

Technical Note

Project: 25-49 Victoria Road, Ruislip Manor

Subject: Refuse Strategy

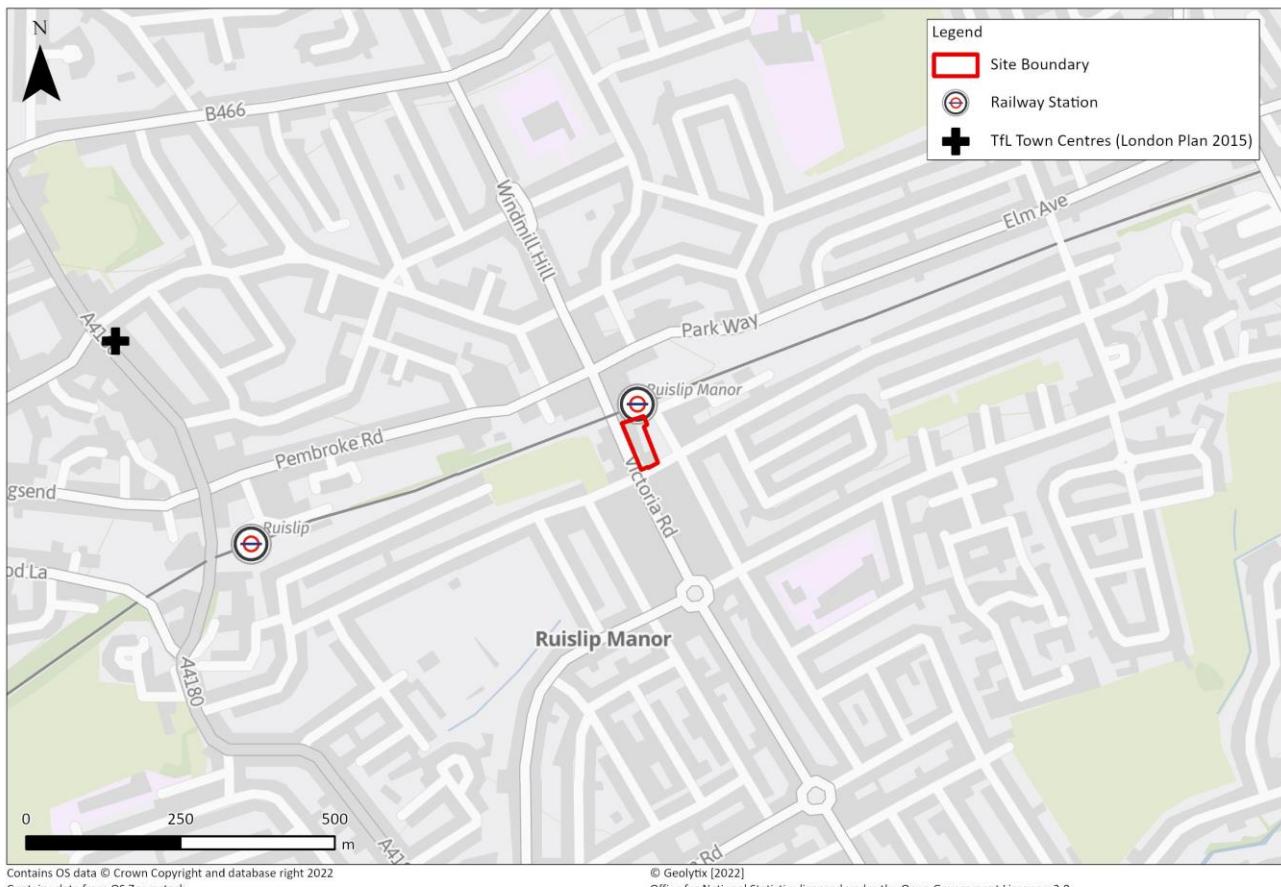
Client:	Urbanhold Limited	Version:	B
Project No:	07084	Author:	TH
Date:	27/06/2023	Approved:	CH/LK

I Introduction

I.1 Overview

- 1.1.1 This Refuse Strategy Technical Note (TN) has been prepared by PJA on behalf of Urbanhold Limited in association with the proposed development of a site at 25-49 Victoria Road, Ruislip Manor, located within the London Borough of Hillingdon (LBH).
- 1.1.2 The purpose of this TN is to ensure that the site can be adequately serviced whilst minimising congestion, pollution and obstruction on the highway.
- 1.1.3 The development proposals comprise roof extensions at second and third floor level to deliver nine additional dwellings alongside private amenity space, car and cycle parking, refuse storage, and other associated infrastructure. A site location plan is presented in Figure 1.

Figure 1: Site Location Plan



1.1.4 Throughout this report 'the site' refers to the land located at the aforementioned address and 'the development' refers to the buildings that are proposed to be constructed in the future.

1.1.5 This Refuse Strategy TN has been produced in accordance with the principles outlined within:

- National Planning Policy Framework (2021),
- The Freight and Servicing Action Plan (TfL, 2019),
- Delivery and Servicing Plans; Making freight work for you, (TfL, 2020), and
- Retiming deliveries, (TfL, 2018).

1.1.6 This document should be read in conjunction with the developments Transport Statement (TS) which has been submitted with the planning application as a standalone document.

1.2 Pre-application Discussions

1.2.1 Development proposals on the application site were subject to pre-application discussion with the LBH in March 2020 and subsequently a pre-application response was provided, including transport related comments. In summary, the relevant key transport related issues raised included:

“Subject to further work required to demonstrate satisfactory ‘thru-site’ vehicle transition, further detail will also be required in order for the proposal to conform to accepted ‘waste collection distances’ standards etc. i.e. bins/refuse collection points should be positioned within 10m of a refuse vehicle with a maximum carrying distance of 25m from each of the residential or commercial units to the point of collection.”

1.2.2 The March 2020 pre-application response provided by LBH is attached in **Appendix A**.

1.2.3 The development proposals were subject to further pre-application discussion with LBH in March/June 2022 and subsequently a pre-application response was provided in August 2022, which included transport related comments.

1.2.4 The August 2022 pre-application response provided by LBH is presented in **Appendix B**.

1.2.5 This TN will seek to address the relevant comments provided by LBH, as part of pre-application discussions.

2 Site Information

2.1 Overview

2.1.1 The site is located within the London Borough of Hillingdon. It is bound by Victoria Road to the west, Linden Avenue to the south, Ruislip Manor station and TfL railway line to the north, and an LBH car park to the east.

2.1.2 25-49 Victoria Road is currently occupied by a mix of retail land uses at ground floor level, with residential units located above. An access road is provided to the rear of the retail units, providing for servicing and delivery vehicles. This is reached via a vehicle crossover on Linden Avenue, approximately 35m to the east of Victoria Road.

2.1.3 Ruislip town centre is located approximately 800m to the west of the site. Ruislip Manor station, which is served by London Underground Metropolitan and Piccadilly Line services, is located approximately 100m to the north of the site. Ruislip Gardens station, which is served by London Underground Central Line services, is located approximately 1.6km to the south of the site.

2.2 Existing Highway Network

Victoria Road

- 2.2.1 Victoria Road is a single carriageway road with a north-south alignment, connecting with Windmill Hill and Park Way / Pembroke Road to the north and Field End Road and Eastcote Lane to the south. Victoria Road is subject to a 30mph speed limit in the vicinity of the site.
- 2.2.2 Footways and streetlighting are present along both sides of Victoria Road. A zebra crossing is provided approximately 10m to the south of the junction with Linden Avenue.
- 2.2.3 In the vicinity of the site, Victoria Road is controlled by defined on-street 'pay and display' parking bays, provided along both sides of the carriageway. The 'pay and display' parking is enforced between Monday – Saturday 08:00-18:30, with a maximum stay of two hours.
- 2.2.4 Ruislip Manor railway bridge, which has a 4.8m height restriction, is located approximately 100m to the north of the junction of Victoria Road / Linden Avenue.

Linden Avenue

- 2.2.5 Linden Avenue is a single carriageway road with an east-west alignment, connecting with Victoria Road to the west and Oak Grove to the east. Linden Avenue is subject to a 30mph speed limit in the vicinity of the site.
- 2.2.6 It is observed that footways and streetlighting are present along both sides of Linden Avenue.
- 2.2.7 In the vicinity of the site, double yellow lines are present along both sides of the carriageway, which restrict waiting at any time. Furthermore, double yellow kerb markings are present between Victoria Road and Dulverton Road / Linden Close, which restrict loading/unloading at any time.
- 2.2.8 Waiting by any goods vehicles with a maximum gross weight of five tonnes or greater or by buses is prohibited from 00:00 to 08:00 and 18:30 to 00:00 along Linden Avenue. Furthermore, a weight restriction of 7.5 tonnes is enforced in the vicinity of the site, with exception for access.
- 2.2.9 A loading bay is located on the northern side of Linden Avenue, approximately 10m to the west of the existing site access crossover. The bay provides goods vehicles loading only between Monday-Saturday, 08:00-18:30, with a maximum dwell time of 20 minutes.

3 **Proposed Refuse Strategy**

3.1 Overview

3.1.1 The development proposals comprise an “*extension of the existing two-three storey buildings along 25 – 49 Victoria Road to provide nine additional dwellings arranged over two additional storeys; proposals include private amenity space, car and cycle parking, refuse storage, and other associated infrastructure.*”

3.1.2 The development proposals include the following mix of units:

- Four 1 bed units
- One 2 bed unit
- Four 3 bed units

3.1.3 Proposed site layout plans are provided in **Appendix C**.

3.2 Refuse Strategy

Existing Development

3.2.1 Access to the rear of the existing commercial units will be retained from the existing access road. Vehicle swept path analysis demonstrating how the existing delivery and servicing areas can be accessed is provided in **Appendix D**.

Proposed Development

3.2.2 For delivery and servicing to both the existing and proposed residential units, the existing loading bay on Linden Avenue will be retained. It is anticipated that refuse collection will be undertaken from this bay, in line with the existing refuse collection on the site.

3.2.3 A new bin store will be provided along the site access road, located approximately 14m north of the site access. This bin store will serve both the existing and proposed residential units.

3.2.4 It is acknowledged that the proposed arrangement would not meet the maximum carry distances set out within the previous pre-application responses, for either waste operatives or some residents. However, it should be noted that the formalisation of the proposals would result in a significant improvement with regards to carry distances for waste operatives accessing the existing residential units.

3.2.5 It should also be noted that similar arrangements, whereby carry distances are in excess of those highlighted within the 2020 pre-application response, were deemed acceptable for two consented schemes located on the opposite side of Victoria Road, including:

- Ref no. 71956/APP/2016/2130 and 71956/APP/2018/4058 – Rear of 26-28 Victoria Road – The proposals included the provision of a bin store located to the rear of 26-28 Victoria Road which would require a push distance of circa. 70m to a point where a refuse vehicle could collect bins.
- Ref no. 20094/APP/2018/794 – 34 – 36 Victoria Road – included the provision of bin storage to the rear of the property and would require a push distance of circa. 45m to a point where a refuse vehicle could collect bins.

3.2.6 The refuse store would comprise a total of five 940l bins (4,700l total refuse capacity) for use by the existing and proposed dwellings. This level of provision would accord with the typical weekly waste arisings and subsequent storage requirements, as set out within the BS 5906:2005, 'Waste management in buildings - Code of practice' document.

4 **Servicing Vehicle Trips**

4.1.1 Service vehicle trips have been assessed using the TRICS database (v.7.10.1) with reference to TRICS sites presented in **Appendix E**. Table 1 outlines the servicing vehicle trip forecast for the proposed residential units, based on recent TRICS survey data.

Table 1: Servicing Vehicle Trip Generation – Proposed Development

Mode	AM Peak Period (08:00 – 09:00)			PM Peak Period (17:00 – 18:00)			Daily (07:00 - 19:00)		
	Arr	Dep	Total	Arr	Dep	Total	Arr	Dep	Total
Trip rate (per dwelling)	0.000	0.000	0.000	0.000	0.000	0.000	0.112	0.112	0.224
Total Servicing Trips	0	0	0	0	0	0	1	1	2

4.1.2 In summary, it is forecast that no servicing trips would be generated by the proposed development during the traditional AM and PM peak periods respectively. It is forecast that a total of two servicing trips (one arrival and one departure) would be generated by the proposed development on an average weekday.

