

# PLANNING STATEMENT

## On behalf of Perl Equity (Ruislip) 4 Limited

In support of a planning application proposing the erection of a ground floor rear extension and a three-storey extension (with the top floor set-in) above an existing single storey commercial parade to provide 7 residential units (2 x 1-bedroom, 2-person units, 4 x 2-bedroom, 3-person units and 1 x 3-bedroom, 5-person unit), on land at ;

**11-17 Victoria Road  
Ruislip  
HA4 9AA**

BPC ref. : AB2501/Planning Statement  
Date : April 2024

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## **1.0 Introduction**

- 1.1 This planning statement has been prepared by Beamish Planning Consultancy on behalf of Perl Equity (Ruislip) 4 Limited and forms part of a full planning application being submitted to the London Borough of Hillingdon (the LPA) in respect of land at 11-17 Victoria Road, Ruislip, HA4 9AA.
- 1.2 That planning application seeks planning permission for the erection of extensions to the existing single storey commercial parade, with the extensions comprising both a ground floor rear extension and a three-storey extension above the existing parade, to provide 7 residential units.
- 1.3 This planning statement is submitted in support of these proposals and should be read in conjunction with the drawings and the other technical reports that comprise the planning application submission.
- 1.4 This statement details the nature of the application site and the surrounding area, the site history, and relevant development plan policies and associated guidance, followed by an assessment of the proposals against those policies, guidance and any other material planning considerations.
- 1.5 This statement concludes that the proposed development with the adopted development plan and therefore, also taking into account all other material planning considerations, planning permission should be granted by the LPA, subject to the imposition of necessary, appropriate and reasonable conditions.

## 2.0 Description of Application Site and Surroundings

- 2.1 The application site comprises a roughly rectangular shaped area of land, which is currently occupied by a single storey parade (incorporating a tall brick parapet) of four commercial units (nos. 11, 13, 15 and 17) fronting onto Victoria Road to the west.
- 2.2 The application site slopes down from north to south by approximately 1.2 metres, and the rear (easternmost) part of the site is more than 2.3 metres high than its Victoria Road frontage, with the commercial units serviced from the rear by way of a series of staircases located within lightwells leading from the rear yard area of the site (which also includes an ancillary storage structure associated with no. 11).
- 2.3 The rear of the site is accessed via a service road which wraps around the side and rear of the neighbouring building to the north (which comprises nos. 69-83 Park Way and nos. 1-11 Victoria Road) and joins Park Way to the north-west.
- 2.4 The commercial units which the application site comprises form part of the secondary shopping area of the designated 'Minor Town Centre' of Ruislip Manor, and the immediate locality is characterised by ground floor commercial uses with either ancillary or standalone commercial floorspace, or residential units, above.
- 2.5 The single storey height of the existing building at the application site is at odds with the majority of the buildings within the immediate surroundings, which range from 2 to 4 storeys in height. The neighbouring building to the north (which comprises nos. 69-83 Park Way and nos. 1-11 Victoria Road) benefits from a commenced (but not completed) planning permission for a new recessed third floor and associated extension, as detailed within the subsequent section of this planning statement.
- 2.6 To the south of the application site is the part single, part two and part three storey Ruislip Manor London Underground Station, which is locally listed and the LPA's statement of significance/reason for designation describes that locally listed building as ;

*'Architectural: Metropolitan Line Station by Charles Holden. 1938. Excellent detailing although the elevated bridge divides the overall composition. Three storey in brick, flat roof with parapet and stone coping. Metal windows, with cill details. Townscape: Key landmark, contributes to local character and street scene.'*

