



**36, 38 & 40 Rickmansworth Road,
Northwood, London Borough of
Hillingdon, HA6 2QG**

PLANNING STATEMENT

IN SUPPORT OF A PLANNING APPLICATION FOR;

***"DEMOLITION OF 3 DETACHED DWELLINGS AND
REDEVELOPMENT TO PROVIDE 25 APARTMENTS, AMENITY
SPACE AND ASSOCIATED CAR PARKING"***

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FOR AND ON BEHALF OF;**



July 2016

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APPENDICIES

1	Hillingdon Written Pre-Application Response
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1. INTRODUCTION

1.1 On behalf of Howarth Homes plc., Preston Bennett Planning have been instructed to prepare a planning application for the re-development of 36, 38 & 40 Rickmansworth Road located in Northwood within the London Borough of Hillingdon (ref. Figure 1). The site area is approximately 0.35ha. The proposed description of development is set out below.

1.2 The proposal is for:

"DEMOLITION OF 3 DETACHED DWELLINGS AND REDEVELOPMENT TO PROVIDE 25 APARTMENTS, AMENITY SPACE AND ASSOCIATED CAR PARKING"

1.3 This statement and the supporting documentation outlines the history of the site, the principle of the proposed development, and the context of the site and the wider locality. This is set in the context of relevant adopted and emerging local and national planning policy.



Figure 1: Existing Site Plan

1.4 This statement should be read in conjunction with the accompanying scheme drawings and Design and Access Statement prepared by Wilcox and Meilwes, as well as the other consultant reports listed in paragraph 1.8.

1.5 The proposals seek to develop this large and prominent site to provide a residential apartment scheme. A mix of one, two and three bedroom flats are provided, along with car parking and a large landscaped area.

1.6 This revised application is prepared in response to the comments received in regard to the planning submission made in March 2016 ref 69978/APP/2016/1280 which was subsequently withdrawn. The revised proposal is for the demolition of the 3 detached houses dwellings on site and the construction of 3 linked buildings housing 25 apartments with associated car parking and high quality amenity and landscape.

1.7 The revised scheme is a result of extensive consultation with Hillingdon Council with the scheme being amended, reduced and refined in its scale, form and design as detailed in this document.

1.8 **Executive Summary– Key Principles of the Proposed Scheme**

- **Demolition of 3 detached dwellings and redevelopment** of under-utilised site in a prominent location in Northwood;
- Redevelopment to provide 3 linked buildings comprising 25 apartments (1, 2 and 3 bedroom units) in a sustainable location **including 3 wheelchair units** on the ground floor;
- High quality **contemporary** design by WAM Architecture;
- The **scale** and **height** of the building respects the surrounding houses and flatted development;
- The **siting** and **layout** of the development provides appropriate separation distances to neighbouring properties ensuring that there will be no loss of amenity, and no loss of outlook nor overbearing relationship on existing neighbouring properties;
- Provision of **39 cycle spaces** and **31 car parking spaces** including 4 disabled spaces;
- Provision of landscaped area to the front and rear of the building; and
- Provision of Financial Contributions towards local infrastructure through Mayoral and Hillingdon CIL.

Consultant Team

1.9 Preston Bennett Planning have been appointed to prepare this Planning Statement and submit the detailed planning application in respect of this proposal. Willcox and Meilwes is the scheme architect for the application and their proposals form the basis of this application submission.

1.10 **Planning Application Submission Documentation**

- **Planning Application Forms**
- **Drawings** (Prepared by Willcox and Meilwes)
- **Design and Access Statement** (Prepared by Willcox and Meilwas)
- **Planning Statement** (Prepared by Preston Bennett Planning)
- **Arboricultural Statement** (Prepared by GHA Trees Arboricultural Consultancy)
- **Noise Assessment** (Prepared by NSL)
- **Transport Assessment** (Prepared by Dermot McCaffery)
- **Drainage Strategy** (Prepared by EAS)

2. APPLICATION SITE

Site Description

- 2.1 The application site is 0.35ha in size and is located within the London Borough of Hillingdon on the northern side of Rickmansworth Road. The site is located on land comprising 3 large detached two storey dwellings, numbers 36, 38 and 40 Rickmansworth Road (Ref. Figure 2).
- 2.2 The site slopes from north to south and west to east, with a fall of approximately 5.5m from the north-west corner to the south-east corner of the site. Access to all three dwellings is gained from Rickmansworth Road and No 38 has a secondary access off Greenheys Close at the northern end of the site.



Figure 2: Aerial View of Site

- 2.3 There are a number of trees on site, with substantial planting along the Rickmansworth Road frontage. This includes a Pine (T1) in the garden of No 36, and a Beech (T3) in the garden of No 38, both protected by Tree Preservation Order No 648.

Area Characteristics

- 2.4 The surrounding area is predominantly residential in character comprising buildings with varied design and sizes with a mixture of flats, maisonettes and detached houses. Immediately to the west is a 5 storey block of flats located on the northern side of Rickmansworth Road. To the east are detached dwellings. To the north of the site is Greenheys Close, a cul-de-sac serving 2 storey detached and semi-detached dwellings. On the southern side of Rickmansworth Road, opposite the site, there are detached and terraced two storey residential dwellings.

Planning Designations

- 2.5 As shown by Figure 3, the site falls within white land and is not impacted by any planning designations. To the east of the site shown by the brown hatching is a designated Area of Special Character and the Greenbelt and a Nature Conservation Site are in close proximity to the site to the west.



Figure 3: Extract from Hillingdon Planning Policy Map

Flood Risk

- 2.6 The site falls outside of any flood risk zone (falling within Flood Zone 1) as defined on Environment Agency flood mapping (Figure 4) and is therefore not at risk of flooding. The site is less than 1 hectare in size; therefore the planning application is not required to be accompanied by a Flood Risk Assessment.