4.1.3 Therefore, it is anticipated that the day-to-day servicing and delivery activities generated by the development would have a negligible impact on the surrounding highway network.

5 Summary

- 5.1.1 This Refuse Strategy Technical Note has been prepared by PJA on behalf of Urbanhold Limited in association with the proposed development of a site at 25-49 Victoria Road, Ruislip Manor, located within the London Borough of Hillingdon.
- 5.1.2 The purpose of this TN is to ensure that the site can be adequately serviced whilst minimising congestion, pollution and obstruction on the highway.
- 5.1.3 The development proposals comprise roof extensions at second and third floor level to deliver nine additional dwellings alongside private amenity space, car and cycle parking, refuse storage, and other associated infrastructure.
- 5.1.4 Access to the rear of all commercial developments will be retained from the existing access road.
- 5.1.5 For delivery and servicing to both the existing and proposed residential units, the existing loading bay on Linden Avenue will be retained. It is anticipated that refuse collection will be undertaken adjacent to the site access on Linden Avenue, in line with the existing arrangement.
- 5.1.6 A new bin store will be provided along the site access road, located approximately 14m north of the site access. The bin store is proposed to serve both the existing and proposed residential units.
- 5.1.7 It is forecast that no servicing trips would be generated by the proposed development during the traditional AM and PM peak periods respectively. It is forecast that a total of two servicing trips (one arrival and one departure) would be generated by the proposed development on an average weekday.
- 5.1.8 This document has identified that the development would not result in an adverse transport impact, on the basis of the refuse strategy. It is therefore reasonable to conclude that the development proposals are in accordance with the principles of sustainable development set out within the National Planning Policy Framework and are therefore fully acceptable in transport planning terms.



Appendix A LBH 2020 Pre-Application Response

Officers Report

Planning Applications Team
London Borough of Hillingdon
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Uxbridge

Idp
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CV1 3BA

Tel: 01895 250230
Case Officer: Zenab Haji-Ismail
Email: zhaji-ismail@hillingdon.gov.uk
Date: 26th June 2020
Our Ref: 75382/PRC/2020/39

Dear Idp

RE: Redevelopment of existing mixed use terrace and introduction of 13 new residential units with podium courtyard

SITE: 25-49 Victoria Road Ruislip

I refer to your request for pre-application planning advice dated 06-02-20 and our subsequent conference call on 18 March 2020 relating to the above development. The advice provided is based on the following drawings and documents issued to the Local Planning Authority for consideration.

Plan Numbers: 25-49 Victoria Road, Ruislip Manor - Pre application Concept Report - received 10 Feb 2020

Outlined below is a preliminary assessment of the proposal, including an indication of the main issues that should be addressed should you choose to submit a formal planning application. Please note that the views expressed in this letter represent officer opinion only and cannot be taken to prejudice the formal decision of the Council in respect of any subsequent planning application, on which consultation would be carried out which may raise additional issues. In addition, the depth of analysis provided corresponds with the scope of information made available to Council officers.

The Site and Surrounds

The application site is situated to the rear of Nos 25-49 Victoria Road and immediately west of the Linden Avenue Public Car Park. It extends to 0.25 ha and it is largely made up of the servicing area to the rear of the parade of shops along Victoria Road. The surrounding area comprises a mix of uses, to the east of the site is the car park, beyond which are residential properties, to the west is a similar parade of shops along Victoria Road with residential flats above, to the south is a further parade fronting Victoria Road and Ruislip Manor Library behind and to the north is the Ruislip Manor Underground Station. The site falls within Ruislip Manor Town Centre. The application does not lie within a Conservation Area nor are there Listed Buildings in the immediate vicinity of the application site.

The Proposal

The pre-application proposal before the Council comprises:

- Demolition of the existing staircase leading to flats above the shops
- 13 new residential units (4 x 1 bedroom and 9 x 2 bedroom)
- 11 car parking spaces at ground floor level
- Associated access and amenity space for existing and proposed residential units

Planning Policy

The proposed development would be assessed against 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 - The Spatial Development Strategy for London consolidated with alterations since 2011 (2016) and national guidance:

Part 1 Policies:

- PT1.H1 (2012) Housing Growth
- PT1.BE1 (2012) Built Environment
- PT1.CI1 (2012) Community Infrastructure Provision
- PT1.E1 (2012) Managing the Supply of Employment Land
- PT1.EM1 (2012) Climate Change Adaptation and Mitigation
- PT1.EM11 (2012) Sustainable Waste Management
- PT1.EM6 (2012) Flood Risk Management
- PT1.EM8 (2012) Land, Water, Air and Noise
- PT1.H2 (2012) Affordable Housing
- PT1.HE1 (2012) Heritage

Other Policies:

- DMAV 1 Safe Operation of Airports
- DMCI 4 Open Spaces in New Development
- DMHB 7 Archaeological Priority Areas and archaeological Priority Zones
- LPP 2.8 (2016) Outer London: Transport
- LPP 3.11 (2016) Affordable housing targets
- LPP 3.13 (2016) Affordable housing thresholds
- LPP 3.5 (2016) Quality and design of housing developments
- LPP 3.6 (2016) Children and young people's play and informal recreation facilities
- LPP 4.1 (2016) Developing London's economy
- LPP 4.12 (2016) Improving opportunities for all
- LPP 4.3 (2016) Mixed use development and offices
- LPP 4.4 (2016) Managing Industrial Land and Premises
- LPP 5.13 (2016) Sustainable drainage
- LPP 7.3 (2016) Designing out crime
- DMCI 7 Planning Obligations and Community Infrastructure Levy
- DME 1 Employment Uses in Designated Sites
- DMEI 1 Living Walls and Roofs and Onsite Vegetation
- DMEI 10 Water Management, Efficiency and Quality
- DMEI 11 Protection of Ground Water Resources
- DMEI 12 Development of Land Affected by Contamination
- DMEI 14 Air Quality
- DMEI 2 Reducing Carbon Emissions
- DMEI 9 Management of Flood Risk
- DMH 2 Housing Mix
- DMH 4 Residential Conversions and Redevelopment
- DMH 7
- DMHB 1 Heritage Assets

DMHB 11	Design of New Development
DMHB 12	Streets and Public Realm
DMHB 14	Trees and Landscaping
DMHB 15	Planning for Safer Places
DMHB 16	Housing Standards
DMHB 17	Residential Density
DMHB 18	Private Outdoor Amenity Space
DMHB 19	Play Space
DMT 1	Managing Transport Impacts
DMT 2	Highways Impacts
DMT 3	Road Safeguarding
DMT 4	Public Transport
DMT 5	Pedestrians and Cyclists
DMT 6	Vehicle Parking
DMTC 1	Town Centre Development
DMTC 4	Amenity and Town Centre Uses
LPP 2.16	(2016) Strategic Outer London Development Centres
LPP 2.17	(2016) Strategic Industrial Locations
LPP 2.7	(2016) Outer London: Economy
LPP 3.12	(2016) Negotiating affordable housing on individual private residential and mixed-use schemes
LPP 3.2	(2016) Improving health and addressing health inequalities
LPP 3.8	(2016) Housing Choice
LPP 3.9	(2016) Mixed and Balanced Communities
LPP 5.11	(2016) Green roofs and development site environs
LPP 5.12	(2016) Flood risk management
LPP 5.17	(2016) Waste capacity
LPP 5.2	(2016) Minimising Carbon Dioxide Emissions
LPP 5.21	(2016) Contaminated land
LPP 5.3	(2016) Sustainable design and construction
LPP 6.10	(2016) Walking
LPP 6.13	(2016) Parking
LPP 6.5	(2016) Funding Crossrail and other strategically important transport infrastructure
LPP 6.9	(2016) Cycling
LPP 7.1	(2016) Lifetime Neighbourhoods
LPP 7.13	(2016) Safety, security and resilience to emergency
LPP 7.14	(2016) Improving air quality
LPP 7.15	(2016) Reducing and managing noise, improving and enhancing the acoustic environment and promoting appropriate soundscapes.
LPP 7.2	(2016) An inclusive environment
LPP 7.4	(2016) Local character
LPP 7.5	(2016) Public realm
LPP 7.6	(2016) Architecture
LPP 7.8	(2016) Heritage assets and archaeology

LPP 8.2	(2016) Planning obligations
LPP 8.3	(2016) Community infrastructure levy
LPP 8.4	(2016) Monitoring and review

Main Planning Issues

1. Principle of development

Redevelopment of the Site to Provide Residential Accommodation

Paragraph 118 of the NPPF expects planning decisions to give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs. It promotes and supports the development of under-utilised land and buildings, especially if this would help to meet identified need.

Policy 3.3 of the London Plan (2016) expects Hillingdon to deliver a minimum of 559 new homes each year until 2025.

Policy H1 of the Local Plan: Part One (2012) requires the Council to exceed or meet its minimum strategic dwelling requirements, where this can be achieved, in compliance with other Local Plan policies.

At the moment, the Council can demonstrate a healthy supply of new homes being delivered within Hillingdon and as such, there is no reason why the redevelopment of the site for residential units would be given priority over the viability of the Town Centre.

Town Centre Development

Paragraph 85 of the NPPF (2019) supports the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management and adaptation. Policy 2.15 of the London Plan (2016) requires new developments to sustain and enhance the vitality and viability of centres.

Policy E5 of the Local Plan: Part One (2012) seeks to protect, enhance and manage local parades to ensure they meet the needs of the local community and enhance the quality of life for local residents, particularly those without access to a car.

Policy DMTC1 of the Local Plan: Part Two (2020) supports main town centre uses where the development is consistent with the scale and function of the centre by ensuring appropriate servicing arrangements have been provided.

The majority of the development is proposed on a service/access road that serves the main town centre uses along Victoria Road. The proposal seeks to utilise the existing service road to provide car parking for the newly created residential units above. There are significant concerns that the proposal would compromise the vitality and viability of the town centre. It is understood that during our pre-application conference call, it was suggested that the service road isn't particularly well used. Whilst that may be the case, historically, the road was designed to service the retail units and flats above from the rear and is intended to be used. A review of Google street view suggests the access road is used to store refuse and provides car parking for the existing shops and residential units above. The proposal would therefore displace access and servicing for the existing units. The alternative to servicing from this area would be from Victoria Road directly which would result in a negative impact on the environment, public realm, and safety of all road users. This proposal would not be supported in principle due to the proposed harmful impact on vitality and viability of the town centre.

Affordable Housing

London Plan Policies 3.11 and 3.12 and draft London Plan Policy H5 and Policy H6 seek to maximise the delivery of affordable housing, setting a strategic target of 50% across London. The Mayor's Affordable Housing and Viability Supplementary Planning Guidance seeks to increase the provision of affordable housing in London and embed affordable housing into land prices. The SPG introduced a threshold approach to viability, whereby schemes meeting or exceeding 25 per cent affordable housing without public subsidy can follow a 'Fast Track Route'. This means applicants are not required to submit viability information at the application stage, and applications are subject to review mechanisms only if an agreed level of progress on implementation has not been achieved within two years of consent being granted or as agreed with the LPA.

The Mayor's Affordable Housing and Viability SPG (2017) states the preferred tenure split is for schemes to deliver:

- At least 30% low cost rent (social rent or affordable rent) with rent set at levels that the LPA considers 'genuinely affordable';
- At least 30% as intermediate products; and
- The remaining 40% to be determined by the relevant LPA.

The London Borough of Hillingdon has determined that this 40% should be delivered as low cost rent (social rent or affordable rent). This approach is consistent with Policy H2 of the Local Plan: Part One (November 2012) and Policy DMH 7 of the Local Plan: Part Two (2020).

