

**DELEGATED DECISION**

- Please select each of the categories that enables this application to be determined under delegated powers  
 - Criteria 1 to 5 or criteria 7 to 9 must be addressed for all categories of application, except for applications for Certificates of Lawfulness, etc.

| <b>APPROVAL RECOMMENDED: GENERAL</b>                 |   | Select an Option         |
|--|---|--------------------------|
| 1.   | No valid planning application objection in the form of a petition of 20 or more signatures, has been received                     | <input type="checkbox"/> |
| 2.   | Application complies with all relevant planning policies and is acceptable on planning grounds                                    | <input type="checkbox"/> |
| 3.   | There is no Committee resolution for the enforcement action   | <input type="checkbox"/> |
| 4.   | There is no effect on listed buildings or their settings  | <input type="checkbox"/> |
| 5.   | The site is not in the Green Belt (but see 11 below)  | <input type="checkbox"/> |
| <b>REFUSAL RECOMMENDED: GENERAL</b>                  |   |                          |
| 6.   | Application is contrary to relevant planning policies/standards   | <input type="checkbox"/> |
| 7.   | No petition of 20 or more signatures has been received  | <input type="checkbox"/> |
| 8.   | Application has not been supported independently by a person/s  | <input type="checkbox"/> |
| 9.   | The site is not in Green Belt (but see 11 below)  | <input type="checkbox"/> |
| <b>RESIDENTIAL DEVELOPMENT</b>                       |   |                          |
| 10.  | Single dwelling or less than 10 dwelling units and/or a site of less than 0.5 ha  | <input type="checkbox"/> |
| 11.  | Householder application in the Green Belt   | <input type="checkbox"/> |
| <b>COMMERCIAL, INDUSTRIAL AND RETAIL DEVELOPMENT</b> |   |                          |
| 12.  | Change of use of retail units on site less than 1 ha or with less than 1000 sq. m other than a change involving a loss of A1 uses | <input type="checkbox"/> |
| 13.  | Refusal of change of use from retail class A1 to any other use  | <input type="checkbox"/> |
| 14.  | Change of use of industrial units on site less than 1 ha or with less than 1000sq.m. of floor space other than to a retail use.   | <input type="checkbox"/> |
| <b>CERTIFICATE OF LAWFULNESS</b>                     |   |                          |
| 15.  | Certificate of Lawfulness (for proposed use or Development)   | <input type="checkbox"/> |
| 16.  | Certificate of Lawfulness (for existing use or Development)   | <input type="checkbox"/> |
| 17.  | Certificate of Appropriate Alternative Development  | <input type="checkbox"/> |
| <b>CERTIFICATE OF LAWFULNESS</b>                     |   |                          |
| 18.  | ADVERTISMENT CONSENT (excluding Hoardings)  | <input type="checkbox"/> |
| 19.  | PRIOR APPROVAL APPLICATION  | <input type="checkbox"/> |
| 20.  | OUT-OF-BOROUGH OBSERVATIONS   | <input type="checkbox"/> |
| 21.  | CIRCULAR 18/84 APPLICATION  | <input type="checkbox"/> |
| 22.  | CORPSEWOOD COVENANT APPLICATION   | <input type="checkbox"/> |
| 23.  | APPROVAL OF DETAILS   | <input type="checkbox"/> |
| 24.  | ANCILLARY PLANNING AGREEMENT (S.106 or S.278) where the Heads of Terms have already received Committee approval                   | <input type="checkbox"/> |
| 25.  | WORKS TO TREES  | <input type="checkbox"/> |
| 26.  | OTHER (please specify)  | <input type="checkbox"/> |

The delegation powers schedule has been changed. Interim Director of Planning, Regeneration & Public Realm can determine this application

Case Officer:

Signature:

Date:

A delegated decision is appropriate and the recommendation, conditions/reasons for refusal and informative's are satisfactory.

Team Manager:

Signature:

Date:

The decision notice for this application can be issued.

Director / Member of Senior Management Team:

Signature:

Date:

NONE OF THE ABOVE DETAILS SHOULD BE USED IN THE PS2 RETURNS ODPM

**Item No.**                      **Report of the Head of Development Management and Building Control**

**Address:**                      11-17 VICTORIA ROAD RUISLIP MANOR

**Development:**                Erection of ground floor rear extension and three storey extension above existing commercial parade to provide 7 residential units (Class C3) (2 x 1-bed, 2 person units, 4 x 2-bed, 3 person units and 1 x 3-bed, 5 person unit)

**LBH Ref Nos:**                **72104/APP/2025/1096**

**Drawing Nos:**                Location Plan  
Design & Access Statement  
Covering Letter  
PLANNING STATEMENT  
Fire Statement  
Drainage documentation  
1117VR-PP1-01  
1117VR-PP1-02  
1117VR-PP1-03  
1117VR-PP1-04  
1117VR-PP1-05  
1117VR-PP1-06  
1117VR-PP1-07  
1117VR-PP1-08

**Date Plans received:**    16-04-25                      **Date(s) of Amendments(s):**

**Date Application valid**    16-04-25

## 1. SUMMARY

The application seeks full planning permission for the erection of a rear ground floor extension and a three-storey vertical extension above the existing single-storey commercial parade at Nos. 11-17 Victoria Road to provide seven self-contained residential units (Use Class C3).

Given the ground floor remains in Use Class E complying with strategic policies that seek to protect the function of main town centres, there is no objection in principle to the proposed residential development.

Whilst there may be scope of a development above the existing units, the proposed development would add a discordant addition to a prominent commercial area failing to appear sympathetic to the street scene and the wider commercial area. Whilst the daylight sunlight report confirms adjoining neighbours would receive sufficient daylight sunlight, the proximity of the development to

the neighbours at 9A Victoria Road would create an increase sense of enclosure and loss of outlook to the detriment of their overall living standards and amenity.

In addition, the application fails to provide an Arboricultural Impact Assessment or Tree Survey in accordance with BS5837:2012 standards to assess the potential impact of the development on the existing tree identified for retention.

It is therefore recommended that the application be refused.

## **2. RECOMMENDATION**

### **REFUSAL for the following reasons:**

#### **1. NON2 Character and appearance**

The proposed development, by reason of its siting, scale, massing, and poor overall design, would result in a discordant and unsympathetic form of development that fails to respect the setting, character, and architectural integrity of the existing and attached building. The proposal is therefore contrary to Policy of the Hillingdon Local Plan: Part One - Strategic Policies (2012); Policies DMHB 11, and DMHB 12 of the Hillingdon Local Plan: Part Two - Development Management Policies (2020); Policies D3 and D4 of the London Plan (2021); and the National Planning Policy Framework (2024).

#### **2. NON2 Impact on Neighbours Amenity**

The proposal, by virtue of its bulk and proximity, would be detrimental to the amenities of the neighbouring occupiers at 9a Victoria Road by reason of loss of outlook and sense of enclosure. The proposal would therefore be contrary to Policy BE1 of the Hillingdon Local Plan: Part One - Strategic Policies (2012), Policy DMHB 11 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020) and the National Planning Policy Framework (2024).

#### **3. NON2 Tree**

The application fails to provide an Arboricultural Impact Assessment or Tree Survey in accordance with BS5837:2012 standards to assess the potential impact of the development on the existing tree identified for retention. In the absence of this information, the proposal has not demonstrated that the development would safeguard the long-term health and structural integrity of the tree or the site's contribution to local green infrastructure. As such, the application fails to demonstrate compliance with Policy G1 of the London Plan (2021), Policy BE1 of the Hillingdon Local Plan: Part One (2012), and Policies DMHB 14 and DMHD 1 of the Hillingdon Local Plan: Part Two (2020).

