



PROGRESS PLANNING

Land to the rear of 83-89 Manor Way, Ruislip, HA4 8HW

Planning, Design and Access Statement

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Executive Summary

This statement has been submitted in support of a planning application for erection of a single detached family house with associated landscaping works following demolition of the existing private garages.

This application follows a formal pre-application with Hillingdon Council for erection of a 3 storey building that would have provided 5 residential flats. It also follows a planning application for 2 houses that was refused planning permission. As set out in the main body of this report, this reduced proposal would overcome the concerns raised by the previous proposal. The development would make much better use of this existing brownfield site and improve its appearance. The site is situated only 300m from Ruislip Manor Tube Station and has a high PTAL rating. The provision of a high quality family dwelling should be welcomed at this location, particularly given the reuse of this rather unattractive site.

Overall, the development would reflect the 12 core principles of sustainable development as set out in the NPPF. The application scheme meets the strategic policy objectives of the London Plan as well as the aims and objectives of local Council policy. Therefore, it is considered that this amended proposal should be accepted.

Site Description

The site is located on the north side of Manor Way, to the rear of Nos. 83-89 Manor Way, approximately 50m west of its junction with Windmill Hill Road, Ruislip, in the London Borough of Hillingdon. The application site comprises a group of private garages which are owned by 1 individual owner and are used for storage. Apart from garages, the site is completely concreted. The site benefits from 2 access points to the public highway, a vehicular access at the eastern side and a pedestrian access on the western side.

The character of the immediate area is mainly 2/3 storey residential buildings, mostly flats/maisonettes, with more mixed use commercial buildings located to the southeast within Ruislip Manor District Centre. The site is adjacent to Ruislip Manor Way Conservation Area and Ruislip Manor District Centre.

The site has a Public Transport Accessibility Level of 3 and is situated only 200m from Ruislip Manor Tube Station. The site is also located in Flood Zone 1. No other designations are relevant to the determination of this application.

Planning History

In 2020, a formal pre-application was submitted to the Council for a flatted development whereby the Council supported the provision of residential accommodation on the site. However, concerns were raised regarding the scale of the 5 unit scheme; its impact on neighbouring residential amenity; poor external amenity space; and lack of parking provision.

Taking on board the Council's pre-application advice, the proposal was reduced to a pair of semi detached houses as opposed to a larger 5 unit flatted development. A planning application ref: 6280/APP/2021/2919 was submitted in 2021, but this proposal was refused for the following reasons:

1. The proposed development fails to provide an adequate internal site roadway nor a sufficient wide and safe access road into the site, to the detriment of highway and pedestrian safety on and adjacent to the site. The proposal is therefore unsafe and contrary to Local Plan: Part 2 Development Plan (2020) policies DMT 1, DMT 2, and Policy T6 of the London Plan (2021).
2. The proposed development by reason of its size, layout, siting, design and proximity to neighbouring boundaries would result in a cramped and contrived form of development which fails to respect the established pattern of development, detrimental to the character and appearance of the site and surrounding area, all contrary to Local Plan policies BE1 and DMHB11, London Plan Policies D1, D3, and D4 as well as the NPPF in relation to good quality, contextual design.
3. The proposed dwellings, by reason of their design and layout fail to meet the requirements of people with disabilities and would therefore give rise to a substandard form of living accommodation to the detriment of the amenity of future occupiers. The proposal is thus contrary to Policy D7 of the London Plan (2021).

This statement below in the main assessment part will consider how the latest proposal has been revised to address these previous reasons for refusal. As such, the amended scheme overcomes these reasons and the proposal is now acceptable. See below for more details.

The Proposal

The proposal is for erection of a detached single family dwellinghouse with associated landscaping works following demolition of existing private garages.

Planning Policy Context

The proposed development would be assessed against the Development Plan Policies contained within Hillingdon's Local Plan: Part 1 & 2, the London Plan, the NPPF and supplementary planning guidance by both the London Borough of Hillingdon and GLA.

National Policy

National Planning Policy Framework

The National Planning Policy Framework (NPPF) under paragraph 11 states decisions should apply a presumption in favour of sustainable development and 11(c) stipulates that for decision taking this means approving development proposals that accord with an up to date development plan without delay.

Paragraph 38 stipulates that local planning authorities should approach decisions on proposed development in a positive and creative way. Decision-makers at every level should seek to approve applications for sustainable development where possible.

Chapter 5 of the NPPF refers to '*Delivering a sufficient supply of homes*'. Paragraph 59 states that to support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay.

Chapter 9 of the NPPF refers to '*Promoting sustainable transport*'. Paragraph 103 states that the planning system should actively manage patterns of growth in support of these objectives. Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health. However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision making.

Chapter 11 of the NPPF refers to '*Making effective use of land*'. Paragraph 117 states that planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously developed or 'brownfield' land.

