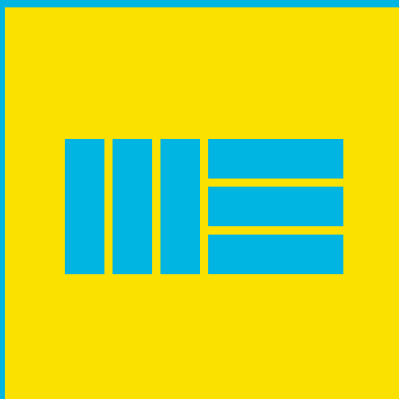


**40 STATION
APPROACH, HA4 6RZ**

ALBION HOUSING LTD

**PLANNING
STATEMENT
ADDENDUM**

MARCH 2021



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01

INTRODUCTION

01. INTRODUCTION

This Planning Statement Addendum has been prepared by Montagu Evans LLP on behalf of Albion Housing Ltd ("the Applicant") to support a full planning application ("the Application") for the erection of a three storey building comprising six residential units and a dental surgery ("the proposed development" or "the proposal") at 40 Station Approach, South Ruislip, Middlesex HA4 6RZ ("the Application Site" or "the Site"). The application is made by the Applicant to the London Borough of Hillingdon ("LBH" or "the Council").

1.1. PROPOSAL OVERVIEW

1.1.1. The Application seeks full planning permission for the following development:

Application for full planning permission for the demolition of the existing building and erection of a three storey building comprising a dental surgery and 6 residential units (no. 1, 3 bed units; no. 2, 2 bed units and no. 3, 1 bed units), car and cycle parking and associated works; temporary permission for the siting of a modular building to the rear of the Site for use as a dental surgery during the demolition of the existing dental surgery and construction of the proposed dental surgery.

1.1.2. This Application is for full planning permission and, in addition to this Addendum, is accompanied by a number of plans, drawings and supporting documents as set out in the schedule of submission documents (00. Schedule of Submission Documents) and drawing schedule (06. Drawing Schedule).

1.1.3. This Addendum should be read alongside the full Planning Statement attached at **Appendix 1**.

1.2. BACKGROUND

1.2.1. The Site was previously subject to a full planning application (ref: 27354/APP/2020/4256) of a similar character and nature for redevelopment of the Site for an improved dental surgery and provision of residential units. The description of development for that application was:

Application for full planning permission for the demolition of the existing building and erection of a three storey building comprising a dental surgery and 7 residential units (no. 6, 1 bed units and no. 1, 2 bed units), car and cycle parking and associated works; temporary permission for the siting of a modular building to the rear of the Site for use as a dental surgery during the demolition of the existing dental surgery and construction of the proposed dental surgery.

1.2.2. The previously submitted application at the Site was refused on 12th March 2021. The decision notice, attached at **Appendix 2**, notes the reasons for refusal as:

- 1) *The proposed development, by reason of the overall size and scale of the building would result in an incongruous and overly dominant form of development that would be detrimental to the character, appearance and visual amenities of the site, the street scene and the wider area. Furthermore, the proposed roof access enclosure and lift over run by reason of its size, scale, bulk and design, would result in an intrusive and incongruous roof addition that adds visual clutter and detracts from the appearance of the building and wider streetscape. As such the proposed would be contrary to Policies DMHB11 and DMHB12 of the Hillingdon Local Plan: Part Two – Development Management Policies (2020), Policy D4 of the London Plan (2021) and the NPPF (2019).*

- 2) *The proposed development leads to the loss of a family sized residential unit and by reason of the unit mix fails to provide sufficient family sized units, as required by the latest information on housing need. The proposed development fails to contribute towards mixed and balanced communities and the range of housing types required within the Borough contrary to Policy DMH 2 of the Hillingdon Local Plan: Part Two – Development Management Policies (January 2020), Policy H10 of the London Plan (2021) and the NPPF (2019).*

1.2.3. The above reasons are the only reasons for refusal listed on the decision notice for the previously submitted scheme which is of a similar character, nature and description to this Application.

1.2.4. Following the refusal of the previously submitted scheme, the applicant has made amendments to the scheme to address the above listed reasons for refusal. These amendments include:

- the removal of the previously proposed roof enclosure;
- the reduction in the overall scale and bulk of the building through a step back of the second floor by approximately 3 metres to the rear;
- alterations to the proposed housing mix to re-provide the one existing three bed unit on site (previously proposed to be lost); and,
- a decrease in the number of one bed units proposed and an increase in the number of two and three bed units proposed.

1.3. FORMAT AND STRUCTURE

1.3.1. This Application follows amendments made to a recently submitted and refused full planning application at the same Site for a scheme of a similar character and description to the development proposed under this Application.

1.3.2. This Statement is an Addendum to the Planning Statement submitted under planning application ref. 27354/APP/2020/4256 attached at **Appendix 1**. The Planning Statement attached at **Appendix 1** sets out the following as it relates to this Application and the Site:

- **Section 2 Site Location and Context** introduces the existing Site, its location and its surroundings, including the Site's planning history and relevant planning history from the wider area;
- **Section 3 Proposed Development** outlines the details of the proposed development and Application;
- **Section 4 Planning Policy Framework** provides an overview of relevant planning policy, including national and local polices and supplementary planning guidance;
- **Section 5 Planning Assessment** considers the proposal against relevant policy and provides a planning assessment, including retail considerations, detailing how the proposal complies with relevant planning policy; and,
- **Section 6 Summary and Conclusion** provides a summary and overview of this Statement and concludes that the proposal complies with the relevant policies and should be granted permission.

1.3.3. This Addendum therefore does not seek to re-establish the acceptability of the principle of the development and material planning considerations, excluding the overall scale and size of the development and the housing mix, demonstrated through the appended planning statement and supported in the conclusions of the Officers report for the previously submitted scheme (**Appendix 3**) and the consultation responses from statutory consultees on the previously submitted application (**Appendix 4**).

1.3.4. As this Application only proposes amendments to the housing mix and overall scale and bulk, the conclusions of the appended Planning Statement for all other material considerations and matters remain relevant for this Application. This Addendum seeks to assess the proposed amendments made to the scheme to address the reasons for refusal on the previously submitted scheme against relevant policies in the adopted relevant local planning policy documents, key national policies and other material considerations.

1.3.5. This Planning Statement Addendum is structured as follows:

- **Section 2: Proposed Amendments** – considers the proposed amendments made to the previously submitted and refused scheme at the Site against the relevant planning policies and guidance;
- **Section 3: Planning Assessment** – considers the proposed amendments against relevant policy details how the proposed amendments comply with relevant planning policy and address the reasons for refusal on the previously submitted scheme at the Site; and,
- **Section 4: Summary and Conclusions** – provides a summary and overview of this Addendum and concludes that the proposed amendments address the reasons for refusal on the previously submitted scheme and the proposed development complies with the relevant policies and should be granted permission.

02

PROPOSED AMENDMENTS

02. PROPOSED AMENDMENTS

This section provides an overview of the proposed amendments to the scheme at the Site as well as the description of development.

3.1. DESCRIPTION OF DEVELOPMENT

3.1.1. The application site forms a rectangular plot at 40 Station Approach, South Ruislip, Middlesex HA4 6RZ. This Application is seeking full planning permission for the demolition of the existing two storey building at the Site and redevelopment of Site to provide a three storey building comprising of six residential units and a dental surgery together with landscaped amenity space, cycle and car parking.

3.1.2. The description of development is as follows:

Application for full planning permission for the demolition of the existing building and erection of a three storey building comprising a dental surgery and 6 residential units (no. 1, 3 bed units; no. 2, 2 bed units and no. 3, 1 bed units), car and cycle parking and associated works; temporary permission for the siting of a modular building to the rear of the Site for use as a dental surgery during the demolition of the existing dental surgery and construction of the proposed dental surgery.

3.1.3. The Site is located within the urban area and a designated local centre. The design has been informed by the surrounding context and adopted planning policy, as set out in the accompanying Design and Access Statement. The Application is also supported by a full suite of existing and proposed drawings which are set out in full in the Drawing Schedule (06. Drawing Schedule).

3.1.4. Section 3 of the attached Planning Statement (**Appendix 1**) provides a full overview of the proposed development and how this response to the pre-application advice sought on the proposed development.

3.2. PROPOSED AMENDMENTS

1.3.6. Following the refusal of the previously submitted scheme, the applicant has made amendments to the scheme to address the above listed reasons for refusal. These amendments include:

- the removal of the previously proposed roof enclosure;
- the reduction in the overall scale and bulk of the building through a step back of the second floor by approximately 3 metres to the rear;
- alterations to the proposed housing mix to re-provide the one existing three bed unit on site (previously proposed to be lost); and,
- a decrease in the number of one bed units proposed and an increase in the number of two and three bed units proposed.

1.3.7. The removal of the roof enclosure, including lift to the outdoor amenity space on the roof, means no enclosure structures or lift and lift overruns are proposed on the roof. The outdoor amenity space on the roof will still be accessible via stairs to a sliding glass roof door with a chairlift installed on the stairs to ensure it is accessible to all.

1.3.8. A reconfiguration of the internal layout and reduction in the number of residential units proposed allows for a reduction in the depth of the second floor by approximately 3 metres. The change in the overall size and scale of the proposed development resulting from this amendment maintains or exceeds policy requirements for internal space and outdoor amenity space.

1.3.9. The housing mix has been amended to provide the below housing mix under this Application:

	1 bed units	2 bed units	3 bed units	Total residential units
Proposed mix under this Application	3	2	1	6

1.3.10. It is considered that the proposed amendments made to the scheme listed above address the reasons for the Council refusing the previously submitted scheme at the Site and this is discussed and confirmed in Section 3 of this Addendum.

03

PLANNING ASSESSMENT

03. PLANNING ASSESSMENT

In this section we assess the proposed amendments against the relevant development plan policies and other material considerations outlined in Section 4 of the Planning Statement attached at **Appendix 1**.

5.1. PRINCIPLE OF DEVELOPMENT

- 5.1.1. The principle of development as well as the housing size, quality, impact on residential amenity, transport considerations (including car and cycle parking), design, landscaping, amenity and outdoor space; dental surgery (including temporary provision) has been assessed under the previously submitted application at the Site (Ref. 27354/APP/2020/4256) and were considered acceptable in principle, thus didn't form a reason for refusal, according to the Officers report for the previously submitted scheme and decision notice (**Appendix 3** and **Appendix 2** respectively).
- 5.1.2. The Officers report for the previously submitted scheme, attached at **Appendix 3**, notes that "*it is considered that the principle of the current scheme is acceptable*" (7.01 of Appendix 3). Statutory consultees were consulted on the previously submitted application and those made available to the Applicant are compiled and attached at **Appendix 4**. All the statutory consultee responses which the Applicant was provided sight of during the course of the Application raised no objection to the proposed scheme based on their specialisms; highways (including parking), trees and landscaping, accessibility and contaminated land.
- 5.1.3. As such, it is considered that the principle of the development, along with other key considerations like residential amenity, highways and car parking have been assessed and considered acceptable under the previously submitted scheme (Ref. 27354/APP/2020/4256) and the only matters that require consideration are the amendments made to address the reasons for refusal, namely the impact of the proposed roof enclosure and the overall size and scale of the proposal and the housing mix.
- 5.1.4. The planning assessment should therefore focus on the acceptability of the proposed amendment against relevant planning policy areas.

5.2. OVERALL SIZE AND SCALE OF DEVELOPMENT

- 5.2.1. The first reason for refusal listed on the decision notice (**Appendix 2**) for the previously submitted application (Ref. 27354/APP/2020/4256) is as follows:

The proposed development, by reason of the overall size and scale of the building would result in an incongruous and overly dominant form of development that would be detrimental to the character, appearance and visual amenities of the site, the street scene and the wider area. Furthermore, the proposed roof access enclosure and lift over run by reason of its size, scale, bulk and design, would result in an intrusive and incongruous roof addition that adds visual clutter and detracts from the appearance of the building and wider streetscape. As such the proposed would be contrary to Policies DMHB11 and DMHB12 of the Hillingdon Local Plan: Part Two – Development Management Policies (2020), Policy D4 of the London Plan (2021) and the NPPF (2019).

- 5.2.2. The proposal has been designed to create a high quality, appropriately proportioned building that respects and responds to its surrounding context. The Design and Access Statement details the design process and considerations in full and is submitted in support of this Application.
- 5.2.3. Since the previously submitted application was refused for the above listed reason, the proposed roof enclosure has been removed from the scheme meaning there will be no enclosure or structure on the roof. This amendment wholly addresses the concern of the Council expressed in the above reason that "*the proposed roof access enclosure and lift over run by*

reason of its size, scale, bulk and design, would result in an intrusive and incongruous roof addition that adds visual clutter and detracts from the appearance of the building and wider streetscape".

- 5.2.4. It is proposed the shared amenity space on the roof can be accessed from the stairs via an openable glass rooflight. To ensure addressing this reasons for refusal doesn't adversely impact wheelchair users or those with reduced mobility, a chairlift will be installed to ensure accessibility for all future inhabitants to maintain access for all to the shared amenity space on the roof.
- 5.2.5. The above listed reason for refusal also notes that the *"overall size and scale of the building would result in an incongruous and overly dominant form of development that would be detrimental to the character, appearance and visual amenities of the site, the street scene and the wider area"*. Prior to the submission of the previously submitted application a massing exercise was been undertaken to ensure the proposed development optimises the use of the site within the context of the existing surroundings, including No. 42 Station Approach, the building directly to the east of the Site and the residential bungalow to the rear, No. 1 Northolt Avenue. In addition, following pre-application engagement with the Council the design and massing of the proposed development was materially and positively amended to response to pre-application comments on the height of the proposal (previously four storeys) and the design.
- 5.2.6. The previously submitted and refused scheme proposed a three storey building on the Site, reflecting the mix of two storey, three storey and three storey equivalent buildings in the local area. The height of the building matched the height of the buildings in the Station Approach parade the building resides in as well as the height of the recently constructed Acol Crescent development on the opposite side of Station Approach.
- 5.2.7. Notwithstanding the above, further amendments have been made alongside the removal of the roof enclosure to materially reduce the overall height, scale and bulk of the proposed development. The proposed housing mix has been altered (see 5.3 below) and the internal layout has been re-configured to facilitate a significant step back and reduce in the building mass to the rear amounting to approximately 3 metres across the whole of the second floor. This, alongside the removal of the roof enclosure represents a material reduction in the overall height, scale and size of the proposed development.
- 5.2.8. It is important to note that the changes to the housing mix and internal reconfiguration of the residential units does not change the conclusions of the attached planning statement (Appendix 1) with regard to the schemes compliance with space standards and private and outdoor amenity space standards. The proposed development still complies with internal space standards and provides, or exceeds, the level of outdoor amenity space required under the London Plan and Local Plan. The submitted Design and Access Statement provides a detailed breakdown of the amenity space provided as well as a schedule of accommodation. The submitted plans also show the internal and external spaces to scale and can be used to confirm the schemes compliance.
- 5.2.9. Given the Site's Local Centre location, accessibility, surrounding context the height and mass of the building is considered wholly appropriate and now sits visually below the height of the recently approved Acol Crescent development in the immediate vicinity of the Site.
- 5.2.10. No. 52 to No. 40 Station Approach, the neighbouring buildings within the station approach parade, maintain a strong building line which the current building on the Site deviates from. This currently creates a disjointed visual appearance and flow. Therefore the proposed building would match the established building line of the Station Approach buildings to the east and enhance the visual appearance of the site. The parade of buildings the Site resides in, from No. 52 to No. 40 Station Approach, has a mix of styles, masses and appearances. The proposal takes the opportunity to provide a modern and interesting design through pulling design elements from the mixed character of the local area. The materials and light colour palette proposed would utilised brick in a push pull pattern to create interest and break up the elevation which will ultimately enhance the quality of a key corner site which is currently of poor quality.

- 5.2.11. The Site is a prominent corner Site and the existing building is of little architectural merit. The design and mass of the scheme has evolved following pre-application discussions with the Council and in response to the stated reasons for refusal on the previously submitted scheme. The proposed would be a three storey development with no roof enclosure. This height, scale and mass is common in the surrounding area, and the proposed development sits visually below the recently developed Acol Crescent develop opposite.
- 5.2.12. For the above reasons it is considered that the proposed development, inclusive of the material amendments made to remove the roof enclosure and reduce the overall scale and mass of the development, addresses the Councils reason for refusal that *"overall size and scale of the building would result in an incongruous and overly dominant form of development that would be detrimental to the character, appearance and visual amenities of the site, the street scene and the wider area"*. We are of the opinion the scheme represents a building of a size and scale in keeping with the Site's location (in an accessible designated local centre), would not result in an incongruous or overly dominant appearance and would positively contribute to the visual amenities of the site, streetscene and wider area particularly in the context of recently constructed development in the immediate vicinity and of the existing building and Site which is of poor quality and does not positively contribute to the visual amenity of the streetscene.
- 5.2.13. It is therefore considered that the proposed development is an attractive scheme that would have a positive impact on the local area and streetscene in line with policy D4 of the Draft New London Plan, Policy DMHB 11 of the Local Plan and the Mayor of London's Housing SPG.

5.3. HOUSING MIX

- 5.3.1. The second reason for refusal listed on the decision notice for the previously submitted application (Ref. 27354/APP/2020/4256) was as follows:

The proposed development leads to the loss of a family sized residential unit and by reason of the unit mix fails to provide sufficient family sized units, as required by the latest information on housing need. The proposed development fails to contribute towards mixed and balanced communities and the range of housing types required within the Borough contrary to Policy DMH 2 of the Hillingdon Local Plan: Part Two – Development Management Policies (January 2020), Policy H10 of the London Plan (2021) and the NPPF (2019).

- 5.3.2. The above reason for refusal notes policies DMH 2 of the Hillingdon Local Plan Part Two and H10 of the London Plan as well as the NPPF. Policy H10 of the London Plan states that when determining the appropriate mix of unit sizes applicants and decision makers should have regard to a number of factors including 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.
- 5.3.3. It has been detailed in the planning statement for the previously submitted scheme (**Appendix 1**) that the Site is located in an accessible location, both close to local amenities (indeed the Site is located in a local parade of shops and services) and public transport links and that the Site is located in a designated Local Centre, which based on national and London Plan policies, is an appropriate location for smaller units and has the opportunity to optimise housing supply. The NPPF and London Plan encourages smaller units in designated centres.
- 5.3.4. However, Policy DMH 2 of the Hillingdon Local Plan Part Two makes no clear provision for consideration of Site specific circumstances as per the above provisions of the NPPF and London Plan and states only 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"*, which, according to paragraph 4.6 of the Hillingdon Local Plan Part Two is for a *"borough-wide required for larger affordable and private market units"*.
- 5.3.5. On balance of the above policies, precedent of adjacent recently constructed one and two bed flatted schemes such as Acol Crescent and the Site's local centre location and constraints, the Council consider that a provision of seven residential

units of a one and two bed mix is unacceptable (as was proposed on the previously submitted scheme) when weighed against the loss of one, three bed residential unit and a proposed mix of smaller units.

- 5.3.6. As such, the Applicant has proposed amendments to the housing mix to address the Council's reason for refusal and decrease the number of one bed residential units provided in favour of two and three bed units as well as re-provide the loss of the one, three bed unit currently on Site according to the officers report (**Appendix 3**). The below table shows the existing provision and mix of residential at the Site, the provision and mix of the refused scheme at the Site and the proposed provision and mix under this Application.

	1 bed units	2 bed units	3 bed units	Total residential units
Existing mix on Site	0	0	1	1
Proposed mix under previously submitted application (Ref. 27354/APP/2020/4256)	6	1	0	7
Proposed mix under this Application	3	2	1	6

- 5.3.7. It is understood from the context of the Officers report that a family sized unit is considered to be a three bed unit. As can be seen from the above table, the proposed housing mix under this application will now re-provide a three bed residential unit to address the Council's reason for refusal that the *"development leads to the loss of a family sized residential unit"*.
- 5.3.8. The above table also illustrates how the Applicant has responded to the Council's refusal of the previously submitted application due to the concern that the *"proposed development fails to contribute towards mixed and balanced communities"*. The housing mix has materially reduced the number of one bed units proposed and increased the two bed units proposed at the Site compared to the previously submitted scheme and provides a greater mix of different sized units.
- 5.3.9. Based on the above detailed amendment it is considered the proposed housing mix is wholly appropriate for the Site's location which, as per the Officers report for the previously submitted scheme, is *"located within a local centre and close to South Ruislip tube station and it is relatively well connected"* (Appendix 3, 7.01). We are therefore of the opinion that the proposed amendments to the housing mix address the Council's reason for refusing the previously submitted scheme and the Application continues to comply with relevant policies in the London Plan and NPPF and further responses to the expectations of DMH 2 of the Hillingdon Local Plan Part Two (2020) to provide three bed units.

5.4. PLANNING ASSESSMENT SUMMARY

- 5.4.1. The above discussion considers the proposed amendments to the previously submitted scheme against the relevant planning policies outlined in Section 4 of the attached Planning Statement (**Appendix 1**) and details how the amendments ensure the proposed development continues to comply with both national and local planning policy whilst further positively and wholly addressing the reasons for refusal stated on the decision notice attached at **Appendix 2** and discussed above.
- 5.4.2. Like the previously submitted scheme at the Site, the proposed development would continue to redevelop underutilised brownfield land through an increased, but scheme and context appropriate density.

- 5.4.3. The provision of six residential units will provide much needed housing in an accessible location, with a housing mix and density reflective of the Site's location. Although the proposal would result in the loss of one, three bed residential unit (forming part of the second reason for refusal) the proposed amendment now ensures a three bed residential unit is re-provided at the Site alongside a greater number of two bed residential units and delivering a net increase in much needed housing at the Site. The proposed amendments to the scheme with regard to housing mix therefore entirely address the reasons for refusal of the previously submitted scheme at the Site of a similar character and nature. As a result, the proposed development will continue to make much more effective use of this underutilised Local Centre location, the principle of which is supported by the NPPF, NPPG's, Draft London Plan and Local Plan whilst also addressing the Council's reasons for refusing a similar scheme at the Site previously.
- 5.4.4. The design and mass of the scheme has evolved following pre-application discussions with the Council. The design introduced verticality to the elevations as well as utilising a mixed brick palette harmonising well with the mixed character of the local area. The proposed would be a three storey development with a minimal stairwell and lift access to the roof. This height and mass is common in the surrounding area, and mirrors the recently developed Acol Crescent development opposite as well as the pitch height of the neighbouring shopping parade the Site forms part of.
- 5.4.5. The massing of the building takes account of the first floor residential dwelling at No. 42 and has been pulled away from this elevation to allow a 45 degree from the rear of No. 42. In addition, the building is pulled back from the side of No. 1 Northolt Avenue creating a good separation distance between the proposed development and No. 1. The side elevation of No. 1 Northolt Avenue has no windows into habitable rooms where there would be any potential window to window overlooking. Notwithstanding this, the separation distance between No. 1 and the proposed development prevents any adverse overlooking or privacy issues. Given the Site's Local Centre location, accessibility, surrounding context the height and mass of the building is considered wholly appropriate.
- 5.4.6. The Site falls within a designated Local Centre which are recognised as the nexus of local communities and neighbourhoods, providing convenient goods and services to the community. The proposed dental surgery will allow an existing local business to remain in the area, providing them the opportunity to expand into a much improved space.
- 5.4.7. Each residential unit will comply with nationally described space standards and provide private outdoor amenity space in the form of balconies / terraces. In addition, a landscaped shared outdoor amenity space is provided via a roof terrace, with stair and lift access making this space accessible to all residents. The provision of both private and shared amenity space complies with the requirements of the Draft London Plan and Local Plan and helps to provide a high quality development with a high level of residential amenity for occupants. The level of amenity space is in complete compliance with all relevant planning policies.
- 5.4.8. The proposed development will also provide cycle parking which remain in line with national and local expectations to reduce reliance on the private car. Five car parking spaces are also proposed which is an appropriate provision given the Site's accessible location (both to public transport and local amenities), the low parking stress of the surrounding area, the sustainable transport methods already utilised by users of the dental surgery and the policy requirements to shift to more sustainable transport methods. An accessible car parking space is also provided as part of the proposed development as is 1 active EVCP with the remainder provided with passive provision, all in line with London and local planning policy. As is clear from the highways officers' response on the previously submitted application (**Appendix 4**) this principle of this is accepted.
- 5.4.9. This section has assessed the proposed amendments to the scheme against relevant national and local planning policies and has clearly demonstrated that the amendments to the housing mix, complete removal of the roof enclosure and reduction to the overall size and scale of the building wholly address the reasons for refusing the previously submitted scheme at the Site. More widely, the proposed development as a whole continues to represent sustainable development and complies with relevant planning policies. As such, the Application should be granted full planning permission.

04

SUMMARY AND CONCLUSION

04. SUMMARY AND CONCLUSION

This Statement has been prepared by Montagu Evans LLP in support of an application for full planning permission for a three storey building comprising of six residential units and a dental surgery together with landscaped amenity space, cycle and car parking. The scheme has been developed in full accordance with up to date and relevant planning policy.