- 2.7 It should be noted that the map which forms part of the local listing entry excludes the single storey commercial unit (no. 19) which is sited between the application site and the station buildings.
- 2.8 There are no other either statutorily or locally listed buildings within the immediate surroundings (although the Heritage Statement which forms part of the planning application does identify a listed building within 250 metres of the application site) and nor is the application site or its immediate surroundings within a Conservation Area (although again the accompanying Heritage Statement references Ruislip Manor Conservation Area, the boundaries of which are within 250 metres of the site).
- 2.9 The application site benefits from a Public Transport Accessibility Level (PTAL) of 4 (on a scale of 0 (worst) and 6b (best)), with the aforementioned Ruislip Manor underground station, less than 50 metres from the site, served by both Metropolitan and Piccadilly line services, and there are also bus stops ranging from 25 metres to 150 metres walking distance of the site on Victoria Road, Park Way, Windmill Road and Pembroke Road, served by local bus services travelling in a variety of directions.
- 2.10 There is no no-site vehicle parking available, whilst there are on-street pay and display bays on Victoria Road to the front of the site (with payment required between the hours of 06:00 to 18:30 on weekdays, and a maximum stay of 2 hours duration permitted). The immediate surroundings are not within a Controlled Parking Zone.

### 3.0 Relevant Planning History of Application Site and Surroundings

3.1 On 4<sup>th</sup> April 2025, the LPA granted planning permission (application ref. 79290/APP/2025/389) for the installation of a replacement shopfront to the existing commercial premises at 17 Victoria Road. That permission is yet to be implemented.

3.2 There is no other recent planning history relating to the application site.

3.3 In regard to the immediate surroundings, in May 2017 planning permission (application ref. 72040/APP/2016/2531) was granted by the LPA for the following development on the neighbouring site at 69-83 Park Way and 1-11 Victoria Road ;

*'Enlargement of the roof, including raising of the ridge and eaves height to provide new recessed third floor, erection of a third-floor extension to the rear of Nos. 69 to 81 Park Way, including the installation of rooflights, rebuilding of chimneys and new emergency external stairs to the rear of No. 9 Victoria Road, to allow for the provision of 9 new flats.'*

3.4 Pre—commencement conditions 6, 9 and 10 were subsequently discharged by the LPA by way of discharge of conditions application refs. 72040/APP/2017/2549 and 72040/APP/2017/2465, both of which were approved in September 2017, and in May 2020 the LPA issued a Certificate of Existing Lawful Development (application ref. 72040/APP/2020/1293) confirming that the development approved by way of the granting of planning application ref. 72040/APP/2016/2531 had been lawfully commenced.

## **4.0 The Proposed Development**

- 4.1 The planning application to which this planning statement relates proposes the erection of extensions to the existing single storey commercial parade to provide 7 residential units above the existing ground floor commercial units.
- 4.2 At ground floor level a single storey rear extension is proposed to provide both refuse (including general waste and recyclable material) and cycle storage (for 16 bicycles) for the proposed residential units and to provide both a staircase and lift enabling circulation between ground floor level and first floor level.
- 4.3 A three storey extension above the extended ground floor is also proposed, with the top floor of that extension set-in from the front and side elevations of the extended building. A further staircase and lift residential core will also enable circulation between all the upper floors of the extended building.
- 4.4 The 7 residential units proposed would comprise 2 x 1-bedroom, 2-person units, 4 x 2-bedroom, 3-person units and 1 x 3-bedroom, 5-person unit. Both the gross internal areas and the bedroom dimensions of all proposed residential units, as well as floor to ceiling heights, will meet (and in the case of 5 of the 7 proposed units exceed) the requirements set out within the Nationally Described Space Standards (NDSS).
- 4.5 All but 1 residential unit will benefit from generously proportioned private amenity space (comprising balconies and roof terraces), and the cumulative provision of private amenity space (totalling 155 square metres) will significantly exceed London Plan requirements. All proposed residential units will also be dual aspect.
- 4.6 As detailed within the accompanying Design and Access Statement prepared by Wave Architects, the design of the proposals has evolved by way of a comprehensive appraisal of both constraints and opportunities associated with the application site, with the final scheme utilising recesses and step-backs in response to the site's topography and contextual constraints, whilst the proposed materials seek to strike a balance between respecting the wider context and contemporary expression.
- 4.7 A Daylight & Sunlight Study (prepared by Fortress Assessments) forms part of the planning application submission and demonstrates that the proposed development will not negatively impact upon the residential amenities of the occupiers of the neighbouring building to the north, whilst future occupiers of the proposed development will benefit from highly satisfactory levels of daylight and sunlight.
- 4.8 As detailed on accompanying drawing no. 1117VR-PP1-06 (proposed roof plan) prepared by Wave Architects, a green (sedum) roof is proposed along with solar photovoltaic roof panels and heat pumps.
- 4.9 The planning application submission also includes a Fire Statement prepared by Accendo Fire Safety Services having regard to the provisions of London Plan policy D12 (Fire Safety), and a Drainage Strategy Report (prepared by Nimbus Engineering Consultants Ltd.) detailing how foul and surface water run-off arising from the proposals would be managed.
- 4.10 Finally, conscious that the neighbouring Ruislip Manor London Underground Station is a locally listed building, the planning application submission includes a Heritage Assessment prepared by Gareth Jones Heritage Planning.