#### **4. NON2 Non Standard reason for refusal**

The proposed access arrangement to the residential development, located to the rear of the existing street frontage, is considered unacceptable due to concerns relating to the safety and security of future occupants. The access route lacks appropriate levels of natural surveillance and fails to provide a clearly defined, well-lit, and secure approach to the residential units. This creates an environment that may foster crime and antisocial behaviour, to the detriment of residential amenity and community safety. The proposal therefore fails to comply with the principles of "Secured by Design" and is contrary to Policy D11 of the London Plan (2021), Policy DMHB 11 of the Hillingdon Local Plan: Part Two - Development Management Policies (2020), and the guidance set out in the National Planning Policy Framework (2024).

## 5. NON2 Air quality and Obligations

The proposed development is located within the LBH Air Quality Management Area, and within the Ruislip Town Centre Focus Area. No appropriate mitigation was offered by the applicant and therefore the proposed development is contrary to local and regional policies, Policy DMEI 14: Air Quality , London Borough of Hillingdon Air Quality Action Plan and the London Plan, Policy SI1.

## INFORMATIVES

### 1. I52 Compulsory Informative (1)

The decision to REFUSE planning permission has been taken having regard to all relevant planning legislation, regulations, guidance, circulars and Council policies, including The Human Rights Act (1998) (HRA 1998) which makes it unlawful for the Council to act incompatibly with Convention rights, specifically Article 6 (right to a fair hearing); Article 8 (right to respect for private and family life); Article 1 of the First Protocol (protection of property) and Article 14 (prohibition of discrimination).

### 2. I74 Community Infrastructure Levy (CIL) (Refusing Consent)

This is a reminder that Under the terms of the Planning Act 2008 (as amended) and Community Infrastructure Levy Regulations 2010 (as amended), should an application for appeal be allowed, the proposed development would be deemed as 'chargeable development' and therefore liable to pay the London Borough of Hillingdon Community Infrastructure Levy (CIL) and the Mayor of London's Community Infrastructure Levy (CIL). This would be calculated in accordance with the London Borough of Hillingdon CIL Charging Schedule 2014 and the Mayor of London's CIL Charging Schedule 2012.

For more information on CIL matters please visit the planning portal page at:  
[www.planningportal.gov.uk/planning/applications/howtoapply/whattosubmit/cil](http://www.planningportal.gov.uk/planning/applications/howtoapply/whattosubmit/cil)

### I53 Compulsory Informative (2)

The decision to REFUSE planning permission has been taken having regard to the policies and proposals in the Hillingdon Local Plan Part 1 (2012) and Part 2 (2020) set out below, including Supplementary Planning Guidance, and to all relevant material considerations, including The London Plan (2021) and national guidance.

DMCI 7 Planning Obligations and Community Infrastructure Levy

DMEI 10 Water Management, Efficiency and Quality

DMEI 2 Reducing Carbon Emissions

DMEI 9 Management of Flood Risk

DMH 1 Safeguarding Existing Housing

DMH 2 Housing Mix

|            |   |
|------------|---|
| DMHB 11    | Design of New Development   |
| DMHB 12    | Streets and Public Realm  |
| DMHB 14    | Trees and Landscaping   |
| DMHB 16    | Housing Standards   |
| DMHB 17    | Residential Density   |
| DMHB 18    | Private Outdoor Amenity Space   |
| DMT 1      | Managing Transport Impacts  |
| DMT 2      | Highways Impacts  |
| DMT 5      | Pedestrians and Cyclists  |
| DMT 6      | Vehicle Parking   |
| NPPF11 -24 | NPPF11 2024 - Making effective use of land                                      |
| NPPF12 -24 | NPPF12 2024 - Achieving well-designed places                                    |
| NPPF14 -24 | NPPF14 2024 - Meeting the challenge of climate change, flood and coastal change |
| NPPF2 -24  | NPPF2 2024 - Achieving sustainable development                                  |
| NPPF4 -24  | NPPF4 2024 - Decision making  |
| NPPF5 -24  | NPPF5 2024 - Delivering a sufficient supply of homes                            |
| NPPF9 -24  | NPPF9 2024 - Promoting sustainable transport                                    |
| LPP D3     | (2021) Optimising site capacity through the design-led approach                 |
| LPP D4     | (2021) Delivering good design   |
| LPP D5     | (2021) Inclusive design   |
| LPP D6     | (2021) Housing quality and standards  |
| LPP D7     | (2021) Accessible housing   |
| LPP GG2    | (2021) Making the best use of land  |
| LPP GG4    | (2021) Delivering the homes Londoners needs                                     |
| LPP DF1    | (2021) Delivery of the Plan and Planning Obligations                            |
| LPP D12    | (2021) Fire safety  |
| LPP G7     | (2021) Trees and woodlands  |
| LPP H1     | (2021) Increasing housing supply  |

|          |  |
|----------|--|
| LPP H10  | (2021) Housing size mix                    |
| LPP HC1  | (2021) Heritage conservation and growth    |
| LPP SI12 | (2021) Flood risk management               |
| LPP SI13 | (2021) Sustainable drainage                |
| LPP SD6  | (2021) Town centres and high streets       |
| LPP SI2  | (2021) Minimising greenhouse gas emissions |
| LPP T5   | (2021) Cycling                             |
| LPP T6   | (2021) Car parking                         |
| LPP T6.1 | (2021) Residential parking                 |

### 3. CONSIDERATIONS

#### 3.1 Site and Locality

The application site comprises a single-storey parade of four commercial units (Nos. 11-17 Victoria Road) located within the Ruislip Manor Minor Town Centre. The site fronts Victoria Road and features a rear yard accessed via a service road off Park Way. The ground level rises toward the rear, with servicing access provided by staircases within lightwells.

The surrounding area is characterised by mixed-use development, with ground floor commercial uses and residential or commercial units above, typically 2-4 storeys in height. The locally listed Ruislip Manor Station lies immediately to the south. The site is not within a Conservation Area, though the Ruislip Manor Conservation Area lies within 250 metres.

The site has a PTAL rating of 4, indicating good access to public transport, with the underground station and several bus routes nearby. There is no on-site parking, but on-street bays are available along Victoria Road.

#### 3.2 Proposed Scheme

The application seeks full planning permission for the erection of a rear ground floor extension and a three-storey vertical extension above the existing single-storey commercial parade at Nos. 11-17 Victoria Road to provide seven self-contained residential units (Use Class C3).

At ground floor level, a single-storey rear extension is proposed to provide a refuse store, cycle parking for 16 bicycles, and access to the upper residential floors via a new internal staircase and lift core.

Above the extended commercial units, three additional storeys of residential accommodation are proposed, with the third floor set back from the front and side elevations. The development would comprise:

- 2 x 1-bedroom, 2-person flats
- 4 x 2-bedroom, 3-person flats

1 x 3-bedroom, 5-person flat

### 3.3 Relevant Planning History

#### Comment on Planning History

No comment

### 4. Advertisement and Site Notice

4.1 Advertisement Expiry Date: Not applicable

4.2 Site Notice Expiry Date: Not applicable

### 5. Comments on Public Consult

A total of 43 neighbouring properties were consulted by letter on 1 May 2025. The statutory consultation period expired on 23 May 2025.