6.1. The application proposal to which this statement relates seeks full planning permission for:

Application for full planning permission for the demolition of the existing building and erection of a three storey building comprising a dental surgery and 6 residential units (no. 1, 3 bed units; no. 2, 2 bed units and no. 3, 1 bed units), car and cycle parking and associated works; temporary permission for the siting of a modular building to the rear of the Site for use as a dental surgery during the demolition of the existing dental surgery and construction of the proposed dental surgery.

6.2. The application site is located in South Ruislip on a rectangular plot at the corner of Station Approach to the north and Northolt Avenue to the west. There is an access road to the rear of the Site. The Local Planning Authority is the London Borough of Hillingdon.

6.3. This Application is for full planning permission and, in addition to this Statement, is accompanied by a number of plans, drawings and supporting documents as set out in the schedule of submission documents (00. Schedule of Submission Documents) and drawing schedule (06. Drawing Schedule).

6.4. The submission of this Application follows a redesign and reconfiguration in response to the refusal of a similar scheme at the Site (Ref. 27354/APP/2020/4256) on 12th March 2021. A summary of the reasons for refusal stated on the decision notice for the previously submitted scheme at the Site and the amendments proposed to the scheme to address the aforementioned reasons are listed below:

1. *The proposed development, by reason of the overall size and scale of the building would result in an incongruous and overly dominant form of development that would be detrimental to the character, appearance and visual amenities of the site, the street scene and the wider area. Furthermore, the proposed roof access enclosure and lift over run by reason of its size, scale, bulk and design, would result in an intrusive and incongruous roof addition that adds visual clutter and detracts from the appearance of the building and wider streetscape.*

Amendments made to address this reason for refusal:

The application submitted has removed the lift overrun in its entirety. As there is no longer a lift overrun and roof enclosure there former access to the roof will not add visual clutter or detract from the appearance of the building or wider streetscape. To ensure the amenity area on the roof is still fully accessible to all a chairlift will be installed on the staircase going from the second floor to the roof. More widely, the change to the unit mix from the previously submitted scheme, discussed below, has enabled a setback of approximately 3 metres to be provided on the second floor at the rear of the building, facilitating a material step down in height and overall size and scale. This reduction, alongside the significant removal of the lift overrun and roof enclosure materially reduces the overall size and scale of the building. The proposed development wholly relates to the character and appearance of the local area and has a positive impact on the streetscene. The proposed development is a marked visual and architectural improvement on the existing poor built form in situ.

2. *The proposed development leads to the loss of a family sized residential unit and by reason of the unit mix fails to provide sufficient family sized units, as required by the latest information on housing need. The proposed development fails to contribute towards mixed and balanced communities and the range of housing types required within the Borough.*

Amendments made to address this reason for refusal:

In response to this reason for refusal, the application submitted has made provision for a greater mix of two bed units as well as the provision of the existing three bed unit at the Site. The proposed development now provides a total of six residential units, compared to the current one residential unit provided on Site thus continues to positively provide much needed housing in line with national, London and local planning policies. The unit mix has been altered to provide a three bed unit to account for the loss of the one residential unit on Site. Further to this, the proposed application now provides two, two bed units in response to the above listed reason for refusal. The table below summaries the changes between the existing situation, the previously refused scheme at the Site and this Application. The below table clearly demonstrates that the above reason for refusal has been addressed and the proposed development does not lead to the loss of a 'family sized' residential unit and does provide much needed housing with an appropriate mix for the Site and location.

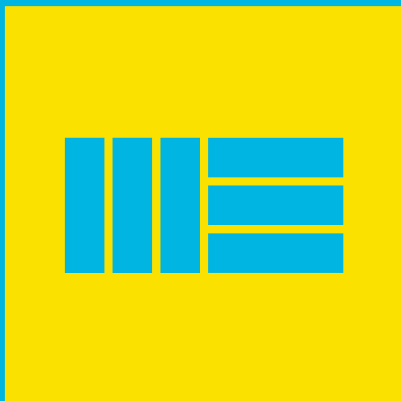
	1 bed units	2 bed units	3 bed units	Total residential units
Existing mix on Site	0	0	1	1
Proposed mix under previously submitted application (Ref. 27354/APP/2020/4256)	6	1	0	7
Proposed mix under this Application	3	2	1	6

- 6.5. The proposed development will deliver a three storey building comprising of a dental surgery on the ground floor to re-accommodate the existing dental surgery in situ in an improved unit to facilitate this local business to expand and remain in the local area.
- 6.6. The proposed amendments would ensure the scheme continues to provide much needed housing through the provision of six residential units with both private outdoor amenity space and landscaped shared amenity space. However, the proposed amendment to the housing mix increased the number of two bed residential units and re-provides a three bed residential unit (replacing the sole residential unit the Site currently delivers to housing in the area). The mix of housing type is wholly appropriate for the Site's accessible location within a designated local centre and is wholly in line with the NPPF, London Plan and Local Plan guidance.
- 6.7. The removal of the roof enclosure coupled with the reduction in the bulk to the rear of the second floor by approximately 3 metres have addressed the Council's refusal of the previously submitted scheme due to the *"overall size and scale of the building"* and the size, scale, bulk and design of the roof enclosure potentially resulting *"in an intrusive and incongruous roof addition"*. The scheme, inclusive of these amendments, would positively contribute to the visual amenities of the site, streetscene and wider area and would result in a betterment compared to the existing building and Site which is of poor quality and does not positively contribute to the visual amenity of the streetscene.
- 6.8. The proposal makes effective use of underutilised brownfield land to provide much needed housing in line with the NPPF, London Plan and Local Plan. It has been clearly demonstrated through this Addendum and the principle established through

the attached Planning Statement (**Appendix 1**), that the scheme has addressed the reasons the previously submitted similar scheme was refused and complies with the key policies of the Hillingdon Local Plan and London Plan as well as relevant policies from the NPPF and supplementary planning guidance.

- 6.9. Further to the above amendments, the suite of submission documents highlight the noteworthy benefits of developing this underutilised and unattractive Site to provide an increase in much needed housing, as the Site currently only provides one residential unit, as well as the material value of aiding a local business in improving and expanding their operations. These are important benefits of the scheme which weigh in favour of the, already policy compliant, proposal. As a result of the above, attached and enclosed supporting documents, it is our opinion that the Application is entirely acceptable and planning permission should be granted by the Council accordingly.

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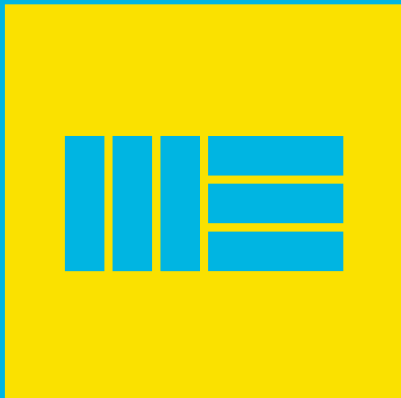
WE CONSIDER OUR CREDENTIALS, HOW WE HAVE STRUCTURED OUR BID AND OUR PROPOSED CHARGING RATES TO BE COMMERCIALY SENSITIVE INFORMATION.
WE REQUEST THAT THESE BE TREATED AS CONFIDENTIAL.

**40 STATION
APPROACH, SOUTH
RUISLIP, HA4 6RZ**

ALBION HOUSING LTD

**PLANNING
STATEMENT**

DECEMBER 2020



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01

INTRODUCTION

01. INTRODUCTION

This Planning Statement has been prepared by Montagu Evans LLP on behalf of Albion Housing Ltd ("the Applicant") to support a full planning application ("the Application") for the erection of a three storey building comprising seven residential units and a dental surgery ("the proposed development" or "the proposal") at 40 Station Approach, South Ruislip, Middlesex HA4 6RZ ("the Application Site" or "the Site"). The application is made by the Applicant to the London Borough of Hillingdon ("LBH" or "the Council").

1.1.1. PROPOSAL OVERVIEW

1.1.2. The Application seeks full planning permission for the following development:

Application for full planning permission for the demolition of the existing building and erection of a three storey building comprising a dental surgery and 7 residential units (no. 6, 1 bed units and no. 1, 2 bed units), car and cycle parking and associated works; temporary permission for the siting of a modular building to the rear of the Site for use as a dental surgery during the demolition of the existing dental surgery and construction of the proposed dental surgery.

1.1.3. The Site is located in South Ruislip on a rectangular plot at the corner of Station Approach to the north and Northolt Avenue to the west. There is an access road to the rear of the Site. A Site Location Plan outlining the Site in red is included within the application submission. The Local Planning Authority is the London Borough of Hillingdon.

1.1.4. This Application is for full planning permission and, in addition to this Statement, is accompanied by a number of plans, drawings and supporting documents as set out in the schedule of submission documents (00. Schedule of Submission Documents) and drawing schedule (06. Drawing Schedule).

1.1.5. This supporting Statement assesses the development proposal against relevant policies in the adopted relevant local planning policy documents, key national policies and other material considerations including supplementary planning guidance. Furthermore, this Statement seeks to demonstrate why the Application is considered appropriate for the Site and surrounding area, adheres to national and local planning policy and is therefore acceptable in planning terms.

1.1.6. This Planning Statement is structured as follows:

- **Section 2 Site Location and Context** introduces the existing Site, its location and its surroundings, including the Site's planning history and relevant planning history from the wider area;
- **Section 3 Proposed Development** outlines the details of the proposed development and Application;
- **Section 4 Planning Policy Framework** provides an overview of relevant planning policy, including national and local polities and supplementary planning guidance;
- **Section 5 Planning Assessment** considers the proposal against relevant policy and provides a planning assessment, including retail considerations, detailing how the proposal complies with relevant planning policy; and,
- **Section 6 Summary and Conclusion** provides a summary and overview of this Statement and concludes that the proposal complies with the relevant policies and should be granted permission.

02

SITE LOCATION AND CONTEXT

02. SITE LOCATION AND CONTEXT

This section describes the Site and its context, including an overview of relevant planning history of the Site and surrounding area.

2.1. THE APPLICATION SITE

- 2.1.1. The Site is located in South Ruislip, within the administrative boundary of the London Borough of Hillingdon ("LBH") and within the South Ruislip Local Centre. It relates to 40 Station Approach, South Ruislip, Middlesex HA4 6RZ. The exact application site and the surrounding context is shown on the submitted Site Location Plan which accompanies this application.
- 2.1.2. The Site comprises a relatively flat and rectangular shaped plot situated on a street corner, with Station Approach to the north, Northolt Avenue to the west and an access road to the rear of the Site. The existing two storey brick building is not listed (nor are there any listed buildings or structures on or near the Site). It has negligible design and architectural interest, and is occupied by a dental surgery on the ground floor with a residential unit on the first floor.
- 2.1.3. There are areas of hardstanding to the front and rear of the plot which can be accessed by vehicular crossovers from both Station Approach and Northolt Avenue. These areas of hardstanding to the front and rear are currently used for occasional, informal parking (utilising the existing vehicular crossovers), storage and access for the dental surgery.
- 2.1.4. There is minimal landscaping features on the existing Site and no formal amenity space. The Site has no notable ecological or environmental features. It is in Flood Zone 1 as defined by the Environment Agency Flood Maps and thus is at low risk of flooding. There are no known land contamination issues at the site.
- 2.1.5. With regard to accessibility, approximately 230m to the east of the Site is South Ruislip underground and overground stations. The underground station offers regular services to central London and the National Rail services from the overground station also provides services to central London as well as High Wycombe, Bicester, Oxford and other destinations.
- 2.1.6. Approximately 210m to the west of the Site is the A4180 West End Road, which provides a direct link to the A40, and accommodates regular bus services. The nearest bus stops to the Site are approximately 300m to the southwest and include the E7 service which operates between Ruislip and Ealing Broadway Station every 10-12 minutes in peak times. The accompanying Transport Technical Note (ref. SKPNES22466-01b) provides an assessment of the Site's accessibility and concludes the Site has good accessibility. The Transport Technical Note should be read alongside this Statement.
- 2.1.7. With respect to local amenities, the Site resides within a local shopping and services parade including a convenience store neighbouring the Site and beauty salon. Further beyond the parade the Site also benefits from further amenities including a food superstores and a cinema, approximately 500 metres from the Site. The Site has a PTAL rating of 3 which is considered good accessibility.

2.2. SITE PLANNING HISTORY

- 2.2.1. At the time of writing, there are also no extant permissions that could be implemented or applications awaiting determination on the Site. From the records available the Site has a limited planning history, all related to the existing dental surgery and residential unit. The Site's planning history is detailed below:

- 27354/79/1638: Residential extension, approved, 31/08/1979
- 27354/A/86/1182: Residential extension, approved, 02/07/1986
- 27354/D/90/1464: Use of part of the residential property as dental surgery, approved, 22/08/1990
- 27354/ADV/2000/59: Installation of 2 wall mounted illuminated box signs and one non-illuminated free standing sign, approved, 17/07/2000

2.2.2. The planning history of the Site detailed above demonstrates that the Site has an established dental surgery and residential mixed use and applications to enhance and support this use have been accepted and approved throughout the Site's history since the late 1970s.

2.3. SURROUNDING AREA

2.3.1. The land uses in the immediate vicinity to the north, south and west are predominantly residential, with a mix of two storey terraced and semi-detached houses and blocks of flats up to three storeys. To the rear of the Site is a small access road beyond which is a detached bungalow at 1 Northolt Avenue.

2.3.2. To the north of Station Approach and directly opposite the Site is a recently constructed three storey residential development at Acol Crescent (Application Reference Number: 67607/APP/2017/4627). This is a flatted scheme over 11 metres in height. This recently constructed development comprises a mix of one and two flats with roof terraces and balconies provided for shared and private amenity space. The scheme is a large flat roofed single block which utilises design detailing and articulation to break up the massing and a mix of red and grey-blue brick which harmonises with the mixed local character.

2.3.3. To the east of the Site the character is much more mixed, with retail, residential and commercial uses interspersed and mixed. The site borders a two storey building to the east, which comprises a local convenience store with residential above. Beyond it is a two-three storey buildings currently used as flats, houses and a beauty salon. The existing building on the Site is setback from the building line of its neighbours to the east (No. 50 to No. 42 Station Approach) creating a disjointed appearance to this elevation.

2.3.4. Approximately 160 metres west of the Site is the location of 3 Station Approach. A three storey building residential building drawing on a predominately brick material palette and limited private outdoor amenity space or shared outdoor amenity for occupants of the dwellings. This development is designed to incorporate elements of the verticality into the design to break up the massing of this single block. In addition, Great Central House a three storey brick and render development formed of residential dwellings is located in the surrounding area, between Station Approach and Long Drive. An assessment of the Site context highlights flatted three storey developments are commonplace in the local area.

2.3.5. The mix of uses and types of development on Station Approach is reflective of the Site's urban location in, or close to, a designated Local Centre, with predominately flatted schemes interspersed with a mix of single dwellinghouses and other uses. In addition, the Acol Crescent development and 3 Station Approach development are indicative of recent developments in the surrounding area of a similar height and greater scale than the proposed development, utilising balcony and shared amenity space as well as a brick based palette. The Council have deemed each acceptable and appropriate for the area and compliant with national and local planning policy.

03

PROPOSED DEVELOPMENT

03. PROPOSED DEVELOPMENT

This section provides an overview of the proposed development as well as the description of development.

3.1. DESCRIPTION OF DEVELOPMENT

3.1.1. The application site forms a rectangular plot at 40 Station Approach, South Ruislip, Middlesex HA4 6RZ. This Application is seeking full planning permission for the demolition of the existing two storey building at the Site and redevelopment of Site to provide a three storey building comprising of seven residential units and a dental surgery together with landscaped amenity space, cycle and car parking.

3.1.2. The description of development is as follows:

Application for full planning permission for the demolition of the existing building and erection of a three storey building comprising a dental surgery and 7 residential units (no. 6, 1 bed units and no. 1, 2 bed units), car and cycle parking and associated works; temporary permission for the siting of a modular building to the rear of the Site for use as a dental surgery during the demolition of the existing dental surgery and construction of the proposed dental surgery.

3.1.3. The Site is located within the urban area and a designated local centre. The design has been informed by the surrounding context and adopted planning policy, as set out in the accompanying Design and Access Statement. The Application is also supported by a full suite of existing and proposed drawings which are set out in full in the Drawing Schedule ((06. Drawing Schedule).

3.1. PRE-APPLICATION ENGAGEMENT

3.1.1. The Applicant has engaged with LBH prior to the submission of the Application to facilitate positive and collaborative working with the Council during the evolution of the proposal in line with paragraphs 39 to 46 of the National Planning Policy Framework ("NPPF").

3.1.2. The proposed scheme submitted to LBH for which pre-application advice was sought comprised of a four storey building (eight residential units and a dental surgery) with private amenity space in the form of balconies / terraces, car parking and cycle parking. A full description and illustrative drawings of the scheme submitted for pre-application advice is provided in the accompanying Design and Access Statement.

3.1.3. A pre-application meeting was held on 16th September 2020 where the scheme was discussed with a LBH Planning Officer, Design Officer and Highways Officer. Following on from the meeting a written response was received on 16th October 2020 from the Council providing full comments and advice on the submitted scheme.

3.1.4. The Applicant has evolved the scheme positively in response to the pre-application meeting and written response. Since receiving the pre-application advice the Applicant has revised the scheme to introduce verticality into the design of the scheme as well as introduce a material palette utilising brick, in a push and pull pattern to break up the elevation, to harmonise with the mixed local character.

3.1.5. The Applicant has also removed the top floor of the originally submitted scheme to address LBH's design officer's comments. The proposed development now comprises of a three storey building akin to the prevailing height and character of the neighbouring parade and surrounding development to the north and east. In addition, the Applicant has increased

the number of car parking spaces provided on site, provided additional cycle parking to the front of the Site and introduced a landscaped shared amenity space for use by the residents.

- 3.1.6. A summary of the scheme and design evolution, including design response to pre-application comments are included in the submitted Design and Access Statement. A copy of the full written pre-application response received from LBH is also contained at Appendix 1.

3.2. PROPOSED DEVELOPMENT COMPONENTS

- 3.2.1. The concept for the proposed development is for a well-designed building which will enhance the existing underutilised and poorly designed corner plot; provide much needed housing in an accessible location and facilitate the growth of and improved offering for an existing local dental surgery. The scheme has evolved based on this concept, in line with the policy considerations discussed in Section 4 and in response to pre-application advice received from LBH.

- 3.2.2. The proposed development for which full planning permission is sought comprises of the following:

- The demolition of the existing building,
- The construction of a three storey building comprising:
 - A dental surgery (approximately 80sqm GIA),
 - 7 residential units (no. 1, 2 bed and no. 6, 1 bed),
- Landscaped amenity area of approximately 145sqm,
- A minimum of 8 cycle parking spaces and 3 cycle stands,
- 5 car parking spaces comprising:
 - 1 car parking space to the front of the Site to serve the dental surgery,
 - 4 car parking spaces to serve the residential element.

- 3.2.3. The proposed dental surgery will be situated on the ground floor fronting Station Approach. The size (approximately 83sqm GIA) and shape of the proposed dental surgery will provide the existing dental occupier with a much improved space for its operation and therefore facilitate the existing dental surgery to be re-accommodated in the development. The proposed dental surgery would have a dedicated entrance fronting Station Approach which would be separate from the residential component of the proposal.

- 3.2.4. The demolition of the existing building will require the temporary siting of a modular building for use by the existing dental surgery until they can be relocated into the proposed development. It is critical for the existing dental surgery to continue their business operations during construction given their existing users are locally based. As such, this Application seeks temporary permission for the siting of a modular building for the duration of the building works. Please see the Temporary Dental Surgery Plan and Example Specification Sheet attached at Appendix 3 for details on the type of temporary modular building to be housed on Site.

- 3.2.5. The residential element of the scheme will comprise of seven residential units, all exceeding the Nationally Described Space Standards. The residential component of the Scheme will have a dedicated entrance from Northholt Avenue, separate from the proposed dental surgery. The residential element of the development will be entirely separate, both externally and internally.

- 3.2.6. One of the residential units is proposed to be two bed units and is located on the ground floor. The remaining five residential units are proposed to be one bed units and are located on the first and second floors. Internally, all floors will be accessible via stairs and a lift.

- 3.2.7. Private external amenity space is proposed for each residential unit in the form of balconies / terraces. In addition to this, shared external amenity is provided in the form of a roof terrace. The use of the roof terrace will be for the private enjoyment of the residents and can only be accessed via the residential stairwell and lift. To allow for access to the shared amenity space cover stairs and a lift are provided to the roof level.
- 3.2.8. The proposed amenity space will be landscaped with the accessible and usable amenity space set back from the front, rear and side elevations. In addition to the greening of the main roof, the lower roof to the rear will form a green roof. Soft landscaping as well as a tree will be installed to the front of the Site as well as landscaping to the rear of the Site adjacent to the residential footpath.
- 3.2.9. In total the proposal will provide five car parking spaces. One at the front on the Site for use by the dental surgery and four car parking spaces to the rear of the Site allocated to the residential development, with one space designed as an accessible parking space. The parking spaces would utilise the existing vehicular crossovers to the front of the Site and the existing access road to the south of the Site. One active electric vehicle charging point will be installed with the remainder of the car parking spaces provided as passive provision.
- 3.2.10. Secure and enclosed cycle storage is proposed for the residential units to the rear of the Site, on a 1:1 basis with a minimum of 8 cycle parking spaces provided. Sheffield style cycle stands are also proposed to the front of the Site for use by the dental surgery.
- 3.2.11. Refuse and recycling storage is also provided with a minimum of 140L per 1 bed unit and 200L per 2 bed unit proposed. The refuse and recycling storage for the residential element of the scheme will be securely located to the rear of the Site separate from the refuse, recycling and waste provision for the dental surgery.

04

PLANNING POLICY FRAMEWORK

04. PLANNING POLICY FRAMEWORK

This section provides a summary of the relevant planning policy context for the Site including the adopted development plan policies and other relevant guidance. Section 5 provides an assessment of the Application against the policies and guidance contained within these documents.

4.1. TOWN AND COUNTRY PLANNING ACT 1990

- 4.1.1. Section 70 of the Town and Country Planning Act 1990 states that when determining applications for planning permission, the local planning authority should *“have regard to the provisions of the development plan, so far as material to the application, and to any other material considerations”*.

4.2. NATIONAL PLANNING POLICY FRAMEWORK (2019)

- 4.2.1. The 2019 National Planning Policy Framework (NPPF) was published in February 2019 and sets out the Government’s approach to planning matters. It is a material consideration in the determination of planning applications.
- 4.2.2. The NPPF states that *“the purpose of the planning system is to contribute to the achievement of sustainable development”* (NPPF, paragraph 7). Local planning authorities should seek to guide development to sustainable locations. Paragraph 11 identifies the importance of the presumption in favour of sustainable development and goes on to state that:

“For decision taking this means:

- *Approving development proposals that accord with an up-to-date development plan without delay; or*
- *Where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:*
 - i. *The application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or*
 - ii. *Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.”*

- 4.2.3. Therefore, development management (i.e. the determination of applications such as this) and plan-making should act in a pro-active and positive way to facilitate planning and development. As this more specifically relates to decision making, the NPPF advises that Local Authorities should approach decision making in a positive and creative way and work proactively with applicants to secure developments that improve the economic, social and environmental conditions of an area.
- 4.2.4. The overall purpose of the planning system, as explained in section 2 of the NPPF, is to contribute to the achievement of sustainable development, which is made up of three overarching and interconnected objectives; economic, social and environmental. To achieve these objectives a presumption in favour of sustainable development is central to the NPPF.

Building a strong and competitive economy

- 4.2.5. Chapter 6 of the NPPF sets out the key principles for building a strong, competitive economy. In particular, paragraph 80 states that planning policies and decisions should help the conditions in which businesses can invest, expand and adapt, and give weight to the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development.

Delivering a sufficient supply of homes

- 4.2.6. Chapter 5 of the NPPF relates to housing delivery and the need for the planning system and development to deliver a wide choice of high-quality homes. Paragraph 59 emphasises the importance of identifying and bringing forward a sufficient amount of land to meet the housing needs of different groups. This includes ensuring homes are delivered to meet the needs of families with children, older people, people who rent their homes and other groups (Paragraph 61).
- 4.2.7. Considering the size, type and tenure of housing needed for different groups of the community, the NPPF advises this should be assessed and reflected in planning policies and so, in this sense, housing mix is led by local identified housing needs of different groups.
- 4.2.8. Throughout all development the NPPF seeks to secure high-quality design and, where applicable, a good standard of residential amenity.

Promoting healthy and safe communities

- 4.2.9. Chapter 8 of the NPPF establishes that planning policies and decisions should aim to achieve healthy, inclusive and safe place which promote social interaction, are safe and accessible and enable and support healthy lifestyles.
- 4.2.10. Paragraphs 91 and 92 of the NPPF provide guidance on how healthy and safe communities can be realised spatially. For example:
- Through mixed use developments, strong neighbourhood centres and street layouts that allow for easy pedestrian and cycle connections and active frontages, all of which promote social interaction;
 - Through the use of clear and legible pedestrian routes, and high-quality public space which encourages the active and continual use of public areas and safe and accessible spaces; and
 - Through the provision of safe and accessible green infrastructure, sports facilities, local shops and layouts that encourage walking and cycling amongst other interventions, all of which enable and support healthy lifestyles.