Policy H2 of the Local Plan: Part One (November 2012) require a minimum of 35% of units within developments of 10 or more units to be delivered as affordable housing. Policy DMH 7 of the Local Plan: Part Two (2020) expects, subject to viability and if appropriate in all circumstances, a minimum of 35% of all new homes on sites of 10 or more units should be delivered as affordable housing, with the tenure split 70% Social/Affordable Rent and 30% Intermediate.

In the first instance, it is expected that this is provided on site in line with the policy requirements set out above. If the required level of affordable housing is not provided on site, the application should be accompanied by a Financial Viability Assessment which will be reviewed independently. The cost of the independent review of the Financial Viability Assessment would need to be met by the applicant. The Council is unlikely to support a development that does not provide a policy compliant level of affordable housing.

2. Design

Paragraph 131 of the NPPF requires that in determining applications, great weight should be given to outstanding or innovative designs which promote high levels of sustainability, or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings.

Policies 7.1 to 7.8 of the London Plan (2016) place great emphasis on the importance of good design. Policy at all levels require buildings, streets and spaces to respond in a manner which promotes inclusive and sustainable development and contributes positively to the relationship between urban and natural environments and the general character of the location.

Policies D1 to D3 of the draft London Plan (2019) require developments to achieve high quality design that helps to reinforce the characteristics of a place.

Policy BE1 of the Local Plan: Part One (2012) requires all new development to improve and maintain the quality of the built environment in order to create successful and sustainable neighbourhoods, where people enjoy living and working and that serve the long-term needs of all residents.

Policy DMHB 11 of the Hillingdon Local Plan: Part Two (2020) re-emphasises the importance of good design in new development by:

- A) requiring all new buildings and extensions to be designed to the highest standards, which incorporate principles of good design, such as harmonising with the local context by having regard to the scale, height, mass and bulk of surrounding buildings; using high quality materials and finishes; having internal layouts and design which maximise sustainability and the adaptability of the space; protecting features which contribute positively to the area and provide landscaping that enhances amenity, biodiversity and green infrastructure;
- B) avoiding adverse impacts on the amenity, daylight and sunlight of adjacent property and open space;
- C) safeguarding the development potential of adjoining sites and
- D) making adequate provision for refuse and recycling storage.

Policy DMHB 12 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.

Whilst a fully scaled plans were not provided with the pre-application, using the Council's GIS database to measure the size of the site, it is noted that the site typically has a width of 5m. The pre-application proposal seeks to provide a 3 storey building above ground level.

The new development would be situated over the existing access/servicing area serving Nos 25- 49 Victoria Road. Access to the flats would be from Linden Avenue. Victoria Road is made up of 2 and 3 storey buildings. At 3 storeys above ground level, the proposal is considered to be an overdevelopment of the site that would provide a cramped and an uncharacteristic form of development within the context of this site.

At ground floor level, the car parking space is unlikely to work in practice, particularly when pillars and foundations are factored in. It would compromise existing access to the rear part of the existing units along Victoria Road leaving little room to manoeuvre or reach the car parking spaces or the rear of the shops. Such an arrangement would be dangerous to vehicles or pedestrians using the access road. Furthermore, it may compromise refuse collection and recycling collection and may result in a situation where commercial bins are left on the street.

The proposed cantilevered platform would be highly visible from the surrounding area. Due to its height and proposed design, the proposed development would be visually intrusive, particularly in views approaching Linden Avenue and would be considered unacceptable. The new residential units would be narrow and cramped with windows positioned to minimise the loss of privacy instead of providing good outlook and natural light to habitable rooms resulting in a poor quality environment for future residents.

Whilst the visuals show amenity spaces interspersed within the site, due to the proximity of the proposed development to the existing properties, the space would be overshadowed creating an unattractive environment for existing and future residents.

The proposal seeks to build right up against the boundary of the site and includes windows along the eastern elevation, this could compromise and prejudice any future development of the car park. Windows along the eastern boundary of the site would not be acceptable.

For the reasons set out, above, the proposal is considered to be an over development of the site that would result in a cramped form of development which would not be supported as the proposed redevelopment of this site would be contrary to the policies within the development plan. The proposal would be strongly resisted if an application were to be made.

SUSTAINABLE DESIGN

Should a future application come forward on this site, officers expect sustainability considerations and layout of services to be integrated into the design. This includes plant, lift over runs, PVs, mechanical ventilation. Details of which should be provided when an application is made.

TREES AND LANDSCAPING

Policy DMHB 14 of Local Plan: Part Two (2020) notes all developments will be expected to retain or enhance the existing landscape, trees, biodiversity and natural features of merit. Planning applications for proposals that would affect existing trees will be required to provide an accurate tree survey showing the location, height, spread and species of trees.

There are no TPO's or Conservation Area designations affecting the site. However, the proposal would result in the loss of trees to make way for the development. The proposal would be required to submit an arboricultural impact assessment to consider the trees that would be lost to make way for this development and a comprehensive landscaping proposal should be included with any future planning application.

3. Amenity

Policy DMHB 11 (2020) of the Local Plan: Part Two requires development proposals should not adversely impact on the amenity, daylight and sunlight of adjacent properties and open space.

The nearest residential dwellings are situated above the shops along Victoria Road. Whilst we do not have all of the existing plans for the existing residential units available, the proposal would be situated between 5m and 7m from these existing units. The proposal would result in an overbearing impact and could result in the loss of privacy. Whilst the applicant could make use of alternative window positioning to mitigate overlooking, it would still create a cramped form of development resulting in an overbearing relationship with existing units. The proposal would impact the amenity of neighbouring residential units and would not be supported.

NOISE

To the back of the existing shops, there are a number of air conditioning units which are required for shops or restaurants along the parade. The introduction of more residential units to the rear of the parade could compromise the viability of shops and restaurants if their servicing needs are restricted due to the presence of additional noise sensitive residential units. Furthermore, the proposed amenity space would be exposed to noise and disturbance from servicing activity and the existing air conditioning units. Any future application at this site would be expected to provide a Noise Impact Assessment.

EXTERNAL AMENITY SPACE

Policy DMHB 18 of the Local Plan: Part Two (2020) requires that all new residential development and conversions will be required to provide good quality and useable private outdoor amenity space. Amenity space should be provided. Table 5.3 requires the following:

- 1 bedroom flat 20m² per flat
- 2 bedroom flat 25m² per flat
- 3 bedroom flat 30 m² per flat

Based on the submitted plans it is unclear how much amenity space is being provided and where this is being located. The majority of the amenity space would be overlooked and overshadowed resulting in a poor quality environment.

Adopted local plan policies require developments to deliver private amenity space on site (Policy DMHB18), child play space (Policy DMHB19) and all major developments (such as this) are also required to deliver public open space (Policy DMCI 3). It is acknowledged that this may be challenging for a site of this size but there is an expectation that private, communal and child play space are provided on-site and that a contribution may be required towards upgrading works of local public open space where there is a shortfall of provision. The development is unlikely to provide good quality and useable amenity space and as such, would not be supported.

4. Highways

Policy DMT 2 of the Local Plan: Part Two (2020) notes development proposals must ensure that safe and efficient vehicular access to the highways network is provided to the Council's standards.

Policy DMT 6: Vehicle Parking states:

A) Development proposals must comply with the parking standards outlined in Appendix C Table 1 in order to facilitate sustainable development and address issues relating to congestion and amenity.

The Council may agree to vary these requirements when:

i) the variance would not lead to a deleterious impact on street parking provision, congestion or local amenity; and/or

ii) a transport appraisal and travel plan has been approved and parking provision is in accordance with its recommendations.

B) All car parks provided for new development will be required to contain conveniently located reserved spaces for wheelchair users and those with restricted mobility in accordance with the Council's Accessible Hillingdon SPD.

Transport Assessment

The proposal should be supported by a Transport Assessment which outlines the current position and resultant provisions/impacts of the proposal. Full guidance on the production of a TA is provided by Transport for London (TfL).

As part of the TA, it is crucial that evidence of current trip generation is provided and compared to the anticipated residential activity predicted for the proposal in order to determine net highway capacity/traffic assignment and safety impacts on the local network.

Car Parking

It is proposed to provide 13 new residential units consisting of 9 two bedroom/4 one bedroom units with 10-11 on-plot parking provisions. The standard requires a maximum of 13-19 on-plot spaces. The level of suggested provision therefore falls below the standard. A case would therefore have to be made at the time of a future application submission whereby a lower quantum would need to be shown as justifiable when considering the context of the local highway parking capacity and access to sustainable means of transport.

As part of that exercise, it should be ensured that the proposal is not prejudicial to the existing parking provisions allocated to the adjacent commercial shopping parade and residential component on Victoria Road.

Electric Vehicle Charging Points (EVCP's)

In line with the emerging London Plan, within any final parking quantum there is a requirement for a 20% 'active' EVCP provision with all remaining spaces being designated as 'passive' provisions.

It is noted that it can be reasonably argued that any 'active' space provision could in theory restrict/prevent the use of the 'active' bays for 'non-electrified' cars thereby, in operational terms, lowering secured on-plot parking provisions which are a key consideration when determining a planning application and should be avoided.

To help remedy this anomaly, it is recommended that the 80/20 'passive'/'active' percentage mix is applied under an internal site parking and allocation management regime whereby 'active' bays (20%) are managed on a demand-led principle and perform a dual function. This would entail allowing use of the 'active' bays by residents who do not own electric/hybrid vehicles for the duration of their occupancy. The bays would therefore be fully primed and ready once residents commit to a 'non-fossil' fuel vehicle.

Internal "below podium" Site Layout / Vehicle Access Provisions

The proposed internal parking and road layout arrangement should conform to the Department for Transport's (DfT) - Manual for Streets (MfS) (circa 2007) best practice for road and parking layouts as there is an operational and safety benefit derived from the provision of sufficient turning space within a site arrangement which allows all vehicles using the site to enter and leave in a forward gear without hindrance resulting from an inadequate road layout design (or other obstructions such as parked vehicles). This best practice is also applicable to servicing/delivery, emergency and refuse collection vehicles.

For example and specifically in the case of fire tenders, the podium height of 3.5 m appears to be a potential access constraint hence in order to ensure that final designs can satisfactorily accommodate fire service appliances within the site envelope, there would be a requirement for a comprehensive fire strategy to be produced at the formal planning application submission stage.

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. A waste collection strategy will also therefore be required.

Vehicle 'swept path' analysis should be integral to the assessment of the above in order to demonstrate that all of the above mentioned vehicles entering the site can in fact perform their function and be satisfactorily accommodated without detriment to the internal site workings. At this early stage, the indicative road layout may compromise some of the above mentioned parameters i.e. in terms of insufficient turning space for larger vehicles, which should be addressed accordingly.

It should also be demonstrated that all existing vehicular activities, including parking provisions and servicing requirements, associated with the adjacent commercial shopping parade and residential component on Victoria Road are not comprised in any shape or form.

Satisfactory mutual sight-line inter-visibility should be achieved between all roads users both pedestrian and vehicular within the site and at the main access point onto Linden Avenue. The relevant standard within the aforementioned MfS best practice guidance should be referenced.

Disabled Parking

In accord with the saved UDP standard, 10% of parking spaces should be disabled compliant.

Cycle Parking

For any 1-2 bedroom units, the cycle parking provision should be at a minimum level of 1 secure and accessible space per unit with 2 spaces for each of the larger units. In general a balanced 'design layout' approach is recommended in order to ensure cycle provisions are relatively evenly spread across the site and therefore conveniently located for each residential unit. Full details related to positioning would therefore need to be presented within a future planning application submission.

Refuse Arrangements/Storage

Subject to further work required to demonstrate satisfactory 'thru-site' vehicle transition, further detail will also be required in order for the proposal to conform to accepted 'waste collection distances' standards etc. i.e. bins/refuse collection points should be positioned within 10m of a refuse vehicle with a maximum carrying distance of 25m from each of the residential or commercial units to the point of collection.

In terms of transport/highways impacts, the acceptability (or otherwise) of a future planning application will be dependent on the evidence and detail provided within the submitted documentation together with an appropriate response to the comments and recommendations made within this appraisal.