Three objections were received, along with one additional representation in support of the development, which also raised concerns regarding potential impacts on foundations and flood risk.

The comments received are summarised as follows:

- Concerns regarding impact on the High Street
- Flooding
- Fire engine access concerns
- Tree impact concerns
- Foundations
- Traffic concerns

Ruislip Residents Association:

I am Ruislip Residents Association representative for the Manor parade. The light would be affected if these 'gaps' were filled and the trees showing through north of the station would not be visible which add to the street scene. The necessary works would take some time and scaffolding may affect trade: we have had so much of this in the Manor! The street scene benefits from some of the irregularities in the frontage and with views of the Art Deco nature of the station. I would hope we do not give a repeat of the unsympathetic design of the former Windmill Pub site.

Access Officer:

This proposal for the erection of two additional storeys has been reviewed with reference to London Plan Policy D7. No accessibility concerns are raised subject to the following Conditions attached to any approval: Prior to any works on site above damp proof course level, details of step free access via all points of entry and exit shall be submitted to, and approved in writing, by the Local Planning Authority. The measures implemented as approved shall be retained thereafter. REASON To ensure housing of an inclusive design is achieved and maintained in accordance with Policies D5 and D7 of the London Plan (2021). The dwellings hereby approved shall accord with the requirements of Policy D7 of the London Plan and shall not be occupied until certification of compliance with the technical specifications for an M4(2) dwelling, as set out in Approved

Document M to the Building Regulations (2010) 2015, has been submitted to, and approved in writing, by the Local Planning Authority. All such provisions must remain in place for the life of the building. REASON: To not only allow the Building Control body to require the development to comply with the optional Building Regulations standards, but to also ensure the appropriate quantity and standard of accessible and adaptable housing is constructed and maintained in accordance with policy D7 of the London Plan. The development hereby approved shall accord with London Plan policy D5(B5) and D12(A) to include a minimum of one fire evacuation lift per stair core designed to meet the technical standards set out in BS EN 81-76, BS 9991 and/or BS 9999, with all such provisions remaining in place for the life of the development. REASON: To ensure the development can accommodate robust emergency evacuation procedures, including measure for those who require step-free egress, in accordance with London Plan policy D5 and D12.

Waste Officer:

No comment

Conservation and Design Officer:

Summary

Overall, the current proposal is not supported and in urban design terms does not relate well to the character and context of the area, both in terms of its architectural design and roof form. Concerns are also raised in relation to the proposal access to the flats being from a rear service yard, and in relation the design quality and functionality of the residential accommodation.

Context

The site is located along Victoria Road, within the Ruislip Manor town centre area, and adjoining the Ruislip Manor Station, which provides good links to Uxbridge and Central London. The area has a suburban character with buildings typically 3-4 storeys high.

Recent developments often lack visual appeal, incorporating elements that clash with the area's character, although some positive features like deep window reveals enhance visual quality. The proposed development should draw inspiration from these positive features while avoiding elements that detract from the area's visual integrity.

The adjoining property at 69-83 Park Way and 1-9 Victoria Road is a three-storey mid-20th century shop parade with a red brick facade, stone detailing, and a pitched roof with red tiles and chimney stacks. The new development should understand and replicate or positively interpret these features to maintain visual harmony.

Height, Scale and Massing

The proposed roof extension is in line with the existing adjacent building. The current proposed height is therefore considered to be appropriate to the context.

Roof scape

The proposed roofscape of the building should aim to reflect and build upon the positive local character adjacent to the application site. The proposed roofscape does not achieve this, as it is a series of flat roofs with a lift over run and AOV, which creates an overly complicated and uncharacteristic roof form. A better relationship between the existing and proposed should be created through the use of a more appropriate pitched roof form, which would provide better visual balance to the street.

Elevational Treatment and Architectural Detailing

The current proposal raises concerns in regard to the appearance and aesthetics of the building and its impact/ relationship with the street and character of the area disrupting somewhat the visual harmony of the context.

The current proposal needs to incorporate architectural detailing from the neighbouring building to make sure a visual coherence is kept within the street. The street elevation currently does not keep the same proportions and rhythm as the adjacent building which, despite its height, has a strong vertical rhythm created by its architectural detailing through features such as regular, narrow grouped windows and stone quoining. The current proposed facade introduces more horizontality into the street scene which creates a confused architecture making the building look fragmented rather than balanced. The proposed window openings also lack a clear sense of order or grouping, comprising a series of different window sizes and shapes.

#### Balconies and terraces

The amenity space proposed within the scheme is in the form of external balconies and terraces with glazed balustrades. These elements are considered incongruous to the existing building and its context. Victoria Road is a busy road so the provision of the first floor terraces is not supported as it is considered that in this form, the amenity space is less likely to be used. Inset balconies are considered to work better in this current context providing better screening from traffic, noise and pollution.

#### Internal layout and Residential Access

Significant concerns are raised in relation to the proposed access to the new residential units being from the rear of the site rather than Victoria Road. The current rear of the building has the character of a service yard, being dominated by parking and business such as the neighbouring motorbike and car tyre businesses, meaning it would not be a safe or attractive route for pedestrians. It is recommended that the scheme is changed to create a new residential access from Victoria Road, which would be far more legible, safe and functional. This would require the loss of a relatively small area of commercial floorspace, but there would still be sufficient space for commercial units. The proposed units are in accordance with NDSS in terms of their size, but two of the units are not dual aspect as defined in Appendix 3 of the Mayor of London Housing Design Standards LPG, as they only have a very short side return elevation, raising issues around overheating and a lack of through ventilation. Flat 5 also lacks external amenity space as required by planning policy.

#### Highways:

##### Site Characteristics & Background

This low rise commercial 'block' is located within Ruislip district town centre and fronts Victoria Road. The surroundings consist of a mix of commercial and residential uses and the site is in proximity to Ruislip Manor LU Station and a number of bus routes. Despite this fact, the site exhibits a public transport accessibility level (PTAL) of 4. It is however noted that in practice, the 'real world' PTAL can be considered somewhat higher than numerically depicted due to the proximity of the train station and a plethora of local bus routes serving the locality. The address is located within a 'Stop & Shop' daytime controlled parking zone (CPZ) consisting of 'Pay & Display' facilities operating from Monday to Saturday - 8am to 6.30pm but is devoid of residential 'specific' on-street provisions. It is proposed to provide 3 additional storeys to facilitate 7 residential units comprising of 2x1, 4x2 & 1x3 bedrooms. The site is to remain 'car-free' with servicing occurring on the frontage.

##### Parking Provision

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

London Plan (2021): Policy T6.1 (Residential Parking) requires that new residential development should not exceed the maximum parking standards as set out in table 10.3.

The maximum parking requirement for the residential units as proposed equates to a total of up to

3-5 spaces in compliance with the overriding regional plan. The proposal is presented as 'car-free'. The regional standard only recommends 'car-free' provision where a site registers a PTAL level of 5 or higher which is not the case for this particular address. However, it is acknowledged that the site envelope is located essentially adjacent to Ruislip Manor LU station which indicates a potential anomaly in the PTAL calculation (4) suggesting a higher rating.