Paragraph 122 states that planning policies and decisions should support development that makes efficient use of land, taking into account:

- a) The identified need for different types of housing and other forms of development, and the availability of land suitable for accommodating it;
- b) Local market conditions and viability;
- c) The availability and capacity of infrastructure and services – both existing and proposed – as well as their potential for further improvement and the scope to promote sustainable travel modes that limit future car use;

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

Paragraph 123 states that where there is an existing or anticipated shortage of land for meeting identified housing needs, it is especially important that planning policies and decisions avoid homes being built at low densities, and ensure that developments make optimal use of the potential of each site. In these circumstances:

- b) The use of minimum density standards should also be considered for other parts of the plan area. It may be appropriate to set out a range of densities that reflect the accessibility and potential of different areas, rather than one broad density range; and
- c) Local planning authorities should refuse applications which they consider fail to make efficient use of land, taking into account the policies in this framework. In this context, when considering applications for housing, authorities should take a flexible approach in applying policies or guidance relating to daylight and sunlight, where they would otherwise inhibit making efficient use of a site (as long as the resulting scheme would provide acceptable living standards).

Chapter 12 of the NPPF refers to '*Achieving well-designed places*'. Paragraph 124 states that the creation of high quality buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities. Being clear about design expectations, and how these will be tested, is essential for achieving this. So too is effective engagement between applicants, communities, local planning authorities and other interests throughout the process.

Paragraph 127 states that planning policies and decisions should ensure that developments:

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

Paragraph 131 states that in determining applications, great weight should be given to outstanding or innovative designs which promote high levels of

sustainability, or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings.

Chapter 15 of the NPPF refers to '*Conserving and enhancing the natural environment*' and paragraph 170 states that decisions should contribute to and enhance the natural and local environment.

Regional Policy

Policy GG2 Making the best use of land of the London Plan states that London's population is set to grow from 8.9 million today to around 10.8 million by 2041.

Making the best use of land means directing growth towards the most accessible and well-connected places, making the most efficient use of the existing and future public transport, walking and cycling networks. Integrating land use and transport in this way is essential not only to achieving the Mayor's target for 80 per cent of all journeys to be made by walking, cycling and public transport, but also to creating vibrant and active places and ensuring a compact and well-functioning city.

All options for using the city's land more effectively will need to be explored as London's growth continues, including the redevelopment of brownfield sites and the intensification of existing places, including in outer London. New and enhanced transport links will play an important role in allowing this to happen, unlocking homes and jobs growth in new areas and ensuring that new developments are not planned around car use.

To create successful sustainable mixed use places that make the best use of land, those involved in planning and development must:

- A. Enable the development of brownfield land, particularly in Opportunity Areas, on surplus public sector land, and sites within and on the edge of town centres, as well as utilising small sites
- B. Prioritise sites which are well connected by existing or planned public transport
- C. Proactively explore the potential to intensify the use of land to support additional homes and workspaces, promoting higher density development, particularly in locations that are well connected to jobs, services, infrastructure and amenities by public transport, walking and cycling
- D. Applying a design led approach to determine the optimum development capacity of sites
- E. Understand what is valued about existing places and use this as a catalyst for growth, renewal, and place-making, strengthening London's distinct and varied character
- F. Protect and enhance London's open spaces, including the Green Belt, Metropolitan Open Land, designated nature conservation sites and local spaces, and promote the creation of new green infrastructure and urban greening, including aiming to secure net biodiversity gains where possible
- G. Plan for good local walking, cycling and public transport connections to support a strategic target of 80% of all journeys using sustainable travel, enabling car free lifestyles that allow an efficient use of land, as well as using new and enhanced public transport links to unlock growth

- H. Maximise opportunities to use infrastructure assets for more than one purpose, to make the best use of land and support efficient maintenance

Policy GG4 Delivering the homes Londoners need of the London Plan states that:

To create a housing market that works better for all Londoners, those involved in planning and development must:

- A. Ensure that more homes are delivered
- B. Support the delivery of the strategic target of 50% of all new homes being genuinely affordable
- C. Create mixed and inclusive communities, with good quality homes that meet high standards of design and provide for identified needs, including for specialist housing
- D. Identify and allocate a range of sites to deliver housing locally, supporting skilled precision-manufacturing that can increase the rate of building, and planning all necessary supporting infrastructure from the outset
- E. Establish ambitious and achievable build out rates at the planning stage, incentivising build out milestones to help ensure that homes are built quickly and to reduce the likelihood of permissions being sought to sell land on at a higher value

Policy GG6 Increasing efficiency and resilience of the London Plan states:

To help London become a more efficient and resilient city, those involved in planning development must:

- A. Seek to improve energy efficiency and support the move towards a low carbon circular economy, contributing towards London becoming a zero carbon city by 2050
- B. Ensure buildings and infrastructure are designed to adapt to a changing climate, making efficient use of water, reducing impacts from natural hazards like flooding and heatwaves, while mitigating and avoiding contributing to the urban heat island effect
- C. Create a safe and secure environment which is resilient to the impact of emergencies including fire and terrorism
- D. Take an integrated and smart approach to the delivery of strategic and local infrastructure by ensuring that public, private, community and voluntary sectors plan and work together

