainage Strategy, prepared by KRS;
 - Landscape Plan, prepared by Enplan;
 - Swept Path Analysis, prepared by Motion;
 - Tree Survey/Arboricultural Report, prepared by Hayden's.

Structure of Planning Statement

- 1.5 The subsequent sections of this Planning Statement are structured as follows:
 - **Section 2** – Describes the Site and context
 - **Section 3** – Provides an overview of the pre-application engagement undertaken.
 - **Section 4** – Provides a description of the proposals.
 - **Section 5** – Sets out the relevant national and local planning policy context.
 - **Section 6** – Provides an analysis of the main planning considerations against national and local planning policy.
 - **Section 7** – Provides a summary of the key planning benefits of the proposal.

- **Section 8** – Concludes the planning statement.

2. SITE CONTEXT

Site Description

- 2.1 Located on Long Drive, the Site comprises a strip of land located directly west of South Ruislip railway station, falling within the jurisdiction of LB Hillingdon.
- 2.2 The Site location is shown on Figure 1 below.



Figure 1 Site Location Plan

- 2.3 The Site has a Public Transport Accessibility Level (PTAL) score of 3/2. It is highlighted that South Ruislip railway station is approx. 20 metres (less than one minutes' walk) from the Site and is served by the Central Line, providing transport links across East to West London, as well as national rail services providing public transport links to Central London, via Chiltern Railways (terminating at Marylebone Station) and High Wycombe. Ruislip Gardens station (also on the Central Line) is located 900m north-west of the Site, while Long Drive is served by the 114 bus route which serves Ruislip Station, Harrow, and Mill Hill Broadway. As such, it is considered that the Site benefits from an excellent level of accessibility by public transport.
- 2.4 The front of the Site is occupied by the Ramada hotel (Use Class C1), a four-storey building which forms part of the South Ruislip Local Centre. To the rear of the hotel is a two-storey building comprising a conference centre (associated with the hotel operator) and a cash and carry (both Sui Generis uses). Another two-storey building relating to the cash and carry is located further rearwards and a further single-storey raised vacant building is sited at the most western part of the Site (the last known use of which was as an office (Use Class E(g)(i))).
- 2.5 The rear of the Site forms a detached, isolated part of the Braintree Road Locally Significant Industrial Site (LSIS) designation which formerly also included Arla Food

Depot. Review of the Local Plan Part 2 confirmed the removal of the Arla Food Depot from the LSIS designation and its allocation for residential-led mixed-use redevelopment under Policy SA19, in accordance with the extant consent which was allowed on appeal under appeal ref. 66819/APP/2014/1600 dated 24th December 2014. The residual LSIS designation covers the part of the Site to the rear (not including the hotel), as detailed in the following section.

- 2.6 The adjacent former Arla Food Depot has been built out and comprises 132 flats across nine buildings, in addition to a cinema (Cineworld), a large retail supermarket (ASDA), restaurants, gymnasium, and a petrol station.
- 2.7 A service road within the southern boundary of the Site provides access to a row of small industrial units (predominantly car repair shops), as well as the vacant office building at the rear of the Site. To the west of this are railway lines which serve Chiltern Railway and the Central Line and HS2. Towards the east of the Site is Long Drive and South Ruislip Local Centre – which includes a small parade of shops, a large retail supermarket (Sainsburys) and a public house.
- 2.8 The Site is located within Flood Zone 1, indicating a low probability of flooding from rivers and the sea. It predominantly has a 'Very Low' risk of surface water flooding, although there are minor areas within the Site where there is a 'Medium' risk.
- 2.9 It is not located within a conservation area and does not contain any statutory or locally listed buildings.
- 2.10 A search of LB Hillingdon's online planning records identified the following planning history for the Site:

Reference	Description of Development	Decision
144/APP/2008/1890	Proposed hotel extension and conference facilities including 58 additional bedrooms, lounge bar and restaurant; conference facilities and fitness suite; alterations and recladding of existing hotel with basement car park (involving demolition of existing cash and carry warehouse and conference centre)	Approved 12/02/2009
27515/APP/2008/2070	Erection of single storey rear extension	Approved 01/09/2008
4090/ADV/2003/29	Installation of illuminated signage	Approved 07/04/2003
40940/APP/2000/1086	Retention of 1.3 m diameter satellite antenna	Approved 04/05/2000

2.11 The following table summarises the relevant planning history for the adjacent site at Former Arla Food Depot.

Reference	Description of Development	Decision
66819/APP/2014/1600	Redevelopment of the site to provide a food store with ancillary café (Class A1) and ancillary petrol filling station, cinema (Class D2), 5 x restaurant units (Class A3), and residential development consisting of 132 units, together with new vehicle and pedestrian accesses, car parking, servicing areas, landscaping arrangements, and other associated works.	Approved 24/12/2014
66819/APP/2013/1467	Demolition of existing buildings and redevelopment of site to provide a food store and ancillary café (Class A1) and ancillary petrol filling station, cinema (Use Class D2), 5 x restaurant units (Class A3), 4 x shop units (Class A1 and A2) and residential development consisting of 104 units as well as access parking, landscaping and servicing areas.	Refused 03/06/2013

2.12 The following section provides an overview of the pre-application engagement undertaken.

3. PRE-APPLICATION ENGAGEMENT

3.1 The proposed development has evolved over the course of pre-application discussions held with the Council and Design South East. A public consultation has also been held. The list below provides an overview of the discussions that have taken place:

- Initial pre-application advice was received from London Borough of Hillingdon ('the Council' or 'LB Hillingdon') in September 2022 for a scheme involving the redevelopment of the Site to provide 299 no. residential units across 6 no. buildings reaching up to 7 storeys in height;
- Subsequently a PPA was entered into between the client and the Council, which included 5no. pre-application meetings, with meetings being undertaken on the following dates;
 - LPA Pre-Application Meeting 1 – 7th May 2024
 - LPA Pre-Application Meeting 2 – 23rd October 2024
 - LPA Pre-Application Meeting 3 – 18th December 2024
 - LPA Pre-Application Meeting 4 – 26th November 2024
- A Design Review Panel ("DRP") was undertaken on the 7th of January 2025, with Design South East ("DSE"), the Council and the Applicant.
- Following this, the fifth and final pre-application meeting, as set out in the PPA, was held on the 16th of June 2025.

3.2 Key engagement and the design evolution of the scheme in response are summarised in the paragraphs below.

Pre-Application Scheme Evolution

3.3 The following table provides a summary of the key points raised during pre-application discussions with the LPA and DSE and how the comments received have fed into the final residential development.