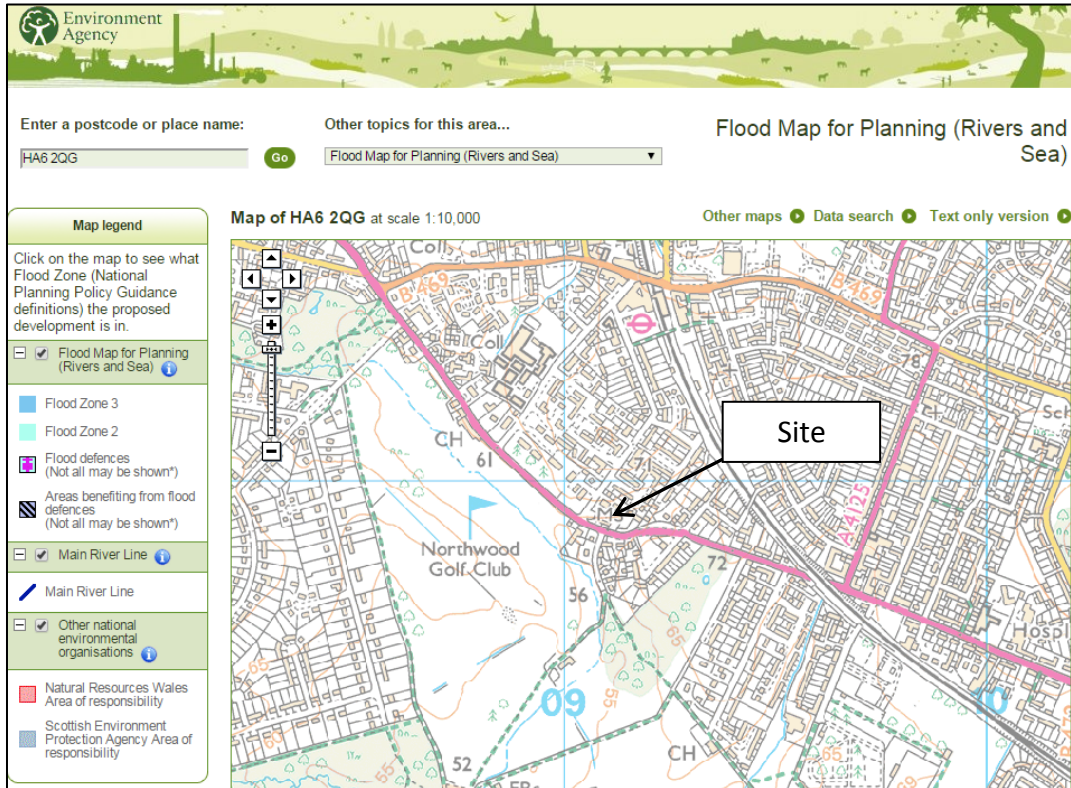


Figure 4: EA Flood Risk Map

Transport

- 2.7 The site has a PTAL rating of 2 (see Figure 5). The nearest bus stop is located approximately 500m from the site on Maxwell Road, where the 331 service runs with a frequency of 3 buses per hour. Northwood Underground Station is located approximately half a mile to the north with a Metropolitan Line service.

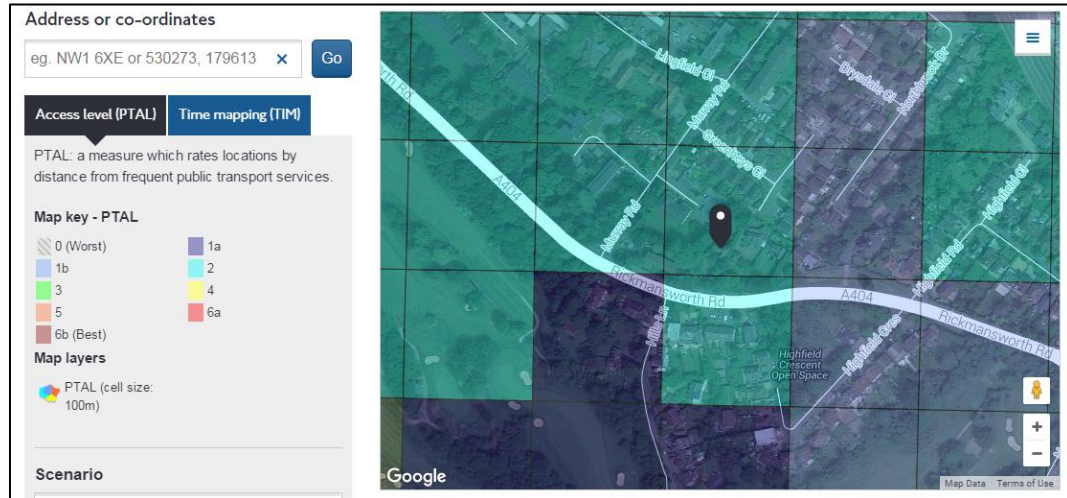


Figure 5: Transport for London, Extract of PTAL Mapping

3. PLANNING HISTORY

- 3.1 The planning history of the site in relation to the construction of flats is limited to 36 and 38 Rickmansworth Road. The pre-app preceding this application was the first to include No 40 in a wider scheme.
- 3.2 In 2002, planning permission for schemes comprising 14 two bedroom flats were refused by the Council (references: 56595/APP/2002/732 and 56595/APP/2002/1363), and subsequent appeals dismissed by the Planning Inspectorate. It was concluded that the proposed buildings would appear over-dominant, incongruous and visually intrusive in the Greenheys Close street scene and that the traffic generated by each development would result in an unacceptable loss of amenity to the occupiers of properties in Greenheys Close.
- 3.3 A third application was submitted in 2003 (references: 56595/APP/2002/2863) for the erection of 5 x five-bedroom two storey dwellings with access to 4 of the dwellings off Greenheys Close (involving demolition of existing houses). This outline application was also refused.
- 3.4 The applicant then amended the second 2002 scheme for flats in an attempt to address the concerns raised by the inspector and lodged a new planning application in 2003 (reference: 56595/APP/2003/282) seeking permission for 11 units, with access to the property from Greenheys Close. The Council held the view that whilst the applicant had made some amendments to the design and reduced the number of units by 3, the changes were not considered to have satisfactorily addressed the previous reasons for refusal. The application was refused by the Council as it was considered that the proposed use of Greenheys Close for vehicular access would result in unreasonable noise and disturbance to the occupiers of residential properties. It was also determined that the siting, scale and bulk of the proposed building, would be overly dominant, intrusive and failed to harmonise with the character of the existing street scene.
- 3.5 The applicant appealed the Council's decision to the Planning Inspectorate (Appeal Reference: APP/R5510/A/03/1121602). The Inspector noted that the density, siting, height, bulk, scale and appearance of the proposal were acceptable. Additionally the inspector concluded that the impact of the scheme on the character and appearance of the locality and street scene would not be harmful. However, the inspector concluded that there would be harm caused to the living conditions of residents of Greenheys Close as a result of traffic arriving and leaving the site via Greenheys Close.
- 3.6 A further planning application on the sites of Nos 36 and 38 Rickmansworth Road was received in 2007 (Reference. 56595/APP/2007/2236) proposing flats. The applicant appealed against a non-determination but later withdrew their appeal.