Therefore, in this case, any apparent 'shortfall' in parking is not considered potentially problematic and it is anticipated that if a refusal reason based on insufficient on-plot parking were to be applied and thereafter appealed, it is highly unlikely to be supported by the Planning Inspectorate given the relatively high 'real-world' PTAL in the first instance and the physical limitations of convenient alternative availability of 'free of charge' parking areas in the vicinity that could serve as an alternative. The Highway Authority therefore advises that no objection is raised to the absence of on-plot parking.

#### Cycle Parking

In terms of cycle parking, the level proposed on the ground floor to the rear of the premises (16 secure and accessible spaces) is considered to standard in terms of quantum and positioning.

#### Vehicular Trip Generation

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

Given the 'car-free' status and physical parking constraints on the local highway network, the proposal does not give rise for concern, as it would be anticipated that any traffic imposition can be absorbed within the local road network without notable detriment to traffic congestion and road safety.

#### Servicing Arrangements

##### Residential- Waste Collection

In the case of waste management, collection distances between a designated bin store and a refuse vehicle should not exceed 10m in order to accord with the council's waste collection standard with carrying distances from each residential unit not exceeding a distance of 30m to the store.

A store is to be located within a rear extension with vehicular access proposed to be taken from the shared service area to the rear of the build. However, the rear service area appears to be physically constrained resulting in potential difficulty of access for refuse vehicles hence a full waste collection strategy should be secured via condition and the council's waste collection service may also wish to comment further on this aspect.

#### Construction Management Plan (CMP)

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

#### Conclusion

The application has been reviewed by the Highway Authority who are satisfied that the proposal would not discernibly exacerbate congestion or parking stress, and would not raise any measurable highway safety concerns, in accordance with Local Plan: Part 2 Development Management Policies (2020) - Policy DMT 1, DMT 2 & DMT 6 and Policies T4, T5 and T6 of the London Plan (2021).

Thames Water:

Waste Comments: The proposed development is located within 15 metres of a strategic sewer. Thames Water requests the following condition to be added to any planning permission. "No piling shall take place until a PILING METHOD STATEMENT (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface sewerage infrastructure, and the programme for the works) and piling layout plan including all Thames Water wastewater assets, the local topography and clearance between the face of the pile to the face of a pipe has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement and piling layout plan. Reason: The proposed works will be in close proximity to underground sewerage utility infrastructure. Piling has the potential to significantly impact / cause failure of local underground sewerage utility infrastructure. Please read our guide 'working near our assets' to ensure your workings will be in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures.

<https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes> Should you require further information please contact Thames Water. Email: [developer.services@thameswater.co.uk](mailto:developer.services@thameswater.co.uk) Phone: 0800 009 3921 (Monday to Friday, 8am to 5pm) Write to: Thames Water Developer Services, Clearwater Court, Vastern Road, Reading, Berkshire RG1 8DB

Public sewers are crossing or close to your development. Build over agreements are required for any building works within 3 metres of a public sewer and, or within 1 metre of a public lateral drain. This is to prevent damage to the sewer network and ensures we have suitable and safe access to carry out maintenance and repairs. Please refer to our guide on working near or diverting our pipes: <https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes> Please ensure to apply to determine if a build over agreement will be granted.

We would expect the developer to demonstrate what measures will be undertaken to minimise groundwater discharges into the public sewer. Groundwater discharges typically result from construction site dewatering, deep excavations, basement infiltration, borehole installation, testing and site remediation. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. Should the Local Planning Authority be minded to approve the planning application, Thames Water would like the following informative attached to the planning permission: "A Groundwater Risk Management Permit from Thames Water will be required for discharging groundwater into a public sewer. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures he will undertake to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 020 3577 9483 or by emailing [trade.effluent@thameswater.co.uk](mailto:trade.effluent@thameswater.co.uk). Application forms should be completed on line via [www.thameswater.co.uk](http://www.thameswater.co.uk). Please refer to the Wholesale; Business customers; Groundwater discharges section.

With regard to SURFACE WATER drainage, Thames Water would advise that if the developer follows the sequential approach to the disposal of surface water we would have no objection. Management of surface water from new developments should follow Policy SI 13 Sustainable drainage of the London Plan 2021. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required. Should you require further information please refer to our website. <https://www.thameswater.co.uk/help/home-improvements/how-to-connect-to-a-sewer/sewer-connection-design>

Thames Water would advise that with regard to WASTE WATER NETWORK and SEWAGE TREATMENT WORKS infrastructure capacity, we would not have any objection to the above planning application, based on the information provided.

**Water Comments:**

Water Comments:With regard to water supply, this comes within the area covered by the Affinity Water Company. For your information the address to write to is - Affinity Water Company The Hub, Tamblin Way, Hatfield, Herts, AL10 9EZ - Tel - 0845 782 3333.

**Supplementary Comments:**

Please submit a foundation/piling layout plan clearly indicating the locations of all foundation/piles to be installed on the development site along with the building footprint. This plan should show the positions of the foundation/piles in relation to Thames Water sewers and local topography such as roads (please include road names), existing buildings and/or any other notable features. Thames Water require drawings indicating the location of all piling/foundations and the clearance between the face of your piles to the face of our pipe. If any basements intended to be constructed as part of the development, please clearly indicate the location, footprint and depth. Without these drawings and cross-sectional details Thames Water will not be able to review your proposals and discharge the requested planning condition.

The Developer is also requested to confirm whether they have been in touch with Thames Water to discuss or arrange for the abandonment of any existing assets beneath the development site. Please give a short summary of any correspondence to date and any references they have been provided.

Plans of Thames Water apparatus can be obtained through our website at [www.thameswater-propertysearches.co.uk](http://www.thameswater-propertysearches.co.uk). Please use the following reference in all future correspondence: DTS 79030

## 6. Local Plan Designation and London Plan

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

**Part 1 Policies:**

PT1.BE1 (2012) Built Environment

**Part 2 Policies:**

|         |  |
|---------|--|
| DMCI 7  | Planning Obligations and Community Infrastructure Levy |
| DMEI 10 | Water Management, Efficiency and Quality               |
| DMEI 2  | Reducing Carbon Emissions                              |
| DMEI 9  | Management of Flood Risk                               |
| DMH 1   | Safeguarding Existing Housing                          |

|            |   |
|------------|---|
| DMH 2      | Housing Mix   |
| DMHB 11    | Design of New Development   |
| DMHB 12    | Streets and Public Realm  |
| DMHB 14    | Trees and Landscaping   |
| DMHB 16    | Housing Standards   |
| DMHB 17    | Residential Density   |
| DMHB 18    | Private Outdoor Amenity Space   |
| DMT 1      | Managing Transport Impacts  |
| DMT 2      | Highways Impacts  |
| DMT 5      | Pedestrians and Cyclists  |
| DMT 6      | Vehicle Parking   |
| NPPF11 -24 | NPPF11 2024 - Making effective use of land                                      |
| NPPF12 -24 | NPPF12 2024 - Achieving well-designed places                                    |
| NPPF14 -24 | NPPF14 2024 - Meeting the challenge of climate change, flood and coastal change |
| NPPF2 -24  | NPPF2 2024 - Achieving sustainable development                                  |
| NPPF4 -24  | NPPF4 2024 - Decision making  |
| NPPF5 -24  | NPPF5 2024 - Delivering a sufficient supply of homes                            |
| NPPF9 -24  | NPPF9 2024 - Promoting sustainable transport                                    |
| LPP D3     | (2021) Optimising site capacity through the design-led approach                 |
| LPP D4     | (2021) Delivering good design   |
| LPP D5     | (2021) Inclusive design   |
| LPP D6     | (2021) Housing quality and standards  |
| LPP D7     | (2021) Accessible housing   |
| LPP GG2    | (2021) Making the best use of land  |
| LPP GG4    | (2021) Delivering the homes Londoners needs                                     |
| LPP DF1    | (2021) Delivery of the Plan and Planning Obligations                            |
| LPP D12    | (2021) Fire safety  |
| LPP G7     | (2021) Trees and woodlands  |
| LPP H1     | (2021) Increasing housing supply  |
| LPP H10    | (2021) Housing size mix   |
| LPP HC1    | (2021) Heritage conservation and growth   |
| LPP SI12   | (2021) Flood risk management  |
| LPP SI13   | (2021) Sustainable drainage   |
| LPP SD6    | (2021) Town centres and high streets  |
| LPP SI2    | (2021) Minimising greenhouse gas emissions                                      |
| LPP T5     | (2021) Cycling  |
| LPP T6     | (2021) Car parking  |
| LPP T6.1   | (2021) Residential parking  |