Comment	Response
Layout	DSE noted strengths of the May 2024 layout, following a more linear row of blocks relating more clearly to the form and orientation of the neighbouring Arla development.
Residential Accommodation	A preference for maisonette layouts to be inverted was noted by the LPA, while this was contrary to the feedback from the DRP, this was suggested to address the
	The principles of the May 2024 layout have been incorporated into the scheme, particularly with regards to the linear form of the development, to support greater permeability and better orientation of the housing.
	The proposed maisonette layouts were inverted, and the inclusion of permanent soft-fencing features included within the landscaping scheme, to ensure privacy is

concern with regards to balconies/terraces at ground floor being blocked up by occupiers to provide privacy.	maintained while encouraging a defensible space to dwelling thresholds.
The LPA recommend introducing front gardens or locating lobbies at block corners.	Lobbies have been located at the corners of blocks to improve legibility and mitigate privacy concern.
Rear 'gardens' were recommended to be provided to all ground floor units along the Arla boundary to prevent the space from encouraging loitering and Anti-Social Behaviour.	Private amenity space and external lighting has been provided at ground floor level with Designing Out Crime principles to discourage Anti-Social Behaviour.
Ensure all balconies meet London Plan minimum standards (including 1.5m clear depth).	All balconies meet London Plan standards, with the majority exceeding this requirement.
Hotel Extension	
Reconsider the design of the hotel extension.	The hotel extension has been redesigned to read as a continuation of existing form.
Access control would be needed to prevent public access to hotel servicing area.	Details of access control will be provided in a management plan to be agreed with the Council by planning condition.
Access	
Reconsider the design of the service road to eliminate the need for the use of third-party land.	The access road has been redesigned to ensure that all servicing can be conducted on-site, without the need for use of third-party land.
Consider reconfiguring the landscaping to give priority to residential arrivals on foot.	The primary access route beyond the parking area is planned as a shared zone, featuring low kerbs and clear cues to highlight pedestrian priority. To accommodate this, the landscape layout has been adjusted with a clear emphasis on pedestrian access for residents.
Main one-way driveway is acceptable only if designed as a shared surface (beyond the car park), with minimal kerb height and legible pedestrian priority.	
The proposed lay-bys interrupt pedestrian movement - revise the layout to support intuitive, direct walking routes.	Parking has been distributed across the Site to mitigate a feeling of car-dominance or the need for large parking courts. This supports the car-free nature of the residential element and better integrates with the surrounding built form.
Open Space and Landscaping	
DSE recommended the entrance to the Site was developed to create a civic space next to the hotel.	The landscaping scheme has been reconfigured to emphasise the entrance as a welcoming civic space adjacent to the hotel, offering a clear point of arrival to the development and marking the transition
The public square at entrance is broadly supported in principle by the LPA, but additional features such as artwork,	

seating and softer landscape elements are recommended.	between the more public-facing hotel and the residential use.
Reimagine the space between the hotel and the residential block as a landscaped, planted transition space, functioning as a route (if north access is secured), rather than a hangout or amenity area.	Additional areas of open space throughout the development have been designed to contrast this formality with a softer, more intimate character, reflecting the different pattern of use of these areas.
Architectural Design	
Improve the architectural vision, by ensuring that openings appear to follow an external architectural logic or rhythm.	Distinct elements, such as framework and banding, have been incorporated into the design, alongside material detailing to reinforce the rhythm of the blocks and emphasising key features. Balconies have been utilised as sculptural breaks adding depth and articulation, particularly on the longer facades.

Land Use

3.4 Pre-application discussions with the Local Planning Authority included detailed consideration of the most appropriate land use on the Site. As part of this discussion, it was requested by the LPA that the applicant compared schemes including the provision of industrial floorspace on-site and a residential-led scheme to demonstrate the respective planning benefits.

3.5 Subsequently, two schemes were presented as outlined below

- Option 1: A mixed-use development which would provide 1,704sqm of industrial floorspace, sited within a block at the north-western corner of the Site and accessed via the existing service road. A further 2no. blocks (2 & 3) of residential accommodation are proposed, comprising a total of 63no. dwellings, in addition to the hotel extension (22no. new rooms). This was designed in accordance with the typology CO1 – Industrial Co-Location as set out in the Industrial Land and Uses London Plan Guidance (draft).
- Option 2: The residential-led scheme involves the redevelopment of the Site to provide a development of 3no. residential blocks comprising 113no. residential dwellings, and an extension to the existing hotel to provide an additional 22no. rooms.

3.6 Accordingly, an assessment of the feasibility and planning benefits of both proposed schemes, was conducted. A summary of the points highlighted were as follows:

Marketing Evidence

3.7 A local commercial agent, JRBT Commercial Property, were asked to provide an analysis of the proposed industrial units in this location and their potential attractiveness to the market. The feedback confirmed the following:

Location / Access:

- In commercial terms, the location of the proposed industrial unit within Option 1 presents several challenges.
- The unit is positioned at the rear of the site with no street frontage and limited visibility from the public highway.
- Access is relatively constrained, given reliance on the existing service road. It is considered that these factors reduce the unit's appeal, particularly when compared to competing industrial stock in the local area, many of which benefit from direct access from the public highways and in more desirable locations.

Proximity to residential uses:

- There are potential conflicts with co-location of industrial and residential uses given the constraints of the Site, which is likely to undermine the long-term success of the industrial units.
- In similar settings, operational demands of industrial occupiers (such as vehicle movements, deliveries, and extended hours) come into direct conflict with the expectations of nearby residents.
- This can require mitigation in terms of limitations of hours of use, noise controls, or restrictions on certain activities—which in turn limits the flexibility and appeal of the space to the commercial market.

Local industrial supply:

- Current market analysis (LSH 2025 Industrial and Logistics Market Report) indicates that there is already a good supply of small-scale industrial and workshop space within the local area (much of which offers superior access, visibility, and flexibility).
- As a result, there is a risk that the proposed units will struggle to let.

3.8 Overall, it is apparent that there is a degree of saturation in this part of the market, and any new industrial provision would need to be clearly differentiated to attract meaningful interest. The constraints of this site do not clearly lend themselves to offering that differentiation.

Compatibility with Neighbouring Uses

3.9 Although the Site is within an LSIS designation, there are no existing or established industrial uses (falling within Use Class E(g)(iii), B2, or B8) on the Site. As such, it is understood that any new industrial use which might generate noise or nuisance would disproportionately assume the responsibility for managing and mitigating the impact to neighbouring uses.

3.10 In particular, there would be a concern regarding the compatibility of an industrial use upon residential amenity of the neighbouring development at the Former Arla Foods site. The neighbouring development comprises several habitable windows and balconies overlooking the Site within proximity of the boundary (historically designed but resulting in an unneighbourly relationship).

Financial Viability Appraisal

3.11 A Financial Viability Appraisal has been carried out by an independent viability assessor, James R Brown & Co (JRB). This was commissioned to establish the viability of each scheme and whether they would be feasible for the Applicant to deliver.

3.12 The analysis by JRB finds that, based on a provision of 35% affordable housing (as per the target set out in Local Plan Policy DMH 7), the schemes would generate as follows:

- Option 1 (Industrial Co-location): loss of £5.53m
- Option 2 (Residential-led): negligible profit

3.13 As such, JRB concludes that Option 1 is too unviable and would not be deliverable. While Option 2 currently provides only a very small amount of profit (far below 22.5% on cost, which would be considered a 'normal' level of developer profit), it may become deliverable with a lower provision of affordable housing and/or if market conditions improve.

LPA Response

3.14 In response to the above arguments, the LPA provided in-depth written feedback, in which it was concluded that:

"Officers recognise that there is, in principle, a planning benefits case to be made in favour of a residential-led scheme which would otherwise conflict with planning policy requirements to retain, intensify and not compromise existing capacity for industrial uses on designated LSISs. The Applicant is encouraged to develop Option 2, with an emphasis that the planning benefits case needs to be comprehensive and clearly outweigh harm identified."

3.15 The following section sets out the engagement and consultation activities held as part of the pre-application process.

Public Consultation

3.16 ROK Planning ran a period of public consultation from 11 October to 31 October. The proposed development was made available on a project website, with advertisements in the West London Gazette and Leaflet Distribution in the South Ruislip area. The website received over 800 visits.