5. Other

ARCHAEOLOGY

Policy 7.8 of the London Plan (2016) expects new development should make provision for the protection of archaeological resources, landscapes and significant memorials. The physical assets should, where possible, be made available to the public on-site. Where the archaeological asset or memorial cannot be preserved or managed on-site, provision must be made for the investigation, understanding, recording, dissemination and archiving of that asset.

Policy DMHB 7 of the Local Plan: Part Two (2020) ensures that sites of archaeological interest within or, where appropriate, outside, designated areas are not disturbed. If that cannot be avoided, satisfactory measures must be taken to mitigate the impacts of the proposals through archaeological fieldwork to investigate and record remains in advance of development works. This should include proposals for the recording, archiving and reporting of any archaeological finds.

Any future planning application should be supported by an archaeological impact assessment in line with Historic England guidance.

AIR QUALITY

The NPPF at para. 123 states that planning policies should sustain compliance with and contribute towards EU limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and the cumulative impacts on air quality from individual sites in local areas. Planning decisions should ensure that any new development in Air Quality Management Areas is consistent with the local air quality action plan.

The site is located within an Air Quality Management Area and as such, an air quality assessment should be provided as part of any application. This will be assessed by the Council in conjunction with the submitted transport assessment.

CRIME PREVENTION

The design and layout should also have regard to secure by design principals. You may wish

to contact Robert Palin of the Metropolitan Police on (ph# 0208 733 3703 or 07825103933) or by e-mail: DOCOMailbox.NW@met.police.uk and Robert.Palin@met.pnn.police.uk@met.pnn.police.uk to discuss means of ensuring community safety by design. An early involvement by the Crime Prevention Adviser is encouraged.

The siting of bin stores and secure cycle storage is fundamental to security. They should not block sight lines or provide refuges for anti social behaviour. Cycle parking and refuse enclosures should be incorporated into the buildings where possible.

CONTAMINATED LAND

Any future application at this site should be supported by a desk top study confirming known or potential contamination issues. The level of information required at this stage will vary dependent on the LPA's concerns. Further information can be found in the Council's Supplementary Planning Guidance 'Land Contamination', which is available on the Council's website. Clarification, if required, can be sought from the Council's Environmental Protection Unit. Applications will be distributed to the Council's Environmental Protection Unit and for comment, and conditions recommended applied in the event of an approval.

RENEWABLE ENERGY / SUSTAINABILITY

Applicants are advised to consult the Mayor's Supplementary Planning Guidance on Sustainable Design and Construction (available at http://www.london.gov.uk/mayor/strategies/sds/sustainable_design.jsp) to assist in achieving a sustainable development.

ENERGY

The development needs to meet Policy 5.2 of the London Plan and set out a 35% reduction in CO2 emissions using 2013 Part L as the baseline. We would expect to see a full energy assessment which incorporates a strategy (or strategies) as to how the 35% reduction would be achieved. It is acceptable to set out a couple of different options for reaching the 35% reduction, provided that there is clear analysis of their applicability within the development. The 35% reduction must be set against a clearly defined 2013 Building Regulation baseline, measured in kWhr and KgCO2. This should be a total for the whole development. The designs of the development must clearly incorporate the identified measures. For example if PVs are proposed, we would expect to see a roof plan setting out the location, orientation, pitch and the appropriate amount.

SUSTAINABLE URBAN DRAINAGE (SUDS)

All new development should incorporate sustainable drainage systems. The proposals need to include a clear drainage strategy that is reflected within the designs of the development. Policy 5.13 of the London Plan sets out a hierarchy to work towards, it also requires a greenfield run-off rate to be met. This means that simply suggesting that the run-off rate will not be increased is not sufficient.

The application will need to demonstrate a greenfield run-off rate in a 1:100 year (+ climate change) storm event. This needs to set out quantities of run-off and pre and post development and include the methods of attenuation to reduce it down to a greenfield rate. If infiltration methods of SUDS are proposed, you will need to demonstrate the receiving subsoils will be adequate. You will also need to set out adoption and maintenance regimes which may require consideration within a subsequent Section 106 legal agreement.

WATER CONSERVATION

The Borough is in a seriously water stressed area and we would expect to see proposals that achieve 105 litre per person per day in accordance with Policy 5.15 of the London plan. We would also expect the initial proposals to demonstrate the inclusion of water collection and reuse measures to reduce the demand on potable water.

NOISE REPORT

The applicant is expected to prepare a noise report setting out how that there is adequate sound attenuation between the residential units and the surrounding environment.

URBAN GREENING FACTOR

The applicant is required to apply an Urban Greening Factor with a target score of 0.4 as required by Policy G5 of the draft London Plan 2019.

FIRE SAFETY

The applicant is required to submit a Fire Statement, which is an independent fire strategy, produced by a third party suitably qualified assessor required by Policy D12 of the London Plan Intend to Publish Version (2019).

WASTE MANAGEMENT

Policy 5.17 of the London Plan sets out the Mayors Spatial Policy for Waste Management including the requirements for new developments to provide appropriate facilities for the storage of refuse and recycling. Accordingly it would be necessary for the development to provide adequate waste storage for the residential units. Bin stores which should have external access. The facilities should be convenient for use by residents and appropriate for servicing. Any refuse or recycling stores should be located within an appropriate distance of the vehicle collection point to enable easy servicing by refuse vehicles.

6. Planning Obligation and CIL (Mayor and LBH)

S106 PLANNING OBLIGATIONS

Policy DMCI 7 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020), requires that where developments generate the need for additional facilities, financial contributions will be sought.

The proposed development is likely to generate requirements for planning obligations, some of which are mentioned within the body of this report:

1) Affordable Housing: The London Plan sets the policy framework for affordable housing delivery in London. Policies 3.10 -3.13 requires that boroughs should seek the maximum reasonable amount of affordable housing when negotiating on individual private residential and mix-use schemes, having regard to their affordable housing targets.

Policy H2 of the Local Plan: Part 1 proposes that schemes will aim to include 35% of on site affordable housing on developments of 10 or more units. The application exceeds the threshold of 10 units and above, therefore affordable housing provision by way of a S106 Legal Agreement is required.

If less than 35% affordable housing is proposed, any application will need to be supported by a financial viability appraisal. At present no viability assessment has been undertaken and this will be required to determine the level of affordable housing that the site can provide.

Financial appraisals may be referred to the Council's specialist Consultant for comment. The applicant will be asked to meet the Council's costs prior to any such action.

The Council would expect the affordable housing provision to be similar in design to the rest of the site, as well as complying with Housing Quality Indicators (HQI's) and Design and Quality Standards (Housing Corporation). The room sizes must meet minimum standards for affordable housing in Hillingdon

2. Public Realm contributions

3. Public Open Space

4. Air Quality offset

5. Carbon Offset

6. Construction Management and delivery/Servicing Plans

7. Construction Training: in line with the s106 SPD a contribution towards or an in-kind scheme delivered during the construction phase will be sought as a result of this proposal. The formula is: £2,500 for every £1m construction cost + 43/160 x £ = total contribution.

8. Highways: in line with the s106 SPD any and all highways works will be required to be met by the applicant including car free development agreement.

COMMUNITY INFRASTRUCTURE LEVY (CIL)

Please be advised that as from 1 April 2012, all planning approvals for schemes with a net additional internal floor area of 100m² or more will be liable for the Mayoral Community Infrastructure Levy (Mayoral CIL), as legislated by the Community Infrastructure Levy Regulations 2010 and The Community Infrastructure Levy (Amendment) Regulations 2011. The liability payable will be equal to £60 per square metre. The London Borough of Hillingdon is a collecting authority for the Mayor of London and this liability shall be paid to LBH in the first instance.

In addition the development represents Chargeable Development under the Hillingdon Community Infrastructure Levy, which came into effect on 1st August 2014. The liability payable will be £95 per square metre. Should you require further information please refer to the Council's Website
www.hillingdon.gov.uk/index.jsp?articleid=24738

It is important to note that this CIL liability will be in addition to the planning obligations (s106) that the Council may seek from your scheme. Should you require further information please refer to the Council's Website www.hillingdon.gov.uk/index.jsp?articleid=24738.

It is important to note that this CIL liability will be in addition to the planning obligations (s106) that the Council may seek from your scheme.

FINANCIAL VIABILITY ASSESSMENTS (FVAs)

Applicants are advised that two versions of the FVA must be submitted as part of a planning application:

- 1) A full FVA, used for full consideration of financial implications.
- 2) A redacted FVA removing any commercially sensitive information alongside a signed statement confirming that your viability appraisal has been prepared in accordance with best practice and the RICS guidance (paragraph 4.5.4 RICS Financial Viability in Planning), with a

clear explanation of why the redaction is appropriate having regard to the tests in the Act (for the purposes of FOI).

7. Application Submission

Please refer to the Council's Draft Validation Checklist which can be viewed on the Council's website.

8. Conclusion

For the reasons outlined within the report, the proposal is considered to be an over-development of the site. Officers do not consider the very limited benefits of the proposal would outweigh the harm and as such the proposal would not be supported.

Please be advised that the Council require confirmation that you wish to enter into a PPA as soon as possible, in order to ensure the necessary resource are in place to meet the terms of the PPA.

Thank you for entering into the Council's pre-application advice service and I trust you have found this service of assistance.

Zenab Haji-Ismail
Principal Planning Officer
Major Applications Team
London Borough of Hillingdon

Planning Guarantee

For complex applications which are likely to exceed the statutory time frames, the applicant is encouraged to enter into a Planning Performance Agreement (PPA) to allow for the negotiation of complex cases. Central Government encourages the use of PPAs for larger and more complex planning proposals to bring together the developer, the Local Planning Authority and key stakeholders to work in partnership throughout the planning process.

Providing a PPA helps ensure that major proposals progress through the application process in a timely fashion and result in high quality development but the service is both time consuming and costly. The charge for all planning performance agreements will ensure that adequate resources and expertise can be provided to advise on major development proposals, the charges are determined on a site by site basis.

Hillingdon are committed to ensure the best possible service provision to all of our applicants. In order to ensure this, we will not be able to facilitate negotiation which would result in an application being determined outside of statutory timeframes, unless the applicant has entered into a Planning Performance Agreement.



Appendix B LBH 2022 Pre-Application Response



Oliver Wheeler
Savills
33 Margaret Street
London
W1G 0JD

Planning Applications Team
Hillingdon Council
Civic Centre, High Street
Uxbridge UB8 1UW

Tel: 01895 250230
Case Officer: Niamh McMenamin
Email: NMcMenamin@hillingdon.gov.uk
Date: 4th August 2022
Our Ref: 75382/PRC/2022/63

Dear Oliver Wheeler

RE: Redevelopment of existing mixed use terrace at 25-49 Victoria Road to provide 9 new residential units and a podium courtyard

SITE: 25-49 Victoria Road Ruislip

I refer to your request for pre-application planning advice dated 25.03.22 and our subsequent meeting on 14.06.22 relating to the above development. The advice provided is based on the following drawings and documents issued to the Local Planning Authority for consideration.

Plan Numbers: Noise Assessment - received 25 Mar 2022
Layout Review Vehicle Swept Path Analysis 6m Light Van - received 25 Mar 2022
Layout Review Vehicle Swept Path Analysis 7m Panel Van - received 06 Apr 2022
Refuse Strategy - received 25 Mar 2022
Pre-Application Concept March 2022 - received 25 Mar 2022
Pre-Application Concept -Part 1 - received 06 Apr 2022
Pre-Application Concept - Part 2 - received 06 Apr 2022
Daylight, Sunlight and Overshadowing Assessment - received 06 Apr 2022
Transport Assessment - received 25 Mar 2022

Outlined below is a preliminary assessment of the proposal, including an indication of the main issues that should be addressed should you choose to submit a formal planning application. Please note that the views expressed in this letter represent officer opinion only and cannot be taken to prejudice the formal decision of the Council in respect of any subsequent planning application, on which consultation would be carried out which may raise additional issues. In addition, the depth of analysis provided corresponds with the scope of information made available to Council officers.