- 3.7 Another planning application was also received in 2007 for a scheme comprising the erection of two, three storey buildings to create 6 two bedroom flats with parking and amenity, including demolition of existing buildings (Reference. 56595/APP/2007/3796) also on the site of 36 and 38 Rickmansworth Road. The application was refused by the Council on highway safety grounds and a failure to submit a S106 agreement. The applicant appealed against the decision and although the appeal was dismissed, the inspector determined that the only reason for refusal was on highway safety grounds, all other aspects of mass, bulk, siting and the principle of a flatted scheme were deemed acceptable.
- 3.8 Since the pre-application response was issued an application to increase the height of 40 Rickmansworth Road to 2 storeys has been approved under planning reference: 23403/APP/2014/4371.
- 3.9 A planning application for the redevelopment of 36, 38 and 40 Rickmansworth Road was submitted in March 2016 to provide 29 apartments, amenity space and car parking (Reference: 69978/APP/2016/1280). This application was later withdrawn based on comments from Planning Officers and local residents with the main issues being the principle of flats on this site and the mass and bulk of the proposal. As previously mentioned the principle of a flatted scheme on this site is established by the previous application for a flatted scheme on this site that was refused on highways grounds, but with the principle of flats being deemed acceptable (Reference: 56595/APP/2007/3796).
- 3.10 This planning statement accompanies the resubmission of this scheme as agreed with Hillingdon Council. The main changes to the scheme break up what was one large apartment building into three separate components that are connected by glass corridors up to eave height. This helps to reduce the appearance of the proposal in terms of mass and bulk.
- 3.11 It is concluded that the changes made by this application and the previous planning history for the site lend weight to the principle of flats being acceptable in this location and this latest proposal seeks to overcome the previously raised issues.

4. PRE-APPLICATION CONSULTATION WITH THE COUNCIL

- 4.1 A significant amount of pre-application discussions took place prior to the submission of the planning application for 29 apartments in March 2016. This played a large part in the evolution of the scheme for 29 apartments and also relates to this resubmission scheme for 25 apartments. The original pre-application consultation included a meeting with Planning Officers at Hillingdon Council on 13th June 2014. The scheme was amended in form and design through the pre-application stages prior to submission.
- 4.2 The original pre-application scheme comprised 25 apartments in one large building. The feedback for the proposal during the pre-application meeting and written response (Appendix 1) was broadly positive, supporting the principle of residential redevelopment.



Figure 6: Twenty Five Unit Pre-Application Scheme

- 4.3 Feedback supports the principle of the residential redevelopment as it is considered an ***“acceptable reuse of a brownfield site and represents an increase in residential accommodation”*** (Appendix 1, Paragraph 1), in accordance with NPPF policy and Policy H3 of the Local Plan. It is also considered that the new flatted scheme would not result in a material change to the established character of Rickmansworth Road.
- 4.4 The written feedback supported the principle of a flatted development in this location stating that, *“...whilst the current proposed scheme is significantly greater in scale than the previously refused proposals, it is considered that these decisions lend weight to the principle of flats being acceptable in this location.”*
- 4.5 Following the pre-application meeting, further amendments were made to the scheme. This included reductions in the bulk and mass of the scheme, and a stepping down in height and scale towards the western boundary of the site. These alterations were welcomed and deemed to improve the overall design and impact of the building.
- 4.6 This revised application is prepared in response to the comments received with regards to the March 2016 planning submission (ref: 69978/APP/2016/1280) which was subsequently withdrawn.



Figure 7: Twenty Nine Unit Previous Submission Scheme - Siteplan



Figure 8: Twenty Nine Unit Previous Submission Scheme – Front Elevation

- 4.7 Since the March 2016 planning application (see Figures 7 & 8) further amendments have been made to the scheme as a part of this resubmission, this includes the breaking up of the building into three components connected corridors up to eave height helping to break up the visual scale and bulk of the scheme. The revised scheme has been amended, reduced and refined in scale, form and design.

5. THE DEVELOPMENT PROPOSAL

- 5.1 The current proposal forming this application submitted is for a residential redevelopment comprising a 3½ storey apartment building of 25 flats with the associated landscaping and car parking, as set out in the proposed description of development below.

"DEMOLITION OF 3 DETACHED DWELLINGS AND REDEVELOPMENT TO PROVIDE 25 APARTMENTS, AMENITY SPACE AND ASSOCIATED CAR PARKING"

- 5.2 Below is a summary of the key characteristics of the proposed development:

The Development

- Part 3, part 2 storey development with accommodation in the roof;
- 3 linked buildings comprising 25 apartments including 14 x 1 bedroom, 2 x 2 bedroom and 3 x 3 bedroom apartments;
- 3 wheelchair accessible units;

Access and Parking

- Combination of undercroft and outdoor car parking, comprising 37 car parking spaces including 4 disabled parking bays;
- Secure cycle storage provision, 39 spaces;

Amenity Provision

- Shared amenity space to the front and rear of proposed building, including podium amenity space to the rear above undercroft parking;
- Majority of units are provided with direct access to communal amenity space, or private balcony;

Refuse / Recycling Provision

- Secure refuse and recycling store at ground floor level;

Sustainability and Accessibility

- All units have been designed to be adaptable through the life cycle of the block and seek to meet Part M of Building Regulations.