- 3.17 The aim of the public consultation was to inform and engage with members of the community and individuals with an interest in the Site and surrounding area. It was important to receive feedback and suggestions from local residents to help inform and shape the plans prior to submission.
- 3.18 Further detail is included within the Statement of Community Involvement which is submitted as part of this application.

4. PROPOSED DEVELOPMENT

Description of Development

4.1 The description of development reads as follows:

“Partial demolition of existing buildings and erection of three buildings comprising residential apartments, plus extension to existing hotel, along with access, car parking, servicing, landscaping, and other associated works.”

Development Proposals

4.2 The detailed parameters of the development are set out below:

- Demolition of the existing buildings to the rear of the existing hotel;
- Erection of 4 residential blocks of 5-storeys comprising 114no. residential units;
- Two-storey rear extension to existing hotel to provide 22no. additional beds;
- New scheme of hard and soft landscaping, including provision of public open spaces and play space;
- Parking for hotel residents and accessible parking spaces serving the residential development;
- Cycle and refuse storage and ancillary plant and servicing.

4.3 The proposed 114no. residential units are split in a ratio of 29no. 1-bed units, 65no. 2-bed units and 20no. 3-bed units.

Scale, Height and Massing

4.4 The scale, height and massing of the proposed development have been carefully designed to reflect and respond to the surrounding area and the emerging context.

4.5 Following demolition of the existing buildings to the rear, four new blocks are proposed in a horizontal arrangement across the depth of the Site. The proposed residential blocks are five storeys in height, taking into account both the protected airspace around RAF Northolt and the safeguarding zone of the subsoil for HS2. The proposed building heights do not exceed the ridge height of the existing hotel.

4.6 The proposed layout, which has evolved in line with discussions with the LPA and DSE (see previous section), has been sensitively arranged to maintain privacy and enhance spatial quality between the developments. Further detail on the evolution of the massing, scale and height, and character of the design is included in the Design and Access Statement prepared by Oak and Prosper and submitted as part of this application.

Façade and External Appearance

- 4.7 The façade has been designed to create a sense of unity and coherence, through the inclusion of vertical articulation, careful grouping of windows and the use of vertical bays to structure the façade composition and create a consistent pattern.
- 4.8 Additionally, distinct elements, such as framing and banding, have been incorporated into the design, alongside material detailing to reinforce the rhythm of the blocks and emphasising key features. Balconies have been utilised as sculptural breaks adding depth and articulation, particularly on the long, continuous frontages.
- 4.9 For further detail, refer to the DAS, prepared by Oak and Prosper and submitted as part of this application.

Landscaping and Public Realm

- 4.10 Improvements to the public realm and landscaping are provided as an integral feature of the proposed development. This comprises a new civic space between the hotel and residential blocks, providing a new public space for residents, visitors and local people to enjoy.
- 4.11 Key features include thoughtful placement of seating areas and gathering spaces to encourage social interaction, carefully selected planting to support local biodiversity and seasonal interest, high-quality materials that align with the surrounding architecture and urban context, and pedestrian-friendly routes to ensure smooth circulation and visual appeal.
- 4.12 Detailed plans, prepared by Enplan and submitted with this application, provide detail on the proposed planting schemes, material choices, and the landscape general arrangement. Emphasis is placed on creating inviting, sustainable outdoor spaces that prioritise accessibility and comfort for pedestrians and cyclists.

Access and Servicing

- 4.13 Access to the Site will be provided via the existing vehicular access from Long Drive.
- 4.14 The proposed access road, which is 10m at the bellmouth and varies in width between 4.5m and 6.4m throughout the Site, provides a generous shared route for vehicles, cyclists and pedestrians to navigate the Site and offers convenient access to amenity spaces.
- 4.15 Pedestrian access to the site will be achieved via the continuation of the existing footways on Long Drive. The existing footway to the east of the access will be extended to route into the site and provide a continuous footway, measuring a minimum of 1.8 metres in width, throughout the extent of the site.

Parking

4.16 The proposed residential apartments will adopt a 'car-free' approach and no car parking will be provided within the curtilage of the site, with the exception of accessible parking spaces. A total of 12no. accessible parking spaces will be provided to serve the proposed residential flats, which remains in accordance with the standards contained within the London Plan (2021).

4.17 233no. cycle parking spaces are proposed, comprising a mix of Sheffield stands and two-tier stackers.

4.18 The cycle parking is located on the ground floor of each block. Additionally, visitor cycle parking is provided at the front and west of the building.

Sustainability

4.19 The proposals seek to deliver sustainability across the development as illustrated by the following key parameters:

- High efficiency air source heat pumps for all hot water and heating;
- Solar PV panels for electrical generation;
- Efficient building construction and high efficiency ventilation and lighting; and
- Future proofing the development should a district heating scheme become available.

4.20 Further sustainability details are included within the Energy and Sustainability Statement prepared by Stroma, submitted as part of this application.

4.21 The Planning Policy Context is detailed within the following section before the proposed development is assessed against this context in Section 6.

5. PLANNING POLICY CONTEXT

5.1 Section 38(6) of the Planning and Compulsory Act 2004 requires any planning application to be determined in accordance with the Development Plan, unless material considerations indicate otherwise.

Local Development Plan

5.2 The relevant Development Plan for LB Hillingdon comprises the following documents:

- The London Plan
- Local Plan Part 1 – Strategic Policies
- Local Plan Part 2 – Development Management Policies
- Local Plan Part 2 - Site Allocations and Designations
- The West London Waste Plan

Local Plan Part 1 – Strategic Policies

5.3 The Local Plan Part 1 – Strategic Policies is the overarching document in the Local Development Plan and sets out fundamental visions and development management policies for the Hillingdon area. The following policies apply in relation to the development scheme:

- Policy E1: Managing the Supply of Employment Land;
- Policy E2: Location of Employment Growth;
- Policy H1: Housing Growth;
- Policy H2: Affordable Housing;
- Policy BE1: Built Environment;
- Policy EM4: Open Space and Informal Recreation
- Policy EM7: Biodiversity and Geological Conservation
- Policy EM11: Sustainable Waste Management
- Policy T1: Accessible Local Destinations

Local Plan Part 2 – Development Management Policies and Site Allocations

5.4 Local Plan Part 2 – Development Management Policies sets out the council's proposed site allocations for development, designations and development management policies. The following policies are of particular relevance:

- Policy DME1: Employment Uses on Designated Sites;
- Policy DME5: Hotels and Visitor Accommodation
- Policy DME6: Accessible Hotels and Visitor Accommodation
- Policy DMH 2: Housing Mix
- Policy DMH7: Provision of Affordable Housing

- Policy DMHB 11: Design of New Development
- Policy DMHB 12: Streets and Public Realm
- 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
- Policy DMHB 19: Play 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 3: Public Open Space Provision
- Policy DMCI 4: Open Spaces in New Development
- Policy DMCI 7: Planning Obligations and Community Infrastructure Levy
- Policy DMT 1: Managing Transport Impacts
- Policy DMT 2: Highways Impacts
- Policy DMT 3: Road Safeguarding
- Policy DMT 5: Pedestrians and Cyclists
- Policy DMT 6: Vehicle Parking
- Policy DMAV 3: RAF Northolt

National Planning Policy Framework (NPPF)

5.5 The National Planning Policy Framework (NPPF) sets out national planning policy. The NPPF was originally published in 2012 and replaced all previous planning policy statements and guidance notes. The NPPF was revised most recently in December 2024.

5.6 At the core of the NPPF is the presumption in favour of sustainable development, including supporting strong, vibrant and healthy communities, ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations, and contributing to protecting and enhancing the natural, built and historic environment.