Chapter 3 Design of the London Plan contains the following relevant policies:

- Policy D1 London's form, character and capacity for growth
- Policy D2 Infrastructure requirements for sustainable densities
- Policy D3 Optimising site capacity through the design-led approach
- Policy D4 Delivering good design
- Policy D5 Inclusive design
- Policy D6 Housing quality and standards
- Policy D7 Accessible housing
- Policy D8 Public realm
- Policy D9 Tall buildings
- Policy D11 Safety, security and resilience to emergency
- Policy D12 Fire safety
- Policy D13 Agent of Change

Policy D14 Noise

Policy D3 Optimising site capacity through the design led approach of the London Plan states:

The design led approach

- A. All development must make the best use of land following a design led approach that optimises the capacity of the sites, including site allocations. Optimising site capacity means ensuring that development is of the most appropriate form and land use for the site. The design led approach requires consideration of design options to determine the most appropriate form of development that responds to a site's context and capacity for growth, and existing and planned supporting infrastructure capacity (as set out in Policy D2 Infrastructure requirements for sustainable densities), and that best delivers the requirements set out in Part D.
- B. Higher density developments should generally be promoted in locations that are well connected to jobs, services, infrastructure and amenities by public transport, walking and cycling, in accordance with Policy D2 Infrastructure requirements for sustainable densities. Where these locations have existing areas of high density buildings, expansion of the areas should be positively considered by Boroughs where appropriate. This could also include expanding Opportunity Area boundaries where appropriate.
- C. In other areas, incremental densification should be actively encouraged by Boroughs to achieve a change in densities in the most appropriate way. This should be interpreted in the context of Policy H2 Small sites.
- D. Development proposals should:

Form and Layout

- 1) Enhance local context by delivering buildings and spaces that positively respond to local distinctiveness through their layout, orientation, scale appearance and shape, with due regard to existing and emerging street hierarchy, building types, forms and proportions
- 2) Encourage and facilitate active travel with convenient and inclusive pedestrian and cycling routes, crossing points, cycle parking, and legible entrances to buildings, that are aligned with peoples' movement patterns and desire lines in the area
- 3) Be street-based with clearly defined public and private environments
- 4) Facilitate efficient servicing and maintenance of buildings and the public realm, as well as deliveries, that minimise negative impacts on the environment, public realm and vulnerable road users

Experience

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

- 9) Help prevent or mitigate the impacts of noise and poor air quality
- 10) Achieve indoor and outdoor environments that are comfortable and inviting for people to use

Quality and character

- 11) Respond to the existing character of a place by identifying the special and valued features and characteristics that are unique to the locality and respect, enhance and utilise the heritage assets and architectural features that contribute towards the local character
- 12) Be of high quality, with architecture that pays attention to detail, and gives thorough consideration to the practicality of use, flexibility, safety and building lifespan through appropriate construction methods and the use of attractive, robust materials which weather and mature well
- 13) Aim for high sustainability standards (with reference to the policies within London Plan (Chapters 8 and 9) and take into account the principles of the circular economy.
- 14) Provide spaces and buildings that maximise opportunities for urban greening to create attractive resilient places that can also help the management of surface water.
- E. Where development parameters for allocated sites have been set out in a Development Plan, development proposals that do not accord with the site capacity in a site allocation can be refused for this reason.

Policy D4 Delivering good design of the London Plan states:

Design analysis and development certainty

- A. Masterplans and design codes should be used to help bring forward development and ensure it delivers high quality design and pace making based on the requirements set out in Part B of Policy D3 Optimising site capacity through the design led approach.
- B. Where appropriate, visual, environmental and move modelling assessments should be undertaken to analyse potential design options for an area, site or development proposal. These models, particularly 3D virtual reality and other interactive digital models, should, where possible, be used to inform plan-making and decision-taking, and to engage Londoners in the planning process.

Design scrutiny

- C. Design and access statement submitted with development proposals should demonstrate that the proposal meets the design requirements of the London Plan.
- D. The design of development proposals should be thoroughly scrutinised by borough planning, urban design, conservation officers, utilising the analytical tools set out in Part B, local evidence, and expert advice where appropriate. In addition, boroughs and applicants should make use of the design review process to assess and inform design options early in the planning process. Development proposals referable to the Mayor must have undergone at least one design review early on in their preparation before a planning is made, or demonstrate that they have undergone a local borough process of design scrutiny, based on the principles set out in Part E, if they:

- 1) Include a residential component that exceeds 350 units per hectare; or
- 2) Propose a building defined as a tall building by the borough (see Policy D9 Tall buildings), or that is more than 30m in height where there is no local definition of a tall building.