6. PLANNING POLICY CONTEXT

National Planning Policy Framework

6.1 The redevelopment of 36, 38 and 40 Rickmansworth Road is proposed in the context of national, regional and local housing, design and urban regeneration objectives as set out in the National Planning Policy Framework (NPPF) (March 2012), adopted Further Alterations to the London Plan (2015), and Hillingdon's Local Plan which all seek to provide new housing in sustainable locations and achieve high quality designed schemes.

6.2 At the centre of the adopted NPPF, which sets out Central Government's overarching national strategic planning objectives, is a presumption in favour of sustainable development:

"At the heart of the National Planning Policy Framework is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making and decision taking. For decision making this means: approving development proposals that accord with the development plan without delay." (NPPF, para. 14)

6.3 NPPF policy is committed to promoting sustainable development by maximising the re-use of previously developed and under-utilised land on sites within urban areas and well served by public transport, providing that a good living environment is maintained:

"Planning should...."

- *encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that is not of high environmental value;*
- *actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable."* (NPPF, para. 17)

6.4 In planning for new housing development, the Government supports the above objectives seeking to ensure that Local Authorities:

"Housing applications should be considered in the context of the presumption in favour of sustainable development." (NPPF, para. 49)

6.5 The importance of windfall sites and future housing supply from the re-use of previously developed land is central to the policy guidance, as detailed in paragraphs 17 and 48 and of the NPPF, and supports the basis of the application scheme.

6.6 In terms of seeking good design, the NPPF states that:

"The Government attaches great importance to the design of the built environment. Good design is a key aspect of sustainable development, it is invisible from good planning, and should contribute positively to making places better for people." (NPPF, para 56)

"It is important to plan positively for the achievement of high quality and inclusive design for all development, including individual buildings." (NPPF, para 57)

6.7 Emphasising the importance of achieving good design it is stated that when making planning decisions:

"Permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions." (NPPF, para 64)

Further Alterations to the London Plan (2015)

6.8 The London Plan is the overall strategic plan for London, setting out an integrated economic, environmental, transport and social framework for development over the plan period from its adoption.

6.9 With regard to **Housing Need** Table 3.1 of the London Plan stipulates that the annual monitoring target for housing completions across London as a whole from 2015 to 2025 is 42,389 dwellings per year. Of these, it is expected that **559** dwellings are required annually within Hillingdon, over the same period.

6.10 In light of the projected higher need, the FALP indicates this figure should be regarded as a minimum and therefore should be exceeded where possible. Increases to Hillingdon's minimum housing target figures demonstrates there is a significantly increased demand and required additional capacity in urban areas to accommodate residential growth.

6.11 London Plan **Policy 3.4** sets out the **density** requirements for new residential development within London Boroughs within **Table 3.2**. In suburban areas with a PTAL rating of 2-3, it is suggested that a scheme should fall within the density range of 35-95 dwellings per hectare.

6.12 This 25 unit application scheme represents a density of 71dph, entirely in accordance with this density range and the site's high PTAL rating of 2.

- 6.13 **Policy 3.5** endorses a range of minimum unit sizes for new residential development in London, with details set out in **Table 3.3**. The relevant minimum standards, to which all units within the scheme accord, are:
- Flat: 1 bed 2 person = 50sqm
 - Flat: 2 bed 3 person = 61sqm
 - Flat: 2 bed 4 person = 70sqm
- 6.14 In ensuring a range of housing choice is provided to residents, **Policy 3.8** states that new developments should offer a range of choices. It is considered that the proposal provides appropriate unit sizes in compliance with FALP minimum standards given the site's accessible location.
- 6.15 In respect of **car parking**, the London Plan **Policy 6.1** encourages development that reduces the need to travel by car, with **Matrix 1 and Matrix 2** of the Housing SPG stating that for PTAL 2 to 4 in a suburban location' up to 1.5 car parking spaces are required per unit. The proposed scheme achieves a car parking ratio of approximately 1.6 spaces per unit in line with this policy.
- 6.16 **Policy 7.1** relates to '**Building London's Neighbourhoods and Communities**' and requires development to be designed so that *'the layout, tenure and mix of uses interface with surrounding land and improve people's access to social and community infrastructure (including green spaces), the Blue Ribbon Network, local shops, employment opportunities, commercial services and public transport.'* The proposal would provide additional residential accommodation of an appropriate layout and appropriate mix of units in a sustainable location, close to public transport and local shops and services, fully in accordance with policy 7.1 of the London Plan.
- 6.17 London Plan **Policy 7.4** relates to '**Local Character**' and states proposals should provide a high quality design response that in particular *'has regard to the pattern and grain of the existing spaces and streets in orientation, scale, proportion and mass.'* The policy also seeks to ensure development *'is human in scale, ensuring buildings create a positive relationship with street level activity and people feel comfortable with their surroundings.'*
- 6.18 In this case, the proposed development has been designed to ensure that the pattern, scale and height of the development complements both the flatted schemes and houses in the proximity.

6.19 **Policy 7.6** relates to **good design**, stating that architecture should make a positive contribution and incorporate high quality materials and overall design. Buildings and structures should:

- *"Be of the highest architectural quality;*
- *Be of a proportion, composition, scale and orientation that enhances, activates and appropriately defines the public realm;*
- *Comprise details and materials that complement, not necessarily replicate, the local architectural character;*
- *Not cause unacceptable harm to the amenity of surrounding land and buildings, particularly residential buildings, in relation to privacy, overshadowing, wind and microclimate;*
- *Provide high quality indoor and outdoor spaces and integrate well with the surrounding streets and open spaces;*
- *Be adaptable to different activities and land uses;*
- *Meet the principles of inclusive design; and*
- *Optimise the potential of sites."*

London Plan, Housing Supplementary Planning Guidance

6.20 The London Plan, **Housing Supplementary Planning Guidance** (November 2012) is also a material consideration and is cited within Harrow's Development Management Policies document. The document contains a raft of design guidance in relation to housing developments, particularly in regard to:

- Minimum internal floor areas (Policy 3.5, see paragraph 6.13);
- Minimum amenity space standards;
 - A minimum of 5sqm of private outdoor space should be provided for 1-2 person dwellings and extra 1sqm should be provided for each additional occupant;
- Maximum car parking standards (Policy 6.1, see paragraph 6.15).