5.7 Furthermore, paragraph 125(c) is relevant to the proposed development. 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, proposals for which should be approved unless substantial harm would be caused.” [emphasis added]

National Planning Policy Guidance (NPPG)

5.8 In addition to the NPPF, the Department for Communities and Local Government (DCLG) published the National Planning Policy Guidance (NPPG) in March 2014. The NPPG is a web-based resource which delivers planning procedures and practical guidance in an accessible format and is continually updated when necessary.

6. PLANNING ASSESSMENT

6.1 Section 38(6) of the Planning and Compulsory Act 2004 requires any planning application to be determined in accordance with the development plan, unless material considerations indicate otherwise.

6.2 This section therefore assesses the proposal against the development plan policies and examines relevant material considerations where appropriate.

6.3 The assessment discusses each of the main planning matters relevant to the proposed development, before summarising the main technical matters which are dealt with in detail in the supporting reports.

6.4 The section is ordered as follows:

1. Loss of Existing Uses;
2. Principle of the Provision of Residential;
3. Hotel Extension;
4. Affordable Housing
5. Quality of Accommodation;
6. Housing Mix;
7. Scale, Height and Massing;
8. Landscaping and UGF;
9. Ecology;
10. Daylight and Sunlight;
11. Energy and Sustainability;
12. Transport Considerations;
13. Travel Plan;
14. Flood Risk and Drainage;
15. Air Quality;
16. Fire Safety.

Loss of Existing Uses

6.5 Within Hillingdon Local Plan Part 2, the Site partially falls within the LSIS designation at Braintree Road Industrial Area, South Ruislip. However, the Site does not contain any existing uses that fall into any of the industrial activities as specified in London Plan Policy E4. The existing uses, for clarity, comprise:

- Hotel / conference centre (Use Class C1)
- Cash and carry (Sui Generis)
- (Vacant) office (Use Class E(g)(iii))

6.6 The proposed partial redevelopment of the Site involves the loss of the existing conference centre, cash & carry, and vacant office.

6.7 In relation to the existing conference centre, this is associated with the primary hotel use (which is retained and extended as part of the proposals). Given that the overall C1 use on the Site would be increased, it is not considered that there would be any loss of visitor infrastructure and therefore the proposal would comply with Policy E10 of the London Plan and Policy DME 5 of Hillingdon's Local Plan Part 2.

6.8 Furthermore, it is noted that the applicant has recently developed a conference centre near Heathrow Airport at 1 Nobel Drive, Harlington (also LB Hillingdon). The conference facility has been operated by Courtyard by Marriott since 2021 following implementation of planning permission under ref. 46214/APP/2014/2827 for a new hotel and conferencing development of an existing office building. This development provides modern conferencing facilities in an appropriate location for economic infrastructure, confirming that there is no net loss of such facilities within the Borough.

6.9 There are no specific planning policies relating to the existing cash & carry use, which is a *sui generis* planning use. Overall, the economic benefits of the proposed development are considered to outweigh the loss of the existing commercial floorspace and limited on-site employment opportunities.

6.10 The vacant office building to the rear of the Site is in a poor condition and has not been in use for an extended period of time. As such, it is not considered that there would be any loss of office floorspace arising from the proposed development. As above, the benefits of the scheme would significantly outweigh any perceived loss in this respect.

6.11 As discussed in the pre-application section of this Planning Statement, the Applicant has undertaken a detailed analysis of redevelopment options for the Site, including a scheme involving provision of industrial space on-site. This is constrained by several factors including viability and the unsuitability of the Site for an industrial use, given the adjacent residential uses and likely conflicts, which would be contrary to London Plan Policy D13 (Agent of Change). Through this process, it is demonstrated that the planning benefits of a residential-led scheme are considered to clearly outweigh any potential alternative development of the Site, and therefore in accordance with the Development Plan as a whole.

6.12 Furthermore, the supporting text to Policy E1: Managing the Supply of Employment Land in the Local Plan Part 1 reveals that 17.58 hectares of surplus industrial and warehousing land could be released from 2011 - 2026. The Council has updated its Employment Land Study since the adoption of the Local Plan Part 1. The updated study identifies a surplus of employment land in the region of between 16.3 and 20.6 hectares.

6.13 The proposed scheme will deliver significant economic benefits across multiple areas, including operational and construction phases, that will create jobs and stimulate local supply chains. It will also enhance the visitor economy by attracting more people to the area, supporting hospitality and retail businesses. In addition, increased local expenditure from both visitors and workers will boost community spending, while developer contributions agreed through a Section 106 agreement and the Community Infrastructure Levy (CIL) will provide further investment in local infrastructure, services, and amenities.

6.14 As such, it is considered that a loss of the existing uses on the Site is justified and in accordance with relevant local planning policy.

Principle of Residential Development

6.15 Policy GG2 of the London Plan supports development of brownfield land, sites within and on the edge of town centre and sites well-connected by existing or planned public transport to intensify the use of land to support additional homes, workspaces and higher density development using a design-led approach.

6.16 London Plan Policy SD6 supports mixed-use or housing-led development in town centres to optimise residential growth potential. Residential uses are considered an important aspect of the town centre in line with paragraph 90(f) of the NPPF, which states that planning must *“recognise that residential development often plays an important role in ensuring the vitality of centres and encourage residential development on appropriate sites.”*

6.17 Over the Plan period (2011 – 2026) a minimum provision of 6,375 dwellings is targeted within LB Hillingdon, in accordance with Policy H1.

6.18 Policy H1 encourages optimisation of housing delivery on sites with:

- Existing or planned PTAL levels of 3-6 or which are located within 800m distance of a station or town centre boundary; and
- Appropriate low-density sites in commercial, leisure and infrastructure use.

6.19 The Site comprises brownfield land adjacent to South Ruislip underground station and South Ruislip Local Centre. It represents a highly sustainable location for residential development and an opportunity to provide a significant number of new homes to contribute towards meeting local housing needs. This is in accordance with national planning policy objectives, including paragraph 123 of the NPPF which promotes the *“effective use of land in meeting the need for homes and others”* and the promotion of *“brownfield first”* in the NPPF and London Plan Policy GG2. As such, the principle of residential development on this Site is considered acceptable.

Hotel Extension

6.20 Policy SD6 of the London Plan seeks to enhance the vitality and viability of town centres through ensuring town centres are the primary location for commercial activity beyond the CAZ, encouraging a diverse range of uses including main town centre uses, and delivering sustainable access to local amenities through walking, cycling and public transport.

6.21 Policy E10 of the London Plan requires a sufficient supply and range of serviced accommodation to be maintained. In outer London, serviced accommodation should be promoted in town centres where they are well-connected to public transport. Supporting paragraph 6.10.2 identifies a need for an additional 58,000 bedrooms by 2041 (2,230 per annum).

6.22 The Hillingdon Local Plan Part 1 Core Policy 5 states the aim to deliver 3,800 additional hotel bedrooms between 2007 and 2026, in accordance with the GLA Hotel Demand Study 2006. However, Hillingdon's Tourism Study identifies a need for 5,600 additional hotel rooms within the borough.

6.23 Policy DME 5 of the Local Plan Part 1 supports visitor accommodation in accessible sustainable locations, as defined in the Site Allocations and Designations document, subject to:

- A high standard of building and site design, including landscaping and placement of signage that makes a positive contribution to local amenity and the streetscape
- Provision of accessible layout and rooms
- No adverse impact on nearby land uses or on the amenity of either adjoining occupants or proposed occupants by virtue of noise, lighting, emissions, privacy, overlooking, any other potential nuisance, parking or traffic congestion.