Promoting sustainable transport

- 4.2.11. Chapter 9 sets out the importance of promoting sustainable transport in plan making and during the consideration of development proposals. Paragraph 108 states that applications for development should ensure that appropriate opportunities have been given to promote sustainable transport modes, ensure safe and suitable access to the site and mitigate any impacts from the development on the highway network.
- 4.2.12. Paragraph 110 outlines a hierarchy of priority with regard to transport modes. This paragraph states that priority should be given first to pedestrian and cycle movements, and secondly to facilitating access to high quality public transport.

Making effective use of land

- 4.2.13. Of particular relevance to the current proposal, Chapter 11 sets out policies to ensure development makes effective use of land, in particular brownfield sites in sustainable locations and emphasises the multiple benefits which can be derived from the effective reuse of land. Paragraph 119 also sets out the proactive role local planning authorities should take to help bring forward land which may be suitable for meeting development needs.
- 4.2.14. Paragraph 118 of the NPPF requires planning policies and decisions to give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs. In addition, the NPPF makes clear planning policies and decisions should promote and support the development of under-utilised land and buildings, especially if this would help meet identified needs for housing.
- 4.2.15. As a mechanism for facilitating development that makes efficient use of land, the NPPF advises that planning policies and decisions should support development that achieves appropriate densities. Paragraph 122 of the NPPF outlines the considerations of development density including:
- The identified need for different types of housing and other forms of development, and the availability of land suitable for accommodating it;
 - Local market conditions and viability;
 - The availability and capacity of infrastructure and services and the scope to promote sustainable travel modes that limit future car use;
 - The desirability of maintaining an area's character and setting, or of promoting regeneration and change; and,
 - The importance of securing well-designed, attractive and healthy places.
- 4.2.16. The NPPF supports optimising development density, through the application of the above considerations, to ensure the effective use of land.

Achieving well-designed places

- 4.2.17. The NPPF recognises that the creation of high quality buildings and places is fundamental to what the planning process and developments should achieve. Chapter 12 of the NPPF sets out guiding principles to ensure that the planning system delivers high quality, well designed places. Paragraph 127 states that planning policies and decisions should ensure developments:
- 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;
 - Are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;
 - 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);
 - 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;

- 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
- 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.

4.3. NATIONAL PLANNING PRACTICE GUIDANCE

- 4.3.1. In March 2014 the Government published the National Planning Practice Guidance (NPPG) which is a material consideration in relation to planning applications. A number of these NPPG's are relevant to this application and provide guidance on more detailed matters for consideration which have been considered in the evolution and development of this Application.
- 4.3.2. Of note for the proposed development is the **Effective Use of Land PPG**. This PPG supports the more effective use of land and outlines how local planning authorities can encourage the best use of under-utilised land and plan for higher density development. The PPG advises a range of tools to help identify the appropriate development density, including the assessment of site accessibility, characterisation studies and infrastructure and environmental assessments to determine the capacity of services and any environmental risks. These assessment tools are set out to ensure the appropriate development densities are focused to the right locations.
- 4.3.3. The Nationally Described Space Standards (2015) set out the internal space standards required for new residential dwellings and are also relevant to this Application.

4.4. DEVELOPMENT PLAN

- 4.4.1. The development plan comprises of a collection of adopted plans which, when read together, outline the spatial strategy for the area. The Statutory Development Plan for LBH consists of the following:
- The Current London Plan (2016);
 - Hillingdon Local Plan Part 1 – Strategic Policies (2012); and,
 - Hillingdon Local Plan Part 2 – Development Management Policies and Site Allocations (2018);
- 4.4.2. Given the advanced stage of the draft New London Plan it is considered the proposal will be assessed against this Plan as opposed to the current London Plan (2016). However, as the current London Plan is still the adopted Development Plan consideration has also been given to the current London Plan (2016) in the development of the scheme.
- 4.4.3. LBH intend to review the Local Plan Part 1 from 2020. However, preparation on this is not yet publically available and therefore the Local Plan Part 1 (2012) is considered part of the development plan for this proposal.

4.5. London Plan

- 4.5.1. The current London Plan places a great emphasis on the delivery of much needed housing and aligns with the NPPF in this regard. There is a recognised need for all housing types and **Policy 3.3** of the London Plan seeks to increase housing supply. **Policy 3.4** seeks to optimise housing potential and **Policy 3.5** seeks housing developments to be of the highest quality. **Policy 2.7** of the current London Plan also seeks to ensure the availability of an adequate number of appropriate homes in outer London to attract and retain employees and help them live close to work.

- 4.5.2. Similarly the Draft London Plan gears policies to increasing the supply and delivery of housing in London. In particular, **Policy H2** of the Draft London Plan advises that boroughs should pro-actively support well-designed new homes on small sites (below 0.25 hectares in size) through both planning decisions. Supporting small sites bringing forward housing will result in a significant increase to London's housing need, diversify the sources, locations, type and mix of housing and support small and medium sized housebuilders.
- 4.5.3. **Policy H10** of the Draft London Plan is concerned with housing mix and states that when determining the appropriate mix if unit sizes applicants and decision makers should have regard to a number of factors including 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.
- 4.5.4. **Policy 3.5** of the current London Plan and **Policy D6** of the Draft London Plan regard the quality and design of new housing development. These policies seek to ensure developments enhance the quality of local places and take into account physical context, local character, density, tenure and land use mix, and relationships with and provision of public and communal open space.
- 4.5.5. In addition, these policies also outline the relevant minimum internal space standards (in line with the national standards) and the expectations for private outdoor amenity space. These are outlined as:
- A minimum of 5sqm of private outdoor space should be provided for 1-2 person dwellings and an extra 1sqm should be provided for each additional occupant; and,
 - The minimum depth and width for all balconies and other private external spaces should be 1500mm.
- 4.5.6. With regard to the strategic approach to transport **Policy T1** of the Draft London Plan sets out the expectation that all development should promote sustainable transport methods and reduce Londoners dependence on cars in favour of walking, cycling and public transport use.
- 4.5.7. More specifically, the Draft New London Plan **Policy T6** has regard to car parking and makes plain car parking should not be an expectation of development. **Policy T6** states that "*car parking should be restricted in line with levels of existing and future public transport accessibility and connectivity*" and that "*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*". **Policy T6** sets out maximum standards which should be used to set local standards and should therefore transpire into local Development Plans. These standards are a maximum requirement and expect no more than 0.75 spaces per dwelling in outer London (area with a PTAL 3).
- 4.5.8. **Policy T6** expects appropriate provision to be made for disabled persons as well as electric vehicle charging points ("EVCP"). 20% of car parking spaces should have active charging facilities with passive provision for all remaining spaces.
- 4.5.9. With regard to cycle provision **Policy 6.9** of the current London Plan and **Policy T5** support development which facilitates cycling and outlines the expected standards on a broadly 1:1 cycle space to bedroom basis. As it relates to the dental surgery, the closest applicable standards also expect provision of cycle spaces for staff and visitors / customers.
- 4.6. [Hillingdon Local Plan \(Part 1 \(2012\) and Part 2 \(2018\)\)](#)
- 4.6.1. With regard to policy designations, according to the Council's online policy mapping system the Site currently falls within a Local Centre in the Urban Area of Hillingdon in the development plan. LBH's Local Plan (**Policies E5** and **DMTC 3**) defines Local and Town Centres as areas which provide essential uses, such as shops and services, for the locality.

Policies within the Local Plan are geared towards the retained of key uses and services where viable and performing a key function.

- 4.6.2. **Policy H1** of the Local Plan sets out the housing delivery targets for the borough and sets out an annual target of 425 dwellings per year. Whilst Policy **DMTC 2** provides guidance on housing mix of residential development coming forward and advises the mix of units should reflect the Council's housing need.
- 4.6.3. Policy **DMHB 16** sets out the housing standards the Council would expect and advises that development should meet minimum space standards.
- 4.6.4. **Policy BE1** relates to the built environment and expects all new development to improve and maintain the quality of the built environment in order to create successful and sustainable neighbourhood where people enjoy living and working and which serve the long term needs of all residents. In addition, **Policy DMHB 11** seeks to ensure that all new development complements and where possible, improves the character and appearance of the area in which it is proposed. Buildings should be of a high quality design, materials and finish.
- 4.6.5. Policy **DMHB 18** regards private outdoor amenity space for new residential development. It requires the provision of good quality and useable private outdoor amenity space and advises the following guidelines for a flatted scheme:
- Studio and 1 bedroom – 20sqm
 - 2 bedrooms – 25sqm
- 4.6.6. **Policy EM1** looks to address climate change through development by utilising a range of measures including:
- Promoting a modal shift away from the private car,
 - Ensuring development meets the highest design standards whilst remaining competitive in the market;
 - Promoting new development to contribute to the upgrading of existing housing stock;
 - Designing development to minimise the probability and impacts of flooding; and,
 - Giving preference to previously developed land to avoid the loss of further green areas.
- 4.6.7. **Policy DMT 2** considers highway impacts and seeks to ensure safe and efficient vehicular access to the highway network is provided, that the development would not contribute to the determination of air quality, noise or local amenity or safety of all road users and residents and that safe, secure and convenient access and facilities for cyclists and pedestrians are satisfactorily accommodated in the design of a scheme.
- 4.6.8. **Policy DMT 6** of the Local Plan outlines the vehicle parking expectations for new development. It stems from the Council's Parking Standards contained in Appendix C of the Local Plan Part 2. These parking standards outline the maximum parking expected for different types of development. The local standards would require no more than 7-10.5 spaces for residential and no more than 2 spaces per consulting room for the dental surgery. This is compared to the standards under the Draft London Plan which would require no more than 5 car parking spaces for the residential element (0.75 spaces per dwelling).
- 4.6.9. It is notable that the car parking standards are maximum and do not take account of a developments location and accessibility as per the requirements of the London Plan.

4.7. [Supplementary Planning Guidance](#)

- 4.7.1. In addition to the above a number of Supplementary Planning Guidance documents ("SPG") were taken into consideration during the development of the proposal and will form a material consideration in the determination of the Application.

- 4.7.2. Of particular relevance to the evolution and subsequent consideration of this Application is the **Mayor of London's Housing SPG (March 2016)** which provides guidance on the implementation of housing policies in London with the aim of increasing housing supply. The guidance outlines the expectations for communal refuse and recycling containers and enclosures, internal dwelling space standards and external space standards. The private open space standards outlined in the Housing SPG mirrors the expectations in Policy D6 for a minimum of 5sqm of private outdoor space to be provided for 1-2 person dwellings and an extra 1sqm for each additional occupant, and it must achieve a minimum depth and width of 1.5m.

05

PLANNING ASSESSMENT

05. PLANNING ASSESSMENT

In this section we assess the proposal against the relevant development plan policies and other material considerations outlined in Section 4 of this Planning Statement.

5.1. PRINCIPLE OF DEVELOPMENT

- 5.1.1. The existing Site comprises a dentist's surgery and flat in an accessible Local Centre. Both the planning history and existing uses demonstrate that the mixed of uses is both suitable and acceptable in principle. Currently, the Site is underutilised and the proposal represents an opportunity to optimise the use of the Site to enhance the surgery and to support the delivery of much needed homes, which are promoted by the NPPF, London Plan and Hillingdon Local Plan.
- 5.1.2. The existing and proposed residential and dental uses are compatible with each other and the land uses of the surrounding area. In addition, the proposal would accord with Policy H2 of the Draft London Plan which advises that *"Boroughs should pro-actively support well-designed new homes on small sites"* given the palpable benefits of bringing forward development on small sites which, in this instance, would increase the housing supply in the local area; diversify the sources, locations, type and mix of housing and support small and medium sized housebuilders. For these reasons it is considered the proposed development is appropriate and acceptable in principle.

5.2. HOUSING MIX, SIZE AND QUALITY

- 5.2.1. The NPPF, current and Draft New London Plan express the need for the planning system to deliver high quality and much needed new homes. This proposal will deliver seven private residential units in line one of the key overarching aims of national and local planning policy; to deliver housing. The proposed development will deliver much needed housing to meet local need.
- 5.2.2. The current and draft new London Plan requires new development to offer a range of housing sizes and types, with Policy H10 of the New Draft London Plan stating that 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"*. At a local level policy DMH 2 requires the provision of a mix of housing units of different sizes in schemes of residential development to reflect need.
- 5.2.3. As detailed in Section 2 the Site is located in an accessible location, both close to local amenities (indeed the Site is located in a local parade of shops and services) and public transport links. In addition, the Site is located in a designated Local Centre, which based on national and London Plan policies, is an appropriate location for smaller units.
- 5.2.4. The scheme will provide a mix of one and two bed residential units (no. 6, 1 bed units and no. 1, 2 bed unit) which is considered appropriate for the Site's location and represents the best way to optimise the potential of the Site to deliver quality housing. The approach to housing mix is considered in line with the relevant policies in the London and Local Plan.
- 5.2.5. Private outdoor amenity space has been provided for each residential unit through balconies and terraces all exceeding the required standards expressed in Policy D6 of the Draft New London Plan, the Mayor of London's Housing SPG and Policy DMHB 18 of the Local Plan.
- 5.2.6. In addition to the proposal would provide a landscaped shared outdoor amenity space on the roof for the private enjoyment of the residents of the scheme. The outdoor amenity space will provide approximately 145sqm of planters, benching and decking and will only be accessible to the residents of the proposal. To allow the outdoor amenity space to be an inclusive space, accessible to all both, stairwell and lift access is provided to the roof terrace. This level of outdoor amenity space

substantially exceeds the requirements of the Draft London Plan and meets the standards set out in DMHB 18 of the Local Plan.

- 5.2.7. The proposal would be of high quality and in excess of the Nationally Described Housing Standards, the current and Draft New London Plan and Local Plan and, as far as possible, provide dual aspect units. The ground floor residential also has step free access and the potential to be an accessible unit.
- 5.2.8. The proposal has been delivered in line with policies of the current and Draft New London Plan, Local Plan and NPPF. We consider the proposal would deliver housing against an identified and pressing need, would provide an appropriate housing mix that optimises the Site's potential and would provide high quality homes with internal and external space standards in line with national standards.

5.3. DESIGN

- 5.3.1. The proposal has been designed to create a high quality, appropriately proportioned building that respects and responds to its surrounding context. The Design and Access Statement details the design process and considerations in full and is submitted in support of this Application.
- 5.3.2. The Site is a prominent corner Site and the existing building is of little architectural merit. A massing exercise has been undertaken to ensure the proposed development optimises the use of the site within the context of the existing surroundings, including No. 42 Station Approach, the building directly to the east of the Site and the residential bungalow to the rear, No. 1 Northolt Avenue. Following pre-application engagement with the Council the design and massing of the proposed development has been amended to response to pre-application comments on the height of the proposal (previously four storeys) and the design.
- 5.3.3. It is proposed the scheme will be a three storey building, reflecting the mix of two storey, three storey and three storey equivalent buildings in the local area. The height of the building would mirror the height of the buildings in the Station Approach parade the building resides in as well as the height of the recently constructed Acol Crescent development on the opposite side of Station Approach and is therefore considered a wholly appropriate height for the Site's location and in relation to the surrounding context.
- 5.3.4. To allow for access to the shared outdoor amenity a covered stairwell and lift are required to the roof. The footprint of this stair and lift access is kept to a minimum and is set back from the front and rear elevations which substantially limits its visibility from street level. As illustrated in the Design and Access statements the stairwell and lift to the roof are only noticeable from very limited viewpoints in the wider area and would have a negligible effect on the streetscene in actuality.
- 5.3.5. The massing of the building takes account of the first floor residential dwelling at No. 42 and has being pulled away from this elevation to allow a 45 degree from the rear of No. 42. In addition, the building is pulled back from the side of No. 1 Northolt Avenue creating a good separation distance between the proposed development and No. 1. The side elevation of No. 1 Northolt Avenue has no windows into habitable rooms where there would be any potential window to window overlooking. Notwithstanding this, the separation distance between No. 1 and the proposed development prevents any adverse overlooking or privacy issues. Given the Site's Local Centre location, accessibility, surrounding context the height and mass of the building is considered wholly appropriate.
- 5.3.6. No. 52 to No. 40 Station Approach, the neighbouring buildings within the station approach parade, maintain a strong building line which the current building on the Site deviates from. This currently creates a disjointed visual appearance and flow. Therefore the proposed building would match the established building line of the Station Approach buildings to the east and enhance the visual appearance of the site.

- 5.3.7. While the residential properties to the rear and west are more uniform in appearance, the parade of buildings the Site resides in, from No. 52 to No. 40 Station Approach, has a mix of styles, masses and appearances. The proposal takes the opportunity to provide a modern and interesting design through pulling design elements from the mixed character of the local area. The materials and light colour palette proposed would utilise brick in a push pull pattern to create interest and break up the elevation which will ultimately enhance the quality of a key corner site which is currently of poor quality.
- 5.3.8. The design and mass of the scheme has evolved following pre-application discussions with the Council. The design introduced verticality to the elevations as well as utilising a mixed brick palette harmonising well with the mixed character of the local area. The proposed would be a three storey development with a minimal stairwell and lift access to the roof. This height and mass is common in the surrounding area, and mirrors the recently developed Acol Crescent development opposite as well as the pitch height of the neighbouring shopping parade the Site forms part of. It is therefore considered that the proposed development is an attractive scheme that would have a positive impact on the local area and streetscene in line with policy D4 of the Draft New London Plan, Policy DMHB 11 of the Local Plan and the Mayor of London's Housing SPG.

5.4. NEIGHBOURING AMENITY

- 5.4.1. New development should not adversely impact on the residential amenity of neighbouring residents through a harmful impact on outlook, overshadowing or privacy. The massing of the proposal has been designed to ensure there is minimal impact on the outlook of the first floor residential unit at No. 42 Station Approach, the neighbouring property to the east, by setting back the building to maintain a 45 degree angle from the first floor rear elevation of No. 42.
- 5.4.2. In addition, the building mass has been pulled back from the rear boundary to ensure a good separation distance is maintained between the rear elevation of the proposal and the side elevation of No. 1 Northolt Road. It should be noted that the side elevation of No. 1 Northolt Avenue has no windows into habitable rooms and, given the dwelling is a bungalow, there are limited opportunities for the proposal to result in direct window to window overlooking. Moreover, the separation distance ensures both that the scheme is not adversely overbearing to No. 1 Northolt Road and does not result in privacy issues to the rear amenity space of No. 1.
- 5.4.3. The Assessment has reviewed the impact of the proposal on daylight, sunlight and overshadowing within the proposed development on proposed residential dwellings and amenity spaces and concluded that the bulk and mass of the proposed development is appropriate.
- 5.4.4. We consider that the scheme has been sensitively designed to ensure the proposal would not result in adverse harm to the residential amenity of the existing neighbouring dwellings and as a result are of the opinion the proposed development complies with relevant national and local planning policies in this regard.

5.5. TRANSPORT CONSIDERATIONS

- 5.5.1. Five car parking spaces are proposed at the Site, one space for use by the dental surgery and four to be allocated to the residential units, one of which is an accessible parking space. The proposed car parking spaces have been positioned to ensure both safe access can be achieved and good visibility as is exemplified in the Car Parking Tracking Plan (ref. 22466-01). In addition, the proposed car parking spaces have been located where access can be achieved via the existing vehicular crossovers. As such, no further permission is required for these crossovers and the principle of their acceptability is already established.
- 5.5.2. The NPPF and Draft New London Plan demonstrate the clear policy shift towards lower levels of parking in accessible locations in a drive to encourage sustainable development and a step-change in reducing car usage. The Draft New London Plan states that "car parking should be restricted in line with levels of existing and future public transport

accessibility and connectivity" and that "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".

- 5.5.3. The NPPF strongly promotes sustainable transport with Chapter 9 outlining a hierarchy with regard to transport modes. This paragraph states that priority should be given first to pedestrian and cycle movements, and secondly to facilitating access to high quality public transport.
- 5.5.4. This is also recognised at a local level in the Hillingdon Local Plan which adopts maximum parking standards through the Local Plan Part 2 to encourage sustainable modes of transport such as walking and cycling. In accordance with national and local guidance, the scale and travel needs of the development, public transport accessibility and location of the development has been considered in arriving at the appropriate parking provision.
- 5.5.5. The Site is in an accessible city centre location, with good access to public transport, shops and services as detailed in Section 2 and the accompanying Transport Technical Note. As the Site is in an accessible location, has a demonstrably low reliance on the private car as a mode of transport and resides in an area of low parking stress the proposed development has been designed in line with the NPPF and local planning policies by prioritising and encouraging sustainable transport methods and reducing the reliance on the private car.
- 5.5.6. The Site is located in a convenient location for access to public transport and local amenities. Because of this, and the clear policy position of the London and Local Plan is it considered the car parking provision proposed aligns with the London Plan and Local Plans impetus to seek minimal levels of parking in accessible locations. However, it is also recognised that development should accommodate car parking spaces for wheelchair users and for those with restricted mobility. As such, an accessible car parking space is proposed at the Site.
- 5.5.7. Reflecting on the maximum parking standards SPD as well as the Site's accessible location close to existing transport links, existing local amenities and in a designated local centre, an appropriate level and mix of car and cycle parking for the Site's central location is proposed. This will entail:
- A total of 5 parking spaces, of which 1 is provided to the front of the Site for the dental surgery, 4 are provided to the rear of the Site for use by the residential element of the scheme (including 1 accessible parking space);
 - Of the above, 1 parking space will be provided as an active electric vehicle charging point ("EVCP") with the remainder provided with passive provision;
 - 8 secure and enclosed cycle parking spaces for use by the residential element of the scheme; and,
 - 3 cycle stands to the front of the Site for use associated with the dental surgery.
- 5.5.8. The Transport Technical Note has assessment the potential parking provision against national and local policy as well as the site's accessibility, transport needs, local parking stress and local car ownership. The full details of these considerations are contained in the Transport Technical Note. The Technical Note concludes that the Site has good accessibility (both to transport links and amenities), has an appropriate level of parking for local car ownership levels and is in an area with no evidence of significant parking stress. In addition, a travel survey of the existing patients to the dental surgery has been undertaken and shows 86% of journeys were by sustainable methods (for example walking, cycling, public transport). Full details of this are available in the submitted Transport Analysis Letter and Survey, also attached at Appendix 2. As a result the Transport Technical Note concludes the level of parking is entirely appropriate.
- 5.5.9. The submitted Transport Technical Note considers the proposed level of car and cycle parking provision against local and national standards and the Car Parking Spaces Tracking Plan (ref. 22466-01) considers the vehicular access. These demonstrate that the proposed development is appropriate in terms of its level of car and cycle parking provision, highway

safety matters and the proposals effect on the surrounding highway network and parking capacity. Based on the above discussion and the supporting information it is considered the proposed development complies with relevant national and local policies regarding transport considerations.

- 5.5.10. Cycle spaces are proposed to be provided on a 1:1 basis for each residential unit at a minimum. The cycle storage will be enclosed and secure in addition to being well located by the residential access to the Site. The cycle space provision, at a minimum of 8 spaces, will encourage sustainable modes of transport and dissuade excessive car usage and reliance on the private car in an area adequately serviced by local amenities and public transport.
- 5.5.11. Paragraph 109 of the NPPF makes clear 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 were severe. The proposed development would utilise existing vehicular crossovers and, as demonstrated by the Car Parking Spaces Tracking Plan (ref. 22466-01), access and egress to the Site can be safely done. The proposed development would not adversely impact highway safety or the safety of other users of the highway and public space. The Application therefore complies with the relevant national and local policies and should be granted permission accordingly.

5.6. DENTAL SURGERY

- 5.6.1. The Site currently houses a dental surgery which is looking to expand its operations. The applicant has been in regular discussion with the dental surgery to ensure the scheme meets their requirements. The proposal would allow the existing occupants of the ground floor commercial unit to retain their location as a key community asset whilst facilitating their growth and need for an enhanced space.
- 5.6.2. The Site falls within a Local Centre as defined by LBH's planning policy map. Local Centres provide convenient good and services, including more specialist functions, for more local communities. The retention of the Dental Surgery will ensure the proposal complies with Policies E5 and Policy DMTC 3 of the Local Plan by ensuring the needs of the local community continue to be met by providing a locally accessible asset. The proposal will therefore provide a significant benefit for local community in retaining this key asset.
- 5.6.3. It is critical to the business that the Dental Surgery can continue to operate during the construction phase. Discussions have taken place with the dental surgery as to how their operations could continue through the construction phase should the application be granted. Different options have been considered to facilitate the continuation of service including relocating to an offsite facility. However, because the dental surgery is established in the local area it is imperative that it remains in its current, accessible, location. A temporary site facility in the form of a modular unit (approximately 35.8 sqm GIA) is proposed to be on site during the construction of the dental surgery's new facility. This facility will be separate and secure from the construction site and will be managed onsite and is shown on the submitted Temporary Dental Surgery Plan and Example Specification Sheet attached at Appendix 3.
- 5.6.4. Servicing and waste management for the dental surgery would be wholly separate from the residential portion of the development and provided in a secure structure to the front of the Site.

5.7. LANDSCAPING, AMENITY AND OUTDOOR SPACE

- 5.7.1. The existing Site currently has no private or shared outdoor amenity space for the enjoyment of the existing occupiers, a poor and disorganised public realm and negligible green spaces and landscaping. The proposal will create new landscaped shared amenity space as well as significant improvements to the public realm; this is in addition to the private outdoor amenity space also provided for each residential unit.