## **5.0 Planning Policies and Government Guidance**

- 5.1 At local level, the currently adopted Development Plan comprises the Local Plan Part 1 (Strategic Policies), which was adopted in November 2012, and the Local Plan Part 2 (Development Management Policies, Site Allocations and Designations), which was adopted in January 2020.
- 5.2 The LPA completed the first stage of consultation relating to a Local Plan Review in June 2024, and consultation on a Regulation 19 'Proposed Submission' Local Plan Review document was expected to commence in early 2025, but to date no such document has been published. Accordingly full weight must continue to be attached to the adopted Development Plan, as long as the relevant policies accord with the more up-to-date development plan at regional level and national planning policy.
- 5.3 Also of relevance at local level is the LPA's 'Accessible Hillingdon' Supplementary Planning Document (SPD), which was adopted in September 2017.
- 5.4 At regional level, the Development Plan comprises the London Plan, which was published by the GLA in March 2021 following independent Examination in Public and subsequent review by the Secretary of State. Also of relevance at regional level is the Housing Design Standards London Plan Guidance (published June 2023), which brings together, and helps to interpret, the housing-related design guidance and policies within the London Plan.
- 5.5 At national level, the latest National Planning Policy Framework (NPPF) was published by the Government in December 2024 and streamlines previous national planning policy into a consolidated set of priorities, to ensure that planning decisions reflect genuine national objectives, with the principle of sustainable development permeating the framework.
- 5.6 The National Planning Policy Guidance (NPPG) was first published by the Government in March 2014 and is regularly updated, and also streamlines previously published national guidance, which had taken the form of planning policy guidance notes and planning policy statements, into a single document.
- 5.7 Finally, also of relevance to the proposals which are the subject of this pre-application advice request is the 'Technical Housing Standards – Nationally Described Space Standards', first published by the Department of Communities and Local Government in March 2015, which sets out technical requirements for the gross internal (floor) area of new dwellings, including bedrooms and storage space.

## 6.0 Planning Assessment

6.1 The starting point for determining any planning application is set out in Section 38(6) of the Planning and Compulsory Purchase Act 2004, which states that “where in making any determination under the planning Acts, regard is to be had to the development plan, the determination shall be made in accordance with the plan unless material considerations indicate otherwise.”

6.2 Accordingly, this section of this supporting planning statement now proceeds to appraise the proposals having regard to the development plan and all other material planning considerations.

### Principle of development

6.3 The LPA’s Core Strategy policy H1 (Housing Growth), adopted London Plan policy H1 (Increasing Housing Supply) and Section 5 (Delivering a Sufficient Supply of Homes) of the National Planning Policy Framework (NPPF) all seek to significantly boost the supply of homes within both the Borough of Hillingdon and the capital as a whole.