In addition:                      Development Plan:

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

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

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

Material Considerations:

The National Planning Policy Framework (NPPF) (2024) is also a material consideration in planning decisions, as well as relevant supplementary planning documents and guidance.

## **7. MAIN PLANNING ISSUES**

### **7.1 Impact on the amenities of the occupiers of neighbouring residential properties**

Policy DMHB 11 of the Hillingdon Local Plan: Part Two - Development Management Policies (2020) states that development proposals should not result in the loss of outlook, privacy or daylight/sunlight to adjacent properties.

Paragraph 5.38 of the Local Plan further clarifies that a minimum separation distance of 21 metres between facing habitable room windows is required to maintain reasonable levels of privacy and prevent overlooking.

#### **Daylight, Sunlight and Outlook**

A Daylight and Sunlight Assessment (prepared by Fortress Assessments) has been submitted in support of the application. The report concludes that the proposal would not result in a reduction of the Vertical Sky Component (VSC) to 7-9 Victoria Road and that all habitable rooms within the proposed development would meet or exceed the BRE 2022 daylight standards. It also states that internal layouts and window placements have been strategically designed to optimise internal daylight and sunlight, contributing to visual comfort and energy efficiency.

While the BRE compliance findings are noted, this does not address concerns related to outlook, privacy, and perceived enclosure. It is noted that the terrace of Flat 1 extends into the 45 degree sight lines which would likely compromise the outlook of bedroom of 9a due to a 1.7m privacy screen which would be secured by condition to protect the privacy of 9a. This would have a detrimental impact on this neighbour's overall standard of accommodation to this nearest bedroom window of this neighbouring property. As this window represents the sole outlook to the rear of this neighbouring flat, ensuring it maintains sufficient outlook and openness would be imperative to ensure their future amenity is protected. Given the requirement for screening to protect the

neighbours amenity from overlooking, this would therefore cause harm to this neighbours amenity through an increase sense of enclosure and loss of outlook.

#### Noise, Activity and Disturbance

The development site is located within a dense commercial and residential area. The additional homes would not lead to any increase in people movements that would be out of character or harmful to residents enough to warrant refusal of the application. If the application is approved, a condition has been recommended to ensure that the construction process is managed in a manner which limits the developments impact on neighbours. Whilst the comments raised by the objections regarding waste and cycle storage are noted, the impact in terms of noise and disturbance from the use of these facilities and the lift would not cause significant noise over and above what would be expected from a residential building.

#### Conclusion

While the submitted Daylight and Sunlight Report demonstrates compliance with BRE guidance in terms of light levels, the proposal by would result in an unacceptable sense of enclosure and loss of outlook.

The development would therefore fail to safeguard residential amenity and would be contrary to Policy DMHB 11 of the Hillingdon Local Plan: Part Two - Development Management Policies (2020), Policy D14 of the London Plan (2021), and paragraph 135 of the NPPF (2024).

## 7.2 Impact on Street Scene

Paragraph 135 of the NPPF (2024) states '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.'

Policies D1, D3 and D4 of the London Plan (2021) require development proposals to be of high quality and to enhance the local context by delivering buildings and spaces that positively respond to local distinctiveness.

Policy DMHB 11 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020) states: 'All development, including extensions, alterations and new buildings will be required to be designed to the highest standards and, incorporate principles of good design including: i) harmonising with the local context by taking into account the surrounding scale of development, height, mass and bulk of adjacent structures; building plot sizes and widths, plot coverage and established street patterns; building lines and setbacks, rooflines, streetscape rhythm, for example, gaps between structures and other streetscape elements, such as degree of enclosure;

architectural composition and quality of detailing; local topography, views both from and to the site; and impact on neighbouring open spaces and their environment.'

Policy DMHB 12 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020) re-emphasises the need for new development to be well integrated with the surrounding area and provides design criteria as to how this would be achieved.

The application site is situated along Victoria Road within the Ruislip Manor town centre, an area characterised by predominantly suburban-scale buildings of three to four storeys. The adjoining properties, notably the parade of shops at 69-83 Park Way and 1-9 Victoria Road, exhibit a mid-20th century architectural style with red brick facades, stone detailing, pitched roofs with red tiles, and chimney stacks. These elements contribute to a cohesive and distinctive local character.

The proposed development does not successfully respond to this established character. While the height of the roof extension aligns with adjacent buildings and is considered appropriate, the overall architectural approach lacks harmony with its surroundings. The proposed roofscape is dominated by flat roofs, a lift overrun, and an automatic opening vent, creating an overly complex and uncharacteristic form that contrasts unfavourably with the traditional pitched roofs of neighbouring properties.

The top floor and its overall roof form would appear discordant and the use of aluminium cladded materials would visually appear awkward adjacent the established commercial buildings which contain more traditional roof forms.

In terms of elevational treatment, the proposal introduces a horizontal emphasis that is inconsistent with the strong vertical rhythm and architectural detailing found in the adjacent buildings. Features such as narrow, regularly spaced grouped windows and stone quoining contribute to the existing streetscene's balanced and cohesive appearance. The proposed facade, by contrast, is fragmented by a variety of window sizes and shapes that disrupt visual continuity and detract from the overall streetscape quality.

The inclusion of external balconies and terraces with glazed balustrades further detracts from the building's suitability within this context. Positioned along a busy road, these elements are unlikely to offer functional or desirable amenity space due to noise and pollution exposure.

Overall, the proposed architectural design and detailing are not considered to adequately reflect or complement the character and appearance of the local area, and in particular, the architectural rhythm of this specific block. While it is acknowledged that there are more modern developments located to the north, these are read within a different visual context and do not form part of the established mid-20th century character of this section of Victoria Road. As such, the proposal is not considered to make a positive contribution to the visual coherence of the street scene or the wider Ruislip Manor town centre.

For these reasons, the proposal is considered to fail in respecting and enhancing the local character and appearance of the area. It would detract from the visual coherence and quality of the Ruislip Manor town centre streetscene, contrary to Policy DMHB 1 of the Hillingdon Local Plan: Part Two - Development Management Policies (2020) and the NPPF (2024)

### **7.3 Traffic Impact/Pedestrian Safety**

#### **Site Context and Accessibility**

The application site is a low-rise commercial block situated on Victoria Road within Ruislip district town centre. The surrounding area comprises a mix of commercial and residential uses and

benefits from excellent public transport connections, including proximity to Ruislip Manor London Underground Station and multiple bus routes. The site has a Public Transport Accessibility Level (PTAL) of 4. However, due to the close physical proximity of the train station and numerous local bus services, the effective accessibility is considered higher than the numerical PTAL suggests.