6.24 The Site is located partly within a Local Centre and currently contains an established hotel business. Hotels are defined within the NPPF as main town centre uses and therefore should be directed to designated centres.

6.25 Overall, it is considered that the proposed hotel use is located in a suitable location and will contribute to the identified visitor accommodation need in both Hillingdon and London-wide, therefore it should be supported.

Affordable Housing

6.23 Policy H2 Affordable Housing in the Local Plan seeks to maximise the delivery of affordable housing from all sites. Furthermore, Policy DMH7 requires developments with a capacity to provide 10 or more units to maximise the delivery of on-site affordable housing.

6.24 The most recently published SHMA, published in 2018, identified a need to provide 14,100 additional affordable dwellings over the 22-year period 2014-36 (an average of 641 per year). This represents 32.1% of the overall OAN for Hillingdon, representing an acute local need for affordable housing.

6.25 The proposed development provides 24no. affordable homes, which represents 21% of the total units. This will make an important contribution to addressing the significant shortfall of affordable housing in Hillingdon.

6.26 The Financial Viability Appraisal, completed by JRB and submitted with this application confirms that this provision exceeds the maximum viable

Housing Mix

6.27 Policy DMH 2 of the Local Plan states that the Council will require the provision of a mix of housing units of different sizes in schemes of residential development to reflect the Council's latest information on housing need.

6.28 Policy H10 of the London Plan requires schemes to consist of a range of unit sizes, having regard to:

- The requirement to deliver a mixed and inclusive neighbourhood
- The need to deliver a range of unit types at different price points across London
- The mix of uses in the scheme
- The nature and location of the Site, with a higher proportion of one and two bed units generally more appropriate in locations which are closer to a town centre or station or with higher public transport access and connectivity
- The aim to optimise housing potential on sites

6.29 The housing mix for the proposed development is as follows:

Unit Type	No. Units	% Units
1B2P	29	25%
2B3P	45	39%
2B4P	20	18%
3B5P	12	11%
3B6P	8	7%

6.30 Given the Site's extremely sustainable location adjacent to South Ruislip station and within the designated Local Centre, it is considered that one- and two-bedroom dwellings are likely to be most attractive to the local housing market.

6.31 The scheme provides a mix of housing, thus making a significant contribution towards the supply of family housing within the local area. The number of larger units have been optimised given the Site's constraints, sustainable location and need for optimisation of homes, and mix of uses. Therefore, it is considered that the development meets the requirements of Local Plan Policy DMH2.

Quality of Accommodation

6.32 Policy DMHB16 and DMHB18 of the Local Plan, relate to the Housing Standards and Private Outdoor Amenity Space of new developments respectively.

Housing Standards

6.33 Policy DMHB16 states that all housing development should have an adequate provision of internal space in order to provide an appropriate living environment.

6.34 The following table sets out the minimum internal floor space standards for new dwellings.

Unit Type	Minimum internal space standards (sqm)	Proposed Area (sqm)	No. of units proposed
1B2P	50	50	29
2B3P	61	61	33
2B3P M4(3)	61	70	12
2B4P	70	70	20
3B5P	86	86	12
3B6P (Maisonette)	102	102	8

6.35 Each of the units proposed within the application meet or exceed the requirements as stated within Policy DMHB16 of the Local Plan.

6.36 Furthermore, Policy DMHB16 states that major developments must provide at least 10% accessible units. The development proposes 12 units as being M4(3) accessible, which represents 10.5% and is therefore in line with the requirements of DMHB16.

Outdoor Amenity

6.37 Policy D6 of the London Plan requires a minimum of 5sqm of private outdoor amenity space per 1–2-person dwelling, with an additional 1sqm per occupant.

6.38 Additionally, Policy DMHB18 requires all new residential development and conversions to provide good quality and useable outdoor amenity space in accordance with the standards set out in Table 5.3 (as follows).

Dwelling Types	Minimum provision (sqm)
Studio and 1 bedroom	20

2 bedrooms (Flat)	25
3 + bedrooms (Flat)	30

6.39 All of the units at upper floors have direct access to private balconies, while ground-floor dwellings benefit from defensible private amenity areas, providing private external amenity in excess of London Plan standards.

6.40 The supporting text of Local Plan (part 2) policy DMHB18 notes that a shortfall in private outdoor amenity space can be provided as communal amenity space where it is not possible for this to be wholly provided via private amenity areas.

6.41 The proposed development includes communal amenity areas across the Site, including a large podium amenity area to Block 2 and additional amenity spaces between each block. The total provision of external amenity across the development is 4,638.5 sqm.

6.42 On this basis, the provision of private internal and external amenity space, and public amenity space through public realm improvements are considered acceptable and reflect best practise. As shown, the total outdoor amenity provision significantly exceeds the minimum requirement and is therefore in accordance with London Plan Policy D6 and Local Plan Policy DMHB18.

Noise Impacts

6.43 Whilst the NPPF does not set criteria that must be achieved, it (paragraph 198) states that new development should:

“Mitigate and reduce to a minimum potential adverse impact resulting from noise from new development – and avoid noise giving rise to significant adverse impacts on health and the quality of life”.

6.44 A Noise Impact Assessment has been prepared by Stroma and submitted as part of this application. In the first instance, the surveyed and predicted noise levels have been assessed to determine the minimum sound reduction requirements of the external building façade elements to achieve suitable internal noise levels, based on the requirements of local and national policy.

6.45 The assessment states that with suitable specification of the building envelope including glazing and suitable ventilation provision that the internal noise level requirements in BS 8233 and ProPG will be achieved throughout the site.

6.46 Furthermore, the noise assessment concludes that it is considered that with suitable design measures set out in this report that the proposed development does not preset a noise impact to existing noise sensitive properties. The new proposed residential accommodation can be suitably protected from noise associated with the surrounding area such that best practice internal acoustic conditions can be met.

6.47 Overall, it is demonstrated that a good level of residential amenity will be provided for residents and the noise impacts associated with the development will not result in adverse noise impacts upon the amenity of existing or future occupiers.

Scale, Height and Massing

6.48 National, regional and local policy places significant emphasis on the design of new developments, requiring new schemes to respect the architectural character of the surrounding area and to minimise amenity impacts on neighbouring properties.

6.49 Policies GG2 and D3 of the London Plan state that development should make the best use of land by following a design-led approach to optimise the capacity of sites. Higher density development should generally be located in sustainable locations that are well connected to jobs, services, infrastructure and amenities by public transport, walking and cycling, in accordance with Policy D2 of the London Plan.

6.50 Having regard to the immediate context, including the adjacent former Arla Depot residential development, South Ruislip station and railway line, and the height constraints of the RAF Northolt, the scale, massing and layout of the development reflects that established within a linear pattern parallel with the Arla Depot development.

6.51 Given the sustainable nature of the development, as outlined previously in this Planning Statement, it is considered that the density of the scheme, which is approximately 117.5 units per hectare, is consistent with the strategic aims of London Plan policies D2, GG2 and D3.

6.52 Strategic Policy DMHB11 of the Local Plan requires buildings to be of a high-quality design that is *“harmonising with the local context by taking into account the surrounding”* in terms of scale of development, building plot sizes, building lines and setbacks, architectural composition, and local topography.