6.4 Additionally, both London Plan policy H2 (Small Sites) and paragraph 73 of the NPPF emphasise the important contribution which small sites, such as the application site, can make towards meeting the housing requirements of an area, and paragraph 90(f) of the NPPF also acknowledges the important role residential development can often play in ensuring the vitality of designated centres.

6.5 Similarly, paragraph 125 of the NPPF stresses the substantial weight that should be attached to using suitable brownfield land within settlements, the support that should be given to the development of under-utilised land and buildings, and the use of airspace above existing residential and commercial premises for new homes, to make the most efficient use of land, reflecting also the thrust of adopted Core Strategy policy H1.

6.6 Having regard to the development plan policies and associated guidance referenced above, the application site, which comprises a ‘small site’ (i.e. less than 0.25 hectares), is located within the designated ‘Minor Town Centre’ of Ruislip Manor, and currently consists of a single-storey commercial parade, which is at odds with the predominantly 3 or 4 storey character of its surroundings.

6.7 Accordingly, the principle of the development of the application site by way of residential units on new upper floors, whilst retaining the 4 existing commercial units at ground floor level and without reducing the existing commercial frontage fronting Victoria Road, is wholly in accordance with the development plan at both local and regional level, as well as national planning policy as set out in the NPPF

6.8 Additionally, the proposed resulting building, and its density, would reflect both the scale of development and the predominant usage character of the immediate locality, with ground floor commercial units and residential units above, complying with adopted Development Management Policies policy DMHB 16 (Residential Density).

### Proposed Housing Mix and Quality of Accommodation

6.09 The residential element of the proposed development would provide 7 new residential units ranging from 1-bedroom, 2-person units to 3-bedroom, 5-person units, with 5 of the proposed units fully complying with M4(2) Building Regulations requirements.

6.10 The LPA’s most recent Strategic Housing Market Assessment was published in October 2018 and concluded that, in terms of market housing, the greatest requirement is for 3-bedroom units and the least requirement is for 1-bedroom units. Adopted Development Management Policies policy DMH 2 (Housing Mix), which postdates the latest Strategic Housing Market Assessment, requires residential developments to provide a mix of housing units in different sizes to reflect the LPA’s latest information on housing need.



- 6.11 Whilst it is acknowledged that 1 (or 14.29%) of the proposed residential units would be a 3-bedroom unit, the majority (57.14%) of the proposed units would be 2-bedroom units, and therefore not only is a broad mix of residential units proposed but also only 28.57%) of the proposed units would comprise 1-bedroom units.
- 6.12 Furthermore, significant weight must be attached to the high-density town centre location of the application site, and both local, regional and national planning policy directs higher density residential development to both town centre and highly accessible locations, such as the application site.
- 6.13 Consequently, a redevelopment of the site to provide a mix of housing which was dominated by larger (3-bedroom plus) units would conflict with such policies, failing to maximise the development potential of the site, whereas the proposed housing mix of reflects the characteristics and location of the application site and its surroundings.
- 6.14 All of the proposed residential units would, at the very least, meet the Nationally Described Space Standards (NDSS), both in terms of the total floor space of each unit and the area and dimensions of the bedrooms within those units. Indeed, as demonstrated by the table within drawing no. 1117VR-PP1-08 prepared by Wave Architects, 5 of the 7 proposed units would exceed those standards (by between 1 and 12 square metres), and the floor to ceiling height of the proposed residential floorspace would be 2.5 metres across at least 75% of the gross internal area.
- 6.15 Accordingly, the proposals are fully NDSS compliant, as well as also accordingly with London Plan requirements (London Plan policy H6), the LPA's Development Management Policies policy DMHB 16 (Housing Standards) and the LPA's 'Accessible Hillingdon' Supplementary Planning Document (SPD).
- 6.16 Furthermore, all the proposed residential units would be dual aspect, with no north-facing fenestration proposed, thereby ensuring effective cross-ventilation and allowing for improved indoor air quality and passive cooling, assisting in overall sustainability and comfort within the living environment.
- 6.17 The planning application submission includes a Daylight & Sunlight Study (prepared by Fortress Assessments) which demonstrates that, in addition to the proposed development not negatively impacting upon the residential amenities of both existing and future occupiers of the neighbouring building to the north, future occupiers of the proposed development would also benefit from highly satisfactory levels of daylight and sunlight, thereby according with BRE requirements.
- 6.17 All but 1 of the proposed residential units would benefit from private amenity space, in the form of both balconies and roof terraces, with the private amenity area for those flats ranging from between 8 square metres to 79 square metres. In total, 155 square metres of private amenity space is proposed, almost quadruple more than the 43 square metres of private amenity space required by the London Plan.
- 6.18 It is acknowledged that adopted Development Management Policies policy DMHB 18 (Private Outdoor Amenity Space) seeks the provision of at least 20 square metres of private outdoor amenity space (for studio and 1-bedroom units), and only the 3-bedroom unit provides a level of private outdoor amenity space which meets the requirements of local policy DMHB 18. However, having regard to the town centre location of the application site, the emphasis placed on making the most efficient use of land (especially previously developed land within designated centres) and how the amount of private amenity space provided is substantially greater than that required by the London Plan, the proposal is acceptable on its planning merits.
- 6.19 Finally in this section we would point out that the proposed development, whilst making the most efficient use of the application site, falls below the threshold for either the provision of on-site affordable housing or a financial contribution towards off-site affordable housing as set out in Core Strategy policy H2 (Affordable Housing) and paragraph 65 of the NPPF.