Hillingdon Local Plan: Part 1 – Strategic Policies

6.21 Policy **H1** Housing Growth sets housing delivery targets for the borough. This includes an annual target of 425 dwellings per year; rolled forward for the plan period to 2026 this equates to a minimum provision of 6,375 dwellings.

6.22 Affordable housing provision is outlined in Policy **H2**. For sites with a capacity of 10 or more units the Council will seek to ensure that the affordable housing mix reflects housing needs in the borough, particularly the need for larger family units. A viability study will be required for proposals with an under-provision of affordable housing.

6.23 Policy **BE1** relates to the Built Environment and requires all new development to improve and maintain the quality of the built environment in order to create successful and sustainable neighbourhoods, where people enjoy living and working and that serve the long-term needs of all residents. It states the criteria that all new developments should meet. The most relevant to this application are:

- *"Achieve a high quality of design in all new buildings, alterations, extensions and the public realm which enhances the local distinctiveness of the area, contributes to community cohesion and a sense of place;*
- *Be designed to be appropriate to the identity and context of Hillingdon's buildings, townscapes, landscapes and views, and make a positive contribution to the local area in terms of layout, form, scale and materials and seek to protect the amenity of surrounding land and buildings, particularly residential properties;*
- *Be designed to include "Lifetime Homes" principles so that they can be readily adapted to meet the needs of those with disabilities and the elderly, 10% of these should be wheelchair accessible or easily adaptable to wheelchair accessibility encouraging places of work and leisure, streets, neighbourhoods, parks and open spaces to be designed to meet the needs of the community at all stages of people's lives;*
- *Improve areas of poorer environmental quality. All regeneration schemes should ensure that they are appropriate to their historic context, make use of heritage assets and reinforce their significance;*
- *Improve the quality of the public realm and provide for public and private spaces that are attractive, safe, functional, diverse, sustainable, accessible to all, respect the local character and landscape, integrate with the development, enhance and protect biodiversity through the inclusion of living walls, roofs and areas for wildlife, encourage physical activity and where appropriate introduce public art;*
- *Maximise the opportunities for all new homes to contribute to tackling and adapting to climate change and reducing emissions of local air quality pollutants."*

Hillingdon Local Plan: Part 2 – Development Management Policies (2015)

6.24 Policy **DMH1: Safeguarding Existing Housing** protects against the net loss of existing self-contained housing, and states that it will be resisted unless the housing is replaced with at least equivalent residential floorspace.

6.25 Housing mix is covered by Policy **DMH2** with the Council requiring the provision of a mix of housing units of different sizes in schemes of residential development.

- 6.26 Policy **DMH4** states that residential redevelopment of dwellings into new blocks of flats will only be permitted where:
- it is on a residential street where the proposal will not result in more than 10% of properties being redeveloped into flats;
 - on residential streets longer than 1km the proposed redevelopment site should be taken as the midpoint of a 1km length of road.
- 6.27 Policy **DMH7** on affordable housing states that developments with a capacity to provide 10 or more units will be required to maximise the delivery of on-site affordable housing. Subject to a viability and if appropriate in all circumstances, a minimum of 35% of all new homes should be delivered as affordable housing, with the tenure split (70% Social/Affordable Rent and 30% Intermediate). Affordable housing should be built to the same standards and should share the same level of amenity as private housing.
- 6.28 Policy **DMHB11** outlines details regarding the design of new development stating that all development will be required to be designed to the highest standards and, incorporate principles of good design including:
- 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;
 - Architectural composition and quality of detailing;
 - Local topography, views both from and to the site; and
 - Impact on neighbouring open spaces and their environment.
 - Ensuring the use of high quality building materials and finishes:
 - Ensuring that the internal design and layout of development maximises sustainability and is adaptable to different activities;
 - 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
 - Landscaping and tree planting to protect and enhance amenity, biodiversity and green infrastructure.
- 6.29 Policy **DMHB14** on trees and landscaping outlines that all development will be expected to retain or enhance existing landscaping, trees, biodiversity or other natural features of merit.

- 6.30 Policy **DMHB16 Housing Standards** states that all new housing developments should have an adequate provision of internal space in order to provide an appropriate living environment. This includes meeting internal space standards and providing at least 10% of new housing to be accessible or easily adaptable for wheelchair users.
- 6.31 Policy **DMHB17** sets out residential density standards as in the table below. In area such as this with a suburban character a flatted scheme should have a density of 50-75 units per hectare. In line with this policy the scheme has a density of 71dph.
- 6.32 Policy **DMHB 18** on private outdoor amenity space states that all new residential development will be required to provide good quality and useable private outdoor amenity space.
- 6.33 Details on open spaces in new development is provided in Policy **DMCI4**. Proposals for major new residential development will be supported where there is a provision for new open space, or enhancements to existing open space. Proposals for major new residential development that fail to make provision for new or enhanced open space, or which result in inappropriate open space will be resisted.
- 6.34 Policy **DMCI7** states that to ensure development is sustainable, planning permission will only be granted for development that clearly demonstrates there will be sufficient infrastructure of all types to support it. The will be addressed predominantly through the Community Infrastructure Levy (CIL).
- 6.35 As set out in Policy **DMT6** development proposals for flatted schemes must comply with the parking standards as set out below.
- 3 – 4 or more bedrooms = 2 spaces per unit;
 - 1 – 2 bedrooms = 1.5 – 1 spaces per unit; and
 - Studio = 1 space per 2 units.

Hillingdon Design and Accessibility Statement SPD

- 6.36 The Hillingdon Design and Accessibility Statement SPD seeks to provide guidance for new development in the borough, providing comprehensive guidance on residential development.
- 6.37 Most relevant to the proposal is guidance on new residential layouts and public realm. The proposed development is fully in compliance as it responds to the specific setting and location of the site, would enhance and contribute positively to the appearance and character of the area, and the units would achieve a good standard of environment for future occupants.
- 6.38 Paragraphs 4.17 to 4.22 detail the guidelines for garden amenity space provision for new flats. Studio and 1 bedroom flats should have 20sqm per unit of shared amenity space, 2 bedroom flats should have 25sqm per unit and 3 bedroom flats should have a provision of 30sqm per flat. Private balconies count towards this provision.