6.53 The proposed development has been carefully designed with consideration for the neighbouring development, with particular regard for its relationship with the Arla development. Similar building plot sizes and architectural compositions have been integrated into the proposal, while established street patterns have guided the layout of the proposal in accordance with Policy DMHB11.

6.54 Policy BE1 of the Local Plan notes that designs should enhance the local distinctiveness of the area and contributes to a sense of place, and reflect the context of local buildings, townscapes and views to make a positive contribution to the local area in terms of layout, form, scale, and materials. Development must ensure high quality materials and finishes which maximise sustainability.

6.55 The scheme layout has been carefully designed to optimise the potential of the sustainable and accessible site, with consideration for the constraints of the relatively narrow, deep form of the Site. Following a design-led approach, the number of residential units has been maximised with mix of suitable uses provided, using and creating a successful mix and inclusive development in accordance with local and London Plan policies.

6.56 It is considered therefore the proposal makes a positive contribution to the local townscape and provides an appropriate density given the location within South Ruislip Local Centre.

Landscaping and Urban Greening Factor (UGF)

6.57 Policy DMHB 14 of the Local Plan states the following:

“A) All developments will be expected to retain or enhance existing landscaping, trees, biodiversity or other natural features of merit.

B) Development proposals will be required to provide a landscape scheme that includes hard and soft landscaping appropriate to the character of the area, which supports and enhances biodiversity and amenity particularly in areas deficient in green infrastructure.

C) Where space for ground level planting is limited, such as high-rise buildings, the inclusion of living walls and roofs will be expected where feasible.

D) Planning applications for proposals that would affect existing trees will be required to provide an accurate tree survey showing the location, height, spread and species of trees. Where the tree survey identifies trees of merit, tree root protection areas and an arboricultural method statement will be required to show how the trees will be protected. Where trees are to be removed, proposals for replanting of new trees on-site must be provided or include contributions to offsite provision.”

6.58 Policy G5 of The London Plan states that major development proposals should contribute to the greening of London by including urban greening as a fundamental element of site and building design, and by incorporating measures such as high-quality landscaping (including trees), green roofs, green walls and nature-based sustainable drainage.

6.59 Policy G7 of The London Plan states development proposals should ensure that, wherever possible, existing trees of value be retained.

6.60 The landscape is designed to support the transition between the various uses of the Site. Additionally, connection with nature is key to well-being and offers an area for social gathering and interactions between residents.

6.61 Landscaping proposals have been integrated as part of the overall design approach from the outset with design revisions throughout the pre-application process and Design Review Panel. Various areas of landscaping are proposed, from a civic open space to

additional areas of open space throughout the development with a softer, more intimate character, reflecting the different patterns of use of these areas.

- 6.62 A Landscape Strategy has been prepared by Enplan and should be read in conjunction with this Planning Statement when considering the proposed landscaping. The proposed landscaping scheme is seen as a vital part of the overall design approach and a contributor towards the proposal's compliance with National and Local policies.
- 6.63 Furthermore, an Urban Greening Factor Statement has been prepared by Enplan and submitted with this application. This confirms that the proposal has a UGF of 0.41, which exceeds the standard of 0.4 for residential development.

Ecology

- 6.64 Biodiversity Net Gain (BNG) is mandatory under Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021). All development (unless exempt) must deliver a BNG of 10%.
- 6.65 Chapter 15 of the NPPF states that planning decisions should contribute to and enhance the natural and local environment by minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures and incorporating features which support priority or threatened species such as swifts, bats and hedgehogs.
- 6.66 Paragraph 8.6.6 of The London Plan states that biodiversity net gain is an approach to development that leaves biodiversity in a better state than before.
- 6.67 Paragraph 6.28 of Hillingdon Council's Local Plan Part 2 states that it is important that planning decisions are appropriately informed by the right level of survey and information on ecology features.
- 6.68 Noting the existing nature of the Site, the site survey revealed the habitats present were predominantly buildings and developed land.
- 6.69 A Preliminary Ecological Appraisal, prepared by Syntegra have been submitted as part of this application. Given the moderate risk of bat activity in the vacant building to the rear of the Site, further bat surveys will be conducted.
- 6.70 Furthermore, in accordance with national requirements, a Biodiversity Net Gain Assessment has been prepared by Syntegra and submitted with this application.
- 6.71 As such, it is considered that through careful landscaping design and mitigation measures, the proposal complies with national and local ecology and landscaping requirements.

Daylight and Sunlight

6.72 A Daylight & Sunlight Report and a Proposed Accommodation Light Assessment have been prepared by CHP and have been submitted as part of this application.

Neighbouring Daylight and Sunlight Assessment

6.73 Part B of Policy DMHB11 of the Local Plan states that "*Development proposals should not adversely impact on the amenity, daylight and sunlight of adjacent properties and open space.*"

6.74 The Daylight & Sunlight Report prepared by CHP considers the impact the proposed development has on the daylight and sunlight of the neighbouring properties. The report considers the daylight against the criteria set out in the BRE Guidance. It is noted, the target levels contained in the BRE Guide correlate with a lower density suburban model and therefore need to be applied flexibly in denser urban locations.

6.75 Considering Daylight on neighbouring buildings, the results of the analysis demonstrates that, whilst the numerical targets set out in the BRE guidelines are not achieved in isolated locations, the resulting levels of daylight are considered appropriate for such an urban location.

6.76 This conclusion has been reached having regard to the relationship of the neighbouring properties to the site boundary and the design of the neighbouring buildings themselves. The proposals are therefore considered achieve the aims of the BRE guidelines and will ensure the neighbouring properties retain appropriate access to daylight.

6.23 Finally, with regard to sunlight, the results of the analysis demonstrate that all rooms will achieve the numerical targets set out in the BRE guidelines and the proposals will not have a significant effect on the sunlight the neighbouring properties enjoy.

Internal Daylight and Sunlight

6.24 The Internal Daylight and Sunlight Assessment by CHP considers the natural daylight and sunlight levels in habitable rooms within the proposed development, against national guidance. The BRE guide (2022) is used to determine whether a new development will achieve acceptable levels of internal daylight within habitable rooms. The guidance states that the rooms within proposed residential accommodation that should be assessed are living rooms, kitchens and bedrooms.

6.25 The results of the daylight analysis of the proposed accommodation demonstrates that 97% will achieve or exceed the numerical values set out in the BRE guidelines, with reference to BS EN 17037, with the remaining six being bedrooms, which are less important.

6.26 Additionally, concerning the units access to sunlight, the analysis demonstrates that 67% of the units will have at least one room that will enjoy 1.5hrs of sunlight on the 21st March and therefore with reference to paragraph 3.1.16 of the BRE guidelines the proposals will provide accommodation with good access to sunlight.

6.27 With regards to the proposed amenity space, the analysis demonstrates that significantly more than 50% of this will enjoy 2hrs of direct sunlight on 21st March and the scheme therefore provides amenity space with good access to sunlight

6.23 The Daylight and Sunlight report confirms that the proposed layout is consistent with planning policy on daylight and sunlight.

Energy and Sustainability

6.24 Policy SI2 of The London Plan states that major development should be net zero-carbon. This means reducing greenhouse gas emissions in operation and minimising both annual and peak energy demand in accordance with the energy hierarchy. A minimum on-site reduction of at least 35 per cent beyond Building Regulations is required for major development.

6.25 Additionally, Policy DMEI 2 of Hillingdon Council's Local Plan Part 2 states that all major development proposals must be accompanied, at submission stage, by an Energy Strategy showing how reductions will be achieved in accordance with Policy SI of The London Plan.