## Scale, Design and Appearance of Proposed Development

- 6.20 This section of this supporting planning statement should be read in conjunction with the Design and Access Statement prepared by the scheme architects, Wave Architects.
- 6.21 That Design and Access Statement details how the proposals have evolved to respond to contextual, technical and regulatory considerations, resulting in a development which integrates effectively into, and harmonises with, its surroundings, whilst addressing and overcoming practical constraints and compliance requirements.
- 6.22 The proposed extended building would comprise three storeys, with an additional recessed fourth storey, incorporating a flat roof. The modern design of the proposed extended building reduces the visual impact of the proposal in terms of both its mass and height from street level whilst blending well with the varied architectural styles present within the immediate surroundings, and the eaves height of the proposed extended building aligns with that of the adjoining building to the north, to achieve seamless integration, whilst a stepped down approach towards the locally listed underground building to the south is also proposed.
- 6.23 The significant variation in levels between the front and rear of the application site has enabled the proposals to incorporate ancillary facilities, including refuse and bicycle storage, for the new residential units, as well as a self-contained residential access core to the rear of the resulting building.
- 6.24 The front (west facing) elevation of the additional upper floors would be set back from the front elevation of the adjoining building to the north, facilitating the provision of private amenity space, and the mass of the proposed extended building is further recessed at the southern part of the site, assisting further in ensuring that the proposed development is respectful of the locally listed building to the south.
- 6.25 To the rear, the proposed extended building is set out in relating to the 45-degree line drawn from the nearest window serving a habitable room within the neighbouring building to the north, thereby minimising overshadowing and ensuring that the residential amenities of neighbouring occupiers are not unacceptably impacted (as also demonstrated by way of the Daylight & Sunlight Study).
- 6.26 The recessed and flat roof design of the top floor of the proposed extended building contributes to a more refined and contemporary architectural expression, whilst respectful the varied architectural character of the surroundings, and the flat roof also enables both a green roof system and the integration of renewable energy technologies, such as photovoltaic panels and/or air source heat pumps, to be incorporated into the building, as well as providing for relevant essential building services to meet fire safety requirements (as detailed within the Fire Statement prepared by Accendo Fire Safety Services).
- 6.27 The proposed elevations, and the intended materials palette, seek to preserve the established rhythm and character of the streetscene, which also delivers a contemporary addition that complements its surroundings.
- 6.28 Accordingly, the scale, design and appearance of the proposed development complies with adopted Core Strategy policies BE1 (Built Environment) and EM1 (Climate Change Adaption and Mitigation), policies DMHB 11 (Design of New Development), DMEI 1 (Living Walls and Roofs and Onsite Vegetation) and DMEI 2 (Reducing Carbon Emissions) of the adopted Development Management Policies, as well as the 'Accessible Hillingdon' SPD, whilst, from a fire safety perspective, the proposals accord with London Plan policy D12 (Fire Safety).