7. PLANNING JUSTIFICATION

- 7.1 This section sets out the planning justification for the merits of the application proposal, addressing the proposed apartment building that provides a high quality residential development on a prominent location on Rickmansworth Road which is in compliance with planning policy and relevant material considerations.

Principle of Development

- 7.2 The NPPF and Hillingdon's planning policy support the provision of residential accommodation in appropriate locations. Paragraph 49 of the NPPF is relevant and a primary objective of national planning policy is to require housing applications to be considered in the presumption in favour of sustainable development. The principle of residential development in accessible locations such as this site is therefore fully supported in policy terms.
- 7.3 Hillingdon Council's written pre-application response (Appendix 1) states the following regarding land use principle;

"The development is considered an acceptable reuse of a brownfield site and would represent an increase in residential accommodation, in accordance with the NPPF and Policy H3 of the Hillingdon Local Plan (November 2012). Therefore the development is considered acceptable in principle." (Appendix 1, Page 4)

- 7.4 The proposed residential redevelopment to provide a modern apartment building is an entirely appropriate form of development for the site, supported by the NPPF, the London Plan and Hillingdon local policy. The principle of residential development on the site has been found to be acceptable as outlined in paragraph 7.3.
- 7.5 As set out in the FALP (2015) Hillingdon Borough's annual housing target is 559 dwellings per annum. The provision of 25 additional residential units would contribute towards meeting these proposed development targets, fully in accordance with the sustainable development principles set out in the NPPF in relation to housing.
- 7.6 In line with Policy DMH4 taken from Hillingdon's emerging Local Plan Part 2 document, an assessment of Rickmansworth Road has been undertaken to determine the proportion of flatted development on the road.
- 7.7 As Rickmansworth Road is over 1km in length the redevelopment site has been taken as the midpoint of a 1km distance (see figure 9). The assessment has found that in the region of 5% of the road would remain in the form of flats with the proposed development taking place. As such, Rickmansworth Road would remain predominantly as housing in line with Policy DMH4
- 7.8 It should also be noted that Policy DMH4 should be given limited weight as the policy is taken from the emerging Local Plan Part 2 which is yet to be formally adopted.

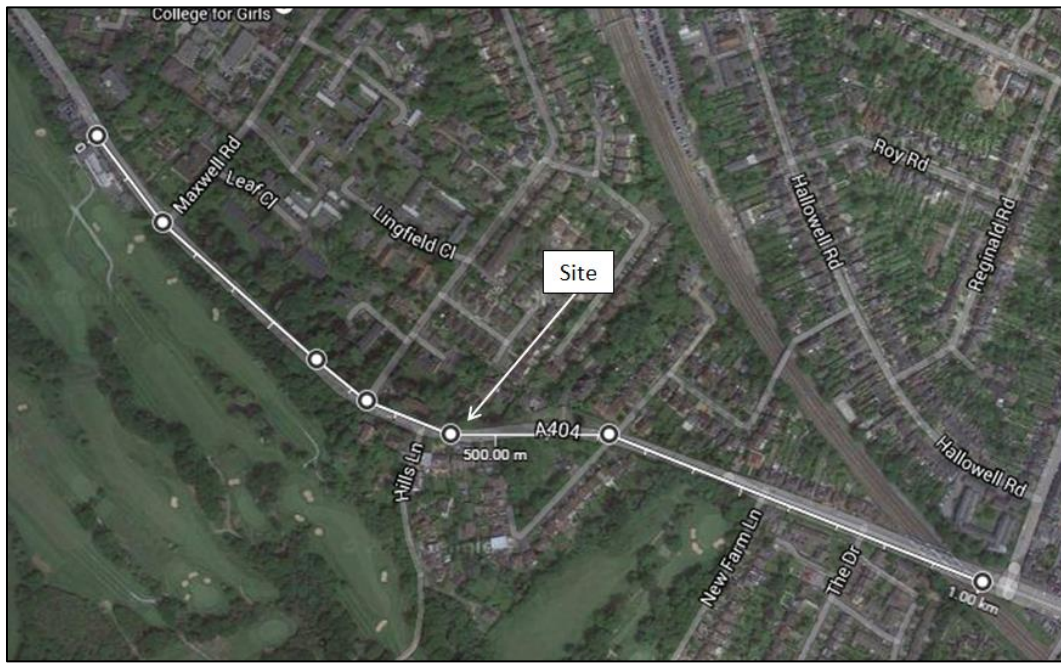


Figure 9: Area of Rickmansworth Road Policy DMH4 Assessment

Scale

- 7.9 The proposal is for a part 2, part 3 storey building with accommodation in the roof comprising 25 apartments. The height of the development is deemed appropriate within the context of the surrounding development, including 34 Rickmansworth Road to the east and development to the north and west as well as the topography of the area (Figure 10).
- 7.10 The proposed apartment building is made up of 3 linked blocks that are designed to appear as 3 large houses in the streetscene. This helps add variation to the roofline of the building and helps to reduce the bulk of the roof in comparison to the previous submission scheme. The building steps down to the right hand side towards No. 34 Rickmansworth Road.
- 7.11 Although the proposed apartment block is taller than the existing dwellings it remains in keeping with the scale of flatted developments in the proximity as well as the adjacent dwellinghouses. The proposed development will make the best use of this previously developed site, whilst complementing the quality of development in the area.



Figure 10: Comparative Elevations (Upper image previous scheme withdrawn, lower image current submission)

Layout

- 7.12 Four apartments are located at ground floor level (Figure 11), one of which is a wheelchair accessible unit. These units front onto the landscaped area at the front of the building. Cycle and bin stores are also located at ground floor level along with stairwells and liftcore. An undercroft car parking area is located to the rear of the building and additional disabled car parking spaces are located to the front of the building providing better access to the building for disabled users. Further landscaped amenity space is located above the undercroft car park

- 7.13 Nine apartments are located on the first floor of the building, with the apartments to the rear provided with Juliet balconies. A further nine apartments are located at second floor level with units 14 and 15 being 3 bedroom duplex units going up to third floor level. An additional 3 units are located in the roofspace on the third floor.