The site lies within a 'Stop & Shop' controlled parking zone (CPZ) operating Pay & Display parking from Monday to Saturday between 8:00am and 6:30pm. However, there are no specific on-street parking provisions for residents in the immediate vicinity.

#### Proposed Parking Provision

The development proposes a three-storey extension to the existing building to create seven residential units, comprising two one-bedroom, four two-bedroom, and one three-bedroom units. The scheme is proposed to be car-free, with no dedicated parking provided on-site.

According to Hillingdon Local Plan: Part 2 Policy DMT 6, new developments must comply with the council's parking standards unless exceptional justification is provided. The London Plan (2021) Policy T6.1 sets maximum residential parking standards, indicating a maximum requirement of between three and five spaces for the proposed units.

While the London Plan encourages car-free development only on sites with a PTAL of 5 or above, the site's location immediately adjacent to Ruislip Manor Station suggests the PTAL 4 rating may underestimate true accessibility. Taking into account the physical constraints of the site and the surrounding highway network, the Highway Authority considers the absence of on-site parking acceptable. Furthermore, any refusal on the basis of insufficient parking would likely not be upheld at appeal given the high level of public transport accessibility and the lack of convenient alternative free parking in the locality.

#### Cycle Parking Provision

The proposal includes provision for 16 secure and accessible cycle parking spaces at ground floor level to the rear of the site. This quantum and siting of cycle parking complies with the council's adopted standards and promotes sustainable transport modes.

#### Vehicular Trip Generation and Impact

Given the car-free nature of the development and lack of on-site parking, the proposed scheme is anticipated to generate minimal additional vehicular traffic. The impact on the local highway and junction capacity is expected to be negligible, and no detriment to traffic flows or highway safety is anticipated. This is consistent with Local Plan: Part 2 Policies DMT 1 and DMT 2.

#### Servicing and Waste Collection Arrangements

A dedicated waste store is proposed within the rear extension, accessible from the shared rear service yard. The council's waste collection standards require that the distance between bin storage and refuse vehicles does not exceed 10 metres, and that carrying distances from each residential unit do not exceed 30 metres. The rear service yard is physically constrained, which may present challenges for refuse vehicle access.

To address this, a detailed waste management strategy will be required via planning condition. The council's waste collection service may also provide further comments or requirements regarding servicing logistics.

#### Construction Management

Due to the sensitive nature of the local road network and potential impacts during construction, a Construction Management Plan (CMP) will be required by condition to ensure disruption is

minimised and public safety maintained.

#### Summary and Conclusion

The Highway Authority has reviewed the proposals and raised no objection, concluding that the development would not result in unacceptable congestion, parking stress, or highway safety issues. The scheme accords with relevant policies including Local Plan: Part 2 Policies DMT 1, DMT 2, and DMT 6, as well as London Plan Policies T4, T5, and T6.

#### 7.4 Carparking & Layout

See above.

#### 7.5 Urban Design, Access and Security Considerations

##### INTERNAL AMENITY SPACE PROVISION:

Policy D6 of the London Plan (2021) sets out the requirements for the gross internal floor area (A) of new dwellings at a defined level of occupancy. Table 3.1 of the London Plan (2021) set out the same gross internal area space standards set out in the Technical housing standards - nationally described space standard (2015). (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.

Policy DMHB 15 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020) states that the Council will require all new development to ensure safe and attractive public and private spaces by referring to the Council's latest guidance on Secured by Design principles.

Policy DMHB 16 of the Hillingdon Local Plan: Part 2 (2020) states that all housing development should have an adequate provision of internal space to provide an appropriate living environment. To achieve this all-residential development or conversions should:

- i) meet or exceed the most up to date internal space standards, as set out in Table 5.1; and
- ii) in the case of major developments, provide at least 10% of new housing to be accessible or easily adaptable for wheelchair users.

Within Table 3.1 of London Plan (2021) Policy D6 requires the following:

- One-storey, one-bedroom, two-person units should provide a minimum of 50 square metres GIA, including 1.5 square metres of built-in storage.

- One-storey, two-bedroom, three-person units should provide a minimum of 61 square metres GIA, including 2 square metres of built-in storage.

- One-storey, three-bedroom, five-person units should provide a minimum of 86 square metres GIA, including 2.5 square metres of built-in storage.

The above is also supported by Policy DMHB 11 of the Hillingdon Local Plan: Part 2 (2020).

Based on the plans submitted, all of the proposed flats would meet the minimum square metre requirement set by Table 3.1 of the London Plan (2021).

#### DAYLIGHT AND SUNLIGHT, PRIVACY AND OUTLOOK:

A Daylight and Sunlight Assessment (prepared by Fortress Assessments) has been submitted in support of the application. The report concludes that all habitable rooms within the proposed development would meet or exceed the BRE 2022 daylight standards. It also states that internal layouts and window placements have been strategically designed to optimise internal daylight and sunlight, contributing to visual comfort and energy efficiency.

Privacy screens have been shown on the proposed plans and details would be secured by condition.

#### PRIVATE AMENITY SPACE:

Policy DMHB 18 of the Hillingdon Local Plan: Part 2 (2020) states:

- A) All new residential development and conversions will be required to provide good quality and useable private outdoor amenity space. Amenity space should be provided in accordance with the standards set out in Table 5.2.
- B) Balconies should have a depth of not less than 1.5 metres and a width of not less than 2 metres.
- C) Any ground floor and/or basement floor unit that is non-street facing should have a defensible space of not less than 3 metres in depth in front of any window to a bedroom or habitable room. However, for new developments in Conservation Areas, Areas of Special Local Character or for developments, which include Listed Buildings, the provision of private open space will be required to enhance the streetscene and the character of the buildings on the site.
- D) The design, materials and height of any front boundary must be in keeping with the character of the area to ensure harmonisation with the existing street scene.

Table 5.2 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2019) sets out minimum private amenity space standards for flatted developments. It requires at least 20 square metres for one-bedroom units, 25 square metres for two-bedroom units, and 30 square metres for three-bedroom units.

While the proposed development broadly exceeds the minimum private amenity space standards set out in the London Plan, it does not comply with Hillingdon's Local Plan. As a result, only the top-floor family unit is able to meet and exceed both the London Plan and Hillingdon Local Plan standards for private outdoor space provision.

The lack of quantity of private amenity space would be offset by the sustainable site location and proximity to local services and amenities including recreational facilities. Furthermore it should be noted that the majority of the units along this parade benefit from residential accommodation above which do not have access to private amenity space therefore a refusal on this basis would be difficult to defend at appeal.

Therefore, on balance, the proposal complies with Policy DMHB 18 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020), Policy D6 of the London Plan (2021) and paragraph 130(f) of the NPPF (2024).

