

## Planning & Heritage Statement

Garages off Green Walk, Ruislip  
Manor, Hillingdon HA4 8NL

*Prepared For*  
Ruislip Manor Cottage Society

9856  
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CHARTERED TOWN PLANNERS

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# 1 INTRODUCTION

- 1.1 This statement is prepared in support of a planning application, made by the Ruislip Manor Cottage Society (RMCS), to London Borough of Hillingdon Council for the following development:

*“Demolition of the existing garages and erection of two semi-detached dwellinghouses, landscaping and parking”*

- 1.2 The following section provide relevant background to the application, including a description of the site and the development proposal. The report then goes on to consider the proposal against the development plan and any relevant material planning considerations.

## USEFUL BACKGROUND

- 1.3 The application follows the refusal of planning application 73047/APP/2019/398 in April 2019 for a similar development:

*“Demolition of the existing garages and erection of two semi-detached dwellinghouses, landscaping and parking”*

- 1.4 A copy of the decision notice is provided at **Appendix 1**. In summary, the reasons for refusal related to amenity and the character and appearance of the area.

- 1.5 The decision was subsequently appealed, which the Inspector dismissed when balancing the harm against the benefits (**Appendix 2**). Even so, it was recognised by the Inspector that:

*“...the development would provide 2 family-sized affordable houses that would contribute towards meeting a significant local need. It would also involve the redevelopment of a previously developed site, in a relatively accessible location, and would generate some modest economic benefits.”*

- 1.6 Notwithstanding the above, it was determined by the Inspector that the design of the proposed dwellings would, on balance, result in harm to the character and appearance of the area. We highlight below where he addressed his observations in this respect:

*“The development proposes the demolition of the garage court and the introduction of 2 semi-detached dwellings. These properties would have a broadly similar design to the existing*



*dwellings along Green Walk, although their footprint would be significantly larger. In this regard, they would have 2 storey side wings, an uneven roof pitch, and large rear dormers. In combination, these features would result in significantly larger, more imposing dwellings that would appear out of scale with the surrounding properties. The side gables in particular would have an awkward and bulky appearance that would be at odds with the character of the area.”*

- 1.7 In summary, the ‘broadly similar design’ was not itself raised as being unacceptable, but rather the size of the proposed dwellings, which would have been larger than the neighbouring properties and the inclusion of 2 storey side wings, uneven roof pitch, and large rear dormers. Significantly, these are however all matters of design that can be addressed.
- 1.8 He also concluded that the development would significantly harm the living conditions of neighbouring occupiers with regard to overlooking. Further scrutiny reveals that this related to the inter-visibility between the proposed building frontage and side windows serving bedrooms in Nos. 4 – 5.
- 1.9 When considering the above outcomes, it was felt that the reasons for refusal could be overcome. This application is for the revised proposal.

#### THE SITE

- 1.10 The application site is located at the end of a narrow spur road (Green walk) set within the Ruislip Manor Way Conservation Area. As aptly described in the appeal decision letter:
- “It [the Conservation Area] is characterised by attractive collections of dwellings, the design of which was strongly influenced by the Arts and Craft Movement and early Garden City planning. Its significance stems from its well-preserved buildings and spaces that reflect the historic development of the area, which formed part of the ‘Metro-Land’ expansion of London”.*
- 1.11 The semi-detached houses along Green Walk are themselves characterised by their consistency of design which is depicted by their steeply pitched roofs, small front gardens, and mature boundary hedges.
- 1.12 In contrast, the application site is set back from the road and consists of a small court of domestic garages, dating to the 1970s, that are described as “unremarkable” by the Inspector. Indeed, they are not attractive in appearance and it is fair that they contribute little, if not negatively, to the character and appearance of the Conservation Area. Due to their



substandard width, they are also unsuitable for many modern cars, meaning that only 6 of the 15 garages are used for storing vehicles (also see paragraph 2.1.2 of the Transport Statement).

- 1.13 The proposed development seeks to enable the utilisation of this land, which will help the RMCS provide much needed low rental family housing to those who cannot otherwise afford to live in the area, relieving pressure on the Local Authority to house them instead.