- 5.7.2. The Draft London Plan and Local Plan creates a policy context which is supportive of the improvement of the public realm and creation of green spaces and open amenity areas. Policy DMHB 18 of the Local Plan recognises the benefits of outdoor amenity space and advises on the expectations for outdoor amenity space for the use of residential developments. In addition, Chapter 12 of the NPPF recognises the role of effective landscaping in creating well designed and distinctive places and sustain an appropriate amount of mix of development including green space.
- 5.7.3. The proposal will deliver a planted and landscaped roof terrace to be enjoyed as shared outdoor amenity space for the residents of the development. The landscaped and shared outdoor space on the roof terrace will total approximately 145sqm comprised of planters, benching, decking and surfacing.
- 5.7.4. The shared outdoor amenity space will not be publically accessible nor accessible for the proposed dental surgery, it will be accessible via the residential stairwell and, to allow for disabled access, the residential lift will also provide access to the shared outdoor amenity space on the roof terrace. The planters will utilise a native planting mix which will result in the greening of this Site and provide environmental, drainage and visual benefits.
- 5.7.5. In addition to the above landscaping, the proposal will also incorporate a full width planter adjacent to the footpath leading to the residential entrance to help soften the building to the rear and create physical and visual distance to the ground floor flat. Furthermore, the lower roof to the rear will be constructed as a green roof utilising a sedum planting mix, again resulting in environmental, drainage and visual benefits.
- 5.7.6. The public realm to the front of the Site will be vastly improvement from what is currently an unattractive space. Hard landscaping to the front of the Site formed of neutral and continuous paving, to harmonise with the proposed building, will enhance this space. A tree will be planted to the front of the Site and will help anchor the space, help soften the appearance of the building and provide a green intervention in this publically accessible space.
- 5.7.7. The landscaping and creation of shared amenity space will deliver urban greening and create a space for nature as well as for residents and improvements to the public realm will vastly improve the views and streetscene along both Station Approach and Northolt Avenue.
- 5.7.8. The provision of these public realm improvements, landscaping and shared outdoor amenity space will result in physical, social and mental benefits and help create a strong and distinctive sense of place on this distinctive corner plot. It will also meet LBH requirements for outdoor amenity space as per policy DMHB 18. It is therefore considered the proposal will comply with the NPPF and relevant local planning policies in this regard.

5.8. OTHER MATTERS

- 5.8.1. A Geotechnical report has been prepared in support of this Application. This has been undertaken to identify any potential geological or geoenvironmental risks in relation to the redevelopment of the Site. The Geotechnical Report has concluded that the identified risk ranges from negligible to moderate/low. Where the risk is moderate/low this relates to potentially contaminated soil and groundwater and can be reduced to low through appropriate construction methods. As such, it is considered the proposed is acceptable with regard to geoenvironmental and geological risks.
- 5.8.2. With regard to flood and drainage a Sustainable Drainage Strategy and Report has been prepared and is submitted in support of the proposed development. Section 14 of the NPPF explains that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk. The NPPF also advises that local planning authorities should ensure that flood risk is not increased elsewhere when determining planning applications. The Site is at the lowest defined risk of flooding as it is identified in Flood Zone 1 by the Environment Agency maps.

- 5.8.3. As detailed in the Sustainable Drainage Strategy and Report the approach to drainage at the Site will follow a hierarchical approach and will, as far as possible, employ SUDs to reduce and avoid water contamination and manage surface water and run-off. The proposed development is utilising existing brownfield land which is dominated by hardstanding and impermeable surfaces, therefore the proposed drainage will look to provide a betterment compared to the existing drainage at the Site. As a result it is considered the proposal will not adversely increase the risk of flooding either on site or elsewhere, would utilise approach drainage and therefore comply with relevant planning policy.

5.9. PLANNING ASSESSMENT SUMMARY

- 5.9.1. The above discussion considers the proposed development against the relevant planning policies outlined in Section 4 and details how the proposal complies with both national and local planning policy. It demonstrates the principle of the development is supported by both national and local policy.
- 5.9.2. The proposed development would redevelop underutilised brownfield land through an increased, but scheme and context appropriate density. The Site also falls within a designated Local Centre which are recognised as the nexus of local communities and neighbourhoods, providing convenient goods and services to the community. The proposed dental surgery will allow an existing local business to remain in the area, providing them the opportunity to expand into a much improved space. The provision of 7 residential units will provide much needed housing in an accessible location, with a housing mix and density reflective of the Site's location. As a result, the proposed development will make much more effective use of this underutilised Local Centre location, the principle of which is supported by the NPPF, NPPG's, Draft London Plan and Local Plan.
- 5.9.3. Each residential unit will comply with nationally described space standards and provide private outdoor amenity space in the form of balconies / terraces. In addition, a landscaped shared outdoor amenity space is provided via a roof terrace, with stair and lift access making this space accessible to all residents. The provision of both private and shared amenity space complies with the requirements of the Draft London Plan and Local Plan and helps to provide a high quality development with a high level of residential amenity for occupants.
- 5.9.4. The design and mass of the scheme has evolved following pre-application discussions with the Council. The design introduced verticality to the elevations as well as utilising a mixed brick palette harmonising well with the mixed character of the local area. The proposed would be a three storey development with a minimal stairwell and lift access to the roof. This height and mass is common in the surrounding area, and mirrors the recently developed Acol Crescent development opposite as well as the pitch height of the neighbouring shopping parade the Site forms part of.
- 5.9.5. The massing of the building takes account of the first floor residential dwelling at No. 42 and has been pulled away from this elevation to allow a 45 degree from the rear of No. 42. In addition, the building is pulled back from the side of No. 1 Northolt Avenue creating a good separation distance between the proposed development and No. 1. The side elevation of No. 1 Northolt Avenue has no windows into habitable rooms where there would be any potential window to window overlooking. Notwithstanding this, the separation distance between No. 1 and the proposed development prevents any adverse overlooking or privacy issues. Given the Site's Local Centre location, accessibility, surrounding context the height and mass of the building is considered wholly appropriate.
- 5.9.6. The proposed development will also provide cycle parking in line with national and local expectations to reduce reliance on the private car. 5 car parking spaces are also proposed which is an appropriate provision given the Site's accessible location (both to public transport and local amenities), the low parking stress of the surrounding area, the sustainable transport methods already utilised by users of the dental surgery and the policy requirements to shift to more sustainable transport methods. An accessible car parking space is also provided as part of the proposed development as is 1 active EVCP with the remainder provided with passive provision, all in line with London and local planning policy.

- 5.9.7. This section has assessed the proposed development against relevant national and local planning policies and has clearly demonstrated that the proposal represents sustainable development and complies with relevant planning policies. The Application should accordingly be granted permission.

06

SUMMARY AND CONCLUSION

06. SUMMARY AND CONCLUSION

This Statement has been prepared by Montagu Evans LLP in support of an application for full planning permission for a three storey building comprising of seven residential units and a dental surgery together with landscaped amenity space, cycle and car parking. The scheme has been developed in full accordance with up to date and relevant planning policy.

6.1. The application proposal to which this statement relates seeks full planning permission for:

Application for full planning permission for the demolition of the existing building and erection of a three storey building comprising a dental surgery and 7 residential units (no. 6, 1 bed units and no. 1, 2 bed units), car and cycle parking and associated works; temporary permission for the siting of a modular building to the rear of the Site for use as a dental surgery during the demolition of the existing dental surgery and construction of the proposed dental surgery.

6.2. The application site is located in South Ruislip on a rectangular plot at the corner of Station Approach to the north and Northolt Avenue to the west. There is an access road to the rear of the Site. The Local Planning Authority is the London Borough of Hillingdon.

6.3. This Application is for full planning permission and, in addition to this Statement, is accompanied by a number of plans, drawings and supporting documents as set out in the schedule of submission documents (00. Schedule of Submission Documents) and drawing schedule (06. Drawing Schedule).

6.4. The proposed development will deliver a three storey building comprising of a dental surgery on the ground floor to re-accommodate the existing dental surgery in situ in an improved unit to facilitate this local business to expand and remain in the local area.

6.5. The proposed development will also provide much needed housing through the provision of seven residential units with both private outdoor amenity space and landscaped shared amenity space. In addition to the landscaped shared amenity space, the lower roof of the proposed development will also be provided as a green roof providing both aesthetic and environmental benefits. The mix of housing type, predominantly one bed units, is appropriate for the Site's accessible location within a designated local centre and is wholly in line with the NPPF, London Plan and Local Plan guidance encouraging smaller units in designated centres.

6.6. The Site is within close proximity to a range of shops and services and good transport links. It is therefore considered to be in an accessible brownfield location, appropriate for redevelopment. In line with this, the proposed development priorities sustainable transport methods such as walking and cycling and provides ample cycle parking, both secure cycle parking for the residential component of the scheme and for the proposed dental surgery.

6.7. In line with the sustainable transport hierarchy, the proposed development has also provided car parking spaces, a total of 5 spaces (1 for the dental surgery and 4 for the residential units of which 1 will be accessible) which is in line with the maximum car parking standards. An active EVCP will be provided with the remainder of the car parking spaces provided with passive provision.

- 6.8. The proposed dental surgery and residential element of the scheme will be entirely separate both internally and externally, with separate dedicated entrances, refuse and recycling storage and outdoor space. The residential components of the proposed development will be served by its own stairwell and lift which will also allow stair and lift access to the shared roof terrace.
- 6.9. The proposal makes effective use of underutilised brownfield land to provide much needed housing in line with the NPPF, London Plan and Local Plan. In addition, the proposed development meets nationally described space standards as well as providing both private and shared amenity space, exceed London Plan requirements and in line with Hillingdon's Local Plan guidance.
- 6.10. In conclusion, it has been clearly demonstrated that the scheme complies with the key policies of the Hillingdon Local Plan and London Plan as well as relevant policies from the NPPF and supplementary planning guidance. This Statement and the wider suite of submission documents highlight the benefits of developing this underutilised and unattractive Site to provide much needed housing as well as aid a local business in improving and expanding their operations.
- 6.11. When taken together the full submission package demonstrates why the application is considered appropriate for the Site and surrounding area, adheres to national and local planning policy and is therefore acceptable in planning terms. As a result, it is our opinion that the Application is acceptable and planning permission should be granted.

APPENDIX 01

PRE- APPLICATION WRITTEN RESPONSE



Montagu Evans Llp
5 Bolton Street
London
W1J 8BA

Planning Applications Team
London Borough of Hillingdon
Civic Centre, High Street
Uxbridge UB8 1UW

Tel: 01895 250230
Case Officer: Rebecca Lo
Email: rlo@hillingsdon.gov.uk
Date: 16th October 2020
Our Ref: 27354/PRC/2020/181

Dear Montagu Evans Llp

RE: Proposed demolition of existing buildings and erection of a four storey building comprising a dental surgery and eight residential units

SITE: 40 Station Approach South Ruislip

I refer to your request for pre-application planning advice dated 28th August 2020 and our subsequent telephone conference meeting on 16th September relating to the above development. The advice provided is based on the following drawings and documents issued to the Local Planning Authority for consideration.

Plan Numbers: 001_2030 Proposed Street Scenes - received 02 Sep 2020
001_2040 Proposed Street Section - received 02 Sep 2020
001_2023 Proposed East Elevation - received 02 Sep 2020
Covering Letter 28 August 2020 - received 02 Sep 2020
001_0000 Existing Plan L00 - received 02 Sep 2020
001_0001 Existing Plan L01 - received 02 Sep 2020
001_0005 Existing Site Plan - received 02 Sep 2020
001_0020 Existing North Elevation - received 02 Sep 2020
001_0021 Existing West Elevation - received 02 Sep 2020
001_0022 Existing South Elevation - received 02 Sep 2020
001_0023 Existing East Elevation - received 02 Sep 2020
001_0030 Existing Street Scenes - received 02 Sep 2020
Ivory Dental Practice - received 02 Sep 2020
Pre Planning Application Document August 2020 - received 02 Sep 2020
001_2000 Proposed Plan L00 - received 02 Sep 2020
001_2001 Proposed Plan L01 & L02 - received 02 Sep 2020
001_2002 Proposed Plan L03 - received 02 Sep 2020
001_2003 Proposed Roof Plan - received 02 Sep 2020
001_2005 Proposed Site Plan - received 02 Sep 2020
001_2020 Proposed North Elevation - received 02 Sep 2020
001_2021 Proposed West Elevation - received 02 Sep 2020
001_2022 Proposed South Elevation - received 02 Sep 2020
001_0105 Prop Temp Dental Surgery - received 02 Sep 2020

ALTERNATIVE PROPOSED PLANS - Proposed North Elevation facing Stating Approach - received 30 Sep 2020
ALTERNATIVE PROPOSED PLANS - Proposed West Elevation facing Northolt Avenue - received 30 Sep 2020
ALTERNATIVE PROPOSED PLANS - Proposed South Elevation facing the access road - received 30 Sep 2020
ALTERNATIVE PROPOSED PLANS - Proposed East Elevation facing buildings along Station Approach - received 30 Sep 2020
ALTERNATIVE PROPOSED DESIGN - Facing North from Northolt Avenue Updated Design - received 30 Sep 2020
ALTERNATIVE PROPOSED DESIGN - Facing North From Northolt Avenue Previous Design - received 30 Sep 2020
ALTERNATIVE PROPOSED DESIGN - 001_2006 Proposed Site Context Plan - received 30 Sep 2020
ALTERNATIVE PROPOSED DESIGN - 001_2041 Proposed Street Section - received 30 Sep 2020
ALTERNATIVE PROPOSED DESIGN - 001_2002 Rev. 01 Proposed Plan L03 - received 30 Sep 2020

Outlined below is a preliminary assessment of the proposal, including an indication of the main issues that should be addressed should you choose to submit a formal planning application. Please note that the views expressed in this letter represent officer opinion only and cannot be taken to prejudice the formal decision of the Council in respect of any subsequent planning application, on which consultation would be carried out which may raise additional issues. In addition, the depth of analysis provided corresponds with the scope of information made available to Council officers.

The Site and Surrounds

The application site is located on the prominent corner of Station Approach and Northolt Avenue. The site is rectangular in shape totalling 396 metres square. The premise is a 2-storeys brick building that is currently occupied by a dental practice on ground floor and used as a residential dwelling on first floor. The front elevation of the site is set back from its adjoining neighbour on the north-east, no. 42B Station Approach. The front hardstanding area faces onto Station Approach is used as parking for the dental surgery while the rear of the property is also hardstanding with access onto Northolt Avenue.

The application site is located 230m south-west of South Ruislip station and has a PTAL score of 3. The property is within the South Ruislip Local Centre, Hillingdon Air Quality Management Area and Air Quality Focus Areas: A40/ South Ruislip Focus Area.

The surrounding area comprises mainly of residential dwellings up to 3 storeys high including, residential flats, semi-detached houses, bungalows and mix use buildings (residential above and commercial on ground level).

SITE HISTORY:

An advertisement consent under planning reference 27354/ADV/2000/59 was granted on 12-10-00 for the installation of 2 wall mounted illuminated box signs and one non-illuminated free standing sign.

A planning application under planning reference 27354/D/90/1464 was granted on 11-12-90 for additional use of part of residential property as dental surgery.

A planning application under planning reference 27354/A/86/1182 was granted on 27-08-86 for a Householder development - residential extension(P).

A planning application under planning reference 27354/79/1638 was granted on 30-10-79 for a Householder development - residential extension(P).

The Proposal

This application seeks pre-application advice for the the demolition of the existing building and erection of a four storey high building comprising a dental surgery on ground level and eight residential units on ground to third floor. One car space to the front for the dentist surgery and 3 car spaces, bin store and cycle storage to the rear. Access to the parking spaces is via Northolt Avenue.

The proposal includes:

Ground Floor:

- Dentist Surgery (78 sqm)
- 2 bed flat (73.7 sqm) with balcony (6.4 sqm)

First Floor:

- 1 Bed Flat (52.3 sqm) with balcony (6 sqm)
- 1 Bed Flat (51.3 sqm) with balcony (6 sqm)
- 1 Bed Flat (56.5 sqm) with balcony (8.8 sqm)

Second Floor:

- 1 Bed Flat (52.3 sqm) with balcony (6 sqm)
- 1 Bed Flat (51.3 sqm) with balcony (6 sqm)
- 1 Bed Flat (56.5 sqm) with balcony (8.8 sqm)

Third Floor:

- 2 Bed Flat (70.9 sqm) with balcony (12.2 sqm)

During the construction of the development, a temporary, single storey building to provide a dental surgery, totalling 35.8 sqm GIA, is to be installed to the rear of the site.

Planning Policy

London Borough of Hillingdon Development Plan (from 6th April 2020)

Planning law requires that applications for planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise.

The Development Plan for the London Borough of Hillingdon currently consists of the following documents:

The Local Plan: Part 1 - Strategic Policies (2012)

The Local Plan: Part 2 - Development Management Policies (2020)

The Local Plan: Part 2 - Site Allocations and Designations (2020)

West London Waste Plan (2015)

The London Plan - Consolidated With Alterations (2016)

The National Planning Policy Framework (NPPF) (2019) is also a material consideration in planning decisions, as well as relevant supplementary planning documents and guidance.

Emerging Planning Policies

Paragraph 48 of the National Planning Policy Framework (NPPF) 2019 states that 'Local Planning Authorities may give weight to relevant policies in emerging plans according to:

- (a) the stage of preparation of the emerging plan (the more advanced its preparation, the greater the weight that may be given);
- (b) the extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given); and
- (c) the degree of consistency of the relevant policies in the emerging plan to this Framework (the closer the policies in the emerging plan to the policies in the Framework, the greater the weight that may be given).

The GLA consulted upon a draft new London Plan between December 2017 and March 2018 with the intention of replacing the previous versions of the existing London Plan. The Plan was subject to examination hearings from February to May 2019, and a Consolidated Draft Plan with amendments was published in July 2019. The Panel of Inspectors appointed by the Secretary of State issued their report and recommendations to the Mayor on 8th October 2019.

The Mayor has considered the Inspectors' recommendations and, on 9th December 2019, issued to the Secretary of State his intention to publish the London Plan along with a statement of reasons for the Inspectors' recommendations that the Mayor did not wish to accept. The Secretary of State responded on the 13th March 2020 and stated that he was exercising his powers under section 337 of the Greater London Authority Act 1999 to direct that modifications are required. These are set out at Annex 1 of the response, however the letter does also state that if the Mayor can suggest alternative changes to policies that would address the concerns raised, these would also be considered.

More limited weight should be attached to draft London Plan policies where the Secretary of State has directed modifications or where they relate to concerns raised within the letter. Greater weight may be attached to policies that are not subject to modifications from the Secretary of State or that do not relate to issues raised in the letter.

Relevant Development Plan Policies

Part 1 Policies:

PT1.BE1	(2012) Built Environment
PT1.EM8	(2012) Land, Water, Air and Noise

Other Policies:

DMCI 1	Retention of Existing Community Sport and Education Facilities
DMCI 7	Planning Obligations and Community Infrastructure Levy
DMEI 14	Air Quality
DMH 2	Housing Mix
DMHB 11	Design of New Development
DMHB 14	Trees and Landscaping
DMHB 16	Housing Standards
DMHB 18	Private Outdoor Amenity Space
DMT 2	Highways Impacts
DMT 6	Vehicle Parking
DMTC 1	Town Centre Development
LPP 3.5	(2016) Quality and design of housing developments
LPP 7.15	(2016) Reducing and managing noise, improving and enhancing the acoustic environment and promoting appropriate soundscapes.
LPP 7.4	(2016) Local character

Main Planning Issues

1. Principle of development

Designations

Local Centre - South Ruislip

Proposed Development

The proposal seeks the demolition of the existing two storey building comprising a dentist's surgery on the ground floor and a single residential unit on the first floor, and the erection of a replacement four storey building with re-provision of the dentist's surgery on the ground floor and eight residential units on the upper floors (6 x 1 bed and 2 x 2 bed flats).

Policy S1 of the Intend to Publish Version of the London Plan states that development proposals that provide high quality, inclusive social infrastructure that addresses a local or strategic need and supports service delivery strategies should be supported. It also states that new facilities should be easily accessible by public transport, cycling and walking and should be encouraged in high streets and town centres. This second policy requirement is mentioned again in reference to health and social care facilities in Policy S2. The site is located within a local centre and close to South Ruislip tube station and it is relatively well connected. The proposal includes the demolition but also re-provision of a dentists surgery which the applicant has stated will be of higher quality and quantity in terms of floorspace. This aspect of the proposal is overall considered to be policy compliant and supported.

The proposed development also includes 8 residential units on the ground and upper 3 floors, a net gain of 7 units. The applicant is proposing 6 x 1 bed units and 2 x 2 bed units. The principle of residential development on site is established through the existing residential unit and a residential use on site in general would be considered to be policy compliant. Policy DMH2 of the LPP2 states that the Council will seek a housing mix which reflects the needs identified in the most up to date housing needs assessment. The Council's current information on housing need indicates a substantial borough-wide requirement for larger affordable and private market units, particularly three bedroom properties. The applicant does not need to provide affordable housing as the proposed development falls under the threshold for provision of affordable housing, however a bigger proportion of larger dwellings would be encouraged on this site. Given the site's location and particular constraints due to site size and ability to provide parking and private amenity space, a housing mix fully in line with current housing requirements is not expected, however the applicant is required to justify how they have tried to optimise the delivery of housing to meet the borough's needs. The Council would ideally like to see a higher proportion of 2 bedroom dwellings however it is understood that there may be constraints on the site and it is up to the applicant to demonstrate to the Council's satisfaction why the housing mix proposed is optimal for this site.

Private amenity space

As stated in policy DMHB 18, all new residential development should provide good quality and useable private outdoor amenity space. Amenity standards should be provided in accordance with the standards set out in table 5.3 of the Local Plan: Part Two (2020).

Housing standards

As stated in policy DMHB 16, all dwellings should meet or exceed the internal space standards set out in Table 5.1 and provide at least 10% of new housing to be accessible or easily adaptable for wheelchair users.

2. Design

The following policy is considered particularly relevant:

Policy DMHB 11 of The Local Plan: Part 2 - Development Management Policies (2020) states that:

A) All development, including extensions, alterations and new buildings will be required to be designed to the highest standards and, incorporate principles of good design including:

- i) harmonising with the local context by taking into account the surrounding:
 - scale of development, considering the height, mass and bulk of adjacent structures;
 - building plot sizes and widths, plot coverage and established street patterns;
 - building lines and setbacks, rooflines, streetscape rhythm, for example, gaps between

- structures and other streetscape elements, such as degree of enclosure;
- architectural composition and quality of detailing;
 - local topography, views both from and to the site; and
 - impact on neighbouring open spaces and their environment.
- ii) ensuring the use of high quality building materials and finishes;
- iii) ensuring that the internal design and layout of development maximises sustainability and is adaptable to different activities;
- iv) protecting features of positive value within and adjacent to the site, including the safeguarding of heritage assets, designated and un-designated, and their settings; and
- v) landscaping and tree planting to protect and enhance amenity, biodiversity and green infrastructure.
- B) Development proposals should not adversely impact on the amenity, daylight and sunlight of adjacent properties and open space.
- C) Development will be required to ensure that the design safeguards the satisfactory re-development of any adjoining sites which have development potential. In the case of proposals for major development sites, the Council will expect developers to prepare master plans and design codes and to agree these with the Council before developing detailed designs.
- D) Development proposals should make sufficient provision for well designed internal and external storage space for general, recycling and organic waste, with suitable access for collection. External bins should be located and screened to avoid nuisance and adverse visual impacts to occupiers and neighbours.

The Council's Conservation Officer provided the following comments:

The application seeks pre-application advice on proposals to demolish the existing buildings on site and to erect a four-storey building comprising a dental surgery and eight residential units.

A pre-application meeting was held on the 16th September where a number of design concerns were raised. Subsequent to this meeting further drawings have now been submitted. These comments relate to the more recent drawings dated 30/09/2020 on the DIP.

40 Station Approach is located on a corner site where Northolt Avenue meets Station Approach. It is situated within a primarily residential area which is interspersed with some shops/ commercial buildings along Station Approach eastwards towards South Ruislip Station.

The buildings are primarily two to three-storeys in height on the south side of the street. Third storeys, where they appear, are contained within the roof respecting the domestic scale of the surrounding streets. The buildings on the north side of the street have a different character with larger blocks of three full storeys.

The existing building frontage is set back from the street on a similar alignment to the residential properties to the west of Northolt Avenue. There would be no objection, in principle, to the proposed new building line that corresponds to the buildings directly to the east in which the development would have a more direct visual relationship. The retention and slight increase of the rear building line, however, will result in a much larger block than those within the group and the relatively unbroken mass would make the building dominate the immediate area.

There are concerns with the introduction of the top set back fourth storey which along with the lift overrun would contribute to an over dominant building that would seek undue attention in the street scene. Three storeys would be more appropriate for the context with a more secondary second storey to help break up the bulk of the building. The rear portion of the block also needs to be reduced in height and depth so that there is a more comfortable transition between the new development and the bungalows / two-storey houses to the south along Northolt Avenue.