6.26 The Energy Strategy prepared by Stroma and submitted as part of this application sets out that the development proposes the following renewable energy sources:

- High efficiency communal air source heat pumps for all hot water and heating;
- Solar PV panels for electrical generation; and
- Efficient building construction and high efficiency ventilation and lighting.

6.27 It is noted that there is currently no District Heat Network system in the vicinity to connect to nor any planned future DHN.

6.28 The proposed development would therefore see an improvement on Part L CO2 emissions by 63%.

6.29 The Energy Statement prepared by Stroma, provides further detail and should be read when considering the energy and sustainability benefits of the proposed developments.

6.30 On the basis of the above, the proposed development is in line with adopted and emerging local policy and considered acceptable in terms of energy and sustainability.

Transport Considerations

6.31 Paragraph 116 of the NPPF states that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network, following mitigation, would be severe, taking into account all reasonable future scenarios.

6.23 Policy T2 of The London Plan states that development proposals must demonstrate how they will deliver improvements that support the ten Healthy Streets Indicators in line with Transport for London guidance, while London Plan Policy T4 states that development proposals should not increase road danger.

6.24 Policies DMT 1 and DMT 2 of Hillingdon Council's Local Plan Part 2 require the Council to consider whether the traffic generated by proposed developments is acceptable in terms of the local highway and junction capacity, traffic flows, and conditions of general highway or pedestrian safety.

6.23 A Transport Assessment prepared by Motion is submitted with the application and should be referred to when assessing transport and highways considerations. A summary of the key elements is provided below.

Cycling

6.25 Policy DMT 5 of the Local Plan states that development proposals will be required to meet the Council's cycle parking standards as set out in Appendix C Table 1.

6.24 Furthermore, London Plan Policy T5 states that development proposals should help remove barriers to cycling and create a healthy environment where people choose to cycle, walk and take public transport.

6.25 Regarding the residential aspect of the development, 77 cycle parking spaces are proposed to be provided to serve Block 2, and Blocks 3.1, 3.2 and 3.3 are each provided with 46 cycle parking spaces. A total of 215 cycle parking spaces is therefore proposed to serve future residents.

6.26 In addition, it is required that appropriate cycle parking be provided for visitors. Three Sheffield stands are provided for Block 2 and two Sheffield stands are provided for Blocks 3.1-3.3, providing a total of 18 visitor cycle parking spaces.

6.27 The proposed development will therefore provide a total of 233 cycle parking spaces for the residential aspect of the development. Appropriate cycle parking provision has been accommodated within each individual block on the ground levels within a dedicated cycle store. The proposed development therefore complies with the minimum cycle parking requirements for residents.

6.28 With regard to cycle parking provision for the hotel, London Plan Policy requires one long-term cycle parking space per 20 bedrooms and one short-term cycle parking space per 50 bedrooms. It is proposed that four Sheffield stands will be provided and positioned directly adjacent to the proposed hotel loading bay.

Car Parking

6.29 London Plan Policy T6 states that car parking should be restricted in line with levels of existing and future public transport accessibility and connectivity. As noted in the London Plan *“Car-free development should be the starting point for all development proposals in places that are (or are planned to be) well-connected by public transport.”*

6.30 The proposed development is car-free, in line with wider local planning policy and the site is within a highly sustainable location and service by frequent and high-quality service routes, including buses and trains to key local and regional destinations.

6.31 Future occupiers will not be eligible for residents' parking permits within the surrounding Controlled Parking Zone (CPZ), which will be secured through the appropriate legal mechanisms, thereby discouraging private car ownership. In addition, access to a car-club will be available to meet occasional car-based needs without requiring private vehicle ownership.

6.32 Having regard to these locational factors and transport measures, it is expected that residents will occupy the dwellings with a clear understanding that reliance on a private car will not be necessary or encouraged.

6.33 The proposal will provide 16no. disabled spaces in line with national and local policy and responds to pre-application feedback. The accessible parking bays on the southern side of the internal access road benefit from a 1.2 metre pedestrian strip on the south side, in addition to a pedestrian crossing point which leads towards the proposed footway on the northern side of the internal access road.

6.34 With regards to car parking for the hotel extension, it is understood that there is currently a total of approximately 55no. car parking spaces, which are not formally rationalised and are shared between the existing cash and carry and the hotel. The total number of car parking spaces will be reduced to 32no., four of which are accessible car parking spaces.

6.35 The proposed car park will be gated, and future guests of the hotel will be required to pre-book a car parking space in advance of their arrival. It will be ensured that the hotel will be responsible for the ongoing management of the car park and appropriate measures will be implemented during operation to ensure the integrity of the car park arrangements are retained.

6.36 It is therefore considered that car parking provision is in line with local and national policy as well as pre-application advice.

Servicing and Refuse

6.37 Part iv of Local Plan Policy DMT1 requires developments to “*adequately address delivery, servicing and drop-off requirements.*”

6.38 A Delivery and Servicing Management Plan, prepared by Motion sets out the typical operational requirements. The purpose of the Delivery, Servicing and Waste Management Plan is to ensure that delivery and servicing activity associated with the proposed development can take place in a safe, efficient and sustainable manner.

6.39 The submitted DSMP confirms that demonstrates that the proposed hotel extension is unlikely to generate any delivery and/or servicing vehicle movements during both the morning and evening peak hour periods. Over an average weekday, the development proposals could generate in the order of four two-way delivery and/or servicing vehicle movements in addition to existing hotel servicing activity.

6.40 With regards to the residential apartments, the DSMP confirms that two delivery and/or servicing vehicle movements during both the morning and evening peak hour periods may be generated.

6.41 Servicing and refuse collecting would be accommodated throughout the Site. The internal access road varies in width between 4.5 to 6.4 metres, ensuring that a minimum of two large cars can pass at any time. A total three servicing bays are provided on the northern side of the internal access road which have been designed to accommodate the movement of all delivery and servicing vehicles which are envisaged to visit the site.

6.42 It is proposed that all servicing and delivery activities will occur within the curtilage of the site, with all servicing and delivery vehicles utilising the proposed loadings bays adjacent to each block. Refuse stores will be located at ground floor level and collection will occur within the curtilage of the site.

6.43 Furthermore, all refuse collection will occur with the curtilage of the site. It is understood that a refuse vehicle will route northwest-bound through the site and utilise the proposed turning head situated between Blocks 3.2 and 3.3 in order to turn on-site. Upon turning, the refuse vehicle will route southeast-bound and utilise the three on-street loading bays in order to exercise all refuse collection activities.

6.44 The site layout has been designed to take into account of relevant Building Regulations principles (as referred to in Manual for Streets, 2007) to cater for service and delivery vehicles like to access the site on a regular basis. Vehicle tracking has been undertaken that demonstrates a refuse collection vehicle can access the Site.

6.45 The Delivery, Servicing and Waste Management Plan prepared by Motion should be referred to when assessing the arrangements for servicing and delivery vehicles to and from the Site.

Summary

6.46 In summary, the proposed development would not have an adverse impact on highway capacity or safety, would promote sustainable travel choices and would include an appropriate level of cycle parking.

6.47 It is therefore considered that the proposed pedestrian and cycle access, delivery and servicing strategy, and waste management strategy comply with the objectives of the NPPF and the requirements of local policy.

Travel Plan

6.48 Paragraph 110 of the NPPF states that significant development should be focused on locations which are or can be made sustainable through limiting needs to travel and offering a genuine choice of transport modes.