#### ABOUT THE RMCS

- 1.14 RMCS is a philanthropic organisation, which was founded in 1911 to provide decent and attractive houses for the working classes in Ruislip and continues to accommodate those who cannot afford to buy or rent property on the open market. The development site is just part of a wider area on the Ruislip Manor Estate under their stewardship, which offers affordable accommodation.
- 1.15 Indeed, it is well documented that there is a shortfall in both market and affordable dwellings across the South East and there continues to be a high demand for the properties managed by the RMCS on the estate. The consequence of changing demographics and people living longer adds further pressures, because the RMCS have fewer properties to go around and only a limited supply of family sized homes, despite the demand for this type of home.
- 1.16 As part of the continued management of the estate RMCS are looking to find suitable opportunities which will allow them to provide additional accommodation. Through analysing their options, it has been recognised that the redevelopment of the site presents an opportunity to enhance this part of the site, as well as provide new family accommodation.



## 2 PLANNING POLICY CONTEXT

2.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning applications should be determined in accordance with the Development Plan unless material considerations indicate otherwise. In this case the Development Plan comprises of the:

- Hillingdon Local Plan: Part 1: Strategic Policies – Adopted November 2012
- Saved Unitary Development Plan Policies – Adopted 2007
- Hillingdon Local Plan: Part 2 – Site Allocations and Designations
- Hillingdon Local Plan: Part 2 Development Management Policies
- The London Plan.

2.2 The National Planning Policy Framework (NPPF), which sets out the Governments planning policy position is also referred to. Whilst it is not part of the statutory Development plan, it is a material planning consideration in the determination of planning applications. It places a presumption in favour of sustainable development at the heart of planning decisions, for which there are three dimensions: economic, social, and environmental.

### HOUSING NEED

2.3 A key objective of the adopted Development Plan is to provide new homes, to meet the need set out in Policy H1, Local Plan Part 1. At the time of its adoption, the policy identified a minimum requirement for at least 4,250 additional dwellings, annualised as 425 dwellings per year for the 10-year period between 2011 and 2021 across the borough. Rolled forward to 2026, this target equates to a minimum provision of 6,375 dwellings over the period of the Hillingdon Local Plan: Part 1- Strategic Policies. This has since been increased in the London Plan to a minimum of 8,385 dwellings over the plan period and an annual monitoring target of 559 dwellings.

2.4 A large proportion of this housing need is for homes with three or more bedrooms and for affordable units, which is consistent with RMCS's own requirements. UDP Policy H5 also makes clear that:



*“...the council will encourage dwellings suitable for large families, where the needs of the area suggest it is appropriate”.*

- 2.5 Indeed, the provision of affordable homes is a key aim of the planning system that weighs in favour of the development.

#### DESIGN AND AMENITY

- 2.6 The quality of design is another consideration of the Council’s development plan, including how the development relates to neighbouring properties and amenity. The proposed development has therefore been designed to reflect the existing local vernacular but to modern building standards.
- 2.7 In this regard the Planning Inspector’s decision commented that the genal design was broadly similar design to the existing dwellings along Green Walk, however concerns were raised in respect of the two-storey side wings, uneven roof pitch and large rear dormers. The submitted scheme has removed these features creating.
- 2.8 As a result, the proposed dwellings will have an appearance that is more closely aligned to the neighbouring dwellings, as seen from the front. The rear elevation will see greater variation, but simple forms are utilised and therefore it would continue to reflect the character of the area, albeit whilst enabling the internal space to be expanded and provided as family sized homes.
- 2.9 The proposed dwellings will also be set further back (compared to the refused scheme) into the site, making it appear even more subservient to the main street scene. This arrangement allows for more soft landscaping to the front of the properties, reducing the amount of hard standing and creating a street scene that is more closely matched to the existing arrangement for the neighbouring properties on Green Walk which tend to have small front gardens, divided up with low level hedgerows. This new arrangement has meant fewer on site car parking spaces, compared with the refused scheme, however this has been assessed as still be sufficient to meet the requirements of the development (see Transport Statement).
- 2.10 Where appropriate, the Council’s design guidance has also been reconsidered, with a view to addressing the concerns raised about neighbouring amenity, ensuring a good standard of



living for the future occupiers and their neighbours. For example, the Council's guidance recommends that 21m should be retained between facing habitable room windows.