Longer distance views of the development along Station Road as well as those along Northolt Avenue and the green open space of Acol Crescent also need to be considered as well as those closer to the development. The close up views as submitted are noted, however, the building would be seen in a wider context and in kinetic views as one moves through the area.

The use of brick as the primary construction material would be supported in principle and would respect the palette of materials in the area subject to an appropriate colour, tone, texture and mortar being chosen.

The scheme in its current form is not considered appropriate for the local context. It is suggested that the above design comments be taken into consideration and amendments be made if the design to be further advanced.

TREE/LANDSCAPE

The following policy is considered:

Policy DMHB 14 of The Local Plan: Part 2 - Development Management Policies (2020) states that:

- 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 off site provision.

The Council's Trees and Landscaping Officer has provided the following comments:

This site is occupied by a two-storey brick building located on the south side of Station Approach. This is a corner plot at the junction with Northolt Avenue. The ground floor houses a dental surgery, with a residential unit on the first floor. An area of hardstanding to the front is currently used for parking. There are no trees or landscaped areas associated with the site and no TPO's or Conservation Area designations affecting it.

COMMENT

No trees will be affected by the proposal to build a four-storey block incorporating a new dental surgery with 8 flats above. The D&AS refers to secure and enclosed cycle storage and bin storage. It also refer to landscaping to the front of the building to enhance the public realm. Private outdoor amenity space is to be provided in the from of private balconies. These should be of sufficient size to be accessible and functional.

RECOMMENDATIONS

The provision of soft landscape enhancement in front of the building for the benefit of the public realm is welcome, subject to detail. Its success will depend on the quality of design, implementation and future maintenance. Given the limited opportunity for providing external amenity space, aside from balconies, green roofs or walls should be considered. If a full application is lodged, conditions COM9 (parts 1,2,3,4,5 and 6) should be added.

3. Amenity

LIVING CONDITIONS

The London Plan - Consolidated With Alterations (2016) sets out the minimum internal floor space standards required for residential developments in order to ensure that there is an adequate level of amenity for existing and future occupants. Table 3.3 contained within Policy 3.5 of the London Plan (2016) requires the following:

- One storey dwelling with 1 bedroom, 2 person occupancy, requires 50 square metres
- One storey dwelling with 2 bedroom, 3 person occupancy, requires 61 square metres
- One storey dwelling with 2 bedroom, 4 person occupancy, requires 70 square metres

The DCLG's Technical Housing Standard (2015) guidance also requires that double bedrooms measure at least 11.5 square metres in floor space and single bedrooms measure at least 7.5 square metres in floor space.

Policy DMHB 16 of The Local Plan: Part 2 - Development Management Policies (2020) states that all housing development should have an adequate provision of internal space in order to provide an appropriate living environment. To achieve this all residential development or conversions should: i) meet or exceed the most up to date internal space standards, as set out in Table 5.1; and ii) in the case of major developments, provide at least 10% of new housing to be accessible or easily adaptable for wheelchair users.

In accordance to the plans provided, the 1-bedroom units are 51.3-56.5 square metres in size and 2-bedroom units ranges from 70.9-73.7 square metres. Evidently, all the proposed units provide sufficient internal floor space in accordance to Policy 3.5 of The London Plan - Consolidated With Alterations (2016) and DCLG's Technical Housing Standard (2015) guidance.

EXTERNAL AMENITY SPACE

Policy DMHB 18 of The Local Plan: Part 2 - Development Management Policies (2020) requires all new residential development to provide good quality and usable private outdoor amenity space. Balconies should have a depth of not less than 1.5 metres and a width of not less than 2 metres. Any ground floor and/or basement floor unit that is non-street facing should have a defensible space of not less than 3 metres in depth in front of any window to a bedroom or habitable room. All new residential development should provide good quality and useable private outdoor amenity space. Amenity standards should be provided in accordance with the standards set out in table 5.3 of the Local Plan: Part Two (2020).

The minimum amenity space provision required:

- Flats - 1 bedroom, requires 20 square metres
- Flats - 2 bedroom, requires 25 square metres

Each residential unit is provided with its own private balcony ranging from 6-12.2 sqm, which is below the minimum space provision required. It should also be noted that at least two balconies are measured as under 1.5 metres in depth. As such, the proposal is not in accordance with the requirements of Policy DMHB 18 of The Local Plan: Part 2 - Development Management Policies (2020).

4. Highways

CAR PARKING & CYCLE PARKING

The following policies are considered:

Policy DMT 1 of The Local Plan: Part 2 - Development Management Policies (2020) requires development proposals to meet the transport needs of the development and address its transport impacts in a sustainable manner and will require to undertake a satisfactory Transport Assessment and Travel Plan if they meet or exceed the appropriate thresholds. All major developments that fall below these thresholds will be required to produce a satisfactory Transport Statement and Local Level Travel Plan. All these plans should demonstrate how

any potential impacts will be mitigated and how such measures will be implemented.

Policy DMT 2 of The Local Plan: Part 2 - Development Management Policies (2020) ensures development proposals have safe and efficient vehicular access to the highway network and would provide a safe, secure and convenient access and facilities for cyclists and pedestrian.

Policy DMT 6 of The Local Plan: Part 2 - Development Management Policies (2020) states that development proposals must comply with the parking standards outlined in Appendix C Table 1 in order to facilitate sustainable development and address issues relating to congestion and amenity. All car parks provided for new development will be required to contain conveniently located reserved spaces for wheelchair users and those with restricted mobility in accordance with the Council's Accessible Hillingdon SPD.

The Council's Highways Officer has provided the following comments:

Site Characteristics & Background

The address is situated in South Ruislip on the corner of Station Approach and Northolt Avenue. The existing building comprises of a dental surgery at the ground floor with a residential unit on the 1st floor. There are areas of hardstanding to the front (a private forecourt) and rear which are currently used for parking purposes and accessed via vehicular crossovers from both Station Approach and Northolt Avenue respectively.

It is proposed to demolish the existing building with a 4 storey replacement build incorporating a new Dental surgery (GIFA -78m²) on the ground floor with 8 flats above (6x1 & 2x2 bedroom units). The surgery would continue operation throughout the build programme with a temporary modular facility provided to the rear of the site. 4 parking spaces are proposed with one allocated to the surgery located on the frontage and 3 spaces (including 1 disabled compliant bay) positioned to the rear. Existing carriageway crossings would remain to serve the spaces.

The Public Transport Accessibility Level (PTAL) is rated at a level of 3 and the immediate highway is generally covered by extensive parking controls which include a CPZ operating from 9am to 5pm - Monday to Friday.

Parking Provision

Local Plan: Part 2 Policy DMT 6 requires that new development will only be permitted where it accords with the Council's adopted parking standards unless it can be demonstrated that a deviation from the standard would not result in a deleterious impact on the surrounding road network.

Residential

The maximum parking provision for each of the 8 flatted units requires 1-1.5 spaces to be provided on-site in order to comply with the adopted parking standard. This would equate to 8-12 on-plot spaces. 3 spaces are proposed which falls significantly below the standard. As the PTAL rating is considered as average which therefore heightens dependency on private motor transport, this aspect needs a review as it is likely that the proposal would be refused on the basis of the low on-plot parking content. For example, a reduction in flatted units would assist matters.

Disabled Compliant Parking

In accord with Hillingdon's Local Plan Part 2 standard - 10% of parking spaces should be disabled compliant. 1 space is proposed which conforms to the standard in the context of the quantum of spaces proposed.

Electric Vehicle Charging Points (EVCP's)

In line with the emerging London Plan, within any final parking quantum there is a requirement for a 20% 'active' EVCP provision with all remaining spaces being designated as 'passive' provisions.

Cycling Provision

In terms of cycle parking there should be a minimum provision of 1 secure and accessible space for each residential unit in order to conform to the adopted minimum borough cycle parking standard. 8 spaces are proposed which conforms to the standard.

Dental Surgery

The proposal indicates a single on-plot parking provision on the private forecourt on the frontage. The parking standard requires two spaces per consulting room. Hence there is likely to be a deficit in provision.

It is however acknowledged that there is little convenient 'free of charge' parking availability in the local area as it is extensively covered by parking restrictions throughout the working week and on Saturday which inherently assists in deterring any potential extraneous parking and traffic generated by the proposal. It is also possible that a proportion of patients would attend the surgery on a 'linked-trip' principle on-route to other destinations by, for example, being 'dropped off & picked up' which would further reduce potential new 'single destination' vehicular trips and resultant impacts generated by the proposal.

Cycling Provision

In terms of cycle parking there should be a minimum provision of 1 secure and accessible space for staff with 1 space per 10 patients.

Vehicular Access Arrangements (Residential & Dental Practice)

In highway impact terms, there is no objection in principle to the parking layouts depicted on the frontage and to the rear of the site envelope and the access points are considered fit for purpose.

Operational Refuse Requirements (Residential)

Refuse collection would presumably occur from Northolt Avenue and a bin storage area is shown to the rear of the site. In order to conform to the Council's 'waste collection' maximum distance collection parameter of 10m i.e. distance from a refuse vehicle to the point of collection or bin store, arrangements should ensure that waste is positioned at a collection point within this set distance. With the arrangement presented, it would appear that the above parameter is met. There are no further observations.

Synopsis

In terms of transport/highways impacts, the acceptability (or otherwise) of a future planning application will be dependent on the evidence and detail provided within the submitted documentation together with an appropriate response to the comments and recommendations made within this appraisal.

5. Other

AIR QUALITY

The following policy context is taken into consideration:

Paragraph 181 of the National Planning Policy Framework (February 2019) states that planning decisions should sustain and contribute towards compliance with relevant limit

values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and Clean Air Zones, and the cumulative impacts from individual sites in local areas. Opportunities to improve air quality or mitigate impacts should be identified, such as through traffic and travel management, and green infrastructure provision and enhancement. Planning decisions should ensure that any new development in Air Quality Management Areas and Clean Air Zones is consistent with the local air quality action plan. Policy 7.14 of the London Plan (March 2016) further supports this.

Policy EM8 of the Hillingdon Local Plan: Part 1 - Strategic Policies (November 2012) states that the Council will seek to safeguard and improve all land, water, air and noise quality. All development should not cause deterioration in the local air quality levels and should ensure the protection of both existing and new sensitive receptors.

Policy DMEI 14 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020) states:

A) 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.

B) Development proposals should, as a minimum: i) be at least "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.

The pre-application site is within the declared Hillingdon Air Quality Management Area and Air Quality Focus Areas: A40/ South Ruislip Focus Area. Focus Areas are where the pollution levels are already elevated and improvements are required to be made.

FLOOD AND WATER MANAGEMENT

The Council's Flood and Water Management Officer has provided the following comments:

This proposal should incorporate Sustainable Drainage design within the application, and permeable surfacing where possible.

NOISE

Policy 7.15 of the London Plan (March 2016) states that development proposals should seek to manage noise by:

- a. avoiding significant adverse noise impacts on health and quality of life as a result of new development;
- b. mitigating and minimising the existing and potential adverse impacts of noise on, from, within, as a result of, or in the vicinity of new development without placing unreasonable restrictions on development or adding unduly to the costs and administrative burdens on existing businesses;
- c. improving and enhancing the acoustic environment and promoting appropriate soundscapes (including Quiet Areas and spaces of relative tranquillity);
- d. separating new noise sensitive development from major noise sources (such as road, rail, air transport and some types of industrial development) through the use of distance, screening or internal layout - in preference to sole reliance on sound insulation;
- e. where it is not possible to achieve separation of noise sensitive development and noise sources, without undue impact on other sustainable development objectives, then any potential adverse effects should be controlled and mitigated through the application of good acoustic design principles;
- f. having particular regard to the impact of aviation noise on noise sensitive development;
- g. promoting new technologies and improved practices to reduce noise at source, and on the transmission path from source to receiver.

Policy EM8 of the Hillingdon Local Plan: Part 1 - Strategic Policies (November 2012) states

that the Council will seek to ensure that noise sensitive development and noise generating development are only permitted if noise impacts can be adequately controlled and mitigated.

The ground floor level of the site comprises of a dental surgery therefore, consideration on noise impact should be considered.

ACCESS

Should you wish to discuss accessibility issues, the Council's Access Officer, Mr Ali Kashmiri can be contacted on 01895 250230 or via akashmiri@hillingdon.gov.uk.

CONTAMINATED LAND

Policy DMEI 12 of The Local Plan: Part 2 - Development Management Policies (2020) states:

A) Proposals for development on potentially contaminated sites will be expected to be accompanied by at least an initial study of the likely contaminants. The Council will support planning permission for any development of land which is affected by contamination where it can be demonstrated that contamination issues have been adequately assessed and the site can be safely remediated so that the development can be made suitable for the proposed use.

B) Conditions will be imposed where planning permission is given for development on land affected by contamination to ensure all the necessary remedial works are implemented, prior to commencement of development.

C) Where initial studies reveal potentially harmful levels of contamination, either to human health or controlled waters and other environmental features, full intrusive ground investigations and remediation proposals will be expected prior to any approvals.

D) In some instances, where remedial works relate to an agreed set of measures such as the management of ongoing remedial systems, or remediation of adjoining or other affected land, a S106 planning obligation will be sought.

The Council's Contaminated Land Officer has provided the following comments:

LAND CONTAMINATION

Section 8.15 of the Council's Supplementary Planning Document 'Planning Obligations' requires:

"Land contamination issues must be sufficiently addressed in any environmental assessment to accompany a planning application, including consideration of the fact that contamination may have spread beyond the development site boundary and that a wider area may require monitoring and/or treatment".

Applications for sensitive developments should therefore be supported by a phased approach to investigation of land conditions at the site, commencing with a desk top study confirming known or potential contamination issues, all in accordance with Environment Agency guidance documents e.g. Land contamination:: risk management (LC:RM) - available at

<https://www.gov.uk/guidance/land-contamination-how-to-manage-the-risks>.

Conditions will be imposed where planning permission is given for development on land affected by contamination to ensure all the necessary remedial works are implemented, prior to commencement of development. The level of additional information and/or action required will vary dependent on findings of the desk top study and any of the LPAs' concerns regarding land contamination. Clarification, if required, can be sought from the Council's Contaminated Land Officer.

In the meantime, available mapping and records indicate that the site does not appear to have been subject to contaminative uses, apart from:

1. Current day car parking activities which may have introduced hydrocarbons from vehicle oil and fuel leaks, and which may prove to be insignificant.
2. Soil gas production from earlier deposits of made ground materials may also require consideration to identify and if necessary eliminate the possibility of toxic gases entering the proposed new structure.

Furthermore, due to the age of the buildings, there is a possibility that asbestos will be present, therefore, demolition and removal of any asbestos containing material (ACM) must be carried out in accordance with guidance from the Health and Safety Executive see <https://www.hse.gov.uk/asbestos/index.htm>).

CRIME PREVENTION

The design and layout should also have regard to secure by design principals. You may wish to contact the Metropolitan Police's Secure by Design Officer, PC Robert Palin who can be contacted on 020 8733 5245 or by e-mail on Robert.Palin@met.pnn.police.uk

6. Planning Obligation and CIL (Mayor and LBH)

PLANNING OBLIGATIONS

Planning Obligations would be sought in accordance with the Councils Planning Obligations SPG 2014.

COMMUNITY INFRASTRUCTURE LEVY (CIL)

Please be advised that as from 1 April 2012, all planning approvals for schemes with a net additional internal floor area of 100m² or more will be liable for the Mayoral Community Infrastructure Levy (Mayoral CIL), as legislated by the Community Infrastructure Levy Regulations 2010 and The Community Infrastructure Levy (Amendment) Regulations 2011. The liability payable will be equal to £60 per square metre (from April 2019). The London Borough of Hillingdon is a collecting authority for the Mayor of London and this liability shall be paid to LBH in the first instance.

In addition the development represents Chargeable Development under the Hillingdon Community Infrastructure Levy, which came into effect on 1st August 2014. The liability payable will be £95 per square metre.

Should you require further information please refer to the Council's Website www.hillingdon.gov.uk/index.jsp?articleid=24738

It is important to note that this CIL liability will be in addition to the planning obligations (s106) that the Council may seek from your scheme.

7. Application Submission

The Councils Local Planning Validation Checklist (June 2020) is available on the Council's website and sets out a full list of the information required to validate a future planning application. The list of documents which should be submitted, but is not limited to, is as follows:

- Application Form
- Site Location Plan
- Block Plan
- Existing and Proposed Floor plans, Elevations and Roof Plan (a scale bar must be included)
- Design and Access Statement
- Landscaping Plan
- Drainage Assessment
- CIL Form

8. Conclusion

In conclusion, the pre-application site is subject to notable constraints. The principle of the redevelopment of the site is considered acceptable however, as noted in the Council's Conservation and Urban Design Officer comments, the introduction of the top third floor would not be supported as it would contribute to an over dominant building on a prominent corner which would result in an adverse impact on the street scene and the character and appearance of the area.

As stated in the main body of the report, the Council would ideally like to see a higher proportion of 2 bedroom dwellings to help meet local housing needs. It is for the applicant to demonstrate to the Council's satisfaction why the housing mix proposed is optimal for this site. In addition, parking provision for the 8 flats proposed requires 8-12 on-plot car parking spaces and the parking provision required for the dental surgery would be 2 spaces per consulting room. Following the assessment by the Council's Highways Officer, the proposal falls significantly below these requirements as only 3 spaces are provided for the residential units and 1 space for the dental surgery.

Overall, the proposed development as it currently stands, would not be supported. Exploring further design solutions in order to resolve the issues identified in this response is necessary.

In the event that these principle issues are resolved, the formal application submission should be supported by the documentation requested within the main body of the report to aid the detailed consideration of the application.

The comments made in this letter represent officer opinion and cannot be seen to prejudice the Local Planning Authority's formal determination of this or any other planning application

Please be advised that the Council require confirmation that you wish to enter into a PPA as soon as possible, in order to ensure the necessary resource are in place to meet the terms of the PPA.

Thank you for entering into the Council's pre-application advice service and I trust you have found this service of assistance.

**Rebecca Lo
Planning Officer
Major Applications Team
London Borough of Hillingdon**

Planning Guarantee

For complex applications which are likely to exceed the statutory timeframes, the applicant is encouraged to enter into a Planning Performance Agreement (PPA) to allow for the negotiation of complex cases. Central Government encourages the use of PPAs for larger and more complex planning proposals to bring together the developer, the Local Planning Authority and key stakeholders to work in partnership throughout the planning process.

Providing a PPA helps ensure that major proposals progress through the application process in a timely fashion and result in high quality development but the service is both time consuming and costly. The charge for all Planning Performance Agreements will ensure that adequate resources and expertise can be provided to advise on major development proposals, the charges are determined on a site by site basis.

Hillingdon are committed to ensure the best possible service provision to all of our applicants. In order to ensure this, we will not be able to facilitate negotiation which would result in an application being determined outside of statutory timeframes, unless the applicant has entered into a Planning Performance Agreement.

APPENDIX 02

TRANSPORT

ANALYSIS

LETTER AND

SURVEY

Transport Analysis survey

Purpose of the survey – To understand how patients travel to visit the practice.

Time period selected – Typical week Monday to Friday

Survey Method – Patients were asked during their appointment their mode of travel. This was then logged by the reception team on the spreadsheet below.

Conclusion – results show that the primary mode of travel is on foot is what would be anticipated given the practices knowledge of the area and patients. Most patients that visit the surgery are within walking distance and we anticipate this to continue to be the case.

Shatin Varsani and Sandip Halai

Partners – Ivory Dental Practice

Date	Walk	Car	Tube	Cycle	other	Totals
20/10/2020	1					
20/10/2020	1					Walk 48
21/10/2020	1					Car 11
21/10/2020					1	Tube 11
21/10/2020	1					Cycle 0
21/10/2020		1				Other 10
21/10/2020			1			
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29/10/2020			1			

APPENDIX 03

MODULAR BUILDING EXAMPLE SPECIFICATION SHEET

Fire Resistant Units – Surefire Anti-Vandal Jack Leg Units

The *Surefire* range of "all-steel" fire rated anti-vandal site accommodation units has been designed, manufactured and independently tested to meet Clause 12.4 of The Joint Code of Practice on the Protection from Fire of Construction Sites and Buildings Undergoing Renovation, offering the best protection in the event of fire.

Stacking

Where units are vertically stacked, the roof/floor assembly and members supporting it achieve at least 30 minutes Fire Resistance (integrity, insulation and load bearing capacity) to BS476 Parts 20 and 21 and comply with Building Regulation requirements.

Fire Resistance

Walls and roof achieve 30 minutes Fire Resistance (integrity and insulation) to BS476 Parts 20 and 22, when tested from below. Door and windows achieve 30 minutes Fire Resistance (integrity) to BS476 Parts 20 and 22.



Fire Resistant Units – Surefire Anti-Vandal Jack Leg Units

Structural Reliability

The extensive use of non-combustible Galvalite steel illustrates our commitment to quality and long life durability.

Foundations

Standard foundation designs are available for each size of building.

Thermal Insulation

Roof and wall cavities are insulated with non combustible glasswool fibre. Floor insulation is optional.

External Finishings

A Zinc rich galvanic primer is applied to all external mild steel surfaces and weld areas. Fully galvanised panels are spray coated with mid grey semi-gloss fast enamel to BS4800 with trims including skirting, jack legs and fascia in contrasting dark grey to BS4800. A coating of semi-gloss solar reflective fast enamel is also spray applied to the roof for added protection.

Electrical Installation

Fluorescent lights, twin 13 amp switched socket outlets, a light switch, consumer unit and earth leakage circuit breakers are fitted as standard.

Jack Legs

Individually adjustable and removable telescopic jack legs for ease of levelling and double stacking without modification.

A steel lifting ring is welded to the top of each jack leg for crane handling using four-leg slings and bow shackles to BS 6994. Certain heavier *Surefire* units are supplied with roof mounted eye bolts instead of jack leg rings.

Fire Resistant Units – Surefire Anti-Vandal Jack Leg Units

Full Scale Fire Test Results

Under an independently conducted, full-scale, real fire test carried out by Warrington Fire Research Centre, the *Surefire* unit was more than able to demonstrate its design and construction fire characteristics confirming:

That despite internal maximum temperatures of 1100°C, after only 10 minutes, structural integrity of the *Surefire* unit remained intact.

When compared with the fire performance of traditionally constructed modular buildings containing polymeric cores and with plywood linings, the fire performance of the *Surefire* building was an immense improvement. Experience during actual fires had demonstrated that normally fires in other types of module would have spread to the outside of the module within 10-15 minutes.

The *Surefire* unit contained the fire for a full 60 minutes, well in excess of the 30 minute minimum requirement and there was no evidence of any flaming from joints in the external wall panels.

Surefire performance exceeded the requirements of BS476 Part 20.

Source: Warrington Fire Research Report



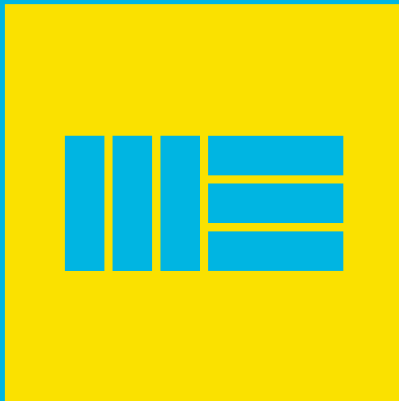
Fire Resistant Units – Surefire Anti-Vandal Jack Leg Units

Unit Sizes & Application:

- 32' x 10' (9.6m x 3m) open plan office
- 32' x 10' (9.6m x 3m) canteen
- 32' x 10' (9.6m x 3m) changing room
- 32' X 10' (9.6m x 3m) toilets & showers
- 24' x 9' (7.2m x 2.4m) open plan office
- 24' x 9' (7.2m x 2.4m) canteen
- 24' x 9' (7.2m x 2.4m) changing room
- 24' x 9' (7.2m x 2.4m) toilets & showers

MONTAGU EVANS

**70 ST MARY AXE
LONDON
EC3A 8BE**



WWW.MONTAGU-EVANS.CO.UK

London | Edinburgh | Glasgow | Manchester

WE CONSIDER OUR CREDENTIALS, HOW WE HAVE STRUCTURED OUR BID AND OUR PROPOSED CHARGING RATES TO BE COMMERCIALY SENSITIVE INFORMATION.
WE REQUEST THAT THESE BE TREATED AS CONFIDENTIAL.



Elizabeth Osborne
Montagu Evans
70 St Mary Axe
London
EC3A 8BE

Application Ref:
27354/APP/2020/4256

TOWN AND COUNTRY PLANNING ACT 1990 (AS AMENDED)

REFUSAL OF PLANNING PERMISSION

The Council of the London Borough of Hillingdon as the Local Planning Authority within the meaning of the above Act and associated Orders **REFUSES** permission for the following:-

Description of development:

Erection of a three storey building comprising a dental surgery and 7 residential units (6 no. 1-bed units and 1 no. 2-bed unit), car and cycle parking and associated works, temporary permission for the siting of a modular building to the rear of the site for use as a dental surgery during the demolition of the existing dental surgery and construction of the proposed dental surgery.

Location of development: 40 Station Approach South Ruislip

Date of application: 06 January 2021

Plan Numbers: See attached Schedule of plans

Permission is refused for the reason(s) listed on the attached schedule:-

Head of Planning, Transportation and Regeneration

Date: 12 March 2021

NOTES: (i) Please also see the informatives included in the Schedule of Reasons.