Figure 11: Proposed Ground Floor Plan

Density

- 7.14 The proposal is for 25 apartments, providing a residential density of 71 dwellings per hectare (dph) for the scheme. In a suburban location with a PTAL rating of 2, it is suggested that a scheme with this mix of units should fall within the density range of 35-95dph, as set out in the London Plan Policy 3.4 (Table 3.2). With a density of 71dph the scheme falls well within the suggested range and is also lower than that of the previously submitted scheme that had a density of 83dph.

Mix of Units

- 7.15 The scheme would deliver a range of 14 x 1 bedroom, 8 x 2 bedroom and 3 x 3 bedroom apartments which are appropriate to this location. This includes three wheelchair accessible units. The mix represents a more balanced mix of accommodation in comparison to the previously submitted scheme where there were solely 1 and 2 bedroom units. The inclusion of 3 bedroom units is more suitable for families.

Unit Orientation

- 7.16 Units have been designed to be predominantly dual aspect. All habitable rooms will have at least one clear glazed openable window, or door, providing future residents with a good standard of accommodation and outlook.

External Amenity Areas & Landscaping

- 7.17 The scheme provides large communal amenity and landscaped areas to the front and rear of the proposed apartment building. The amenity space to the rear is located on a podium above the undercroft car parking area. A further landscaped area is located to the front of the building.
- 7.18 The landscaped areas include existing trees along with additional shrub and tree planting and grassed areas. A policy compliant provision of amenity space is included in the proposals.

Affordable Housing

- 7.19 No affordable housing is proposed as a part of this residential scheme. An affordable housing viability has been undertaken by Turner Morum LLP in line with Hillingdon planning policy which has found that the scheme would be unviable if affordable housing was included as a part of proposals.

Design

- 7.20 WAM Architecture the appointed architect for the scheme have designed a scheme that *"reads as a series of connected separate buildings, which although they share common details are in fact not one single mass. The proposed building has steps both in plan and elevations which create a strong sense of articulation. There are projecting gable elements which create deliberate verticality and balanced fenestration."* WAM's Design & Access Statement goes on to state:

"The overall design approach takes reference from Queen Anne details. There is a strong eaves detail which subtly simplified on the lower elements of the building. The yellow brickwork is broken up by corbelling and quoining emphasising elements of the façade. There is a simple stone dressing around the window openings. All these features work to break up the façade and create interest which softens the mass".

Sustainability

- 7.21 In accordance with the Government's national agenda on climate change and commitment to renewable energy and pollution control, set out in the NPPF, The London Plan and Hillingdon's Local Plan this scheme meets the requirements for sustainable development and energy efficient buildings.
- 7.22 Sustainability and sustainable design through the efficient use of land and construction resources are central objectives of the NPPF and the London Plan. The proposed development would provide a modern building that is sustainable and energy efficient. Environmental considerations and sustainability have been central to the design process and accordingly the development seeks to maximise environmental performance of the

new building in future though CO2 savings as set out in the Energy Statement.

7.23 An Energy Statement has been commissioned to accompany the planning application. This has been carried out by Bluesky Unlimited as part of a comprehensive analysis of available opportunities to reduce carbon dioxide emissions and energy consumption of the proposed development. The statement concludes the following:

"It is proposed to enhance the fabric insulation standards of the apartments above the minimum required by Building Regulations. In addition it is proposed to install a photovoltaic array of 15.kW on the roof of the building. This location will not detrimentally impact on the aesthetics of the development.

The reductions in emissions can be summarised as follows:

	Total Emissions	% Reduction
	kg CO ₂ per year	
Baseline (Building Regulations TER)	29,214	-
Emissions - after energy efficiency	26,400	9.63%
Be Green - after efficiency and LZCs	18,927	35.21%
Reduction from renewables	7,473	28.31% (of DER)

Transport, Accessibility, Parking and Servicing

7.24 Highways issues have been given special consideration as they have been one of the reasons for the refusals for the previous applications. Dermot McCaffery was appointed to provide advice on highway matters for the proposed development has written a Transport Statement to accompany the original planning application.

7.25 Dermot McCaffery's Transport Statement concluded the following:

"The site is within a residential area with good access to local facilities. There is an existing access to Rickmansworth Road that serves 3 dwellings.

The proposed development has been the subject of pre-application discussions and these have informed the highways aspects of the scheme. The proposed access will accommodate the car and delivery vehicle traffic movements that will be generated. Visibility for merging drivers complies with the relevant standards for the recorded vehicle speeds on Rickmansworth Road.

The site layout will enable refuse vehicles to enter the site, manoeuvre and leave in forward gear. This is a safer arrangement than the existing which relies on all servicing to take place from the Rickmansworth Road carriageway.

The development will include car and cycle parking in accordance with the adopted parking standards. This includes spaces for disabled drivers and visitors.

In summary, the proposed development complies with the Council's standards and best practice highway design standards and will not result in an adverse impact to the safety of highway users."

- 7.26 The following feedback was received from Hillingdon highways officers regarding the March 2016 planning application outlining ongoing highways issues relating to the proposed scheme:

"In order to determine the appropriate sight lines to the west speed surveys were carried out on two days. The Council's highway engineer in his pre-application advice had requested a week's survey but these were not provided. The given surveys are now over two years old and there is uncertainty about their reliability at this moment in time.

...The pre-application advice was to provide a right turn lane in Rickmansworth Road at the site access. This has not been provided. However if the application is for approval this ought to be the subject of a Section 106 for off-site highway works.

The transport statement does not provide any indication of trip generation during peak hours and its impact in terms of queue lengths and additional delays in journey times on an already congested highway network, as such the application fails to demonstrate that the development will not have a detrimental impact on the highway network.

The application as it currently stands cannot be supported on highway grounds"

- 7.27 This resubmission application includes further work carried out by Dermot McCaffery Transport Consultant including a 7 day speed survey as requested and finds the 2.4m x 70m visibility splay to the west to exceed minimum requirements.
- 7.28 Further traffic generation data has been provided that proves that the level of traffic generation from the proposed scheme will not have a material impact on the local road network.