- 2.11 In this case a distance of more than 21m is retained between the proposed development and the dwellings behind on Windmill Way, with the exception of nos. 19 and 21, which fall slightly under. This is however deemed acceptable, noting the Inspector's comments, where he said:

*"Whilst the separation distances to Nos 19-21 would be below the distance usually expected by the Council, the angle at which these windows would face one another would be oblique. In this regard, the appellant states that it would be towards the limit of a 45 degree line drawn from the centre of the proposed bedroom windows. In these circumstances, the marginal shortfall against the Council's usual separation distances would not be unduly harmful in my view."*

- 2.12 The gap between the front elevation of the proposed dwellings to the side and rear elevations of nos. 4 and 5 Green Walk have also been increased to 15m, which aligns with the Council's normal separation distance between dwellings, where a two or more storey building abuts a property or its garden.
- 2.13 Internally, the properties have also been designed to meet the London Plan internal space standards for a three-bedroom dwelling, with each of the homes having a floor area of 102.28sqm, compared to a requirement of 102sqm set out in the standards. The gardens have also been designed to provide over 100sqm of external amenity space.
- 2.14 The changes made to the proposed development mark a significant departure from the refused design, whilst maintaining the core principle of seeking to design a scheme that still reflects the character of the street.

## **CONSERVATION AREA**

- 2.15 Notwithstanding the above, the site is located within the Ruislip Manor Way Conservation Area (CA) where there is a statutory duty on the Council to preserve or enhance its character and appearance. To assess the impact of development, we have prepared the following Heritage Impact Assessment.
- 2.16 The Planning (Listed Buildings and Conservation Areas) Act (1990) sets out regarding applications for planning permission within conservation areas that:





*“s.72(1) In the exercise, with respect to any buildings or other land in a conservation area, of any powers under any of the provisions mentioned in subsection (2), special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area.”*

- 2.17 The Council’s Development Plan reflects the above requirement, with Policy DMHB 4 stating that:

*“New development, including alterations and extensions to existing buildings, within a Conservation Area or on its fringes, will be expected to preserve or enhance the character or appearance of the area.”*

- 2.18 Regard is also given to the NPPF, which states at paragraph 189 that:

*“In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets’ importance and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary.”*

- 2.19 The significance of the site in this instance is not related to the existing garages which are of no heritage value and they make little if any valuable contribution towards the character and appearance of the conservation area. In fact, we would go as far as to say they detract from the value of the conservation area. Consequently, their loss would not be unacceptable.

- 2.20 However, it is also recognised that the proposed development must also preserve or enhance the important character and appearance of the Conservation Area, taken as a whole. One of the main contributing factors are the existing dwellings on Green Walk and although these area not particularly significant in terms of their construction, their architectural style is only seen in this sub area of the Conservation Area and aptly described by the Built Heritage Consultancy in their assessment of the refused submission:

*“The houses are arranged as semi-detached houses of 1.5 storeys in height and built across 4 bays, two bays per house. The buildings are designed with pronounced steeply pitched gabled roofs, almost a Saxon typology, that very much dominate the buildings on every elevation. The size of the roofs leaves only a short expanse of rendered brick walls visible at ground floor level*



*to both the front and rear elevations. The buildings comprise one 3-light casement and one 2-light casement to the ground floor; many original timber windows have regrettably been replaced by uPVC varieties. The roof is covered with brown clay pantiles, and the gabled end covered with matching brown clay tiles. The roof also includes two, joined mono-pitched dormers, covered again with brown pantiles.”*

- 2.21 Although the proposed houses do not seek to replicate the form of the existing dwellings, the main architectural detailing and theming is in keeping with the existing properties along Green walk. Notably, being set back, they will not be seen in the context of the main street and only through the gap between nos. 4 and 5.
- 2.22 Any impact will therefore be localised and whilst the proposal will lead to change, this is not the same as harm. Indeed, at worst the impact will be at the lower end of less than significant harm and is more likely to be neutral, therefore preserving the character of the conservation area.
- 2.23 However, even if assessed as leading to less than significant harm, the NPPF guides the decision maker to having regard to the public benefits of the proposal (para 196):
- “Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.”*
- 2.24 A significant benefit is that the proposal will provide much needed affordable accommodation to those who most need it (i.e., families). Although only two homes are proposed, which will make only a small contribution to the overall needs, it is nevertheless significant and can be afforded moderate weight.
- 2.25 Added to the benefit of replacing the garages, which detract from the Conservation Area, the proposal would have significant public benefit that will more than outweigh any potential harm to the Conservation Area.
- 2.26 More widely, the impact of the development on the character and appearance of the Conservation Area will be minimal and will not result in any particular harm. Consequently, it is considered that the proposal would be acceptable in heritage terms.