E. The format of design reviews for any development should be agreed with the borough and comply with the Mayor's guidance on review principles, process and management, ensuring that:

- 1) Design reviews are carried out transparently by independent experts in relevant disciplines
- 2) Design review comments are mindful of the wider policy context and focus on interpreting policy for the specific scheme
- 3) Where a scheme is reviewed more than once, subsequent design reviews reference and build on the recommendations of previous design reviews
- 4) Design review recommendations are appropriate recorded and communicated to officers and decision makers
- 5) Scheme show how they have considered and addressed the design review recommendations
- 6) Planning decisions demonstrate how design review has been addressed.

Maintaining design quality

F. The design quality of development should be retained through to completion by:

- 1) Ensuring maximum detail appropriate for the design stage is provided to avoid the need for later design amendments and to ensure scheme quality is not adversely affected by later decisions on construction, materials, landscaping details or minor alterations to layout or form of the development
- 2) Ensuring the wording of the planning permission, and associated conditions and legal agreement, provide clarity regarding the quality of design
- 3) Avoiding deferring the assessment of the design quality of large elements of a development to the consideration of a planning condition or referred matter

Local planning authorities considering conditioning the ongoing involvement of the original design team to monitor the design quality of a development through to completion.

Policy D5 Inclusive Design of the London Plan states:

B. Development proposal should achieve the highest standards of accessible and inclusive design. They should:

- 1) Be designed taking into account London's diverse population
- 2) Provide high quality people focused spaces that are designed to facilitate social interaction and inclusion
- 3) Be convenient and welcoming with no disabling barriers, providing independent access without additional undue effort, separation or special treatment
- 4) Be able to be entered, used and exited safely, easily and with dignity for all
- 5) Be designed to incorporate safe and dignified emergency evacuation for all building users. In all developments where lifts are installed, as a minimum at least one lift per core (or more subject to

capacity assessments) should be a suitably sized fire evacuation lift suitable to be used to evacuate people who require level access from the building

C. Design and Access Statements, submitted as part of development proposals, should include an inclusive design statement.

Policy D6 Housing quality and standards of the London Plan states:

- A. Housing development should be of high quality design and provide adequate-sized rooms (see Table 3.1) with comfortable and functional layouts which are fit for purpose and meet the needs of Londoners without differentiating between tenures.
- B. Qualitative aspects of a development are key to ensuring successful sustainable housing. Table 3.2 sets out key qualitative aspects which should be addressed in the design of housing developments.
- C. Housing development should maximise the provision of dual aspect dwellings and normally avoid the provision of single aspect dwellings. A single aspect dwelling should only be provided where it is considered a more appropriate design solution to meet the requirements of Part B in Policy D3 Optimising site capacity through the design led approach than a dual aspect dwelling and it can be demonstrated that it will have adequate passive ventilation, daylight and privacy, and avoid overheating.
- D. The design of development should provide sufficient daylight and sunlight to new and surrounding housing that is appropriate for its context, whilst avoiding overheating, minimising overshadowing and maximising the usability of outside amenity space.
- E. Housing should be designed with adequate and easily accessible storage space that supports the separate collection of dry recyclables (for at least card, paper, mixed plastics, metals, glass) and food waste as well as residual waste.
- F. Housing developments are required to meet the minimum standards below which apply to all tenures and all residential accommodation is self-contained.

Private outside space

- 1) Dwellings must provide at least the gross internal floor area and built in storage area set out in Table 3.1
- 2) A dwelling with two or more bedspaces must have at least one double (or twin) bedroom that is at least 2.75m wide. Every other additional double (or twin) bedroom must be at least 2.55m wide.
- 3) A one bedspace single bedroom must have a floor area of at least 7.5 sq.m and be at least 2.15m.
- 4) A two bedspace double (or twin) bedroom must have a floor area of at least 11.5 sq.m.
- 5) Any area with a headroom of less than 1.5m is not counted within the Gross Internal Area unless used solely for storage (if the area under the stairs is to be used for storage, assume a general floor area of 1sq.m. within the Gross Internal Area).
- 6) Any other area that is used solely for storage and has a headroom of 0.9-1.5m (such as under eaves) can only be counted up to 50% of its floor area, and any area lower than 0.9m is not counted at all.
- 7) A built in wardrobe counts towards the Gross Internal Area and bedroom floor area requirements, but should not reduce the effective width of the room below the minimum widths set out above. Any built in area in excess of 0.72 sq.m. in a double bedroom and

0.36 sq.m. in a single bedroom counts towards the built in storage requirements.

- 8) The minimum floor to ceiling height must be 2.5m for at least 75 percent of the Gross Internal Area of each dwelling.
- 9) Where there are no higher local standards in the borough Development Plan Documents, a minimum of 5sqm. of private outdoor space should be provided for 1-2 person dwellings and an extra 1sq.m. should be provided for each additional occupant, and it must achieve a minimum depth and width of 1.5m. This does not count towards the minimum Gross Internal Area space standards required in Table 3.1.