(ii) Should you wish to appeal against this decision please read the attached sheet which explains the procedure.

TOWN AND COUNTRY PLANNING ACT 1990 (AS AMENDED)

REFUSAL OF PLANNING PERMISSION

Application Ref: 27354/APP/2020/4256

SCHEDULE OF REASONS

- 1 The proposed development, by reason of the overall size and scale of the building would result in an incongruous and overly dominant form of development that would be detrimental to the character, appearance and visual amenities of the site, the street scene and the wider area. Furthermore the proposed roof access enclosure and lift over run by reason of its size, scale, bulk and design would result in an intrusive and incongruous roof addition that adds visual clutter and detracts from the appearance of the building and wider streetscape. As such the proposal would be contrary to Policies DMHB 11 and DMHB 12 of the Hillingdon Local Plan: Part Two - Development Management Policies (2020), Policy D4 of the London Plan (2021) and the NPPF (2019).
- 2 The proposed development leads to the loss of a family sized residential unit and by reason of the unit mix fails to provide sufficient family sized units, as required by the latest information on housing need. The proposed development fails to contribute towards mixed and balanced communities and the range of housing types required within the Borough contrary to Policy DMH 2 of the Hillingdon Local Plan: Part Two - Development Management Policies (January 2020), Policy H10 of the London Plan (2021) and the NPPF (2019).

INFORMATIVES:

- 1 On this decision notice policies from the Councils Local Plan: Part 1 - Strategic Policies appear first, then relevant Local Plan Part 2 (2020), then London Plan Policies (2016). Hillingdon's Full Council adopted the Hillingdon Local Plan: Part 1 - Strategic Policies on 8 November 2012 and the Hillingdon Local Plan Part 2 on 16 January 2020.

END OF SCHEDULE

Address:

Residents Services
London Borough of Hillingdon
3 North Civic Centre, High Street, Uxbridge UB8 1UW
Tel: 01895 250230
www.hillingdon.gov.uk

REFUSAL OF PLANNING PERMISSION

Application Ref.No.: 27354/APP/2020/4256

SCHEDULE OF PLANS

001_2000A - received 12 Feb 2021
001_2001A - received 12 Feb 2021
001_2002A - received 12 Feb 2021
001_2003A - received 12 Feb 2021
001_2005A - received 12 Feb 2021
Design and Access Statement (Part 1 of 2) - received 21 Dec 2020
Design and Access Statement (Part 2 of 2) - received 21 Dec 2020
Sustainable Drainage Strategy and Report - received 21 Dec 2020
Geoenvironmental and Geotechnical Desk Study - received 21 Dec 2020
Schedule of Submission Documents - received 21 Dec 2020
22466-01 - received 21 Dec 2020
Transport Analysis Letter and Survey - received 21 Dec 2020
Transport Technical Note - received 21 Dec 2020
001_0006 Rev. 00 - received 21 Dec 2020
Existing Site Plan - received 21 Dec 2020
Temporary Dental Surgery Plan(1 - received 21 Dec 2020
CIL Form - received 21 Dec 2020
Notice under Article 13 - received 21 Dec 2020
001_0001 Rev. 01 - received 21 Dec 2020
001_0020 Rev. 01 - received 21 Dec 2020
001_0021 Rev. 01 - received 21 Dec 2020
001_0022 Rev. 01 - received 21 Dec 2020
001_0023 Rev. 01 - received 21 Dec 2020
001_0030 Rev. 01 - received 21 Dec 2020
Covering Letter (18/12/2020) - received 21 Dec 2020
Drawing Schedule - received 21 Dec 2020
Planning Statement - received 21 Dec 2020
001_0000 Rev. 01 - received 21 Dec 2020
001_2020 Rev. 01 - received 21 Dec 2020
001_2021 Rev. 01 - received 21 Dec 2020

001_2022 Rev. 01 - received 21 Dec 2020
001_2023 Rev. 01 - received 21 Dec 2020
001_2030 Rev. 01 - received 21 Dec 2020
001_2031 Rev. 01 - received 21 Dec 2020
001_2040 Rev. 00 - received 21 Dec 2020
001_2041 Rev. 00 - received 21 Dec 2020
001_2042 Rev. 00 - received 21 Dec 2020
GE0001 Rev. X - received 21 Dec 2020
001_0005 Rev. 01 - received 21 Dec 2020
001_2006 Rev. 01 - received 21 Dec 2020
001_0105 Rev. 01 - received 21 Dec 2020
001_2007 Rev. 00 - received 21 Dec 2020

RIGHTS OF APPLICANTS AGGRIEVED BY DECISION OF LOCAL PLANNING AUTHORITY

TOWN AND COUNTRY PLANNING ACT 1990 (AS AMENDED)

If you are aggrieved by the decision of your local planning authority to refuse permission for the proposed development or to grant it subject to conditions, then you can appeal to the office of the First Secretary of State under Section 78 of the Town and Country Planning Act 1990.

If you want to appeal, then you must do so within six months of the date of this notice, using a form which you can get from the Planning Inspectorate at Customer Support Unit, Room 3/15 Eagle Wing, Temple Quay House, 2 The Square, Temple Quay, Bristol, BS1 6PN (Tel 0117 372 8424). Appeal forms can be downloaded from the Planning Inspectorate's website at www.Planning-inspectorate.gov.uk

If you intend to submit an appeal that you would like examined by inquiry then you must notify the Local Planning Authority and Planning Inspectorate (inquiryappeals@planninginspectorate.gov.uk) at least 10 days before submitting the appeal.

Further details are available at www.gov.uk/government/collections/casework-dealt-with-by-inquiries

The Secretary of State can allow a longer period for giving notice of an appeal, but he will not normally be prepared to use this power unless there are special circumstances, which excuse the delay in giving notice of an appeal.

The Secretary of State need not consider an appeal if it seems to him that the local planning authority could not have granted planning permission for the proposed development or could not have granted it without the conditions imposed, having regard to the statutory requirements, to the provisions of any development order and to any directions given under a development order.

In practice, the Secretary of State does not refuse to consider appeals solely because the local planning authority based their decision on a direction given by him.

Purchase Notices.

If either the local planning authority or the officer of the First Secretary of State refuses permission to develop land or grants it subject to conditions, the owner may claim that he can neither put the land to a reasonably beneficial use by carrying out of any development which has been or would be permitted.

In these circumstances, the owner may serve a purchase notice on the Council (District Council, London Borough Council or Common Council of the City of London) in whose area the land is situated. This notice will require the Council to purchase his interest in the land in accordance with the provisions of Part VI of the Town and Country Planning Act 1990.

Report of the Head of Planning, Transportation and Regeneration

Address	40 STATION APPROACH SOUTH RUISLIP
Development:	Erection of a three storey building comprising a dental surgery and 7 residential units (6 no. 1-bed units and 1 no. 2-bed unit), car and cycle parking and associated works, temporary permission for the siting of a modular building to the rear of the site for use as a dental surgery during the demolition of the existing dental surgery and construction of the proposed dental surgery
LBH Ref Nos:	27354/APP/2020/4256
Drawing Nos:	001_2000A 001_2001A 001_2002A 001_2003A 001_2005A Design and Access Statement (Part 1 of 2) Design and Access Statement (Part 2 of 2) Sustainable Drainage Strategy and Report Geoenvironmental and Geotechnical Desk Study Schedule of Submission Documents 22466-01 Transport Analysis Letter and Survey Transport Technical Note 001_0006 Rev. 00 Existing Site Plan Temporary Dental Surgery Plan(1 CIL Form Notice under Article 13 001_0001 Rev. 01 001_0020 Rev. 01 001_0021 Rev. 01 001_0022 Rev. 01 001_0023 Rev. 01 001_0030 Rev. 01 Covering Letter (18/12/2020) Drawing Schedule Planning Statement 001_0000 Rev. 01 001_2020 Rev. 01 001_2021 Rev. 01 001_2022 Rev. 01 001_2023 Rev. 01 001_2030 Rev. 01 001_2031 Rev. 01 001_2040 Rev. 00 001_2041 Rev. 00 001_2042 Rev. 00 GE0001 Rev. X 001_0005 Rev. 01 001_2006 Rev. 01

001_0105 Rev. 01
001_2007 Rev. 00

Date Plans Received: 21/12/2020

Date(s) of Amendment(s): 21/12/2020

Date Application Valid: 06/01/2021

1. SUMMARY

The current application seeks planning permission for the erection of a three storey building comprising a dental surgery and 7 residential units (6 no.1-bed units and 1 no. 2-bed unit), car and cycle parking and associated works, temporary permission for the siting of a modular building to the rear of the site for use as a dental surgery during the demolition of the existing dental surgery and construction of the proposed dental surgery.

2. RECOMMENDATION

REFUSAL for the following reasons:

1 NON2 Non Standard reason for refusal

The proposed development, by reason of the overall size and scale of the building would result in an incongruous and overly dominant form of development that would be detrimental to the character, appearance and visual amenities of the site, the street scene and the wider area. Furthermore the proposed roof access enclosure and lift over run by reason of its size, scale, bulk and design would result in an intrusive and incongruous roof addition that adds visual clutter and detracts from the appearance of the building and wider streetscape. As such the proposal would be contrary to Policies DMHB 11 and DMHB 12 of the Hillingdon Local Plan: Part Two - Development Management Policies (2020), Policy D4 of the London Plan (2021) and the NPPF (2019).

2 NON2 Non Standard reason for refusal

The proposed development leads to the loss of a family sized residential unit and by reason of the unit mix fails to provide sufficient family sized units, as required by the latest information on housing need. The proposed development fails to contribute towards mixed and balanced communities and the range of housing types required within the Borough contrary to Policy DMH 2 of the Hillingdon Local Plan: Part Two - Development Management Policies (January 2020), Policy H10 of the London Plan (2021) and the NPPF (2019).

INFORMATIVES

1 I59 Councils Local Plan : Part 1 - Strategic Policies

On this decision notice policies from the Councils Local Plan: Part 1 - Strategic Policies appear first, then relevant Local Plan Part 2 (2020), then London Plan Policies (2016). Hillingdon's Full Council adopted the Hillingdon Local Plan: Part 1 - Strategic Policies on 8 November 2012 and the Hillingdon Local Plan Part 2 on 16 January 2020.

3. CONSIDERATIONS

3.1 Site and Locality

The application site is located on the prominent corner of Station Approach and Northolt Avenue. The site is rectangular in shape totalling 396 metres square. The premises is a 2-storey brick building that is currently occupied by a dental practice on ground floor and used as a residential dwelling on first floor. The front elevation of the site is set back from its adjoining neighbour on the north-east, No. 42B Station Approach. The front hardstanding area faces onto Station Approach and is used as parking for the dental surgery while the rear of the property is also hardstanding with access onto Northolt Avenue.

The application site is located 230 m south-west of South Ruislip station and has a PTAL score of 3. The property is within the South Ruislip Local Centre, Hillingdon Air Quality Management Area and Air Quality Focus Areas: A40/ South Ruislip Focus Area.

The surrounding area comprises mainly of residential dwellings up to 3 storeys high including, residential flats, semi-detached houses, bungalows and mix use buildings (residential above and commercial on ground level).

3.2 Proposed Scheme

The current application seeks planning permission for the erection of a three storey building comprising a dental surgery and 7 residential units (6 no. 1-bed units and 1 no. 2-bed unit), car and cycle parking and associated works, temporary permission for the siting of a modular building to the rear of the site for use as a dental surgery during the demolition of the existing dental surgery and construction of the proposed dental surgery. One car space to the front for the dentist surgery and 4 car spaces, bin store and cycle storage to the rear. Access to the parking spaces is via Northolt Avenue.

The proposal includes:

Ground Floor:

- Dentist Surgery (80.3 sqm)
- 2 bed flat (75.9 sqm) with balcony (6 sqm)

First Floor:

- 1 Bed Flat (51.0 sqm) with balcony (6 sqm)
- 1 Bed Flat (51.1 sqm) with balcony (6 sqm)
- 1 Bed Flat (54.8 sqm) with balcony (7 sqm)

Second Floor:

- 1 Bed Flat (51.0 sqm) with balcony (6 sqm)
- 1 Bed Flat (51.1 sqm) with balcony (6 sqm)
- 1 Bed Flat (54.8 sqm) with balcony (7 sqm)

During the construction of the development, a temporary, single storey building to provide a dental surgery, totalling 35.8 sqm GIA, is to be located to the rear of the site.

3.3 Relevant Planning History

Comment on Relevant Planning History

SITE HISTORY:

An advertisement consent under planning reference 27354/ADV/2000/59 was granted on 12-10-00 for the installation of 2 wall mounted illuminated box signs and one non-illuminated free standing sign.

A planning application under planning reference 27354/D/90/1464 was granted on 11-12-90 for additional use of part of residential property as dental surgery.

A planning application under planning reference 27354/A/86/1182 was granted on 27-08-86 for a Householder development - residential extension(P).

A planning application under planning reference 27354/79/1638 was granted on 30-10-79 for a Householder development - residential extension(P).

4. Planning Policies and Standards

Development Plan

Planning law requires that applications for planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise.

The Development Plan for the London Borough of Hillingdon currently consists of the following documents:

The Local Plan: Part 1 - Strategic Policies (2012)
The Local Plan: Part 2 - Development Management Policies (2020)
The Local Plan: Part 2 - Site Allocations and Designations (2020)
The West London Waste Plan (2015)
The London Plan (2021)

Material Considerations

The National Planning Policy Framework (NPPF) (2019) is also a material consideration in planning decisions, as well as relevant supplementary planning documents and guidance.

UDP / LDF Designation and London Plan

The following Local Plan Policies are considered relevant to the application:-

Part 1 Policies:

PT1.BE1 (2012) Built Environment

Part 2 Policies:

DMCI 2 New Community Infrastructure
DMH 2 Housing Mix
DME 1 Employment Uses in Designated Sites
DMEI 14 Air Quality
DMHB 11 Design of New Development
DMHB 12 Streets and Public Realm
DMHB 14 Trees and Landscaping
DMHB 16 Housing Standards

DMHB 18	Private Outdoor Amenity Space
DMT 1	Managing Transport Impacts
DMT 2	Highways Impacts
DMT 6	Vehicle Parking
EM6	(2012) Flood Risk Management
LPP 3.5	(2016) Quality and design of housing developments
LPP 4.3	(2016) Mixed use development and offices
LPP 5.13	(2016) Sustainable drainage
LPP 5.21	(2016) Contaminated land
LPP 5.3	(2016) Sustainable design and construction
LPP 6.3	(2016) Assessing effects of development on transport capacity
LPP 6.9	(2016) Cycling
LPP 6.13	(2016) Parking
LPP 7.4	(2016) Local character
LPP 7.5	(2016) Public realm
LPP 7.6	(2016) Architecture

5. Advertisement and Site Notice

5.1 Advertisement Expiry Date:- Not applicable

5.2 Site Notice Expiry Date:- Not applicable

6. Consultations

External Consultees

57 neighbouring properties and the local residents association were consulted by letter dated 12/1/2021. The consultation period expired on 2/2/2021.

One written representation has been received together with a signed petition with 31 signatures objecting to the proposal summarised as follows:-

Written representation comments

Noise and disturbance from construction work
No need for more flats in the area
House prices devalued

Officer response - Noise due to construction works is of a transient nature and the latter two points are not material planning considerations.

Petition comments

1. Too high and would impact on the character of the surrounding area - especially being located on a corner plot
2. Would impact on the privacy on neighbouring properties in Northolt Avenue
3. Would add parking stress to an already crowded road network with all adjacent streets already part of the SR parking management scheme

4. Failure to provide much needed 3 bedroom family homes to South Ruislip

Officer response - The concerns raised above are material planning considerations and are addressed within the body of this report.

NHS Clinical Commissioning Group - Were consulted but have not commented on the application.

Internal Consultees

PLANNING POLICY

Planning Policy commented as follows:-

Designations · Local Centre - South Ruislip

The applicant is proposing 6 x 1 bedroom flats and 1 x 2 bedroom flat. The application site is within South Ruislip Local Centre and it has a PTAL of 3.

Dental Surgery

The applicant is proposing the demolition of the existing dental surgery and a replacement dental surgery on the ground floor of the new four storey building. A temporary dental facility is proposed on site for use during the construction of the new building.

Policy DMCI 2 of the Hillingdon Local Plan Part Two (LPP2) states that proposals for the refurbishment and re-use of existing premises for community facilities will be supported. Policy S1 of the Publication London Plan states that "Development proposals that provide high quality, inclusive social infrastructure that addresses a local or strategic need and supports service delivery strategies should be supported."

Policy S2 of the London Plan (2021) states that "Development proposals that support the provision of high-quality new and enhanced health and social care facilities to meet identified need and new models of care should be supported." Paragraph 5.1.5 of the London Plan states that "The loss of social infrastructure can have a detrimental effect on a community. Where possible, boroughs should protect such facilities and uses, and where a development proposal leads to the loss of a facility, require a replacement that continues to meet the needs of the neighbourhood it serves."

In principle, the re-provision of a dental surgery of higher quality and increased floor space is supported. It is advised that the CCG are consulted to provide a view on the quality and suitability of the proposed dental surgery to be able to fully assess the proposal. The development proposal does not lead to a loss of social infrastructure however there is concern that the temporary facility, in terms of accessibility and size, at 35.8 sq. m, may not be adequate to function effectively as a dental surgery. It is advised that the CCG is consulted so that they can provide a more informed view on the suitability of the temporary facility as well as the new permanent facility measuring 80 sq. m.

Officer Comment: The proposed surgery is larger (80sq.m) in floor area than the existing surgery (42sq.m), as such it cannot be argued there is a loss of or reduction in scale or form of the community facility. Whereas the temporary facility is smaller than the existing facility, had the development been acceptable in other respects a condition could have been imposed seeking to control (to as short as period as possible) the use of the temporary building. As such it is not considered that an objection can be raised to the proposals in principle. The CCG were consulted, but no comments have been received.

Residential Use

The principle of residential uses on the site has been established through the existing residential unit and it is not an inappropriate place for residential development. There is an existing 3-bedroom flat on the site, and the applicant is proposing the demolition of the existing building and replacement with 7 flats (6 x 1-bed and 1 x 2-bed), a net gain of 6 units.

Housing Mix

Policy H10 of the London Plan (2021) states that schemes should generally consist of a range of unit sizes and sets out a number of factors which should be considered when determining the appropriate housing mix on a particular scheme. This includes local evidence of need.

Policy DMH 2 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020) requires 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. Paragraph 4.6 outlines that there is a substantial borough-wide requirement for larger affordable and private market units, particularly three-bedroom properties

In terms of factors specific to a site, Policy H10 also includes a need to consider, the mix of uses in the scheme, the range of tenures in the scheme and 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. Family housing is defined within the glossary of the Publication London Plan (2020) and outlines it must generally be of a size that has three or more bedrooms. It is worth noting that the Secretary of State directed changes to Policy H10, in order address the need for new family housing, to prevent families from being forced to move outside of London. These changes are incorporated into the Publication London Plan (2020).

The proposal consists of the following housing mix:

- 6 No. of One Bedroom Units (86%)
- 1 No. of Two Bedroom Units (14%)

The proposal involves the demolition of an existing 3 bed dwelling and its replacement with 7 residential units comprising 6 x 1 bed and 1 x 2 bed dwellings. As stated in Policy H10, as well as consideration of local housing need, development proposals should also have regard to the mix of uses in the scheme, the range of tenures in the scheme and the nature and location of the site.

There is an existing family sized unit in the current building and as a minimum the Council would expect the re-provision of at least one 3/3+ bed unit in the proposed development. Although the site is in a designated local centre, it also has a PTAL of 3 and generally speaking it would be suited to family housing as schemes in these locations generally tend to be less constrained and there is more capacity to provide car parking and adequate amenity space.

The most recent assessment of local housing need, the 2018 Strategic Housing Market Assessment also indicates a significant borough-wide need for family units (3 bed or larger) and it is considered that this site is capable of accommodating at least a replacement family dwelling as part of the proposed development. Given this need a net loss of a family unit without suitable justification would be considered contrary to policy.

This particular site is constrained in some ways given the need for the re-provision of a larger dental surgery on the ground floor and a limited site capacity to the rear of the site to provide both adequate private amenity space for residents and adequate levels of car parking. As such, some flexibility in the housing mix required on site would be applied. Currently, however, the proposed housing mix is not considered policy compliant even with some flexibility applied.

Policy H10 also states that schemes should have regard to "the need to deliver a range of unit types at different price points across London" and "the requirement to deliver mixed and inclusive neighbourhoods". The currently proposed housing mix is considered to be contrary to the requirements of Policy H10 and a higher proportion of 2-bed dwellings, as well as re provision of the existing family unit is expected. The 1-bed units equate to 86% of the total units provided in the scheme, which is considered to be contrary to the need to deliver a range of unit types at different price points across London and the requirement to deliver mixed and inclusive neighbourhoods. The scheme as is results in an over-dominance of 1-bed units and the loss of an existing family dwelling which is contrary to policy.

The applicant has not provided any justification or evidence to demonstrate why a housing mix more in line with policy cannot be provided as part of the proposed development. As a suggestion to the applicant, amalgamation of some of the units on the first and second floor to provide larger units seems very possible and it would allow for some of the design issues of the scheme, namely in relation to the single aspect dwellings on the first and second floor, to potentially be resolved and also provide a more policy compliant housing mix. As stated, the principle of residential development on this site is established. It is advised that the applicant revise the proposed housing mix to take account of the above comments.

Private amenity space

As stated in policy DMHB 18, all new residential development should provide good quality and usable private outdoor amenity space. Amenity standards should be provided in accordance with the minimum standards set out in table 5.3 of the Local Plan: Part Two (2020). A minimum of 20 sq. m of private outdoor amenity space for each of the 1-bed flats and a minimum of 25 sq. m for the 2-bed flat should be provided. Communal provision of outdoor space instead of private amenity space for each flat is generally not supported unless there are strong planning reasons and the proposed scheme is of a high quality with clear planning merits, as stated in paragraph 5.70 of the LPP2. A combination of a communal roof terrace of 145 sq. m as well as private balconies for each of the flats have been proposed as part of the scheme. However, floor space figures for each of the private balconies have not been annotated in the drawings provided. These are needed to make a full assessment.

Housing standards

All dwellings should meet or exceed the internal space standards set out in Table 5.1 and provide at least 10% of new housing to be accessible or easily adaptable for wheelchair users.

Living Walls/Roofs

Policy DME1 of the HLLP2 states that all major development (i.e. residential development of 10 dwellings or more) should incorporate living roofs and/or walls into the development. Suitable justification should be provided where living walls/roofs cannot be provided.

TREES AND LANDSCAPING:

This site is occupied by a two-storey brick building located on a corner plot at the junction with Northolt Avenue. The ground-floor houses a dental surgery, with a residential unit on the first floor. An area of hard-standing to the front is currently used for parking and there is a rear service road which provides access to additional parking to the rear of the building. According to Google Streetview there are a two small trees to the rear of the building, however, there are no TPO's or Conservation Area designations affecting the site.

COMMENT This submission follows pre-application ref. 27354/PRC/2020/181. The two trees will be

removed to facilitate car parking and bin / bike stores to the rear. The D&AS refers to secure and enclosed cycle storage and bin storage. It also refer to landscaping to the front of the building to enhance the public realm. Modest areas of soft landscape and green roofs are indicated on the landscape plan. There is an annotation referring to the use of native species. Where the soft landscape is part of the visual amenity for residents, it is unlikely that the use of native species will be suitable, however, there are ornamental plants which are also nectar-bearing species which will encourage biodiversity. Private outdoor amenity space is to be provided in the from of private balconies. These should be of sufficient size to be accessible and functional. The provision of soft landscape enhancement in front of the building for the benefit of the public realm is welcome, subject to detail. Its success will depend on the quality of design, implementation and future maintenance.

HIGHWAYS AND TRANSPORTATION: -

Site Characteristics & Background

The address is situated in South Ruislip on the corner of Station Approach and Northolt Avenue. The existing building comprises of a dental surgery at the ground floor with a residential unit on the 1st floor. There are areas of hardstanding to the front (a private forecourt) and rear which are currently used for parking purposes and accessed via established vehicular crossovers from both Station Approach and Northolt Avenue respectively.

It is proposed to demolish the existing building with a 4-storey replacement build incorporating a new Dental surgery (GIFA -78m²) on the ground floor with 7 flats above (6 x 1 & 1 x 2 bedroom units). The surgery would continue operation throughout the build programme with a temporary modular facility provided to the rear of the site. 5 parking spaces are proposed with one allocated to the surgery located on the frontage and 4 spaces (including 1 disabled compliant bay) positioned to the rear. Existing carriageway crossings would remain to serve the spaces.

During construction, a temporary Dental surgery (two surgery rooms - GIFA 35.8m²) acting as a decant facility would be positioned to the rear of the site where the final on-plot residential parking provisions are proposed.

The Public Transport Accessibility Level (PTAL) is rated at a level of 3 and the immediate highway is generally covered by extensive parking controls which include double yellow lines and a CPZ operating from 9am to 5pm - Monday to Friday.