- 7.29 Regarding the requirement for a right hand turn lane Dermot McCaffery concludes the following:

"Given the level of traffic generation I do not consider that the request for a right turn lane is justified. The centre of Rickmansworth Road has been hatched to visually reduce the width of the carriageway as a traffic calming/management feature. To remove this hatching to create a turning lane would be counterproductive. Paragraph 9.4.8 of Manual for Streets 2 advises that careful consideration should be given to NOT provide right turn lanes.

If the highway officer insists that a right turn lane is justified for the proposed development then one can be achieved by removing the central hatching and this is a matter that can be covered by a suitably worded condition. I do not accept that this matter requires a S106 agreement."

- 7.30 It is considered that all highway issues have now been addressed and that we can expect a positive recommendation from the highway officer.

Noise and Vibration

- 7.31 NSL (Noise Solutions Ltd) have been appointed to establish the existing incident noise levels at the facades of the proposed building and undertake a noise impact assessment to determine the sustainability of the development for residential use.
- 7.32 Paragraph 123 of the NPPF states that planning decisions should aim to avoid noise from giving rise to significant adverse impacts on health and quality of life as a result of new development.
- 7.33 The Noise Assessment concludes that;

"The assessment of the suitability of the site for residential development was undertaken in full accordance with the aims and requirements within the National Policy Statement for England (NPSE), the National Planning Policy Framework (NPPF) and the Planning Practice Guidance (PPG).

The assessment has demonstrated that the proposals will not give rise to significant adverse effects on health and quality of life and that adverse effects will be reduced and minimised as a result of the requirements in the various building regulations (i.e. Approved Document F and L) and the layout of the proposed development

The noise impact assessment has demonstrated that incident noise levels at the proposed development should not be viewed as a constraint to development proposals. The assessment also demonstrated that planning conditions relating to noise are also superfluous for this site "

Trees

- 7.34 GHA Trees were instructed to survey the subject trees within and adjacent to the site in order to assess their general condition and to make sure proposals are compliant with planning policy in terms of tree retention and protection.
- 7.35 The proposed scheme requires the removal of a small number of relatively insignificant trees and shrubs, which will not significantly impact the local or wider landscape. The retained trees require protection in accordance with industry best practice and BS 5837: 2012 – Trees in relation to design, demolition and construction – recommendations, in order to ensure their longevity.
- 7.36 The report concludes the following;

"In conclusion, the principal arboricultural features within the site can be retained and adequately protected during development activities. Subject to precautionary measures as detailed above, the proposal will not be injurious to trees to be retained. There will be no appreciable post development pressure, and certainly none that would oblige the council to give consent to inappropriate tree works. New trees and shrubs can be planted following approval from the Local Planning Authority to ensure a sustainable tree stock in the future."

Flood Risk and Drainage

- 7.37 As previously stated the Environment Agency Flood Maps shows that the entire site is within Flood Zone 1 and therefore is deemed to be at low risk of fluvial flooding. The site is under 1ha and therefore under NPPF guidance the proposals are not required to be accompanied by a Flood Risk Assessment.

8. CIL

8.1 On 6th April 2010 the Community Infrastructure Levy (CIL) Regulations came into force which made it unlawful for a planning obligation to be taken into account as a reason for granting planning permission for a development, or any part of a development, whether there is a local CIL in operation or not; if the obligation does not meet all the following tests set out in Regulation 122(2):

- (i) necessary to make the development acceptable in planning terms;
- (ii) directly related to the development;
- (iii) fairly and reasonably related in scale and kind to the development.

8.2 With regard to the Mayoral and Hillingdon CIL payment the application would attract the following payments to contribute to local infrastructure as set out in the relevant Mayoral CIL schedule and Hillingdon's Local CIL schedule which came into force from the 1st August 2014;

- Existing Development (GIA): 553sqm (including outbuildings)
- Proposed Development (GIA): 2,372sqm
- Net Residential Increase: 1,819sqm

1,819sqm x £35 = £63,665 Mayoral CIL Contribution

1,819sqm x £95 = £172,805 Hillingdon CIL Contribution

TOTAL CONTRIBUTION = £236,470

8.3 Following the grant of any planning permission, the applicant will provide the finalised existing GIA footprint area and the GIA of the proposed scheme to the Council's CIL Officer, to confirm the Mayoral and Hillingdon CIL payment applicable for this application scheme payable on implementation of the development.

9. CONCLUSIONS

- 9.1 In conclusion, it is considered that the application scheme fully accords with the latest national planning policy objectives of the NPPF, as well as those at a local level. **The proposed development will make an efficient and positive use of a previously developed site** in this area of suburban character.
- 9.2 The **new residential units will help to deliver an important part of Hillingdon's required housing land supply** of 559 dwellings per annum as detailed in the Further Alterations to the London Plan (FALP) March 2015 and Hillingdon's policy which recognises the importance of previously developed sites in contributing to housing land supply.
- 9.3 The principle of flatted development on this site has been established through the planning history and the site and the flatted form of the proposed development is **entirely consistent and complementary to the prevailing character and appearance of the area in terms of height and scale**. The extensive proposed landscaping would aid in enhancing the character and appearance of the site.
- 9.4 The **high quality appearance and layout** has been evolved in positive and collaborative pre-application consultation with senior officers, who support the scheme. The proposal will ensure that existing and future residential amenities will be fully protected, fully in accordance with BRE guidelines, and that **the visual amenity of the street scene and locality would be significantly improved**. The development will provide a **sustainable building** that meets amenity standards.
- 9.5 Access and car parking concerns raised from previous planning applications have been resolved.
- 9.6 A CIL contribution will be paid to be used on local infrastructure and community facilities.
- 9.7 **Based upon the detailed design and planning assessment justification case in support of the scheme, the applicant contends that the case in support of the redevelopment of this previously developed site is compelling and that the scheme should be supported by Officers and Members, in accordance with the sustainable development, design and housing objectives in the NPPF, the London Plan and adopted local planning policy.**

Appendices