G. The Mayor will produce guidance on the implementation of this policy for all housing tenures.

Policy D7 Accessible housing of the London Plan states:

- A. To provide suitable housing and genuine choice for London's diverse population, including disabled people, older people, and families with young children, residential development must ensure that:
 - 1) At least 10 percent of dwellings (which are created via works to which Part M volume 1 of Building Regulations applies) meet Building Regulation requirement M4(3) 'Wheelchair user dwellings'
 - 2) All other dwellings (which are created via works to which Part M volume 1 of the Building Regulations applies) meet Building Regulations requirement M4(2) 'accessible and adaptable'.

Policy D11 Safety, security and resilience to emergency of the London Plan states:

- A. The Mayor uses his convening power to work with relevant partners and stakeholders to ensure and maintain a safe and secure environment in London that is resilient against emergencies including fire, flood, weather, terrorism and related hazards as set out in the London Risk Register.
- B. Boroughs should work with their local Metropolitan Police Service 'Design Out Crime' officers and planning teams, whilst also working with other agencies such as the London Fire Commissioner, the City of London Police and the British Transport Police to identify the community safety needs, policies and sites required for their area to support provision of necessary infrastructure to maintain a safe and secure environment and reduce the fear of crime. Policies and any site allocations, where locally justified, should be set out in Development Plans.
- C. Development proposals should maximise building resilience and minimise potential physical risks, including those arising as a result of extreme weather, fire, flood and related hazards. Development should include measures to design out crime that – in proportion to the risk – deter terrorism, assist in the detection of terrorist activity and help mitigate its effects. These measures should be considered at the start of the design process to ensure they are inclusive and aesthetically integrated into the development and the wider area.

Chapter 4 Housing of the London Plan contains the following relevant policies:

Policy H1 Increasing housing supply

Policy H10 Housing size mix

Policy H1 Increasing housing supply of the London Plan states:

- A. Table 4.1 sets the ten year targets for new housing completions that each local planning authority should plan for. Boroughs must include these targets in their Development Plan Documents.
- B. To ensure that ten year housing targets are achieved, boroughs should:
 - 1) Prepare delivery-focused Development Plans which:
 - a. Allocate an appropriate range and number of sites that are suitable for residential and mixed use development and intensification
 - b. Encourage development on other appropriate windfall sites not identified in Development Plan through the Plan period, especially from the sources of supply listed in B2
 - c. Enable the delivery of housing capacity identified in Opportunity Areas, working closely with the GLA.
 - 2) Optimise the potential for housing delivery on all suitable and available brownfield sites through their Development Plans and planning decisions, especially the following sources of capacity:
 - a. Sites with existing or planned public transport access levels (PTALs) 3-6 or which are located within 800m distance of a station or town centre boundary
 - b. Mixed use redevelopment of car parks and low density retail parks and supermarkets
 - c. Housing intensification on other appropriate low density sites in commercial, leisure and infrastructure use
 - d. The redevelopment of surplus utilities and public sector owned sites
 - e. Small sites (see Policy H2 Small sites)
 - f. Industrial sites that have been identified through the processes set out in Policy E4 Land for industry, logistics and services to support London's economic function, Policy E5 Strategic Industrial Locations (SIL), policy E6 Locally Significant Industrial Sites and Policy E7 Industrial intensification, co-location and substitution.
 - 3) Establish ambitious and achievable build out rates at the planning stage, incentivising build out milestones to help ensure that homes are built quickly and to reduce the likelihood of permissions being sought to sell land on at a higher value.
- C. Boroughs should proactively use brownfield registers and permission in principle to increase planning certainty for those wishing to build new homes.
- D. Boroughs should publish and annually update housing trajectories based on the targets in Table 4.1 and should work with the Mayor to resolve any anticipated shortfalls.
- E. Where new sustainable transport infrastructure is planned, boroughs should re-evaluate the appropriateness of land use designations and the potential to accommodate higher-density residential and mixed-use development, taking into account future public transport capacity and connectivity levels.
- F. On sites that are allocated for residential and mixed use development there is a general presumption against single use low density retail and leisure parks. These developments should be designed to provide a mix of uses including housing on the same site in order to make the best use of land available for development.

Policy H2 Small sites of the London Plan states:

- A. Boroughs should pro-actively support well-designed new homes on small sites (below 0.25 hectares in size) through both planning decisions and plan making in order to:
 - 1) Significantly increase the contribution of small sites to meeting London's housing needs
 - 2) Diversify the sources, locations, type and mix of housing supply
 - 3) Support small and medium sized housebuilders
 - 4) Support those wishing to bring forward custom, self-build and community led housing
 - 5) Achieve the minimum targets for small sites set out in Table 4.2 as a component of the overall housing targets set out in Table 4.1.
- B. Boroughs should:
 - 1) Recognise in their Development Plans that local character evolves over time and will need to change in appropriate locations to accommodate additional housing on small sites
 - 2) Where appropriate, prepare site specific briefs, masterplans and housing design codes for small sites
 - 3) Identify and allocate appropriate small sites for residential development
 - 4) List these small sites on their brownfield registers
 - 5) Grant permission in principle on specific sites or prepare local development orders.