## PARKING AND ACCESS

- 2.27 The highway credentials of the proposal have been assessed through the accompanying transport statement and therefore we refer you to that document for the detailed assessment.
- 2.28 We do however draw attention to the fact that car parking is to be provided on site, with a total of 4 spaces provided. These would be allocated with 1 spaces for each of the proposed dwellings and a further 2 spaces for nos. 4 and 5 Green Walk. Access to the site would remain as existing, utilising the spur road. Garden sheds can be provided should secure cycle parking be required.
- 2.29 Notwithstanding the above, the proposal will result in the loss of the existing garages, but as detailed in the Transport Statement, it is anticipated that only 6 vehicles could be displaced onto the public highway network given the poor usage of the garages. Although this still represents a net loss in parking, the parking survey results from March 2018 showed that there is an average of 40 on-street parking spaces within 200m of the site of an evening which residents could utilise. The loss of garage parking will not therefore result in harm to the local public highway.
- 2.30 Indeed, the site is in a sustainable location with access to both public transport choices and local shops and facilities, without the need for the car. The public benefit of providing affordable family sized homes also weighs in favour of losing the underused and unattractive garaging. Any highway impact would not therefore be severe and accords with the Council's policies.

## AFFORDABLE HOUSING STATEMENT

- 2.31 Due to the size of the development, there is no policy requirement for affordable housing, because the proposal is for less than 10 units. However, the philanthropic objectives of the RMCS are nevertheless consistent with the affordable housing policy. The proposal would essentially provide two affordable family sized units. Given the need for affordable housing within the borough, particularly for larger family units, this also weighs in favour of the proposal.



## ECOLOGY AND TREES

- 2.32 Prior to the submission of the application the ecological potential of the site and likelihood of any trees being affected by the proposed development were also assessed.
- 2.33 In respect of the ecological potential of the site, it was found that the site has low ecological value and therefore is not habitat that needs protecting. However, the development proposals do provide opportunities for the enhancement of the site's biodiversity value. The Ecology Assessment therefore recommends the inclusion of the following measures:
- The installation of bat boxes within the brick work would increase the roosting opportunities for bats.
  - The planting of hedge rows and trees will improve nesting and feeding habitat for birds.
- 2.34 Turing to trees, one tree and two groups were surveyed during the Arboricultural Impact Assessment and included apple, Leyland cypress, Lawson cypress and hawthorn. However, due to declining health, poor growth environments, lack of amenity value and unsympathetic past management it has been recommended that T1, G1 and G2 are removed on Arboricultural grounds.
- 2.35 The assessment did otherwise note that G1 and G2 provide some screening value, this is considered limited due to their low quality. As such the report recommends that it would be of more value to the Conservation Area if these trees were replaced after the completion of the development.
- 2.36 In conclusion the report found no Arboricultural reason why the development cannot go ahead, by taking appropriate protective and mitigation measures so that all retained trees can be adequately protected, preventing any negative impacts to those trees.



### 3 SUMMARY AND CONCLUSIONS

- 3.1 The proposed development seeks to provide two additional family sized dwellings on the Ruislip Manor Estate, which is owned and managed by the RMCS. The two dwellings would add to the RMCS's portfolio of affordable properties, helping them to provide additional homes on the popular estate.
- 3.2 The development site, which is presently occupied by garaging, is underutilised for its intended purpose, and adds little value or character of the street. Optimising the land for residential use is an opportunity to improve the appearance of the site and the Conservation Area while also providing much needed housing.
- 3.3 The new design has resulted in significant changes compared to the refused scheme, removing the unfavourable elements, and improving the relationship with the neighbouring properties.
- 3.4 Overall, the proposed design is considered to make at least a neutral addition to the character and appearance of the area. In combination with the provision of affordable accommodation, the planning balance firmly falls in favour of the development.
- 3.5 The proposals therefore comply with the aims of all relevant development plan policies and with central government advice in accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004. In our judgement no other material considerations weigh against it. Accordingly, we trust the Council will determine that the application for planning permission can be approved.



## **APPENDIX 1 – DECISION NOTICE (73047/APP/2019/398)**



## APPENDIX 2 – APPEAL DECISION