The Site and Surrounds

The application site is situated to the rear of Nos 25-49 Victoria Road and immediately west of the Linden Avenue Public Car Park. It extends to some 0.25 ha and it is largely made up of the servicing area to the rear of the parade of shops along this part of Victoria Road. The surrounding area comprises a mix of uses, to the east of the site is the car park, beyond which are residential properties, to the west is a similar parade of shops along Victoria Road with residential flats above, to the south is a further parade fronting Victoria Road and Ruislip Manor

Library behind and to the north is the Ruislip Manor Underground Station. The site lies within the Primary Shopping Frontage of Ruislip Manor Minor Town Centre.

The application site is located on Potentially Contaminated Land, within the Ruislip Town Centre Air Quality Focus Area, lies in a Critical Drainage Area and has a Public Transport Accessibility Level (PTAL) of 3. The application does not lie within a Conservation Area nor are there Listed Buildings in the immediate vicinity of the application site.

The Proposal

The pre-application proposal before the Council comprises:

- 9 new residential units (4 x 2 bedroom and 5 x 3 bedroom);
- Pedestrian access to existing and proposed residential dwellings;
- 556sqm communal amenity space; and
- Covered cycle storey

This is a revised scheme from a previously assessed pre-application proposal which proposed the development of 13 residential units and 11 car parking spaces (ref. 75382/PRC/2020/39).

Planning Policy

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 London Plan (2021)
- The West London Waste Plan (2015)

Material Considerations

The National Planning Policy Framework (NPPF) (2021) is also a material consideration in planning decisions, as well as relevant supplementary planning documents and guidance.

Part 1 Policies:

- PT1.BE1 (2012) Built Environment
- PT1.E5 (2012) Town and Local Centres
- PT1.EM6 (2012) Flood Risk Management
- PT1.EM8 (2012) Land, Water, Air and Noise
- PT1.H1 (2012) Housing Growth

Other Policies:

- DMEI 14 Air Quality
- DMH 2 Housing Mix
- DMHB 11 Design of New Development
- DMHB 14 Trees and Landscaping
- DMHB 16 Housing Standards
- DMHB 18 Private Outdoor Amenity Space

DMEI 9	Management of Flood Risk
DMT 2	Highways Impacts
DMT 6	Vehicle Parking
DMTC 1	Town Centre Development
DMCI 7	Planning Obligations and Community Infrastructure Levy
LPP D14	(2021) Noise
LPP D3	(2021) Optimising site capacity through the design-led approach
LPP D5	(2021) Inclusive design
LPP D6	(2021) Housing quality and standards
LPP D7	(2021) Accessible housing
LPP D8	(2021) Public realm
LPP GG2	(2021) Making the best use of land
LPP H1	(2021) Increasing housing supply
LPP H10	(2021) Housing size mix
LPP SD6	(2021) Town centres and high streets
LPP SI13	(2021) Sustainable drainage
LPP T5	(2021) Cycling
LPP T6	(2021) Car parking
LPP T6.1	(2021) Residential parking
NPPF11	NPPF 2021 - Making effective use of land
NPPF12	NPPF 2021 - Achieving well-designed places
NPPF14	NPPF 2021 - Meeting the challenge of climate change flooding
NPPF5	NPPF 2021 - Delivering a sufficient supply of homes
NPPF7	NPPF 2021 - Ensuring the vitality of town centres

Main Planning Issues

1. Principle of development

The redevelopment of the site to provide residential accommodation:

Paragraph 120 of the NPPF (2021) gives substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land.

Policy H1 of the Local Plan: Part One (2012) requires the Council to exceed or meet its minimum strategic dwelling requirements, where this can be achieved, in compliance with other Local Plan policies.

At the moment, the Council can demonstrate a 5 year housing land supply and, as such, there is no reason why the redevelopment of the site for residential units would be given priority over the viability of the Ruislip Manor Minor Town Centre.

The proposed development should not prejudice the potential for the Linden Avenue Public Car Park, to the east of the site, to come forward for residential development by having windows that overlook the car park.

Town Centre Development:

Paragraph 86 of the NPPF (2021) states that planning policies and decisions should support the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management and adaptation.

Policy DMTC 1 states that the Council will support 'main town centre uses' where the development proposal is consistent with the scale and function of the centre. Town centre development will need to demonstrate that appropriate servicing arrangements have been provided.

The majority of the development is proposed on a service/access road that serves main town centre uses along Victoria Road. These shops along Victoria Road form part of the Primary Shopping Area for Ruislip Manor Town Centre and are therefore protected through the Development Plan. As outlined in Policy DMTC 1, the applicant would need to clearly demonstrate that these shops can be viably serviced and staffed as part of the proposed development.

9 residential units are proposed (5 x 3 bedroom and 4 x 2 bedroom units) located within separate blocks running north to south throughout the length of the rear service road. The unit structures would be raised to a podium level with approximately 3.5m height clearance in order to allow continuance of vehicular and pedestrian activities via the rear service road related to the existing shopping parade and residential components including the proposal itself. The scheme is presented as 'car-free'.

The concerns in relation to the redevelopment of this access road were echoed in the previously submitted scheme and it was concluded that whilst the service road is not particularly well used, it was originally intended to be used to service the retail and residential units on Victoria Road. The Officer stated that the proposal would therefore displace access and servicing for the existing units and would not be supported in principle due to the proposed harmful impact on vitality and viability of the town centre.

The agent has responded to the above concerns in the associated Cover Letter and stated that a review of servicing arrangements has been undertaken and the proposals have been designed having regard to the needs of the existing commercial premises. The Cover Letter states that the vast majority of the existing commercial units service there premises from Victoria Road. The proposals have been designed so rear vehicular access to all existing is retained so that servicing by smaller vehicles to the rear remains.

At a formal application stage, it should be confirmed that larger vehicles are currently (or in future) not required to enter the site and that the shops along Victoria Road can be viably serviced and staffed.

Affordable Housing

London Plan Policies H4 and H5 seek to maximise the delivery of affordable housing, setting a strategic target of 50% across London on developments of 10 or more homes. The Mayor's Affordable Housing and Viability Supplementary Planning Guidance seeks to increase the provision of affordable housing in London and embed affordable housing into land prices.

It is noted that the proposed development does not meet the threshold to provide affordable housing, however in the unlikely event that further capacity is found and the site is deemed to be able to accommodate 10 units or more, affordable housing would be required.

2. Design

Paragraph 126 of the NPPF (2021) states that the creation of high quality, beautiful and sustainable buildings and places are fundamental to what the planning and development process should achieve. Paragraph 124 states that development that is not well design should be refused, especially where it fails to reflect local design policies and government guidance on design.

Policy BE 1 of the Hillingdon Local Plan: Part 1 (2012) requires all new development to improve and maintain the quality of the built environment in order to create successful and

sustainable neighbourhoods.

Policy DMHB 11 of the Hillingdon Local Plan: Part 2 (2020) states that:

A) 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, considering the height, mass and bulk of adjacent structures;
- building plot sizes and widths, plot coverage and established street patterns;
- building lines and setbacks, rooflines, streetscape rhythm, 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.

ii) ensuring the use of high quality building materials and finishes;

iii) ensuring that the internal design and layout of development maximises sustainability and is adaptable to different activities;

iv) protecting features of positive value within and adjacent to the site, including the safeguarding of heritage assets, designated and un-designated, and their settings; and

v) landscaping and tree planting to protect and enhance amenity, biodiversity and green infrastructure.

B) Development proposals should not adversely impact on the amenity, daylight and sunlight of adjacent properties and open space.

C) Development will be required to ensure that the design safeguards the satisfactory re-development of any adjoining sites which have development potential. In the case of proposals for major development sites, the Council will expect developers to prepare master plans and design codes and to agree these with the Council before developing detailed designs.

D) Development proposals should make sufficient provision for well designed internal and external storage space for general, recycling and organic waste, with suitable access for collection. External bins should be located and screened to avoid nuisance and adverse visual impacts to occupiers and neighbours.

The terrace of shops is two / three-storeys in height and is to a symmetrical composition constructed from traditional materials that include facing brickwork and a combination of tiled pitched roofs and flat roofs set behind parapets. The shops are located at street level in the conventional manner with residential accommodation above.

As stated in the previous pre-application response there are concerns that this is not a conventional development site and in order for it to be developed it requires the intrusion of an incongruous raised deck above the access road to provide a platform to build the residential properties and provide access to the flats above the shop and the new units.

The proposed development is not substantially different from the previous pre-application scheme under ref. 75382/PRC/2020/39. The main change is the reduction from a predominantly 4-storey scheme to 3-storeys with a 4-storey unit being retained at the north end reducing the number of units from 13 to 9.

The proposed development would appear contrived and incongruous and would not harmonise with the suburban townscape in which it would be located. The proposed row of houses and the deck / walkways would appear to be suspended on stilts and the 'cantilevered' form of the residential block to the south and along the car park edge would appear suspended in air with the creation of an unattractive undercroft space running the full length of the access road. These would be completely alien to the area and would give the development a 'temporary' and insubstantial appearance. This visual harm would be exacerbated further by the dead inactive frontage that would be presented to Linden Avenue Car Park. Moreover, the car park is operated by Transport for London and has the potential for redevelopment. Any future application should not prejudice the potential for this site to

come forward by having windows that overlook the car park.

The development does not provide any meaningful soft landscaping and what could be provided would be insubstantial and within raised planters on the deck / walkways.

In order to install a deck, it would appear that there would need to be additional column supports other than those directly below the dwellings. There would be concerns that if additional columns were necessary that this would have a further impact on the vehicular access beneath the deck. The introduction of the deck could restrict the types of deliveries / services that could be made to the shops if there are height restrictions and a number of supporting columns to navigate. This could impact on the future viability of the shops.

It is also not clear how the deck would be able to accommodate the existing rear extensions and how maintenance and repairs could continue to be undertaken to the roofs once covered with the deck. The scheme also does not appear to be DDA compliant.

The accompanying design document refers to recent 'precedence' with a number of development schemes. Having looked through the examples I cannot see much comparison between the schemes and the proposed development except for side terraces between the units in some of the examples. None of the development sites shown are built over access roads or face directly on the backs of shops or have large 'dead' inactive elevations (Linden Avenue Car Park) and undercrofts. The architects had suggested that they had undertaken similar schemes, however, none of these examples feature within their design document.

The schemes referred to within the design document and during the TEAMS presentation to the rear of nos. 26-28 and 34-36 Victoria Road are also not considered to be comparable with the proposed development. These are isolated extensions that relate to an additional storey being built above existing large rear extensions to the shops on the western side of Victoria Road. These developments do not build over the access road or introduce a deck and walkways to the rear of the terrace.

In terms of the housing mix, the application proposes to deliver 5 x 3 bedroom homes. The scheme looks unlikely to deliver good quality family units (3 bedrooms or more) and therefore it would not be deemed appropriate to pursue the 3 bedroom units.

For the reasons set out above, the proposed development would appear as an incongruous and cramped form of development that would attract undue attention appearing as an awkward intrusion within the townscape emphasising the sites inappropriateness for a development of this type. The proposed development fails to overcome the previously raised concerns in terms of the design and it would be resisted if an application were to be made.

3. Amenity

Policy DMHB 11 (2020) of the Local Plan: Part Two requires that development proposals should not adversely impact on the amenity, daylight and sunlight of adjacent properties and open space.

The proposed separation distances between the windows of habitable rooms of the proposed dwellings and the residential accommodation fronting Victoria Road are well below 21 metres. Paragraph 5.38 of the Local Plan includes a requirement for at least 21 metres to be provided between the windows of habitable rooms. It is considered that this could not be achieved without providing some form of contrived window layout that would likely result in a poor elevation to the deck and the residential flats directly opposite. In this regard, it is not clear if the proposed development could be erected without adversely impacting the amenity of neighbouring residential units.

NOISE

It is noted that a pre-application noise report has been submitted as part of this pre-application. The report concludes that the initial assessment of Noise Risk is that the application site is likely to be in the 'Medium' to 'High' Noise Risk category.