Chapter 8 Green Infrastructure and Natural Environment of the London Plan contains the following relevant policies:

Policy G7 Trees and Woods of the London Plan states:

- A. London's urban forest and woodlands should be protected and maintained, and new trees and woodlands should be planted in appropriate locations in order to increase the extent of London's urban forest – the area of London under the canopy of trees.
- B. In their Development Plans, boroughs should:
 - 1) Protect 'veteran' trees and ancient woodland where these are not already part of a protected site
 - 2) Identify opportunities for tree planting in strategic locations
- C. Development proposals should ensure that, wherever possible, existing trees of value are retained. If planning permission is granted that necessitates the removal of trees there should be adequate replacement based on the existing value of the benefits of the trees removed, determined by for example, i-tree or CAVAT or another appropriate valuation system. The planting of additional trees should generally be included in new developments, particularly large canopied species which provide a wider range of benefits because of the larger surface area of their canopy.

Policy SI 12 Flood risk management of the London Plan states:

- C. Development proposals should ensure that flood risk is minimised and mitigated, and that residual risk is addressed. This should include, where possible, making space for water and aiming for development to be set back from the banks of watercourses.

Policy SI 13 Sustainable drainage of the London Plan states:

B. Development proposals should aim to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible. There should also be a preference for green over grey features, in line with the following drainage hierarchy:

- 1) rainwater use as a resource (for example rainwater harvesting, blue roofs for irrigation)
- 2) rainwater infiltration to ground at or close to source
- 3) rainwater attenuation in green infrastructure features for gradual release (for example green roofs, rain gardens)
- 4) rainwater discharge direct to a watercourse (unless not appropriate)
- 5) controlled rainwater discharge to a surface water sewer or drain
- 6) controlled rainwater discharge to a combined sewer.

Chapter 10 Transport of the London Plan contains the following relevant policies:

Policy T4 Assessing and mitigating transport impacts

Policy T5 Cycling

Policy T6 Car parking

Policy T6.1 Residential parking

Policy T4 Assessing and mitigating transport impacts of the London Plan states:

- D. The cumulative impacts of development on public transport and the road network capacity including walking and cycling, as well as associated effects on public health, should be taken into account and mitigated.
- E. Development proposals should not increase road danger.

Policy T5 Cycling of the London Plan states:

- A. Development proposals should help remove barriers to cycling and create a health environment in which people choose to cycle. This will be achieved through:
 - 1) Supporting the delivery of a London wide network of cycle routes, with new routes and improved infrastructure
 - 2) Securing the provision of appropriate levels of cycle parking which should be fit for purpose, secure and well-located. Development should provide cycle parking at least in accordance with the minimum standards set out in Table 10.2 and Figure 10.3, ensuring that a minimum of two short-stay and two long-stay cycle parking spaces are provided where the application of the minimum standards would result in a lower provision.
- B. Cycle parking should be designed and laid out in accordance with the guidance contained in the London Cycling Design Standards. Development proposals should demonstrate how cycle parking facilities will cater larger cycles, including adapted cycles for disabled people.

Policy T6 Car parking of the London Plan states:

- A. Car parking should be restricted in line with levels of existing and future public transport accessibility and connectivity.
- B. 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, with developments elsewhere designed to provide the minimum necessary parking ('car lite'). Car-free development has no general parking, but should still provide disabled persons parking in line with Part E of this policy.

- C. An absence of local on street parking controls should not be a barrier to new development, and boroughs should look to implement these controls wherever necessary to allow existing residents to maintain safe and efficient use of their streets.
- D. The maximum car parking standards set out in Policy T6.1 Residential parking to Policy T6.5 Non-residential disabled persons parking should be applied to development proposals and used to set local standards within Development Plans.
- E. Appropriate disabled persons parking for Blue Badge holders should be provided as set out in Policy T6.1 Residential parking to Policy T6.5 Non-residential disabled persons parking.
- F. Where provided, each motorcycle parking space should count towards the maximum for car parking space at all use classes.
- G. Where car parking is provided in new developments, provision should be made for infrastructure for electric or other Ultra-Low Emission vehicles in line with Policy T6.1 Residential parking, Policy T6.2 Office Parking, Policy T6.3 Retail parking, and Policy T6.4 Hotel and leisure uses parking. All operational parking should make this provision, including offering rapid charging. New or re-provided petrol filling stations should provide rapid charging hubs and/or hydrogen refuelling facilities.
- H. Where electric vehicle charging points are provided on-street, physical infrastructure should not negatively affect pedestrian amenity and should ideally be located off the footway. Where charging points are located on the footway, it must remain accessible to all those using it including disabled people.
- I. Adequate provision should be made for efficient deliveries and servicing and emergency access.
- J. A Parking Design and Management Plan should be submitted alongside all applications which include car parking provision, indicating how the car parking will be designed and managed, with reference to Transport for London guidance on parking management and parking design.
- K. Boroughs that have adopted or wish to adopt more restrictive general or operational parking policies are supported, including borough-wide or other area based car free policies. Outer London boroughs wishing to adopt minimum residential parking standards through a Development Plan Document (within the maximum standards set out in Policy T6.1 Residential Parking) must only do so for parts of London that are PTAL 0-1. Inner London boroughs should not adopt minimum standards. Minimum standards are not appropriate for non-residential uses classes in any part of London.
- L. Where sites are redeveloped, parking provision should reflect the current approach and not be re-provided at previous levels where this exceeds the standards set out in this policy. Some flexibility may be applied where retail is redeveloped outside of town centres in areas which are not well served by public transport, particularly in outer London.