6.49 This is continued in Paragraph 118 of the NPPF (2024), which states that all developments that will generate significant amounts of movement should be required to provide a Travel Plan.

6.50 Furthermore, Policy DMT1 (part B) of the Local Plan states that *“Development proposals will be required to undertake a satisfactory Transport Assessment and Travel Plan if they meet or exceed the appropriate thresholds.”*

6.51 The core objective of a Travel Plan is to reduce the number of single occupancy vehicle trips, which has already been achieved through the car-free nature of the development. Thus, the aim of the plan is to encourage sustainable changes to travel behaviour resulting in a higher proportion of trips via active travel modes.

6.52 A draft Travel Plan prepared by Motion has been submitted to support the application. This draws together the proposed measures, monitoring and review proposals into a costed Action Plan that identifies who will be responsible for the delivery of each element. The Action Plan will be implemented at the outset in order to maximise the opportunity to influence the future residents' travel patterns.

6.53 The plan will be updated prior to occupation of the residential units and final details agreed with the Council. The Travel Plan Coordinator (TPC) will be responsible for the day-to-day management, coordination, promotion, and implementation of the Travel Plan. Additionally, the TPC will be a point of contact for the Council, and for any occupants who have queries about their travel.

6.54 The proposed development therefore complies with Local Plan Policy DMT 1, and the relevant paragraphs of the NPPF.

Flood Risk and Drainage

6.55 Policy DMEI 9 of the Local Plan set out the strategy for the management of flood risk for the area.

6.56 The EA identify that the Site is located within Flood Zone 1 (indicating a low risk of fluvial flooding) and has a medium risk of surface water flooding.

6.57 A Flood Risk Assessment has been prepared by KRS Consulting and is submitted with the planning application. The Assessment concludes that the proposal is planning policy compliant, being safe for its lifetime and not increasing flood risk elsewhere in line with the NPPF.

6.58 Additionally, a surface water drainage strategy has been prepared by KRS Consulting and submitted as part of this application and should be referred to for further details regarding drainage.

6.59 The proposed SuDS Strategy will take the form of:

- Permeable surfaces and landscaping
- Surface water attenuation storage in the form of an underground crate system attenuation tanks.
- Runoff rates would be restricted to Greenfield Runoff Rates to the public surface water sewer.

6.60 The proposal is therefore considered acceptable in flood risk and drainage terms, and in line with national and local policy.

Air Quality

6.61 Policy DMEI14 of the Local Plan states that development proposals should demonstrate appropriate reductions in emissions to contribute towards national air quality objectives for pollutants. They should, as a minimum:

- i. be “air quality neutral”;*
- ii. include sufficient mitigation to ensure there is no unacceptable risk from air pollution to sensitive receptors, both existing and new; and*
- iii. actively contribute towards the improvement of air quality, especially within the Air Quality Management Area.*

6.26 An Air Quality Assessment has been prepared by Stroma and submitted as part of this application.

- 6.27 The assessment has been undertaken to assess both construction and operational impacts associated with the proposed development.
- 6.28 An assessment of the potential dust impacts has been carried out and concludes that the impact of dust soiling and PM10 can be reduced to negligible through appropriate mitigation measures.
- 6.29 Finally, the proposed development will be car-free. Therefore, the number of trips generated is significantly reduced, therefore in considering the impact of vehicle emissions, the change in predicted NO2, PM10 and PM2.5 concentrations at existing receptors in 2029 following completion of the proposed development is considered negligible at all modelled receptors.
- 6.30 The air quality neutral assessment has concluded that the proposed development will meet building and transport emission benchmarks. As such, no mitigation measures are required to reduce these emissions.
- 6.31 Overall, the assessment concludes that the air quality is not considered a constraint to the development of the Site, as proposed and therefore it should not be a material consideration in relation to the planning application at the Site.
- 6.32 The proposed development therefore complies with Policy DMEI14 Local Plan.

Fire Safety

- 6.33 A Fire Statement has been prepared by MU Consultants to accompany the submission. The Fire Statement sets out the fire safety measures and features that must be included in the various detailed design packages that form the information to be used for Building Regulations approval.
- 6.34 The Fire Safety Regulations (2022) defines 'high-rise residential buildings' as those 18m above ground level or those which have at least 7 storeys. Given the height of the proposal does not meet these criteria it is not considered that the proposal constitutes a high-rise residential building and therefore the relevant provisions of the regulations are not applicable in this instance.
- 6.35 The report includes an analysis of the scheme against relevant legislation and the recommendations made have informed the final design.
- 6.36 It is concluded that the building design as documented can meet the Functional Requirements of Part B of the Building Regulations 2010 (as amended) and is therefore considered acceptable.

7. PLANNING BENEFITS

7.1 The proposal will deliver the following benefits:

- The development will provide 114no. high-quality dwellings within a highly sustainable location, including 21% provision of affordable housing, a significant provision against a high local need;
- The regeneration of a highly sustainable site contributing towards the wider aims of the area and delivering an optimum use across the Site;
- An enhanced public realm with landscaping and an accessible cycle/ footpath.
- The development will promote sustainable modes of transport and reduction in vehicle movement against the existing use of the Site owing to the car-free nature of the proposal and significant cycle parking provision, as well as improved pedestrian and cycle access to the Site;
- The development will contribute towards the Council's sustainability objectives, incorporating numerous energy efficient measures;
- The development will achieve a total CO2 emission reduction of 63% below the Part L 2021 baseline;
- The development will adopt a scale, form and enclosure of built development, materiality and colour palette and vertical emphasis that has been found to respond better to the existing and emerging local context;
- The proposal will create a safer local environment as a result of increased natural surveillance;
- The proposal will deliver a number of economic benefits including operational and construction phases that will create jobs and stimulate local supply chains as well as enhance the visitor economy by attracting more people to the area, supporting hospitality and retail businesses;
- In addition, increased local expenditure from both visitors and workers will boost community spending, while developer contributions through Section 106 agreements and the Community Infrastructure Levy (CIL) will provide further investment in local infrastructure, services, and amenities.

7.2 Overall, it is demonstrated that the proposed development will provide significant benefit to the local area. There is no planning harm identified that would outweigh this.

8. CONCLUSION

8.1 The applicant seeks planning permission for the following development works:

“Partial demolition of existing buildings and erection of three buildings comprising a total of 114no. units, plus extension to existing hotel to provide an additional 22no. rooms, along with access, car parking, servicing, landscaping, and other associated works.”

8.2 Paragraph 125(c) and (d) of the NPPF states that planning policies and decisions should:

“c) give substantial weight to the value of using suitable brownfield 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”

8.3 The land currently comprises a cash and carry, convention centre and a vacant building, and thereby represents under-utilised land within Hillingdon. The proposal will provide a comprehensive redevelopment of the Site, providing additional hotel rooms alongside 114no. new dwellings which will meet the identified needs for housing locally and provide a more effective use of a sustainable, brownfield site. Therefore, paragraph 125 requires that the proposed development should be approved unless **“substantial harm would be caused”**.

8.4 Section 6 of this planning statement confirms that the proposed development is in accordance with local and national planning policy.

8.5 It is demonstrated in Section 7 of this Statement that the proposed development would deliver significant planning benefits to the local area. Furthermore, the assessment in Section 6 does not identify any conflict with relevant local and national planning policy, nor any harm in planning terms.

8.6 As such, the proposals accord with the Development Plan and planning permission should be granted without delay, as per paragraph 11 of the NPPF.