In any future application, a noise assessment must be submitted to the Council for approval of external noise levels including reflected and radiated noise and details of the sound insulation of the building envelope, orientation of habitable rooms away from major noise sources and of acoustically attenuated mechanical ventilation as necessary to achieve internal room and (if provided) external amenity noise standards.

As disruption may be caused during the construction phase of this project, a Construction Management Plan should be submitted to and approved in writing by the Council. Details should include control measures for dust, noise, vibration, lighting, delivery locations, restriction of hours of work and all associated activities audible beyond the site boundary to 0800-1800hrs Mondays to Fridays and 0800 -1300 hrs on Saturdays, advance notification to neighbours and other interested parties of proposed works and public display of contact details including accessible phone contact to persons responsible for the site works for the duration of the works.

INTERNAL SPACE STANDARDS

Policy DMHB 16 of the Local Plan: Part Two (2020) requires that all housing development should have an adequate provision of internal space in order to provide an appropriate living environment. To achieve this all residential development or conversions should: meet or exceed the most up to date internal space standards, as set out in Table 5.1 of the Local Plan - Part 2 (2020).

The submitted Pre-Application Concept refers to the proposed dwellings providing the following gross internal areas:

- 2 x 2b/3p @ 65 to 66.9sqm;
- 2 x 2b/4p @ 77.4 to 84.3sqm; and
- 5 x 3b/4p @ 84.1 to 85.7sqm.

The proposed gross internal areas for the 2 storey 2b/3p dwellings are below the 70sqm required in Table 5.1 of the Local Plan - Part 2 (2020). One of the 2 storey 2b/4p dwellings is below the 79sqm required. The 2 storey 3b/4p dwellings all appear to meet or exceed the 84sqm required. On this basis, the proposed development would not meet the requirements of Policy DMHB 16 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020) and could not be supported by the Council.

EXTERNAL AMENITY SPACE

Policy DMHB 18 of the Local Plan: Part Two (2020) requires that all new residential development and conversions will be required to provide good quality and useable private outdoor amenity space. Amenity space should be provided. Table 5.3 requires the following:

- 1 bedroom flat 20m² per flat
- 2 bedroom flat 25m² per flat
- 3 bedroom flat 30 m² per flat

Adopted local plan policies require developments to deliver private outdoor amenity space on site (Policy DMHB 18), child play space (Policy DMHB 19) and major developments are also required to deliver public open space (Policy DMCI 3). It is acknowledged that this may be challenging for a site of this size but there is an expectation that private and communal outdoor amenity space and child play space are provided on-site and that a contribution may be required towards upgrading works of local public open space where there is a shortfall of

provision. The development is considered unlikely to provide good quality and useable amenity space and, as such, would not be supported by the Council.

4. Highways

Policy DMT 2 of the Local Plan: Part Two (2020) notes development proposals must ensure that safe and efficient vehicular access to the highways network is provided to the Council's standards.

Policy DMT 6: Vehicle Parking states:

A) Development proposals must comply with the parking standards outlined in Appendix C Table 1 in order to facilitate sustainable development and address issues relating to congestion and amenity.

The Council may agree to vary these requirements when:

i) the variance would not lead to a deleterious impact on street parking provision, congestion or local amenity; and/or

ii) a transport appraisal and travel plan has been approved and parking provision is in accordance with its recommendations.

B) All car parks provided for new development will be required to contain conveniently located reserved spaces for wheelchair users and those with restricted mobility in accordance with the Council's Accessible Hillingdon SPD.

The locality is comprehensively covered by parking controls including areas of 'all-day' pay & display operating from Monday to Saturday, whilst the public transport accessibility level (PTAL) is at rated at a moderate level of 3 however in practice, it is appreciated that the 'real world' PTAL can be considered somewhat higher than numerically depicted due the proximity of Ruislip Manor LU Station and a plethora of local bus services within the locality.

The unit structures would be raised to a podium level with approximately 3.5m height clearance in order to allow continuance of vehicular and pedestrian activities via the rear service road related to the existing shopping parade and residential components including the proposal itself. The scheme is presented as 'car-free'.

Parking Provision:

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.

It is proposed to provide 9 new residential units consisting of 5 three bedroom & 4 two-bedroom units on a 'car-free' basis. The standard would require a maximum of 14-16 on-plot spaces whilst the London Plan (LP 2021) standard demands a lesser 'maximum' quantum of 6-7 spaces. The 'car-free' option therefore technically falls below both standards. The pre-applicant suggests that the LP would encourage a development at this location to be 'car-free' but this regional standard only recommends this 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.

On the basis of above reasoning, it is therefore considered that a 'car-free' proposal may be further considered in this case subject to the findings of an on-street parking stress survey which should be undertaken, in line with the industry recognised 'Lambeth Council Parking Survey' methodology, within the locality in order to catalogue the levels of on-street parking demand in all roads within a walking distance of 200m of the site. This would give some indication as to the availability of spare on-street parking capacity (if any) which would be taken into consideration if a 'car-free' proposal is presented at a future planning application in

a balanced context of available local highway parking capacity and access to sustainable means of transport.

Cycle Parking

14 secure and accessible cycle spaces should be provided for the 9 units to conform to the council's adopted cycle parking standard. 20 communal provisions are proposed towards the far end of the rear access road. This exceeds the standard but is considered acceptable given the associated benefits with encouraging this mode of sustainable travel.

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.

Evidence of anticipated residential activity predicted for the proposal should be presented to determine the likely net highway capacity/traffic assignment and safety impacts on the local network. Trip analysis based on the 'industry recognised' assessment tool (TRICS - Land Use Database) should be applied. This will allow for an informed decision to be made on the acceptability (or otherwise) of this aspect of the scheme.

Internal "below podium" Site Layout / Vehicle Access Provisions

The proposed internal parking and road layout arrangement should conform to the Department for Transport's (DfT) - Manual for Streets (MfS) (circa 2007) best practice for road and parking layouts as there is an operational and safety benefit derived from the provision of sufficient turning space within a site arrangement which allows all vehicles using the site to enter and leave in a forward gear without hindrance. This best practice is also applicable to servicing/delivery, emergency and refuse collection vehicles related to the existing and proposed uses.

Access for Emergency Services

Specifically in the case of fire tenders (or larger service vehicles), the podium height of 3.5 m appears to be a potential access constraint hence in order to ensure that final designs can satisfactorily accommodate fire service appliances within the site envelope, there would be a requirement for a comprehensive fire safety strategy to be produced at the formal planning application submission stage. It is acknowledged that some work on this aspect has already been submitted in the form of a 'swept path' exercise which demonstrates that a fire tender (or larger service vehicle) would, in fact, be compromised.

Notwithstanding this point, it is acknowledged that, in circumstances where a fire tender cannot, for whatever reason, gain access to a specific location, Building Regulations (Fire Safety: Document B) make allowance for this scenario by stipulating that fire appliances should be able to be positioned within 45m of the source of an emergency in order to execute their duty. In line with the aforementioned Building Regulations, if this distance is exceeded then alternative solutions such as hydrants, fire detection/alarm/internal water sprinkler/dry riser systems can be applied in lieu of a fire tender accessing a location thereby covering most, if not all, eventualities.

General Access Requirements

It should also be demonstrated that all existing vehicular activities, including parking provisions and servicing requirements, associated with the adjacent commercial shopping parade and residential component on Victoria Road are not compromised in any shape or form by the proposal.

Vehicle 'swept path' analysis should therefore be integral to the assessment of the above in order to demonstrate that all of the above-mentioned vehicles entering the existing site can in fact perform their function and be satisfactorily accommodated without detriment to the internal site workings. At this early stage, indicative 'swept path' exercises appear to be encouraging in terms of allowing access/egress for a 7m panel van albeit with a clash with the proposed waste storage area which needs resolution. Clearly, larger vehicles would be prohibited from entering the site envelope unencumbered, so at the formal application stage it should be confirmed that larger vehicles are currently (or in future) not required to enter the site otherwise this could raise issue for the existing businesses and residential occupiers of the address as highlighted earlier.

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.

As depicted, the former '10m' parameter would broadly be met. However, the aforementioned 'swept path' exercise indicates that the proposed 'sub-podium' waste storage location inhibits vehicle movements for larger 7m panel vans and therefore requires relocation. In addition, the latter '30m' carrying distance parameter would not be met by some of the units. The pre-applicant mentions that nearby schemes have received consent with excessive carrying distances however all effort should be to best resolve this issue hence this aspect should be further investigated with submission of a detailed waste collection strategy at the formal application stage.

It is reiterated that collections from the existing and adjacent commercial premises and residential components on Victoria Road should not be compromised in any shape or form as a result of the proposal. A narrative explaining the method of collection from the established uses should be presented within a future submission.

Sight-Lines at the Access/Egress on Linden Avenue

Satisfactory mutual sight-line inter-visibility should be demonstrated between all road users both pedestrian and vehicular at the main access point onto Linden Avenue. The relevant standard within the aforementioned MfS best practice guidance should be referenced.

Synopsis

In terms of transport/highways impacts, the acceptability (or otherwise) of a future planning application will be dependent on the evidence and detail provided within the submitted documentation together with an appropriate response to the comments and recommendations made within this appraisal.

5. Other

AIR QUALITY

Policy SI 1 of the London Plan (2021) requires development proposals to ensure that where emissions need to be reduced to meet the requirements of Air Quality Neutral or to make the impact of development on local air quality acceptable, this is done on-site.

Policy DMEI 14 of the Local Plan: Part Two (2020) requires development proposals to demonstrate appropriate reductions in emissions to sustain compliance with and contribute towards meeting EU limit values and national air quality objectives for pollutants.

The site is located within the Ruislip Town Centre Air Quality Focus Area and as such, an air quality assessment should be provided as part of any application. This will be assessed by

the Council in conjunction with the submitted transport assessment.

CRIME PREVENTION

The design and layout should also have regard to secure by design principals. You may wish to contact Robert Palin of the Metropolitan Police on (ph# 0208 733 3703 or 07825103933) or by e-mail: DOCOMailbox.NW@met.police.uk and Robert.Palin@met.pnn.police.uk@met.pnn.police.uk to discuss means of ensuring community safety by design. An early involvement by the Crime Prevention Adviser is encouraged.

The siting of bin stores and secure cycle storage is fundamental to security. They should not block sight lines or provide refuges for anti social behaviour. Cycle parking and refuse enclosures should be incorporated into the buildings where possible.

CONTAMINATED LAND

Any future application at this site should be supported by a desk top study confirming known or potential contamination issues. The level of information required at this stage will vary dependent on the LPA's concerns. Further information can be found in the Council's Supplementary Planning Guidance 'Land Contamination', which is available on the Council's website. Clarification, if required, can be sought from the Council's Contaminated Land Officer. Applications will be distributed to the Council's Contaminated Land Officer for comment, and conditions recommended applied in the event of an approvable scheme.

RENEWABLE ENERGY / SUSTAINABILITY

Applicants are advised to consult the Mayor's Supplementary Planning Guidance on Sustainable Design and Construction (available at http://www.london.gov.uk/mayor/strategies/sds/sustainable_design.jsp) to assist in achieving a sustainable development.

ENERGY

Policy SI 2 of the London Plan (2021) requires major developments to be net zero-carbon.

Policy EM1 of the Hillingdon Local Plan: Part 1 - Strategic Policies (November 2012) states that the Council will ensure that climate change mitigation is addressed at every stage of the development process.

Policy DMEI 2 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020) requires that:

- A) All developments make the fullest contribution to minimising carbon dioxide emissions in accordance with London Plan targets;
- B) All major development proposals must be accompanied by an energy assessment showing how these reductions will be achieved;
- C) Proposals that fail to take reasonable steps to achieve the required savings will be resisted. However, if the Council is minded to approve the application despite not meeting the carbon reduction targets, then it will seek an off-site contribution to make up for the shortfall. The contribution will be sought at a flat rate of £/tonne over the lifetime of the development, in accordance with the current 'allowable solutions cost'.

The design of the development must clearly incorporate the identified measures. For example if PVs are proposed, we would expect to see a roof plan setting out the location, orientation, pitch and the appropriate amount.