Policy T6.1 Residential Parking of the London Plan states:

- A. New residential development should not exceed the maximum parking standards set out in Table 10.3. These standards are a hierarchy with

the more restrictive standard applying when a site falls into more than one category.

- B. Parking spaces within communal car parking facilities (including basements) should be leased rather than sold.
- C. All residential car parking spaces must provide infrastructure for electric or Ultra-Low Emission vehicles. At least 20 percent of spaces should have active charging facilities, with passive provision for all remaining spaces.
- D. Outside of the CAZ, and to cater for infrequent trips, car club spaces may be considered appropriate in lieu of private parking. Any car club spaces should have active charging facilities.
- E. Large-scale purpose-built shared living, student accommodation and other *sui generis* residential uses should be car-free.
- F. The provision of car parking should not be a reason for reducing the level of affordable housing in a proposed development.
- G. Disabled persons parking should be provided for new residential developments. Residential development proposals delivering ten or more units must, as a minimum:
 - 1) Ensure that for three percent of dwellings, at least one designated disabled persons parking bay per dwelling is available from the outset
 - 2) Demonstrate as part of the Parking Design and Management Plan, how an additional seven percent of dwellings could be provided with one designated disabled persons parking space per dwelling in future upon request as soon as existing provision is sufficient. This should be secured at the planning stage.
- H. All disabled persons parking bays associated with residential development must:
 - 1) Be for residents' use only
 - 2) Not be allocated to specific dwellings, unless provided within the curtilage of the dwelling
 - 3) Be funded by the payment of a commuted sum by the applicant, if provided on-street (this includes a requirement to fund provision of electric vehicle charging infrastructure)
 - 4) Count towards the maximum parking provision for the development
 - 5) Be designed in accordance with the design guidance in BS8300vol.1
 - 6) Be located to minimise the distance between disabled persons parking bays and the dwellings or the relevant block entrance or lift core, and the route should be preferably level or where this is not possible, should gently sloping (1:60-1:20) on a suitable firm ground surface.

The Mayor's Housing SPG
 The Mayor's Accessible London SPG

Local Policies

Hillingdon Local Plan

The Local Plan Part 1 - Strategic policies sets out the overall level and broad locations of growth up to 2026. Together with the Local Plan Part 2 Development Management Policies and Site Allocations and Designation documents it forms the Council's future development strategy for the borough.

The Local Plan Part 1 – Strategic policies contains the following relevant policies:

Policy H1: Housing Growth
Policy HE1: Built Environment
Policy EM1: Climate Change Adaptation and Mitigation
Policy EM8: Land, Water, Air and Noise
Policy T1: Accessible Local Destinations
Policy T5: Crossrail
Policy CI1: Community Infrastructure Provision

The Local Plan Part 2 – Development Management Policies contains the following relevant policies:

DMH2 Housing Mix

DMHB11 Design of New Development
DMHB12 Streets and Public Realm
DMHB14 Trees and Landscaping
DMHB15 Planning for Safer Places
DMHB16 Housing Standards
DMHB17 Residential Density

DMEI10 Water Management, Efficiency and Quality

DMCI2 New Community Infrastructure

DMT1 Managing Transport Impacts
DMT2 Highways Impacts
DMT5 Pedestrians and Cyclists
DMT6 Vehicle Parking

Assessment

The current proposal seeks to address the issues raised with the previous proposal. Since the previous application was refused, the proposal has been reduced further in scale and density. The proposal now only seeks 1 single family dwellinghouse which is significant reduction from the previous proposal for 2 houses and a substantial decrease since the original 5 unit flatted development.

As highlighted earlier in this statement, the previous pair of semi-detached dwellings were refused for the following reasons:

1. The proposed development fails to provide an adequate internal site roadway nor a sufficient wide and safe access road into the site, to the detriment of highway and pedestrian safety on and adjacent to the site. The proposal is therefore unsafe and contrary to Local Plan: Part 2 Development Plan (2020) policies DMT 1, DMT 2, and Policy T6 of the London Plan (2021).
2. The proposed development by reason of its size, layout, siting, design and proximity to neighbouring boundaries would result in a cramped and contrived form of development which fails to respect the established pattern of development, detrimental to the character and appearance of the site and surrounding area, all contrary to Local Plan policies BE1 and DMHB11, London Plan Policies D1, D3, and D4 as well as the NPPF in relation to good quality, contextual design.
3. The proposed dwellings, by reason of their design and layout fail to meet the requirements of people with disabilities and would therefore give rise to a substandard form of living accommodation to the detriment of the amenity of future occupiers. The proposal is thus contrary to Policy D7 of the London Plan (2021).