Parking Provision

Local Plan: Part 2 Policy DMT 6 requires that new development will only be permitted where it accords with the Council's adopted parking standards unless it can be demonstrated that a deviation from the standard would not result in a deleterious impact on the surrounding road network.

Residential

The maximum parking provision for each of the 7 flatted units requires 1-1.5 spaces to be provided on-site in order to comply with the adopted parking standard. This would equate to 7-11 on-plot spaces. 4 spaces are proposed which falls significantly below the standard.

It is noted that the surrounding residential catchment and road network exhibits certain characteristics which arguably support a lower quantum of on-plot parking provision. To expand - the local area is covered by extensive daytime parking controls in the vicinity of the address which consist of a controlled parking zone (CPZ) which operates between 9am to 5pm - Monday to Friday. Double yellow lines are also present at key junction locations. Also, there are relatively generous off-

street parking facilities for most of the surrounding residential properties in the area such as Northolt Avenue which assists in reducing general on-street parking demand.

The applicant has also undertaken parking stress surveys within the locality in order to catalogue the levels of parking demand in all roads within a walking distance of 200m of the site. Industry recognised methodology has been applied and the findings indicate that during the recommended surveyed periods there appears to be in the region of 35% spare parking capacity which can be legitimately used on the surrounding roadways. As there is no evidence to the contrary as confirmed by random checks by Council officers, the findings are considered robust and relevant and therefore supportive of a lower on-plot parking quantum.

Disabled Compliant Parking

In accord with Hillingdon's Local Plan: Part 2 standard - 10% of parking spaces should be disabled compliant. 1 space is proposed which conforms to the standard in the context of the quantum of spaces proposed.

Electric Vehicle Charging Points (EVCP's)

In line with the emerging London Plan, within any final parking quantum there is a requirement for a minimum 20% 'active' EVCP provision with all remaining spaces being designated as 'passive' provisions. This equates to 1 'active' and 3 'passive' spaces which is proposed hence there are no further observations made.

Cycling Provision

In terms of cycle parking there should be a minimum provision of 1 secure and accessible space for each residential unit in order to conform to the adopted minimum borough cycle parking standard. 8 spaces are proposed within 'two tier' racks located to the rear of the site envelope which conforms to the standard.

Dental Surgery

The proposal indicates a single on-plot parking provision on the private forecourt on the frontage. The parking standard requires two spaces per consulting room. Hence given the proposed GIFA, there is a deficit in provision.

It is however acknowledged that there is little convenient 'free of charge' parking availability in the local area as it is extensively covered by parking restrictions throughout the working week which inherently assists in deterring any potential extraneous parking and traffic generated by the proposal. It is also possible that a proportion of patients would attend the surgery on a 'linked-trip' principle on-route to other destinations by, for example, being 'dropped off & picked up' which would further reduce potential new 'single destination' vehicular trips and resultant impacts generated by the proposal. This has, in fact, been demonstrated by the applicant who undertook a travel survey which indicated a high percentage attendance by way of sustainable travel modes. The findings are considered robust and relevant and therefore supportive of a lower on-plot parking quantum.

Cycling Provision

In terms of cycle parking there should be a minimum provision of 1 secure and accessible space for staff with 1 space per 10 patients. 3 'Sheffield' stands are proposed on the frontage which satisfies the requirement.

Temporary Dental Surgery

During construction, a temporary Dental surgery (two surgery rooms - GIFA 35.8m²) acting as a decant facility would be positioned to the rear of the site where the final on-plot parking provisions are proposed. This aspect of the proposal does not give rise for concern given current activities linked to the established Dental surgery use and its physical separation from the main construction site.

Vehicular Access Arrangements (Residential & Dental Practice)

In highway impact terms, there is no objection in principle to the parking layouts depicted on the frontage and to the rear of the site envelope and the access points are considered fit for purpose as demonstrated by the submitted vehicle swept path analysis.

Operational Refuse Requirements (Residential)

Refuse collection would occur from Northolt Avenue and a bin storage area is shown to the rear of the site. In order to conform to the Council's 'waste collection' maximum distance collection parameter of 10m i.e. distance from a refuse vehicle to the point of collection or bin store, arrangements should ensure that waste is positioned at a collection point within this set distance. With the arrangement as presented, the above parameter is met. There are no further observations.

Construction Management Plan (CMP)

The above will be a requirement given the constraints and sensitivities of the local road network in order to avoid/minimise potential detriment to the public realm. It will need to be secured under planning condition.

Conclusion

The application has been reviewed by the Highway Authority who are satisfied that the proposal would not discernibly exacerbate congestion or parking stress, and would not raise any measurable highway safety concerns, in accordance with Local Plan: Part 2 Development Plan Policies DMT 1, DMT 2 & DMT 6 and Policies 6.3, 6.9, and 6.13 of the London Plan (2016).

RECOMMENDATIONS No objection subject to conditions COM 9 (parts 1,2,3,4,5 and 6).

The Access officer commented on 12/01/2021 as follows: -

This proposal for a replacement dental surgery building, with 6 x 1 bed and 1 x 2 bed flats has been reviewed with reference to the 2016 London Plan and its contained policies 3.1, 3.8 and 7.2. Policies D5, D7, D12, T6.1 and T6.5 set out in the 2019 (intend to publish) London Plan have also been referenced, as well as the Council's Supplementary Planning Document 'Accessible Hillingdon' (adopted September 2017). No details have been submitted in respect of the proposed dental surgery internal layout, and an indicative layout should be submitted to ensure the principals of Inclusive Design can be achieved as per policy 7.2 referenced above.

The residential element plans are satisfactory for the purposes of development control, however, the following conditions should be attached to any approval:

Prior to works commencing, details of step free access via the principal private entrances, and all other points of entry and exit, including step free access to the roof garden, shall be submitted to, and approved in writing, by the Local Planning Authority. Such provision shall remain in place for the life of the building.

REASON: To ensure that an appropriate standard of housing stock, in accordance with the 2016 London Plan policy 3.8(c) and policy D7 of the 2019 (Intend to Publish) London Plan, is achieved and maintained.

The development hereby approved shall provide access to the roof garden, via a lift compatible with the technical requirements set out in Approved Document M to the Building Regulations, Volume 1, with the lift remaining in place and in working order for the life of the building.

REASON: To ensure that an appropriate standard of housing stock, in accordance with the 2016 London Plan policy 3.8(c) and policy D7 of the 2019 (Intend to Publish) London Plan, is achieved and maintained.

The dwellings hereby approved shall be constructed to meet the standards for a Category 2 M4(2) dwelling, as set out in Approved Document M to the Building Regulations (2010) 2015, and all such provisions shall remain in place for the life of the building.

REASON: To ensure that an appropriate standard of housing stock, in accordance with the 2016 London Plan policy 3.8(c) and policy D7 of the 2019 (Intend to Publish) London Plan, is achieved and maintained. Conclusion: further details in respect of the dental surgery layout are requested.

Following additional information submitted by the agent on 12/2/2021, the Access officer commented further on 14/02/2021 as follows:-

The additional details shown on revised plan 00_2000A_2005A have been reviewed, and the details shown are now satisfactory for the purposes of development control. However, given that an indicative layout for the proposed dental surgery has not been submitted, the following informative should be attached to any planning permission:

The Equality Act 2010 seeks to protect people accessing goods, facilities and services from discrimination on the basis of a 'protected characteristic', which includes those with a disability. As part of the Act, service providers are obliged to improve access to and within the structure of their building, particularly in situations where reasonable adjustment can be incorporated with relative ease. The Act states that service providers should think ahead to take steps to address barriers that impede disabled people.

7. MAIN PLANNING ISSUES

7.01 The principle of the development

The proposal seeks the demolition of the existing two storey building comprising a dentist's surgery on the ground floor and a single residential unit on the first floor, and the erection of a replacement three storey building comprising a dental surgery and 7 residential units (6 no. 1-bed units and 1 no. 2-bed unit), car and cycle parking and associated works, temporary permission for the siting of a modular building to the rear of the site for use as a dental surgery during the demolition of the existing dental surgery and construction of the proposed dental surgery.

Policy S1 of the London Plan (2021) states that development proposals that provide high quality, inclusive social infrastructure that addresses a local or strategic need and supports service delivery strategies should be supported. It also states that new facilities should be easily accessible by public transport, cycling and walking and should be encouraged in high streets and town centres. This second policy requirement is mentioned again in reference to health and social care facilities in Policy S2. The site is located within a local centre and close to South Ruislip tube station and it is relatively well connected. The proposal includes the demolition but also re-provision of a dentist's surgery. This aspect of

the proposal is overall considered to be policy compliant and supported.

The proposed development also includes 7 residential units on the ground and upper 2 floors, a net gain of 6 units. The applicant is proposing 6 x 1 bed units and 1 x 2 bed units. The principle of residential development on site is established through the existing residential unit and a residential use on site in general would be considered to be policy compliant. Policy DMH 2 of the LPP2 states that the Council will seek a housing mix which reflects the needs identified in the most up to date housing needs assessment.

The Council's current information on housing need indicates a substantial borough-wide requirement for larger affordable and private market units, particularly three bedroom properties. The applicant does not need to provide affordable housing as the proposed development falls under the threshold for provision of affordable housing. That said, given the site's location and particular constraints due to site size and the fact that sufficient parking and private amenity space can be provided, it is considered that the principle of the current scheme is acceptable.

7.02 Density of the proposed development

Not relevant to this application

7.03 Impact on archaeology/CAs/LBs or Areas of Special Character

Not relevant to this application

7.04 Airport safeguarding

Not relevant to this application

7.05 Impact on the green belt

Not relevant to this application:

7.07 Impact on the character & appearance of the area

Policy DMHB 11 of The Local Plan: Part 2 - Development Management Policies (2020) states that:

A) All development, including extensions, alterations and new buildings will be required to be designed to the highest standards and, incorporate principles of good design including:

- i) harmonising with the local context by taking into account the surrounding:
 - scale of development, considering the height, mass and bulk of adjacent structures;
 - building plot sizes and widths, plot coverage and established street patterns;
 - building lines and setbacks, rooflines, streetscape rhythm, for example, gaps between structures and other streetscape elements, such as degree of enclosure;
 - architectural composition and quality of detailing;
 - local topography, views both from and to the site; and
 - impact on neighbouring open spaces and their environment.
- ii) ensuring the use of high quality building materials and finishes;
- iii) ensuring that the internal design and layout of development maximises sustainability and is adaptable to different activities;
- iv) protecting features of positive value within and adjacent to the site, including the safeguarding of heritage assets, designated and un-designated, and their settings; and
- v) landscaping and tree planting to protect and enhance amenity, biodiversity and green infrastructure.

B) Development proposals should not adversely impact on the amenity, daylight and sunlight of adjacent properties and open space.

C) Development will be required to ensure that the design safeguards the satisfactory re-development of any adjoining sites which have development potential. In the case of proposals for major development sites, the Council will expect developers to prepare master plans and design codes and to agree these with the Council before developing

detailed designs.

D) Development proposals should make sufficient provision for well designed internal and external storage space for general, recycling and organic waste, with suitable access for collection. External bins should be located and screened to avoid nuisance and adverse visual impacts to occupiers and neighbours.

The proposals is considered to be satisfactory from an accessibility perspective. The Access officer has recommended conditions in the event of an approval.

The application seeks planning permission to erect a three-storey building comprising a dental surgery and 7 residential units (6 no. 1-bed units and 1 no. 2-bed unit), car and cycle parking and associated works, temporary permission for the siting of a modular building to the rear of the site for use as a dental surgery during the demolition of the existing dental surgery and construction of the proposed dental surgery.

There have been previous pre-application discussions for this site under app: 27354/PRC/2020/181 where number of design concerns were raised. The submitted scheme has taken into consideration some of the concerns but others remain and are discussed below.

40 Station Approach is located on a prominent corner site where Northolt Avenue meets Station Approach. It is situated within a primarily residential area which is interspersed with some shops/ commercial buildings along Station Approach eastwards towards South Ruislip Station.

The buildings are primarily two to three-storeys in height on the south side of the street. Third storeys, where they exist, are contained within the roof respecting the domestic scale of the surrounding streets. The buildings on the north side of the street have a different character with larger blocks of three full storeys.

The existing building frontage is set back from the street on a similar alignment to the residential properties to the west of Northolt Avenue. There would be no objection to the proposed new front building line that corresponds to the buildings directly to the east in which the development would have a more direct visual relationship.

The retention and slight increase of the rear building line taken together with the frontage increase, however, will result in a much larger block than those within the group and the relatively unbroken mass would make the building dominate the southern side of the street in this location.

It is considered that the rear portion of the block would need to be reduced in height and depth so that there is a more comfortable transition between the new development and the bungalows / two-storey houses to the south along Northolt Avenue. It would also help the development relate better to the rear building lines of the group of buildings in which it is most closely related (nos. 40-50).

There are concerns with the roof access enclosure and lift over run which result in an intrusive and incongruous roof addition that adds visual clutter and detract from the appearance of the new building and wider streetscape. This element would seek undue attention particularly given the building's prominent corner location where it would be seen in prominent views along Station Road as well as those looking north along Northolt Avenue and the green open space of Acol Crescent

The use of brick as the primary construction material would be supported in principle and would respect the palette of materials in the area subject to an appropriate colour, tone, texture and mortar being chosen.

Overall the scale and mass of the proposed building is considered to have an unacceptable impact on the character and appearance of the streetscene. The scheme in its current form is not considered appropriate for the local context.

The proposed development, by reason of the overall size and scale of the building would result in an incongruous and overly dominant form of development that would be detrimental to the character, appearance and visual amenities of the site, the street scene and the wider area. Furthermore the proposed roof access enclosure and lift over run by reason of its size, scale, bulk and design would result in an intrusive and incongruous roof addition that adds visual clutter and detracts from the appearance of the building and wider streetscape. As such the proposal would be contrary to Policies DMHB 11 and DMHB 12 of the Hillingdon Local Plan: Part Two - Development Management Policies (2020), Policy D4 of the London Plan (2021) and the NPPF (2019).

7.08 Impact on neighbours

Policy DMHB 11 of the Local Plan: Part Two (2020) notes development should not have an adversely impact the amenity, daylight and sunlight of adjacent properties and open space

The proposed building would be set further forward on the site than the existing building and would be in line with the front building line of the neighbouring property to the north east at 42B Station Approach. In addition, it would not extend beyond this property's rear wall. Consequently it is considered that the proposal would not significantly impact on the amenity of the neighbouring occupiers by virtue of visual amenity, overbearing or loss of light. The principle windows serving the proposed units would face front and rear.

The side elevation windows would serve both habitable and non habitable rooms however, these together with the balconies on this south west elevation would face onto the public highway known as Northolt Avenue. The separation distance to the property on the opposite corner would be approximately 18 metres however, as this neighbouring property at 38 Station Approach has one first floor flank elevation window which serves a non habitable room there would be no adverse affect on this property's residential amenity.

The proposal also includes the siting of a temporary outbuilding which would be located to the rear of the site. The outbuilding would have a maximum height of 2.5 m and it is not considered that this would have any detrimental affect on the residential amenities of the 42B Station Approach. In addition, the outbuilding or modular 'Portakabin' would be a temporary structure that would be removed after the development is completed should planning permission be forthcoming.

As such the proposal would comply with Policy DMHB 11 of the Local Plan: Part Two (2020).

7.09 Living conditions for future occupiers

LIVING CONDITIONS

The DCLG's Technical Housing Standard (2015) guidance also requires that double bedrooms measure at least 11.5 square metres in floor space and single bedrooms measure at least 7.5 square metres in floor space.

Policy DMHB 16 of The Local Plan: Part 2 - Development Management Policies (2020)

states that all housing development should have an adequate provision of internal space in order to provide an appropriate living environment. To achieve this all residential development or conversions should: i) meet or exceed the most up to date internal space standards, as set out in Table 5.1; and ii) in the case of major developments, provide at least 10% of new housing to be accessible or easily adaptable for wheelchair users.

In accordance to the plans provided, the 1-bedroom units provide between 51.3 - 54.8 square metres and the 2-bedroom 4 person unit provides 75.9 square metres. Consequently, all the proposed units provide sufficient internal floor space in accordance with Policy 3.5 of The London Plan - Consolidated With Alterations (2016) and DCLG's Technical Housing Standard (2015) guidance.

EXTERNAL AMENITY SPACE

Policy DMHB 18 of The Local Plan: Part 2 - Development Management Policies (2020) requires all new residential development to provide good quality and usable private outdoor amenity space. Balconies should have a depth of not less than 1.5 metres and a width of not less than 2 metres. Any ground floor and/or basement floor unit that is non-street facing should have a defensible space of not less than 3 metres in depth in front of any window to a bedroom or habitable room. All new residential development should provide good quality and usable private outdoor amenity space. Amenity standards should be provided in accordance with the standards set out in table 5.3 of the Local Plan: Part Two (2020).

The minimum amenity space provision required:

- Flats - 1 bedroom, requires 20 square metres
- Flats - 2 bedroom, requires 25 square metres

Each residential unit is provided with its own private balcony ranging from 6 - 9.9 sqm, which is below the minimum space provision required. That said, the proposal includes a communal roof terrace which would provide a further 145 sqm of usable external amenity space.

It is considered that an argument that the amenity space is substandard may be hard to sustain on appeal given the relatively small scale of the development. Albeit there are concerns as regards how practicable the roof-space amenity area will be.

7.10 Traffic impact, car/cycle parking, pedestrian safety

The Public Transport Accessibility Level (PTAL) is rated at a level of 3 and the immediate highway is generally covered by extensive parking controls which include double yellow lines and a CPZ operating from 9am to 5pm - Monday to Friday.

Parking Provision

Local Plan: Part 2 Policy DMT 6 requires that new development will only be permitted where it accords with the Council's adopted parking standards unless it can be demonstrated that a deviation from the standard would not result in a deleterious impact on the surrounding road network.

Residential

The maximum parking provision for each of the 7 flatted units requires 1-1.5 spaces to be provided on-site in order to comply with the adopted parking standard. This would equate to 7-11 on-plot spaces. 4 spaces are proposed which falls significantly below the standard.

It is noted that the surrounding residential catchment and road network exhibits certain characteristics which arguably support a lower quantum of on-plot parking provision. To expand - the local area is covered by extensive daytime parking controls in the vicinity of the address which consist of a controlled parking zone (CPZ) which operates between 9am to 5pm - Monday to Friday. Double yellow lines are also present at key junction locations. Also, there are relatively generous off-street parking facilities for most of the surrounding residential properties in the area such as Northolt Avenue which assists in reducing general on-street parking demand.

The applicant has also undertaken parking stress surveys within the locality in order to catalogue the levels of parking demand in all roads within a walking distance of 200m of the site. Industry recognised methodology has been applied and the findings indicate that during the recommended surveyed periods there appears to be in the region of 35% spare parking capacity which can be legitimately used on the surrounding roadways. As there is no evidence to the contrary as confirmed by random checks by Council officers, the findings are considered robust and relevant and therefore supportive of a lower on-plot parking quantum.

Disabled Compliant Parking

In accord with Hillingdon's Local Plan: Part 2 standard - 10% of parking spaces should be disabled compliant. 1 space is proposed which conforms to the standard in the context of the quantum of spaces proposed.

Electric Vehicle Charging Points (EVCP's)

In line with the emerging London Plan, within any final parking quantum there is a requirement for a minimum 20% 'active' EVCP provision with all remaining spaces being designated as 'passive' provisions. This equates to 1 'active' and 3 'passive' spaces which is proposed hence there are no further observations made.

Cycling Provision

In terms of cycle parking there should be a minimum provision of 1 secure and accessible space for each residential unit in order to conform to the adopted minimum borough cycle parking standard. 8 spaces are proposed within 'two tier' racks located to the rear of the site envelope which conforms to the standard.

Dental Surgery

The proposal indicates a single on-plot parking provision on the private forecourt on the frontage. The parking standard requires two spaces per consulting room. Hence given the proposed GIFA, there is a deficit in provision.

It is however acknowledged that there is little convenient 'free of charge' parking availability in the local area as it is extensively covered by parking restrictions throughout the working week which inherently assists in deterring any potential extraneous parking and traffic generated by the proposal. It is also possible that a proportion of patients would attend the surgery on a 'linked-trip' principle on-route to other destinations by, for example, being 'dropped off & picked up' which would further reduce potential new 'single destination' vehicular trips and resultant impacts generated by the proposal. This has, in fact, been demonstrated by the applicant who undertook a travel survey which indicated a high

percentage attendance by way of sustainable travel modes. The findings are considered robust and relevant and therefore supportive of a lower on-plot parking quantum.

Cycling Provision

In terms of cycle parking there should be a minimum provision of 1 secure and accessible space for staff with 1 space per 10 patients. 3 'Sheffield' stands are proposed on the frontage which satisfies the requirement.

Temporary Dental Surgery

During construction, a temporary Dental surgery (two surgery rooms - GIFA 35.8m²) acting as a decant facility would be positioned to the rear of the site where the final on-plot parking provisions are proposed. This aspect of the proposal does not give rise for concern given current activities linked to the established Dental surgery use and its physical separation from the main construction site.

Vehicular Access Arrangements (Residential & Dental Practice)

In highway impact terms, there is no objection in principle to the parking layouts depicted on the frontage and to the rear of the site envelope and the access points are considered fit for purpose as demonstrated by the submitted vehicle swept path analysis.

Operational Refuse Requirements (Residential)

Refuse collection would occur from Northolt Avenue and a bin storage area is shown to the rear of the site. In order to conform to the Council's 'waste collection' maximum distance collection parameter of 10m i.e. distance from a refuse vehicle to the point of collection or bin store, arrangements should ensure that waste is positioned at a collection point within this set distance. With the arrangement as presented, the above parameter is met. There are no further observations.

Construction Management Plan (CMP)

The above will be a requirement given the constraints and sensitivities of the local road network in order to avoid/minimise potential detriment to the public realm. It will need to be secured under planning condition.

Conclusion

The application has been reviewed by the Highway Authority who are satisfied that the proposal would not discernibly exacerbate congestion or parking stress, and would not raise any measurable highway safety concerns, in accordance with Local Plan: Part 2 Development Plan Policies DMT 1, DMT 2 & DMT 6 and Policies 6.3, 6.9, and 6.13 of the London Plan (2016).

7.11 Urban design, access and security

The proposals is considered to be satisfactory from an accessibility perspective. The Access officer has recommended conditions in the event of an approval.

The application seeks planning permission to erect a three-storey building comprising a dental surgery and 7 residential units (6 no. 1-bed units and 1 no. 2-bed unit), car and cycle parking and associated works, temporary permission for the siting of a modular building to

the rear of the site for use as a dental surgery during the demolition of the existing dental surgery and construction of the proposed dental surgery.

There have been previous pre-application discussions for this site under app: 27354/PRC/2020/181 where number of design concerns were raised. The submitted scheme has taken into consideration some of the concerns but others remain and are discussed below.

40 Station Approach is located on a prominent corner site where Northolt Avenue meets Station Approach. It is situated within a primarily residential area which is interspersed with some shops/ commercial buildings along Station Approach eastwards towards South Ruislip Station.

The buildings are primarily two to three-storeys in height on the south side of the street. Third storeys, where they exist, are contained within the roof respecting the domestic scale of the surrounding streets. The buildings on the north side of the street have a different character with larger blocks of three full storeys.

The existing building frontage is set back from the street on a similar alignment to the residential properties to the west of Northolt Avenue. There would be no objection to the proposed new front building line that corresponds to the buildings directly to the east in which the development would have a more direct visual relationship.

The retention and slight increase of the rear building line taken together with the frontage increase, however, will result in a much larger block than those within the group and the relatively unbroken mass would make the building dominate the southern side of the street in this location.

It is considered that the rear portion of the block would need to be reduced in height and depth so that there is a more comfortable transition between the new development and the bungalows / two-storey houses to the south along Northolt Avenue. It would also help the development relate better to the rear building lines of the group of buildings in which it is most closely related (nos. 40-50).

There are concerns with the roof access enclosure and lift over run which result in an intrusive and incongruous roof addition that adds visual clutter and detract from the appearance of the new building and wider streetscape. This element would seek undue attention particularly given the building's prominent corner location where it would be seen in prominent views along Station Road as well as those looking north along Northolt Avenue and the green open space of Acol Crescent

The use of brick as the primary construction material would be supported in principle and would respect the palette of materials in the area subject to an appropriate colour, tone, texture and mortar being chosen.

The scheme in its current form is not considered appropriate for the local context.

7.12 Disabled access

As discussed above

7.13 Provision of affordable & special needs housing

Not relevant to this application

7.14 Trees, Landscaping and Ecology

TREES & LANDSCAPE

Policy DMHB 14 of The Local Plan: Part 2 - Development Management Policies (2020) states that:

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 off site provision.

The Council's Trees and Landscaping Officer has provided the following comments:

This site is occupied by a two-storey brick building located on a corner plot at the junction with Northolt Avenue. The ground-floor houses a dental surgery, with a residential unit on the first floor. An area of hard-standing to the front is currently used for parking and there is a rear service road which provides access to additional parking to the rear of the building. According to Google Streetview there are a two small trees to the rear of the building, however, there are no TPO's or Conservation Area designations affecting the site.