SUSTAINABLE URBAN DRAINAGE (SUDS)

Policy SI 13 of the London Plan (2021) requires development proposals to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible. There should also be a preference for green over grey features, in line with the drainage hierarchy.

Policy DMEI 10 of the Local Plan: Part Two (2020) applications for all new build developments are required to include a drainage assessment demonstrating that appropriate sustainable drainage systems (SuDS) have been incorporated in accordance with the London Plan Hierarchy.

A sustainable drainage system (SuDS) and drainage statement would be required with any future application.

WATER CONSERVATION

The Borough is in a seriously water stressed area and we would expect to see proposals that achieve 105 litres, or less, per person per day in accordance with Policy SI 5 of the London Plan (2021). We would also expect the initial proposals to demonstrate the inclusion of water collection and re-use measures to reduce the demand on potable water.

URBAN GREENING FACTOR

The applicant is required to apply an Urban Greening Factor with a target score of 0.4 as required by Policy G5 of the London Plan (2021).

FIRE SAFETY

The applicant is required to submit a Fire Statement, which is an independent fire strategy, produced by a third party suitably qualified assessor required by Policy D12 of the London Plan (2021).

WASTE MANAGEMENT

Policy EM11 of the Local Plan: Part One (2012) requires all new development to address waste management at all stages of a development's life from design and construction through to the end use and activity on site, ensuring that all waste is managed towards the upper end of the waste hierarchy. Accordingly it would be necessary for the development to provide adequate waste storage for the residential units. Bin stores which should have external access. The facilities should be convenient for use by residents and appropriate for servicing. Any refuse or recycling stores should be located within an appropriate distance of the vehicle collection point to enable easy servicing by refuse vehicles.

6. Planning Obligation and CIL (Mayor and LBH)

S106 PLANNING OBLIGATIONS

Policy DF1 of the London Plan (2021) requires development proposals to provide the infrastructure and meet relevant policy requirements necessary to ensure that they are sustainable and to support delivery of the Plan.

Policy DMCI 7 of the Local Plan: Part Two (2020) seeks 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. Planning obligations are sought on a scheme-by-scheme basis to ensure that development proposals provide or fund improvements to mitigate site specific impacts made necessary by the proposal.

The proposed development is likely to generate requirements for planning obligations, some

of which are mentioned within the body of this report:

1. Public Realm contributions
2. Public Open Space/Private or Communal Open Space
3. Air Quality offset
4. Carbon Offset
5. Construction Management and delivery/Servicing Plans

6. Construction Training: in line with the s106 SPD a contribution towards or an in-kind scheme delivered during the construction phase will be sought as a result of this proposal. The formula is: £2,500 for every £1m construction cost + co-ordinator costs = total contribution.

7. Highways: in line with the s106 SPD any and all highways works will be required to be met by the applicant including any car free development agreement.

COMMUNITY INFRASTRUCTURE LEVY (CIL)

Please be advised that as from 1 April 2012, all planning approvals for schemes with a net additional internal floor area of 100m² or more will be liable for the Mayoral Community Infrastructure Levy (Mayoral CIL), as legislated by the Community Infrastructure Levy Regulations 2010 and The Community Infrastructure Levy (Amendment) Regulations 2011. The liability payable will be equal to £60 per square metre. The London Borough of Hillingdon is a collecting authority for the Mayor of London and this liability shall be paid to LBH in the first instance.

In addition the development represents Chargeable Development under the Hillingdon Community Infrastructure Levy, which came into effect on 1st August 2014. The liability payable for residential development will be £95 per square metre, index linked. Should you require further information please refer to the Council's Website www.hillingdon.gov.uk/index.jsp?articleid=24738

It is important to note that this CIL liability will be in addition to the planning obligations (s106) that the Council may seek from your scheme.

7. Application Submission

The Council has an adopted Local Planning Validation Checklist (June 2020), which sets out in full the documents required to accompany a planning application and is available on the Council's website.

Should you require further information, please refer to the Council's website:
<https://www.hillingdon.gov.uk/apply-planning-permission>.

8. Conclusion

As proposed, the development could not be supported by the Council. There are concerns in relation to the impact of the proposal on the amenity of adjacent properties and possible future adjacent properties and the overall design of the proposal, including inadequate private outdoor amenity space and child play space provision, which would be contrary to the requirements of Policies DMHB 11, DMHB 18 and DMHD 1 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020) and could not be supported by the Council.

The proposed development would appear as an incongruous and cramped form of development appearing as an awkward intrusion within the townscape emphasising the sites inappropriateness for a development of this type. The proposed development fails to overcome the previous concerns raised in terms of the design and could not be supported by the Council if a future application were to be made.

The proposed gross internal areas for the 2 storey 2b/3p dwellings are below the 70sqm required in Table 5.1 of the Local Plan - Part 2 (2020). One of the 2 storey 2b/4p dwellings is below the 79sqm required. The 2 storey 3b/4p dwellings all appear to meet or exceed the 84sqm required. On this basis, the proposed development would not meet the requirements of Policy DMHB 16 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020) and could not be supported by the Council.

Please be advised that the Council require confirmation that you wish to enter into a PPA as soon as possible, in order to ensure the necessary resource are in place to meet the terms of the PPA.

Thank you for entering into the Councils pre-application advice service and I trust you have found this service of assistance.

**Niamh McMenamin
Planning Officer
Major Applications Team
London Borough of Hillingdon**

Planning Guarantee

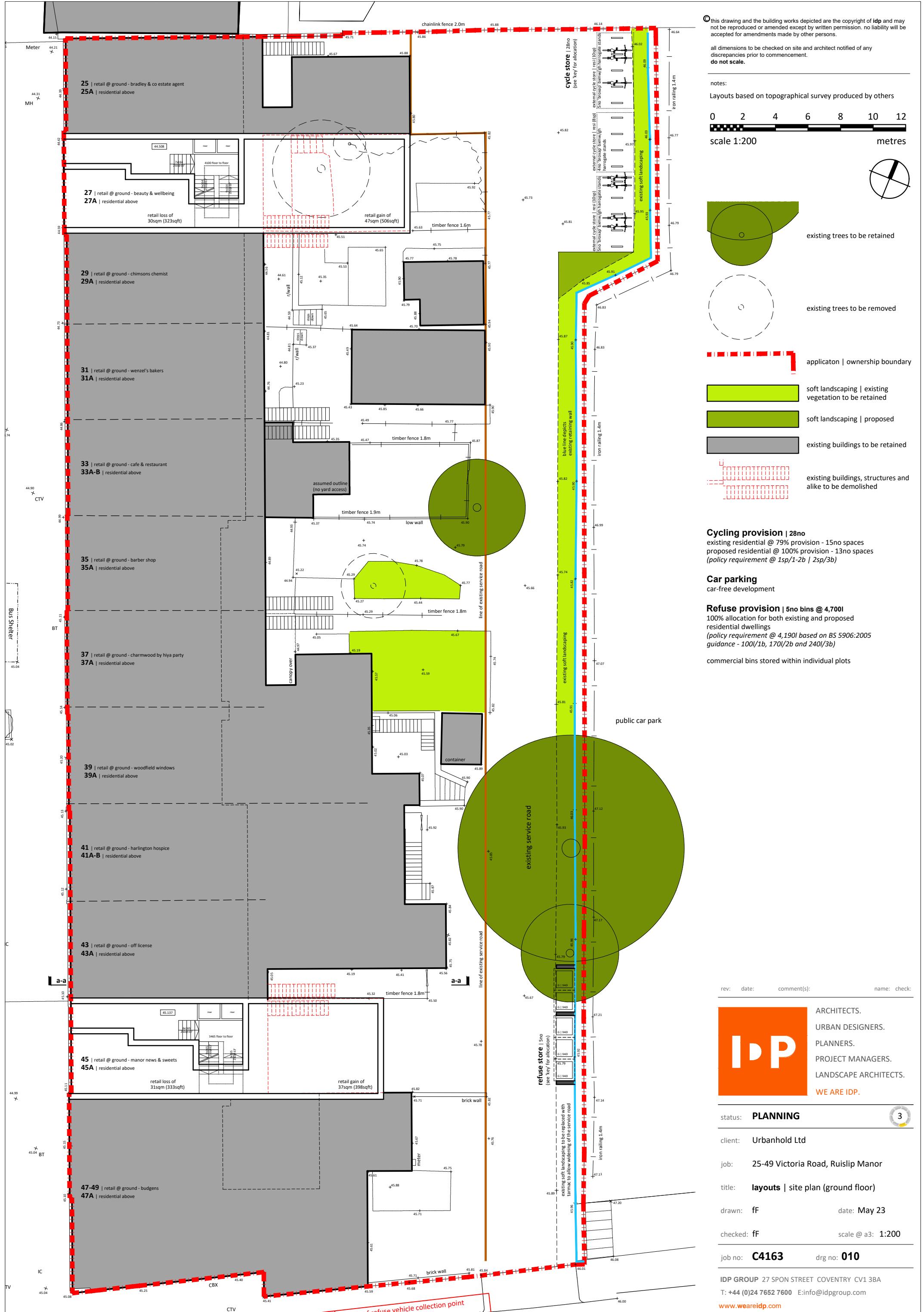
For complex applications which are likely to exceed the statutory timeframes, the applicant is encouraged to enter into a Planning Performance Agreement (PPA) to allow for the negotiation of complex cases. Central Government encourages the use of PPAs for larger and more complex planning proposals to bring together the developer, the Local Planning Authority and key stakeholders to work in partnership throughout the planning process.

Providing a PPA helps ensure that major proposals progress through the application process in a timely fashion and result in high quality development but the service is both time consuming and costly. The charge for all Planning Performance Agreements will ensure that adequate resources and expertise can be provided to advise on major development proposals, the charges are determined in a site by site basis.

Hillingdon are committed to ensure the best possible service provision to all of our applicants. In order to ensure this, we will not be able to facilitate negotiation which would result in an application being determined outside of statutory timeframes, unless the applicant has entered into a Planning Performance Agreement.