## Heritage Matters

- 6.29 The planning application submission includes a Heritage Assessment prepared by Gareth Jones Heritage Consultancy, which sets out the heritage context of the application site, assesses the heritage significance of the heritage assets within the immediate surroundings, and then assesses the proposed development and its effect on the heritage significance of those assets, having regard to local, regional and national planning policies and associated guidance.
- 6.30 The heritage assessment predominantly focuses upon the locally listed building of Ruislip Manor London Underground Station to the south of the application site (whilst noting that the retail unit between the site and the station is not part of the locally listed building).
- 6.31 The assessment concludes that the proposed development will have a neutral impact on the setting of that listed building, and will relate positively to its context, in accordance with adopted Core Strategy policy HE1 (Heritage), policies DMHB 1 (Heritage Assets) and DMHB 3 (Locally Listed Buildings) of the adopted Development Management Policies, and policy HC1 (Heritage Conservation and Growth) of the London Plan, as well as relevant national planning policy and guidance as set out in both the NPPF and National Planning Policy Guidance (NPPG).

## Transport and Highways Matters

- 6.32 The proposed development incorporates the provision of 16 cycle parking spaces (double the level of provision required at local level) within the proposed ground rear floor rear extension, thereby enabling future occupiers to store cycles within a covered and secure environment.
- 6.33 Additionally, as detailed by way of drawing no. 1117VR-PP-08, a storage room within the rear extension will provide sufficient bin storage to meet/exceed the requirements of the proposed residential development in terms of general waste, recyclable material and garden waste, with servicing able to continue taking place from the shared area to the rear of the site, which is accessed from Park Way.
- 6.34 In light of the highly sustainable town centre location of the application site, no on-site vehicle parking is proposed, and it is noted that the area does not fall within a Controlled Parking Zone.
- 6.35 Therefore, the proposals accord with policies DMT 1 (Managing Transport Impacts), DMT 5 (Pedestrians and Cyclists) and DMT 6 (Vehicle Parking) of the adopted Development Management Policies, policies T4 (Assessing and Mitigating Transport Impacts), T5 (Cycling), T6 (Car Parking) and T6.1 (Residential Parking) of the London Plan, as well as paragraph 116 of the NPPF, which advises that development should only be prevented or refused on highway grounds if there here would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network, following mitigation, would be severe, taking into account all reasonable future scenarios.

## Drainage

- 6.36 The planning application submission incorporates a Drainage Strategy prepared by Nimbus Engineering Consultants Ltd., with that strategy assessing the existing and proposed surface run-off at the application site and proposing a suitable SuDS strategy, as well as detailing the proposed foul water strategy.

## **7.0 Conclusions**

- 7.1 For the reasons set out within this supporting planning statement and within all the other supporting documentation which comprises the planning application submission, the proposals accord with the development plan at local, regional and national level, and there are no other material planning considerations which would outweigh that compliance with the development plan.
- 7.4 The proposals represent an effective and sustainable use of this highly sustainable, underdeveloped brownfield site, maximising its development potential whilst not harming the amenity of neighbouring residents, the character and appearance of the surrounding area or the setting of the locally listed building to the south.
- 7.5 Consequently planning permission should be granted for the proposed development, subject to the imposition of appropriate, reasonable and necessary conditions.