COMMENT This submission follows pre-application ref. 27354/PRC/2020/181. The two trees will be removed to facilitate car parking and bin / bike stores to the rear. The D&AS refers to secure and enclosed cycle storage and bin storage. It also refer to landscaping to the front of the building to enhance the public realm. Modest areas of soft landscape and green roofs are indicated on the landscape plan. There is an annotation referring to the use of native species. Where the soft landscape is part of the visual amenity for residents, it is unlikely that the use of native species will be suitable, however, there are ornamental plants which are also nectar-bearing species which will encourage biodiversity. Private outdoor amenity space is to be provided in the from of private balconies. These should be of sufficient size to be accessible and functional. The provision of soft landscape enhancement in front of the building for the benefit of the public realm is welcome, subject to detail. Its success will depend on the quality of design, implementation and future maintenance.

7.15 Sustainable waste management

As discussed in section 07:17 below

7.16 Renewable energy / Sustainability

Not relevant to this application

7.17 Flooding or Drainage Issues

FLOOD AND WATER MANAGEMENT

The Council's Flood and Water Management Officer has provided the following comments:
No objection based on the submitted information.

7.18 Noise or Air Quality Issues

As discussed in section 07:22 below

7.19 Comments on Public Consultations

Comments received are addressed within the body of this report

7.20 Planning Obligations

COMMUNITY INFRASTRUCTURE LEVY (CIL)

The Council adopted its own Community Infrastructure Levy (CIL) on August 1st 2014 and the Hillingdon CIL charge for additional floor space for residential developments is £95 per square metre and office developments of £35 per square metre. This is in addition to the Mayoral CIL charge of £60 per sq metre.

The existing floor area to be demolished is 141.6 sqm.

The proposed total additional floor area as advised in the CIL application form is 389.7 (residential) and 80.3 (non residential) equalling 470 sqm.

470 sqm total proposed - 141.6 sqm existing = 328.4 sqm

The net gain would comprise 297.4 sqm (residential), 31 sqm (non residential). = 328.4 sqm

This would equate to:

Hillingdon CIL £29,338

Mayoral CIL £19,704

Total = £49,042

7.21 Expediency of enforcement action

Not relevant to this application

7.22 Other Issues

AIR QUALITY

The following policy context is taken into consideration:

Paragraph 181 of the National Planning Policy Framework (February 2019) states that planning decisions should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and Clean Air Zones, and the cumulative impacts from individual sites in local areas. Opportunities to improve air quality or mitigate impacts should be identified, such as through traffic and travel management, and green infrastructure provision and enhancement. Planning decisions should ensure that any new development in Air Quality Management Areas and Clean Air Zones is consistent with the local air quality action plan. Policy 7.14 of the London Plan (March 2016) further supports this.

Policy EM8 of the Hillingdon Local Plan: Part 1 - Strategic Policies (November 2012) states that the Council will seek to safeguard and improve all land, water, air and noise quality. All development should not cause deterioration in the local air quality levels and should ensure

the protection of both existing and new sensitive receptors.

Policy DMEI 14 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020) states:

A) 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.

B) Development proposals should, as a minimum: i) be at least "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.

The application site is within the declared Hillingdon Air Quality Management Area and Air Quality Focus Areas: A40/ South Ruislip Focus Area. Focus Areas are where the pollution levels are already elevated and improvements are required to be made.

NOISE

Policy D14 Noise of the London Plan (2021) states:

A In order to reduce, manage and mitigate noise to improve health and quality of life, residential and other non-aviation development proposals should manage noise by:

- 1) avoiding significant adverse noise impacts on health and quality of life
- 2) reflecting the Agent of Change principle as set out in Policy D13 Agent of Change
- 3) mitigating and minimising the existing and potential adverse impacts of noise on, from, within, as a result of, or in the vicinity of new development without placing unreasonable restrictions on existing noise-generating uses
- 4) improving and enhancing the acoustic environment and promoting appropriate soundscapes (including Quiet Areas and spaces of relative tranquillity)
- 5) separating new noise-sensitive development from major noise sources (such as road, rail, air transport and some types of industrial use) through the use of distance, screening, layout, orientation, uses and materials - in preference to sole reliance on sound insulation
- 6) where it is not possible to achieve separation of noise-sensitive development and noise sources without undue impact on other sustainable development objectives, then any potential adverse effects should be controlled and mitigated through applying good acoustic design principles
- 7) promoting new technologies and improved practices to reduce noise at source, and on the transmission path from source to receiver.

B Boroughs, and others with relevant responsibilities, should identify and nominate new Quiet Areas and protect existing Quiet Areas in line with the procedure in Defra's Noise Action Plan for Agglomerations.

Policy EM8 of the Hillingdon Local Plan: Part 1 - Strategic Policies (November 2012) states that the Council will seek to ensure that noise sensitive development and noise generating development are only permitted if noise impacts can be adequately controlled and mitigated.

The ground floor level of the site comprises a dental surgery therefore had the application been acceptable in other respects conditions would have been imposed to address noise impacts.

CONTAMINATED LAND

Policy DMEI 12 of The Local Plan: Part 2 - Development Management Policies (2020) states:

A) Proposals for development on potentially contaminated sites will be expected to be accompanied by at least an initial study of the likely contaminants. The Council will support planning permission for any development of land which is affected by contamination where it can be demonstrated that contamination issues have been adequately assessed and the site can be safely remediated so that the development can be made suitable for the proposed use.

B) Conditions will be imposed where planning permission is given for development on land affected by contamination to ensure all the necessary remedial works are implemented, prior to commencement of development.

C) Where initial studies reveal potentially harmful levels of contamination, either to human health or controlled waters and other environmental features, full intrusive ground investigations and remediation proposals will be expected prior to any approvals.

D) In some instances, where remedial works relate to an agreed set of measures such as the management of ongoing remedial systems, or remediation of adjoining or other affected land, a S106 planning obligation will be sought.

The Council's Contaminated Land Officer has provided the following comments:

Summary of Comments:

I have reviewed a copy of the following report:

Title: 40 Station Approach, Ruislip, HA4 6RZ, Geoenvironmental & Geotechnical Desk Study; Ref: RTCL-40SA-004 RevC; Date: 14/12/2020; Prepared by: R. Thorpe Consultancy Ltd. (RTC).

The report represents a Phase 1 study which includes a conceptual site model and preliminary risk assessment of the ground conditions (including environmental, geological, hydrological and hydrogeological conditions) at the site.

The assessed risks range from "Negligible to Moderate/Low" with regards to potential land contamination.

Details within the report are considered to be suitable and sufficient and acceptable to justify its conclusion that "intrusive investigation is not deemed necessary to further assess contamination risks."

However, I am recommending that if planning consent is granted then the following condition should be imposed:

No contaminated soils or other materials (e.g. subsoils, loose hardstanding surfacings etc) shall be imported to the site. All imported soils and/or other materials for landscaping purposes etc. shall be independently tested for chemical contamination and the results of this testing shall demonstrate the materials are clean and free of contaminants. The report/s shall be submitted to and approved in writing by the Local Planning Authority prior to occupation of the development.

REASON To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and the development can be carried out safely without unacceptable

risks to workers, neighbours and other offsite receptors in accordance with Hillingdon Local Plan: Part 2 (January 2020) Policies - DMEI 11: Protection of Ground Water Resources and DMEI 12: Development of Land Affected by Contamination.

Reason for Refusal (if objecting): N/A

Observations:

The report indicates that:

- A Moderate/Low risk to human health has been identified, which can be reduced to Low through use of PPE on site and the use of appropriate construction methods to reduce dust during groundworks and construction
- Site workers should have undertaken asbestos awareness training and have access to appropriate PPE including P3 masks, if required. If ACM is identified on site, an appropriately qualified person should attend site to inspect and advise.

8. Observations of the Borough Solicitor

General

Members must determine planning applications having due regard to the provisions of the development plan so far as material to the application, any local finance considerations so far as material to the application, and to any other material considerations (including regional and national policy and guidance). Members must also determine applications in accordance with all relevant primary and secondary legislation.

Material considerations are those which are relevant to regulating the development and use of land in the public interest. The considerations must fairly and reasonably relate to the application concerned.

Members should also ensure that their involvement in the determination of planning applications adheres to the Members Code of Conduct as adopted by Full Council and also the guidance contained in Probity in Planning, 2009.

Planning Conditions

Members may decide to grant planning consent subject to conditions. Planning consent should not be refused where planning conditions can overcome a reason for refusal. Planning conditions should only be imposed where Members are satisfied that imposing the conditions are necessary, relevant to planning, relevant to the development to be permitted, enforceable, precise and reasonable in all other respects. Where conditions are imposed, the Council is required to provide full reasons for imposing those conditions.

Planning Obligations

Members must be satisfied that any planning obligations to be secured by way of an agreement or undertaking pursuant to Section 106 of the Town and Country Planning Act 1990 are necessary to make the development acceptable in planning terms. The obligations must be directly related to the development and fairly and reasonably related to the scale and kind to the development (Regulation 122 of Community Infrastructure Levy 2010).

Equalities and Human Rights

Section 149 of the Equalities Act 2010, requires the Council, in considering planning

applications to have due regard to the need to eliminate discrimination, advance equality of opportunities and foster good relations between people who have different protected characteristics. The protected characteristics are age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation.

The requirement to have due regard to the above goals means that members should consider whether persons with particular protected characteristics would be affected by a proposal when compared to persons who do not share that protected characteristic. Where equalities issues arise, members should weigh up the equalities impact of the proposals against the other material considerations relating to the planning application. Equalities impacts are not necessarily decisive, but the objective of advancing equalities must be taken into account in weighing up the merits of an application. The weight to be given to any equalities issues is a matter for the decision maker to determine in all of the circumstances.

Members should also consider whether a planning decision would affect human rights, in particular the right to a fair hearing, the right to respect for private and family life, the protection of property and the prohibition of discrimination. Any decision must be proportionate and achieve a fair balance between private interests and the public interest.

9. Observations of the Director of Finance

Not applicable

10. CONCLUSION

The currently proposed housing mix is considered to be contrary to the requirements of Policy DMH 2 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020) and Policy H10 of the London Plan (2021) and a higher proportion of 2-bed dwellings, as well as re-provision of the existing family unit is expected.

The 1-bed units equate to 86% of the total units provided in the scheme, which is considered to be contrary to the need to deliver a range of unit types at different price points across London and the requirement to deliver mixed and inclusive neighbourhoods. The scheme as is results in an over-dominance of 1-bed units and the loss of an existing family dwelling which is contrary to policy.

The applicant has not provided any justification or evidence to demonstrate why a housing mix more in line with policy cannot be provided as part of the proposed development. As a suggestion to the applicant, amalgamation of some of the units on the first and second floor to provide larger units seems very possible and it would allow for some of the design issues of the scheme, namely in relation to the single aspect dwellings on the first and second floor, to potentially be resolved and also provide a more policy compliant housing mix. As stated, the principle of residential development on this site is established.

The proposed development, by reason of the overall size and scale of the building would result in an incongruous and overly dominant form of development that would be detrimental to the character, appearance and visual amenities of the site, the street scene and the wider area. Furthermore the proposed roof access enclosure and lift over run by reason of its size, scale, bulk and design would result in an intrusive and incongruous roof addition that adds visual clutter and detracts from the appearance of the building and wider streetscape. As such the proposal would be contrary to Policies DMHB 11 and DMHB 12 of the Hillingdon Local Plan: Part Two - Development Management Policies (2020), Policy D4 of the London Plan (2021) and the NPPF (2019).

Consequently the proposal is recommended for refusal

11. Reference Documents

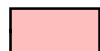
Hillingdon Local Plan: Part One - Strategic Policies (November 2012)
Hillingdon Local Plan: Part Two - Development Management Policies (January 2020)
The London Plan (2021)
Technical Housing Standards - Nationally Described Space Standard (2015)
Hillingdon Design and Accessibility Statement: Accessible Hillingdon
National Planning Policy Framework (2019)

Contact Officer: Diane Verona

Telephone No: 01895 250230



Notes:

 Site boundary

For identification purposes only.

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Site Address:

**40 STATION APPROACH
SOUTH RUISLIP**

Planning Application Ref:

27354/APP/2020/4256

Planning Committee:

North

Scale:

1:1,250

Date:

March 2021

**LONDON BOROUGH
OF HILLINGDON**
Residents Services
Planning Section

Civic Centre, Uxbridge, Middx. UB8 1UW
Telephone No.: Uxbridge 01895 250111



HILLINGDON
LONDON

TRANSPORT/HIGHWAY APPRAISAL

Reference	27354/APP/2020/4256
Location	40 STATION APPROACH SOUTH RUISLIP
Proposal	Erection of a three storey building comprising a dental surgery and 7 residential units (no. 6, 1 bed units and no. 1, 2 bed units), car and cycle parking and associated works, temporary permission for the siting of a modular building to the rear of the site for use as a dental surgery during the demolition of the existing dental surgery and construction of the proposed dental surgery.
Case Officer	Diane Verona

Site Characteristics & Background

The address is situated in South Ruislip on the corner of Station Approach and Northolt Avenue. The existing building comprises of a dental surgery at the ground floor with a residential unit on the 1st floor. There are areas of hardstanding to the front (a private forecourt) and rear which are currently used for parking purposes and accessed via established vehicular crossovers from both Station Approach and Northolt Avenue respectively.

It is proposed to demolish the existing building with a 4-storey replacement build incorporating a new Dental surgery (GIFA -78m²) on the ground floor with 7 flats above (6x1 & 1x2 bedroom units). The surgery would continue operation throughout the build programme with a temporary modular facility provided to the rear of the site. 5 parking spaces are proposed with one allocated to the surgery located on the frontage and 4 spaces (including 1 disabled compliant bay) positioned to the rear. Existing carriageway crossings would remain to serve the spaces.

During construction, a temporary Dental surgery (two surgery rooms - GIFA 35.8m²) acting as a decant facility would be positioned to the rear of the site where the final on-plot residential parking provisions are proposed.

The Public Transport Accessibility Level (PTAL) is rated at a level of 3 and the immediate highway is generally covered by extensive parking controls which include double yellow lines and a CPZ operating from 9am to 5pm - Monday to Friday.

Parking Provision

Local Plan: Part 2 Policy DMT 6 requires that new development will only be permitted where it accords with the Council's adopted parking standards unless it can be demonstrated that a deviation from the standard would not result in a deleterious impact on the surrounding road network.

Residential

The maximum parking provision for each of the 7 flatted units requires 1-1.5 spaces to be provided on-site in order to comply with the adopted parking standard. This would equate to 7-11 on-plot spaces. 4 spaces are proposed which falls significantly below the standard.

It is noted that the surrounding residential catchment and road network exhibits certain characteristics which arguably support a lower quantum of on-plot parking provision. To expand - the local area is covered by extensive daytime parking controls in the vicinity of the address which consist of a controlled parking zone (CPZ) which operates between 9am to 5pm - Monday to Friday. Double yellow lines are also present at key junction locations. Also, there are relatively generous off-street parking facilities for most of the surrounding residential properties in the area such as Northolt Avenue which assists in reducing general on-street parking demand.

The applicant has also undertaken parking stress surveys within the locality in order to catalogue the levels of parking demand in all roads within a walking distance of 200m of the site. Industry recognised methodology has been applied and the findings indicate that during the recommended surveyed periods there appears to be in the region of 35% spare parking capacity which can be legitimately used on the surrounding roadways. As there is no evidence to the contrary as confirmed by random checks by Council officers, the findings are considered robust and relevant and therefore supportive of a lower on-plot parking quantum.

Disabled Compliant Parking

In accord with Hillingdon's Local Plan: Part 2 standard - 10% of parking spaces should be disabled compliant. 1 space is proposed which conforms to the standard in the context of the quantum of spaces proposed.

Electric Vehicle Charging Points (EVCP's)

In line with the emerging London Plan, within any final parking quantum there is a requirement for a minimum 20% 'active' EVCP provision with all remaining spaces being designated as 'passive' provisions. This equates to 1 'active' and 3 'passive' spaces which is proposed hence there are no further observations made.

Cycling Provision

In terms of cycle parking there should be a minimum provision of 1 secure and accessible space for each residential unit in order to conform to the adopted minimum borough cycle parking standard. 8 spaces are proposed within 'two tier' racks located to the rear of the site envelope which conforms to the standard.

Dental Surgery

The proposal indicates a single on-plot parking provision on the private forecourt on the frontage. The parking standard requires two spaces per consulting room. Hence given the proposed GIFA, there is a deficit in provision.

It is however acknowledged that there is little convenient 'free of charge' parking availability in the local area as it is extensively covered by parking restrictions throughout the working week which inherently assists in deterring any potential extraneous parking and traffic generated by the proposal. It is also possible that a proportion of patients would attend the surgery on a 'linked-trip' principle on-route to other destinations by, for example, being 'dropped off & picked up' which would further reduce potential new 'single destination' vehicular trips and resultant impacts generated by the proposal. This has, in fact, been demonstrated by the applicant who undertook a travel survey which indicated a high percentage attendance by way of sustainable travel modes. The findings are considered robust and relevant and therefore supportive of a lower on-plot parking quantum.

Cycling Provision

In terms of cycle parking there should be a minimum provision of 1 secure and accessible space for staff with 1 space per 10 patients. 3 'Sheffield' stands are proposed on the frontage which satisfies the requirement.

Temporary Dental Surgery

During construction, a temporary Dental surgery (two surgery rooms - GIFA 35.8m²) acting as a decant facility would be positioned to the rear of the site where the final on-plot parking provisions are proposed. This aspect of the proposal does not give rise for concern given current activities linked to the established Dental surgery use and its physical separation from the main construction site.

Vehicular Access Arrangements (Residential & Dental Practice)

In highway impact terms, there is no objection in principle to the parking layouts depicted on the frontage and to the rear of the site envelope and the access points are considered fit for purpose as demonstrated by the submitted vehicle swept path analysis.

Operational Refuse Requirements (Residential)

Refuse collection would occur from Northolt Avenue and a bin storage area is shown to the rear of the site. In order to conform to the Council's 'waste collection' maximum distance collection parameter of 10m i.e. distance from a refuse vehicle to the point of collection or bin store, arrangements should ensure that waste is positioned at a collection point within this set

distance. With the arrangement as presented, the above parameter is met. There are no further observations.

Construction Management Plan (CMP)

The above will be a requirement given the constraints and sensitivities of the local road network in order to avoid/minimise potential detriment to the public realm. It will need to be secured under planning condition.

Conclusion

The application has been reviewed by the Highway Authority who are satisfied that the proposal would not discernibly exacerbate congestion or parking stress, and would not raise any measurable highway safety concerns, in accordance with Local Plan: Part 2 Development Plan Policies DMT 1, DMT 2 & DMT 6 and Policies 6.3, 6.9, and 6.13 of the London Plan (2016).

END

Richard Michalski - Highway Authority (12/01/2021)

Online Comment

03-03-21

Application Reference: 27354/APP/2020/4256
Site Location: 40 STATION APPROACH SOUTH RUISLIP
Officer: Diane Verona
Date Entered: 28-01-21
Date Transferred: 28-01-21
Consultee: Trees/Landscape
Address of Consultee: Trees/Landscape 4 West
Reference: CRS66477

[Click to view comments and associated attachments/documents](#)

Comments: Diane

This site is occupied by a two-storey brick building located on a corner plot at the junction with Northolt Avenue. The ground-floor houses a dental surgery, with a residential unit on the first floor. An area of hard-standing to the front is currently used for parking and there is a rear service road which provides access to additional parking to the rear of the building. According to Google Streetview there are two small trees to the rear of the building, however, there are no TPO's or Conservation Area designations affecting the site.

COMMENT

This submission follows pre-application ref. 27354/PRC/2020/181.

The two trees will be removed to facilitate car parking and bin / bike stores to the rear.

The D&AS refers to secure and enclosed cycle storage and bin storage. It also refers to landscaping to the front of the building to enhance the public realm. Modest areas of soft landscape and green roofs are indicated on the landscape plan. There is an annotation referring to the use of native species. Where the soft landscape is part of the visual amenity for residents, it is unlikely that the use of native species will be suitable, however, there are ornamental plants which are also nectar-bearing species which will encourage biodiversity.

Private outdoor amenity space is to be provided in the form of private balconies. These should be of sufficient size to be accessible and functional.

The provision of soft landscape enhancement in front of the building for the benefit of the public realm is welcome, subject to detail. Its success will depend on the quality of design, implementation and future maintenance.

RECOMMENDATIONS

No objection subject to conditions COM9 (parts 1,2,3,4,5 and 6).

Robert Reeves



Planning Specialist Observations			
Specialism(s)	Contaminated Land		
Officer	Simon Snape		
Site	40 STATION APPROACH SOUTH RUISLIP		
Proposal	Erection of a three storey building comprising a dental surgery and 7 residential units (no. 6, 1 bed units and no. 1, 2 bed units), car and cycle parking and associated works, temporary permission for the siting of a modular building to the rear of the site for use as a dental surgery during the demolition of the existing dental surgery and construction of the proposed dental surgery.		
Planning Ref	27354/APP/2020/4256	Date	21/12/2020

Objection	Condition	Informative	Comments	Discharge of Condition
-	yes	-	See below	-

1 Summary of Comments:

I have reviewed a copy of the following report:

Title: 40 Station Approach, Ruislip, HA4 6RZ, Geoenvironmental & Geotechnical Desk Study; Ref: RTCL-40SA-004 RevC; Date: 14/12/2020; Prepared by: R. Thorpe Consultancy Ltd. (RTC).

The report represents a Phase 1 study which includes a conceptual site model and preliminary risk assessment of the ground conditions (including environmental, geological, hydrological and hydrogeological conditions) at the site.

The assessed risks range from “Negligible to Moderate/Low” with regards to potential land contamination.

Details within the report are considered to be suitable and sufficient and acceptable to justify its conclusion that *“intrusive investigation is not deemed necessary to further assess contamination risks.”*

However, I am recommending that if planning consent is granted then the following condition should be imposed:

No contaminated soils or other materials (e.g. subsoils, loose hardstanding surfacings etc) shall be imported to the site. All imported soils and/or other materials



for landscaping purposes etc. shall be independently tested for chemical contamination and the results of this testing shall demonstrate the materials are clean and free of contaminants. The report/s shall be submitted to and approved in writing by the Local Planning Authority prior to occupation of the development.

REASON To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors in accordance with Hillingdon Local Plan: Part 2 (January 2020) Policies - DMEI 11: Protection of Ground Water Resources and DMEI 12: Development of Land Affected by Contamination.

2 Reason for Refusal (if objecting):

N/A

3 Observations:

The report indicates that:

- A Moderate/Low risk to human health has been identified, which can be reduced to Low through use of PPE on site and the use of appropriate construction methods to reduce dust during groundworks and construction
- Site workers should have undertaken asbestos awareness training and have access to appropriate PPE including P3 masks, if required. If ACM is identified on site, an appropriately qualified person should attend site to inspect and advise.

Name: Simon Snape.

Title: Contaminated Land Officer.

Date: 04/02/2021

Online Comment

03-03-21

Application Reference: 27354/APP/2020/4256
Site Location: 40 STATION APPROACH SOUTH RUISLIP
Officer: Diane Verona
Date Entered: 12-01-21
Date Transferred: 13-01-21
Consultee: Access Officer (3.N/03)
Address of Consultee: Planning Specialists Team
Reference: CRS65831

[Click to view comments and associated attachments/documents](#)

Comments: This proposal for a replacement dental surgery building, with 6 x 1 bed and 1 x 2 bed flats has been reviewed with reference to the 2016 London Plan and its contained policies 3.1, 3.8 and 7.2. Policies D5, D7, D12, T6.1 and T6.5 set out in the 2019 (intend to publish) London Plan have also been referenced, as well as the Council's Supplementary Planning Document 'Accessible Hillingdon' (adopted September 2017).

No details have been submitted in respect of the proposed dental surgery internal layout, and an indicative layout should be submitted to ensure the principals of Inclusive Design can be achieved as per policy 7.2 referenced above.

The residential element plans are satisfactory for the purposes of development control, however, the following conditions should be attached to any approval:

1. Prior to works commencing, details of step free access via the principal private entrances, and all other points of entry and exit, including step free access to the roof garden, shall be submitted to, and approved in writing, by the Local Planning Authority. Such provision shall remain in place for the life of the building.

REASON: To ensure that an appropriate standard of housing stock, in accordance with the 2016 London Plan policy 3.8(c) and policy D7 of the 2019 (Intend to Publish) London Plan, is achieved and maintained.

2. The development hereby approved shall provide access to the roof garden, via a lift compatible with the technical requirements set out in Approved Document M to the Building Regulations, Volume 1, with the lift remaining in place and in working order for the life of the building.

REASON: To ensure that an appropriate standard of housing stock, in accordance with the 2016 London Plan policy 3.8(c) and policy D7 of the 2019 (Intend to Publish) London Plan, is achieved and maintained.

3. The dwellings hereby approved shall be constructed to meet the standards for a Category 2 M4(2) dwelling, as set out in Approved Document M to the Building Regulations (2010) 2015, and all such provisions shall remain in place for the life of the building.

REASON: To ensure that an appropriate standard of housing stock, in accordance with the 2016 London Plan policy 3.8(c) and policy D7 of the 2019 (Intend to Publish) London Plan, is achieved and maintained.

Conclusion: further details in respect of the dental surgery layout are requested.