#### ACCESS:

This proposal for the erection of two additional storeys has been reviewed with reference to London

Plan Policy D7. No accessibility concerns are raised subject to the following Conditions attached to any approval: Prior to any works on site above damp proof course level, details of step free access via all points of entry and exit shall be submitted to, and approved in writing, by the Local Planning Authority. The measures implemented as approved shall be retained thereafter. REASON To ensure housing of an inclusive design is achieved and maintained in accordance with Policies D5 and D7 of the London Plan (2021). The dwellings hereby approved shall accord with the requirements of Policy D7 of the London Plan and shall not be occupied until certification of compliance with the technical specifications for an M4(2) dwelling, as set out in Approved Document M to the Building Regulations (2010) 2015, has been submitted to, and approved in writing, by the Local Planning Authority. All such provisions must remain in place for the life of the building. REASON: To not only allow the Building Control body to require the development to comply with the optional Building Regulations standards, but to also ensure the appropriate quantity and standard of accessible and adaptable housing is constructed and maintained in accordance with policy D7 of the London Plan. The development hereby approved shall accord with London Plan policy D5(B5) and D12(A) to include a minimum of one fire evacuation lift per stair core designed to meet the technical standards set out in BS EN 81-76, BS 9991 and/or BS 9999, with all such provisions remaining in place for the life of the development. REASON: To ensure the development can accommodate robust emergency evacuation procedures, including measure for those who require step-free egress, in accordance with London Plan policy D5 and D12.

#### SECURITY:

The proposed access arrangement to the new residential development, located to the rear of the existing street frontage, is considered to be unacceptable due to concerns relating to security and the safety of future occupants. The rear access route lacks appropriate natural surveillance and does not provide a clearly defined, well-lit, and secure approach to residential dwellings, thereby creating opportunities for crime and antisocial behaviour.

Therefore, the proposed access arrangement fails to provide a safe and secure environment for future occupants. The scheme does not comply with the principles of "Secured by Design" as set out in Policy D11 of the London Plan (2021), Policy DMHB 11 of the Hillingdon Local Plan: Part Two - Development Management Policies (2020), and the National Planning Policy Framework (2024), which require developments to incorporate crime prevention measures through design that promote safe, accessible, and secure environments.

#### FIRE SAFETY:

Policy D12 of the London Plan (2021) states that in the interests of fire safety and to ensure the safety of all building users, all development proposals must achieve the highest standards of fire safety. Policy D5 part B of the London Plan (2021) states development should be designed to incorporate safe and dignified emergency evacuation for all building uses.

A fire statement has been provided with a strategy for evacuation. The London Plan is clear that the applicants should demonstrate on a site plan that space have been identified for appropriate appliances. However, Officers consider that this could be addressed through a suitable worded condition.

## 7.6 Other Issues

### PRINCIPLE OF DEVELOPMENT

Paragraph 124 of the NPPF (2024) 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 125 of the NPPF (2024) states that substantial weight should be given to the value of using suitable brownfield land within settlements for homes and other identified needs in addition to promoting and supporting the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively.

Policy GG2 of the London Plan (2021) states to create successful sustainable mixed-use places that make the best use of land, those involved in planning and development must: enable the development of brownfield land, prioritise sites which are well-connected by existing or planned public transport and 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.

Policy SD7 of the London Plan (2021) states - Development plans should 6) identify sites suitable for higher density mixed-use residential intensification capitalising on the availability of services within walking and cycling distance and current and future public transport provision including, for example: d) delivering residential above existing commercial, social infrastructure and transport infrastructure uses or re-providing these uses as part of a mixed-use development.

Policy DMTC 1: Town Centre Developments of Hillingdon Local Plan Part 2 - Development Management Policies states that residential use of ground floor premises in primary and secondary shopping areas and in designated parades will not be supported.

Paragraph 3.4 (Hillingdon Local Plan Part 2 - Development Management Policies) states that the London Plan Policy 2.15: Town Centres (d) states that development proposals in town centres should be in scale with the centre. In ascertaining scale and suitability of the proposal to a centre, consideration should be given to the consistency of proposals with the definition of the centres in Table 3.1 above. All proposals for town centre uses will be expected to comply with other relevant policies in the development plan for Hillingdon. Proposed development should:

- enhance the town centres offer and be compatible with the nature, scale and function of the centre;
- have no deleterious impact on the function and vitality of the centre or on the Borough centres hierarchy;
- be in accessible locations or locations that are able to be made accessible by public and active transport; and
- in areas of regeneration, contribute positively to wider regeneration objectives.

Paragraph 3.7 (Hillingdon Local Plan Part 2 - Development Management Policies) states that ensuring the viability of Hillingdon's retail centres by managing their land uses is considered integral to the economic and social prosperity of Hillingdon. Vibrant town centres need to have a "critical mass" appropriate to their role in the network and an appropriate level of diversity of retail development to attract consumers of all ages and backgrounds on a regular basis at different times of the day and throughout the year. However, the Council will consider proposals which constitute a departure from policies in this chapter, where they provide clear and long lasting benefits to the vitality and viability of town centres in the borough

The site is within a minor town centre, and secondary shopping area. It is also a sustainable location with a public transport accessibility level (PTAL) of 4. As noted above, Policy DMTC1

(Town Centre Developments) will support main town centre uses which are consistent with the function of the centre. Part B of this policy states that residential uses of ground floor premises in primary and secondary shopping areas will not be supported. Policy DMTC2 of the Development Management Policies seeks to protect the retail function within Primary Shopping Area. It seeks to retain 70% of shop frontages within formerly use Class A1 (Retail). Part iv of the policy seeks to protect against an overconcentration of non retail uses which could be considered to cause harm to the vitality and viability of the town centre.

Whilst there is no objection in principle to the proposed residential development, the ground floor must remain in Use Class E to comply with strategic policies that seek to protect the function of main town centres. The submitted drawings demonstrate that this will be the case. Accordingly, the principle of residential development is acceptable, subject to compliance with wider planning policies.

#### HOUSING MIX:

The development would comprise:

2 x 1-bedroom, 2-person flats

4 x 2-bedroom, 3-person flats

1 x 3-bedroom, 5-person flat

The Council's current information on housing need indicates a borough-wide requirement for larger affordable and private market units, particularly three-bedroom properties. While the proposed housing mix does include a 3 bed family home, which is considered a benefit of the scheme. Therefore, it is considered that the proposal would consist of an appropriate housing mix in accordance with Policy DMH 2 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020) and Policy H10 of the London Plan (2021).

#### DENSITY LEVELS:

Policy D3 of the London Plan (2021) states that all development must make the best use of land by following a design-led approach that optimises the capacity of sites. Policy DMHB 17 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020) states that all new residential development should take account of the Residential Density Matrix contained in Table 5.2.

Numerical density levels are considered to be more appropriate to larger sites and are not typically used in the assessment of schemes of less than 10 units. The key consideration is therefore whether the development would acceptably integrate with the character and appearance of the locality, and would respect residential amenity considerations. Please refer to the other sections of this report which assesses these planning considerations in further detail.

#### SUSTAINABILITY:

Policy SI 2 of the London Plan (2021) states residential development should achieve at least a 10% improvement beyond Building Regulations 2013.

Policy DMEI 2 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020) requires all developments to make the fullest contribution to minimising carbon dioxide emissions in

accordance with the 2016 London Plan targets.

Policy EM1 of the Hillingdon Local Plan: Part 1 - Strategic Policies (2012) sets out that the installation of renewable energy will be encouraged for all new developments.

The design of the development should incorporate renewable energy to reduce carbon emissions. No details of the sustainability credentials of the proposed development or the type of renewable technologies that would be utilised have been provided. However, it is considered that this matter could be resolved by the imposition of a planning condition, if planning permission were to be granted. Also, a condition would be secured requiring the proposed dwellings to achieve as a minimum, a water efficiency standard of no more than 105 litres per person per day, maximum water consumption.