Appendix C Proposed Site Layout Plans





Appendix D Vehicle Swept Path Analysis

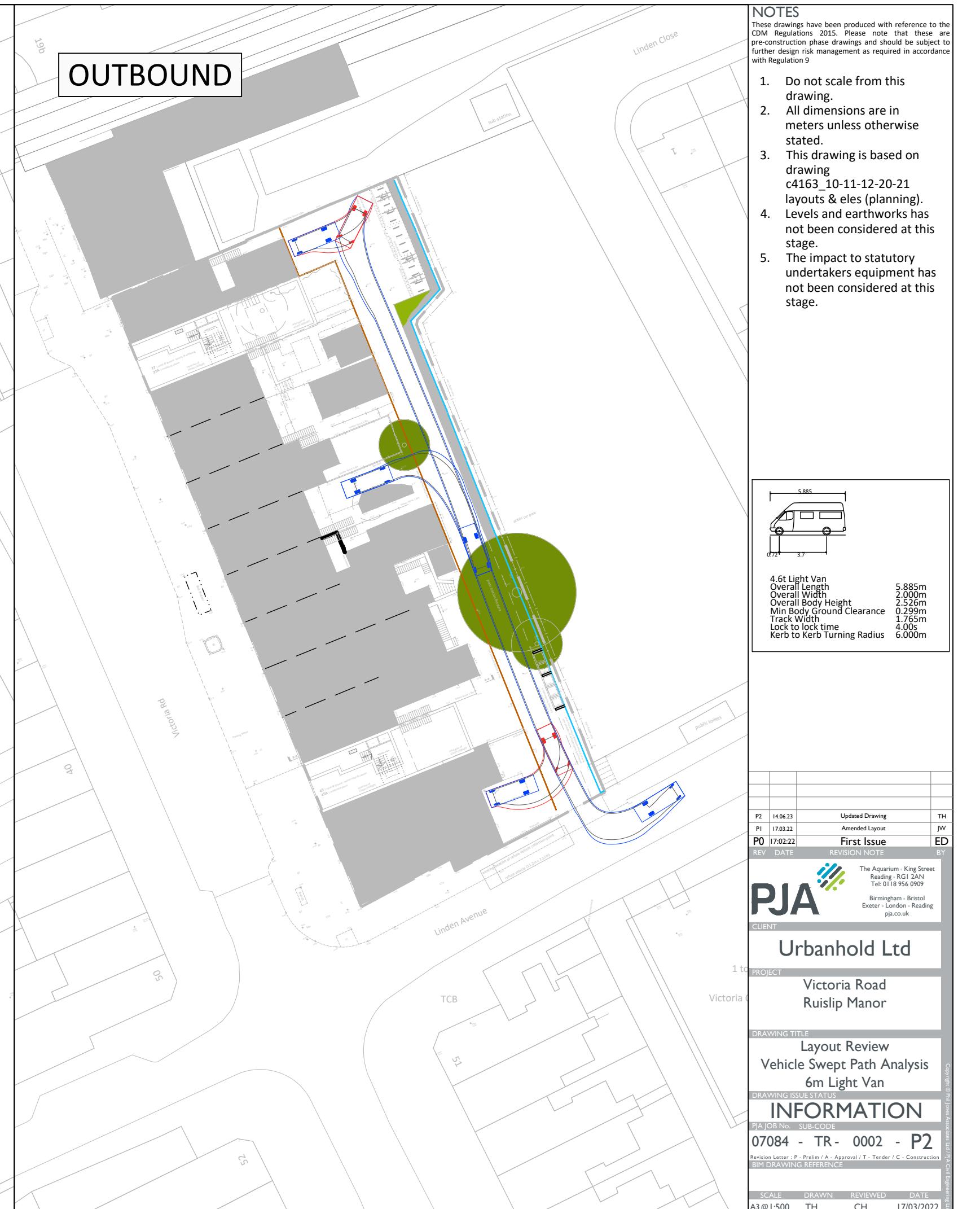
A3

1:500 10 20 30



INBOUND

OUTBOUND



NOTES

These drawings have been produced with reference to the CDM Regulations 2015. Please note that these are pre-construction phase drawings and should be subject to further design risk management as required in accordance with Regulation 9

1. Do not scale from this drawing.
2. All dimensions are in meters unless otherwise stated.
3. This drawing is based on drawing c4163_10-11-12-20-21 layouts & elec (planning).
4. Levels and earthworks has not been considered at this stage.
5. The impact to statutory undertakers equipment has not been considered at this stage.

4.6t Light Van Overall Length 5.885m Overall Width 2.000m Overall Body Height 2.526m Min Body Ground Clearance 0.299m Track Width 1.765m Lock to lock time 4.00s Kerb to Kerb Turning Radius 6.000m

P2	14.06.23	Updated Drawing	TH
PI	17.03.22	Amended Layout	JW
PO	17.02.22	First Issue	ED
REV DATE		REVISION NOTE	BY


PJA
 CLIENT

Urbanhold Ltd
 PROJECT
 Victoria Road
 Ruislip Manor

DRAWING TITLE
 Layout Review
 Vehicle Swept Path Analysis
 6m Light Van

DRAWING ISSUE STATUS
INFORMATION
 PJA Job No. SUB-CODE
 07084 - TR - 0002 - P2

Revision Letter : P - Prelim / A - Approval / T - Tender / C - Construction
 BIM DRAWING REFERENCE

SCALE DRAWN REVIEWED DATE
 A3 @ 1:500 TH CH 17/03/2022



Appendix E TRICS Outputs

PJA Seven House, High Street Longbridge, Birmingham

Licence No: 231601

Calculation Reference: AUDIT-231601-230616-0643

TRIP RATE CALCULATION SELECTION PARAMETERS:

Land Use : 03 - RESIDENTIAL
 Category : C - FLATS PRIVATELY OWNED
 MULTI-MODAL TOTAL PEOPLE

Selected regions and areas:

01	GREATER LONDON		
HO	HOUNSLOW		1 days
IS	ISLINGTON		2 days
KI	KINGSTON		1 days

This section displays the number of survey days per TRICS® sub-region in the selected set

Primary Filtering selection:

This data displays the chosen trip rate parameter and its selected range. Only sites that fall within the parameter range are included in the trip rate calculation.

Parameter: No of Dwellings
 Actual Range: 14 to 20 (units:)
 Range Selected by User: 6 to 20 (units:)

Parking Spaces Range: All Surveys Included

Parking Spaces per Dwelling Range: All Surveys Included

Bedrooms per Dwelling Range: All Surveys Included

Percentage of dwellings privately owned: All Surveys Included

Public Transport Provision:

Selection by: Include all surveys

Date Range: 01/01/15 to 25/05/21

This data displays the range of survey dates selected. Only surveys that were conducted within this date range are included in the trip rate calculation.

Selected survey days:

Monday	2 days
Wednesday	1 days
Friday	1 days

This data displays the number of selected surveys by day of the week.

Selected survey types:

Manual count	4 days
Directional ATC Count	0 days

This data displays the number of manual classified surveys and the number of unclassified ATC surveys, the total adding up to the overall number of surveys in the selected set. Manual surveys are undertaken using staff, whilst ATC surveys are undertaken using machines.

Selected Locations:

Edge of Town Centre	3
Edge of Town	1

This data displays the number of surveys per main location category within the selected set. The main location categories consist of Free Standing, Edge of Town, Suburban Area, Neighbourhood Centre, Edge of Town Centre, Town Centre and Not Known.

Selected Location Sub Categories:

Residential Zone	3
Built-Up Zone	1

This data displays the number of surveys per location sub-category within the selected set. The location sub-categories consist of Commercial Zone, Industrial Zone, Development Zone, Residential Zone, Retail Zone, Built-Up Zone, Village, Out of Town, High Street and No Sub Category.

Inclusion of Servicing Vehicles Counts:

Servicing vehicles Included	5 days - Selected
Servicing vehicles Excluded	X days - Selected

PJA Seven House, High Street Longbridge, Birmingham

Licence No: 231601

Secondary Filtering selection:

Use Class:

C3 4 days

This data displays the number of surveys per Use Class classification within the selected set. The Use Classes Order (England) 2020 has been used for this purpose, which can be found within the Library module of TRICS®.

Population within 500m Range:

All Surveys Included

Population within 1 mile:

20,001 to 25,000	1 days
25,001 to 50,000	1 days
50,001 to 100,000	1 days
100,001 or More	1 days

This data displays the number of selected surveys within stated 1-mile radii of population.

Population within 5 miles:

500,001 or More	4 days
-----------------	--------

This data displays the number of selected surveys within stated 5-mile radii of population.

Car ownership within 5 miles:

0.5 or Less	2 days
0.6 to 1.0	1 days
1.1 to 1.5	1 days

This data displays the number of selected surveys within stated ranges of average cars owned per residential dwelling, within a radius of 5-miles of selected survey sites.

Travel Plan:

No	4 days
----	--------

This data displays the number of surveys within the selected set that were undertaken at sites with Travel Plans in place, and the number of surveys that were undertaken at sites without Travel Plans.

PTAL Rating:

2 Poor	2 days
6a Excellent	2 days

This data displays the number of selected surveys with PTAL Ratings.

PJA Seven House, High Street Longbridge, Birmingham

Licence No: 231601

LIST OF SITES relevant to selection parameters

1	HO-03-C-05	BLOCK OF FLATS PARK LANE HOUNSLOW CRANFORD Edge of Town Residential Zone Total No of Dwellings: <i>Survey date: FRIDAY</i>	14 06/03/20	HOUNSLOW <i>Survey Type: MANUAL</i>
2	IS-03-C-05	BLOCK OF FLATS LEVER STREET FINSBURY Edge of Town Centre Built-Up Zone Total No of Dwellings: <i>Survey date: WEDNESDAY</i>	15 29/06/16	ISLINGTON <i>Survey Type: MANUAL</i>
3	IS-03-C-06	BLOCK OF FLATS CALEDONIAN ROAD HOLLOWAY Edge of Town Centre Residential Zone Total No of Dwellings: <i>Survey date: MONDAY</i>	14 27/06/16	ISLINGTON <i>Survey Type: MANUAL</i>
4	KI-03-C-03	BLOCK OF FLATS PORTSMOUTH ROAD SURBITON Edge of Town Centre Residential Zone Total No of Dwellings: <i>Survey date: MONDAY</i>	20 11/07/16	KINGSTON <i>Survey Type: MANUAL</i>

This section provides a list of all survey sites and days in the selected set. For each individual survey site, it displays a unique site reference code and site address, the selected trip rate calculation parameter and its value, the day of the week and date of each survey, and whether the survey was a manual classified count or an ATC count.

MANUALLY DESELECTED SITES

Site Ref	Reason for Deselection
WF-03-C-05	Covid-19 Restrictions

PJA Seven House, High Street Longbridge, Birmingham

Licence No: 231601

TRIP RATE for Land Use 03 - RESIDENTIAL/C - FLATS PRIVATELY OWNED

MULTI-MODAL TOTAL PEOPLE

Calculation factor: 1 DWELLS

BOLD print indicates peak (busiest) period

Total People to Total Vehicles ratio (all time periods and directions): 3.55

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	4	16	0.032	4	16	0.524	4	16	0.556
08:00 - 09:00	4	16	0.079	4	16	0.825	4	16	0.904
09:00 - 10:00	4	16	0.159	4	16	0.365	4	16	0.524
10:00 - 11:00	4	16	0.095	4	16	0.254	4	16	0.349
11:00 - 12:00	4	16	0.143	4	16	0.143	4	16	0.286
12:00 - 13:00	4	16	0.175	4	16	0.111	4	16	0.286
13:00 - 14:00	4	16	0.175	4	16	0.175	4	16	0.350
14:00 - 15:00	4	16	0.190	4	16	0.159	4	16	0.349
15:00 - 16:00	4	16	0.159	4	16	0.222	4	16	0.381
16:00 - 17:00	4	16	0.444	4	16	0.111	4	16	0.555
17:00 - 18:00	4	16	0.397	4	16	0.063	4	16	0.460
18:00 - 19:00	4	16	0.540	4	16	0.238	4	16	0.778
19:00 - 20:00	4	16	0.413	4	16	0.190	4	16	0.603
20:00 - 21:00	4	16	0.254	4	16	0.175	4	16	0.429
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:		3.255			3.555			6.810	

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: COUNT/TRP*FACT. Trip rates are then rounded to 3 decimal places.

PJA Seven House, High Street Longbridge, Birmingham

Licence No: 231601

TRIP RATE for Land Use 03 - RESIDENTIAL/C - FLATS PRIVATELY OWNED
 MULTI-MODAL Servicing Vehicles
 Calculation factor: 1 DWELLS
 BOLD print indicates peak (busiest) period

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	4	16	0.000	4	16	0.000	4	16	0.000
08:00 - 09:00	4	16	0.000	4	16	0.000	4	16	0.000
09:00 - 10:00	4	16	0.000	4	16	0.000	4	16	0.000
10:00 - 11:00	4	16	0.032	4	16	0.032	4	16	0.064
11:00 - 12:00	4	16	0.000	4	16	0.000	4	16	0.000
12:00 - 13:00	4	16	0.016	4	16	0.000	4	16	0.016
13:00 - 14:00	4	16	0.016	4	16	0.032	4	16	0.048
14:00 - 15:00	4	16	0.032	4	16	0.016	4	16	0.048
15:00 - 16:00	4	16	0.000	4	16	0.016	4	16	0.016
16:00 - 17:00	4	16	0.000	4	16	0.000	4	16	0.000
17:00 - 18:00	4	16	0.000	4	16	0.000	4	16	0.000
18:00 - 19:00	4	16	0.016	4	16	0.016	4	16	0.032
19:00 - 20:00	4	16	0.000	4	16	0.000	4	16	0.000
20:00 - 21:00	4	16	0.000	4	16	0.000	4	16	0.000
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:		0.112			0.112			0.224	

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: COUNT/TRP*FACT. Trip rates are then rounded to 3 decimal places.