Below this statement will address each of these in numerical order.

1. To address this first reason for refusal, it is important to note that the proposal has been reduced from 2 houses to 1 dwelling which would be occupied by a single family. This has a number of effects such as reducing the need for parking on the site to 1 vehicle for use by the single family that would occupy the development. As only 1 private vehicle would access the site, the likelihood of conflict between vehicles on the private access road has been substantially reduced. The access to the development would be private and no longer shared as proposed in earlier proposals.

In addition, the site layout has been revised to allow the private vehicle owned by the future family to turn around within the site and exit the site in forward gear. Therefore, the development would not raise any new highway safety concerns beyond the current access to the garages.

It is important to compare the latest reduced proposal against the current use and access for the site. The site is currently occupied by private garages that are used for storage. These garages are rented and the owners/users visit the garages on a regular basis. In total, there are 6 garages and external space that is used for open storage of building materials. The removal of these 6 garages and storages areas would be likely to reduce the number of visits to the site in comparison with the current proposal which seeks only permission for only 1 family dwelling with 1 car parking space. As such, in comparison with the existing use of the site, the proposal would represent an improvement in highway terms. Please refer to the accompanying Transport Statement prepared by Fotom for more details of how this amended scheme overcomes the previous reason for refusal 1.

Although not mentioned in the reason for refusal, it is worth mentioning that the development site also benefits from a separate pedestrian access that ensures that pedestrians have safe access to the property and that there will be no conflict between pedestrians and vehicles entering/exiting the site. Therefore, and given the changes to the proposal, the access arrangements to the new single family dwellinghouse is considered to be safe for pedestrians and vehicles and would be acceptable.

2. Although the professional team do not agree with this reason for refusal 2 in relation to the previous proposal, we have sought to address the concerns raised by the Council by reducing the scale of the development further and improving the design.

The amended building has been stepped away further from the western boundary of the site by a further 2.1m than the previous proposal (set back only 1m previously). This boundary is also where the adjacent conservation area starts. As such, the proposed new dwelling would at its closest point be 3.1m from this boundary and flare outwards providing a generous sense of openness to the surrounding area, particularly from the conservation area. This represents a significant improvement on what was proposed previously and on what is currently on the site in the form of garages which abut the boundary with the conservation area along the majority of the western boundary

In terms of scale in comparison to the previous proposal, the footprint of the proposal would be 71m² whilst the previous scheme was 90m² which

represents a 21% reduction in footprint. Also, it is worth comparing the proposal against the existing garages on the site. These currently have a footprint of 77.5m² which is nearly 10% larger than the proposal and they are positioned up against the boundary to the west which is also the shared boundary with the conservation area.

The new house would be situated farther away and would give a better sense of relief to the conservation area than both the current situation and what was proposed previously. In addition, the proposal includes a green wall to the proposed dwelling which would further help to soften the appearance of the development.

The height, width, depth and overall scale of the new house being proposed is very much in keeping with the existing pattern of development in the area. The height reflects the height of other buildings in the area or is smaller and the footprint and size of the building is comparable or smaller than surrounding buildings. In addition, the proposed building is separated from other existing buildings by 21.18m or more in every direction and it would not appear dominant or overbearing in any way when viewed from the surrounding area.

The small scale of the development and its comfortable positioning within the site suggests that the development would not appear as a cramped form of development and proposal would sit very comfortably within the setting without harm to the visual amenity of the area or setting of the adjacent conservation area. The proposal would improve the setting of the conservation area by removing development directly abutting it and the more modest and tidy appearance of the proposed single dwelling is considered to generally improve the visual amenity of the area. Therefore, this concern raised by the Planning Inspector is considered to have been overcome.

3. The third reason for refusal could have been quite easily designed out of the previous scheme. Care has been taken to ensure that the new house would overcome the specific concerns raised by the Council's Access Officer as set out in the Case Officer's Report. Specifically, a level and step free access have been provided for the new dwelling. Furthermore, the WC at ground floor level has been increased in size to ensure there is the requisite space standards required to provide clear access zones for such a cubicle within a three bedrooomed house. Also, the other rooms within the dwelling have been enlarged to make them more accessible in general terms. The proposal would meet M4(2) of the Building Regulations and is now considered to overcome this previous reason for refusal.

As is clear from the above, the reduced proposal would now overcome the concerns raised by the previous proposal. The development would make much better use of this existing brownfield site and improve its appearance. The site is situated only 300m from Ruislip Manor Tube Station and has a high PTAL rating. The provision of a high quality family dwelling should be welcomed at this location, particularly given the reuse of this rather unattractive site.

Overall, the development would reflect the 12 core principles of sustainable development as set out in the NPPF. The application scheme meets the strategic policy objectives of the London Plan as well as the aims and objectives of local Council policy. Therefore, it is considered that this amended proposal should be accepted.