Subject to the above conditions, the proposal would be compliant with Policy SI 2 of the London Plan (2021) and Policy DMEI 2 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020).

#### FLOOD RISK:

Policy SI 12 of the London Plan (2021) states that development proposals should ensure that flood risk is minimised and mitigated, and that residual risk is addressed. Policy SI 13 of the London Plan (2021) states that 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.

Policy DMEI 9 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020) states that proposals that fail to make appropriate provision for flood risk mitigation, or which would increase the risk or consequences of flooding, will be refused.

Policy DMEI 10 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020) states that development within areas identified at risk from surface water flooding which fail to make adequate provision for the control and reduction of surface water runoff rates will be refused.

The site is in in Flood Zone 1. The proposal involves the conversion of the upper floors of an existing building to residential, and a rear extension to the ground floor. The application is supported by a drainage strategy demonstrating compliance with the SuDS hierarchy, in line with London Plan Policy SI 13 and Local Plan Policy DMEI 10.

Measures include a rainwater harvesting tank, approximately 48m<sup>2</sup> of green/sedum roof, two raingarden planters, and porous surfacing with slot drains to manage runoff. These features will reduce peak surface water discharge rates, with supporting calculations provided.

Foul water from the 7 new flats is estimated at 0.35 l/s and will connect by gravity to an existing foul sewer adjacent to the site.

A management company will be responsible for ongoing maintenance, with inspections and cleaning of drainage features proposed every 3 to 6 months.

Therefore, subject to compliance, the proposed development is not expected to increase flood risk on-site or elsewhere, in accordance with Policies DMEI 9 and DMEI 10 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020) and Policies SI 12 and SI 13 of the London Plan (2021).

## AIR QUALITY:

Policy SI 1 of the London Plan (2021)

Policy DMEI 14 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020) states that proposals should demonstrate appropriate reductions in emissions. It adds that, development proposals should, as a minimum:

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

The proposed development is located within the LBH Air Quality Management Area, and within the Ruislip Town Centre Focus Area. As per the London Plan, developments need to be neutral as minimum and LBH requires development proposals located in Focus Areas (or that impact on Focus Areas) to be air quality positive and in accordance with measure 5 of the LBH Air Quality Local Action Plan 2019-2024, mitigate total emissions in these sensitive areas.

LBH requires developments to incorporate air quality positive design measures from the outset and suitable mitigation measures to reduce pollution, especially with impacts in areas where the air quality is already poor (LBH Air Quality Local Action Plan 2019-2024), namely Focus Areas. Furthermore, policy DMEI 14 of the emerging London Borough of Hillingdon Local Plan (part 2), requires active contribution towards the continued improvement of air quality, especially within the Air Quality Management Area.

According to LBH Local Action Plan, proposed development within Focus Areas (or with impacts on FAs) require more stringent air quality neutral procedures and needs to be Air Quality positive, with a total emission mitigation approach.

No appropriate mitigation has been proposed by the applicant and therefore the proposed development is contrary to local and regional policies, Policy DMEI 14: Air Quality , London Borough of Hillingdon Air Quality Action Plan and the London Plan, Policy SI1.

## COMMUNITY INFRASTRUCTURE LEVY:

Policy DMCI 7 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020) 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. Infrastructure requirements will be predominantly addressed through the Council's Community Infrastructure Levy (CIL).

The Council adopted its own Community Infrastructure Levy (CIL) on 1st August 2014. The Hillingdon CIL charge for residential developments is £95 per square metre of additional floor space. This is in addition to the Mayoral CIL charge of £60 per square metre. CIL rates are index linked. The proposal involves the erection of new dwellings and is therefore CIL liable if planning permission were to be granted.

## TREES AND LANDSCAPING:

Policy G1 of the London Plan (2021) states that development proposals should incorporate appropriate elements of green infrastructure that are integrated into London's wider green

infrastructure network.

Policies DMHB 11 and DMHB 14 of the Hillingdon Local Plan: Part 2 (2020) also require that new development is high quality, sustainable, adaptable, and harmonises with the local context. Landscaping and tree planting should enhance amenity, biodiversity and green infrastructure. Development proposals will be required to provide a landscape scheme that includes hard and soft landscaping appropriate to the character of the area, which supports and enhances biodiversity and amenity particularly in areas deficient in green infrastructure.

The submitted plans indicate that a large existing tree is to be retained; however, no Arboricultural Report has been provided to assess the potential impact of the ground floor extension on the tree's root protection area or long-term health. In the absence of this assessment, it cannot be confirmed that the proposed development would not result in harm to the tree.

As such, the application fails to demonstrate compliance with Policy G1 of the London Plan (2021), Policy BE1 of the Hillingdon Local Plan: Part One (2012), and Policies DMHB 14 and DMHD 1 of the Hillingdon Local Plan: Part Two (2020).

#### BIODIVERSITY NET GAIN:

Biodiversity net gain is a way of creating and improving biodiversity by requiring development to have a positive impact ('net gain') on biodiversity.

In England, biodiversity net gain is required under a statutory framework introduced by Schedule 7A of the Town and Country Planning Act 1990 (inserted by the Environment Act 2021). This statutory framework is referred to as 'biodiversity net gain' in Planning Practice Guidance to distinguish it from other or more general biodiversity gains.

Under the statutory framework for biodiversity net gain, subject to some exceptions, every grant of planning permission is deemed to have been granted subject to the condition that the biodiversity gain objective is met ("the biodiversity gain condition"). This objective is for development to deliver at least a 10% increase in biodiversity value relative to the pre-development biodiversity value of the onsite habitat.

There are exemptions and the BNG planning condition does not apply to planning permission for development that is below a de minimis threshold, i.e.:

- does not impact an onsite priority habitat; and
  - the development impacts less than 25sqm of onsite habitat that has biodiversity value greater than zero; and
  - the development impacts less than 5m in length of onsite linear habitat
- One exemption is Development below a de minimis threshold. This exemption applies to development that does not impact a priority habitat and impacts less than 25 square metres (e.g. 5m x 5m) of non-priority onsite habitat (such as modified grassland) or 5m for non-priority onsite linear habitats (such as native hedgerows).

The development at ground floor would be on existing hard standing. Therefore the development would not exceed the de minimis threshold and is considered to be BNG exempt.

#### PLANNING BALANCE:

The proposal would contribute to the Council's delivery of housing and provide some economic

benefits during the construction stages. However, the scheme is only for seven, one, two and three bedroom private market flats.

Whilst noting that some weight should be given to the delivery of housing and one family sized dwelling, the Council is currently able to demonstrate a five-year supply of deliverable housing sites. The weight to be attached to housing delivery is substantially diminished by the adverse impacts of the scheme as set out above. Limited weight should be given to the proposals social and economic contribution.

## CONCLUSION

For the reasons set out in this report, it is considered that the proposed development would conflict with national, regional and local planning policies and guidance. It is therefore recommended that the application be refused.

## 8. Reference Documents

National Planning Policy Framework (2024)

The London Plan (March 2021)

Hillingdon Local Plan: Part One - Strategic Policies (November 2012)

Hillingdon Local Plan: Part Two - Development Management Policies (January 2020)

Hillingdon Local Plan Accessible Hillingdon Supplementary Planning Document (September 2017)

Technical Housing Standards - Nationally Described Space Standard (March 2015)

Circular 06/05: Biodiversity and Geological Conservation - Statutory Obligations and Their Impact Within The Planning System

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