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# Planning Statement

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25 - 49 VICTORIA ROAD, RUISLIP MANOR,  
HILLINGDON

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## 1. Introduction

- 1.1. This Town Planning Statement has been prepared on behalf of 'Urbanhold Ltd' for development at 25 – 49 Victoria Road, Ruislip Manor (hereafter referred to as "the Site") comprising of 9 no. new residential units (Use Class C3), 84sqm of new commercial floorspace (Class E) revised access arrangements, private amenity space and associated infrastructure.
- 1.2. This proposed description of development is as follows:

*"Extension of the existing buildings along 25 – 49 Victoria Road to provide 9 additional dwellings arranged over up to 2 additional storeys alongside new commercial floorspace; proposals include revised access arrangements, private amenity space, car and cycle parking, refuse storage, and other associated infrastructure."*

### Accompanying Reports

- 1.3. The proposals are set out on the Application Drawings submitted for approval alongside the planning application, and described in detail within the supporting Design and Access Statement. The planning application is also supported by a series of supporting documents (listed below) which address the planning and environmental issues that are considered relevant to the proposals.
  - Design and Access Statement, prepared by IDP;
  - Daylight and Sunlight Assessment, prepared by T16 Design;
  - Energy & Sustainability Statement, prepared by T16 Design;
  - Healthy Streets Transport Statement, prepared by PJA;
  - Refuse Strategy Technical Note, prepared by PJA;
  - Noise Impact Assessment, prepared by Quantum Acoustics Ltd;
  - Fire Statement (including Planning Gateway One form), prepared by Accendo Fire Safety;
  - Flood Risk and SuDS Drainage Strategy, prepared by EAS; and
  - Air Quality Assessment, prepared by Air Quality Assessments Ltd.

## Document Structure

1.4. This document comprises the following sections:

- Chapter 1 – Introduction (this section);
- Chapter 2 – Background;
- Chapter 3 – Planning History;
- Chapter 4 – Pre-application Consultation;
- Chapter 5 – The Proposal;
- Chapter 6 – Planning Considerations; and
- Chapter 7 – Conclusion.

## 2. Site and Surroundings

- 2.1. The application site extends to 0.25 ha and occupies 25-49 Victoria Road, Ruislip Manor which comprises a series part 2 and part 3-storey buildings, primarily used for commercial purposes at ground level with residential uses above.
- 2.2. The surrounding area comprises a mix of uses, to the east of the site is the car park, beyond which are residential properties. In close proximity to the site along both sides of Victoria Road are parades of shops with residential flats above. Ruislip Manor Library is located to the south of the site.
- 2.3. The site falls within the Primary Shopping Frontage of Ruislip Manor Minor Town Centre. The application site does not lie within a Conservation Area nor are there Listed Buildings in the immediate vicinity of the application site. The application site is located on Potentially Contaminated Land, within the Ruislip Town Centre Air Quality Focus Area, and lies in a Critical Drainage Area.
- 2.4. Owing to the Town Centre location of the site the site is in close proximity to a range of shops and services. The site is also in close proximity to Shenley Park (120m due west) and Park Way Park (230m due north), both which are easily accessible by existing pedestrian networks.
- 2.5. The site is located in Flood Zone 1 (representing the lowest risk of flooding), the Surface Water Flood Risk Web Map for the West London SFRA shows that the site is within the extent of 3.3%, 1% and 0.1% annual probability of a surface water flood event.
- 2.6. The site and benefits from good public transport connectivity. The site is PTAL 3 although it lies immediately adjacent to a PTAL Level 4 designated area, with the site having good connections to public transport services. Ruislip Manor Underground Station is located immediately adjacent to the north of the site. The station serves the Metropolitan and Piccadilly Lines, providing direct connections to Baker Street, Wembley Park, Aldgate, Cockfosters, Uxbridge and Acton Town. A bus stop is also located directing in front of the site, providing excellent connections to the wider area.

## 3. Planning History

- 3.1. Following a desktop search of London Borough of Hillingdon's (LBH) public access has revealed a number of planning applications of relevance to the site, as well as a number of applications relevant to adjacent sites.
- 3.2. The details of these applications are outlined in the table below.

*Table 1: Relevant Planning History*

LPA Reference	Description of Development	Decision / Date
<b>Surrounding Sites</b>		
20094/APP/2018/794 34-36 Victoria Road, Ruislip	Second floor extension to create 1 x 3-bed self-contained flat.	Approved 2 <sup>nd</sup> May 2018
71956/APP/2018/4058 Rear of 26-28 Victoria Road, Ruislip	Raising of roof space to create habitable roof space for use as 2x studio flats.	Approved 18 <sup>th</sup> January 2019
71956/APP/2016/2130 Rear of 26-28 Victoria Road, Ruislip	Raising of roof to create a first floor to form 2 x 1-bed flats.	Approved 4 <sup>th</sup> August 2016
72040/APP/2016/2531 69-83 Park Way & 1-11 Victoria Road, Ruislip	Enlargement of the roof, including raising of the ridge and eaves height to provide new recessed third floor, erection of a third floor extension to the rear of Nos. 69-81 Park Way, including the installation of rooflights, rebuilding of chimneys and new emergency external stairs to the rear of No.9 Victoria Road, to allow for the provision of 9 new flats.	Approved 5 <sup>th</sup> May 2017
11924/APP/2006/2632 Windmill P.H, Windmill Hill, Ruislip	Redevelopment of the site with a mixed use comprising thirty nine residential units in two blocks with ground and lower ground parking, amenity space and access from west way and retail unit on ground floor facing Pembroke road/windmill hill (involving demolition of public house).	Approved 20 <sup>th</sup> July 2007

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- 3.3. As detailed within the above table, there are a number of approved applications within the immediate surrounding area which sought to provide roof extensions to existing properties.
- 3.4. No other applications were identified that are considered relevant to the application site or the proposals.

## 4. Pre-application Consultation

- 4.1. The importance of pre-application engagement and frontloading is emphasised in the National Planning Policy Framework (2021) ('NPPF') and in the accompanying planning practice guidance ('PPG'). The NPPF highlights that there is significant potential to improve the efficiency and effectiveness of the planning application system for all parties through early engagement and paragraph 39 states:

*'Good quality pre-application discussion enables better coordination between public and private resources and improved outcomes for the community.'*

- 4.2. The PPG provides further advice on the pre-application engagement process, stating that it needs to be tailored to the nature of the proposed development and the issues to be raised and as a collaborative process between the applicant and The local planning authority.
- 4.3. Having regard to this clear guidance, the Applicant had previously undertaken pre-application consultation with the Council in June 2020 (ref: 75382/PRC/2020/39) and May 2022 (ref: 22/501559/PAMEET) to seek Officer feedback on development proposals at the application site. Whilst the feedback received is not entirely relevant to this scheme, which represents an entirely different design approach to optimisation of the site, the key relevant principles discussed with Officers during the pre-application process are outlined below:

- **Principle:** The proposed development should not prejudice the potential for the Linden Avenue Public Car Par, to the east of the site, to come forward for residential development by having windows that overlook the car park. The applicant would need to clearly demonstrate that the shops along Victoria Road (which form part of the Primary Shopping Area for Ruislip Manor Town Centre) can be viably serviced and staffed as part of the proposed development.
- **Design:** The existing terrace of shops is two / three-storeys in height and comprises a symmetrical composition constructed from traditional materials that include facing brickwork and a combination of tiled pitched roofs and flat roofs set behind parapets. Redevelopment of the rear of the site should respect and enhance this existing build form and character and avoid a dead inactive frontage facing onto Linden Avenue Car Park.

- **Amenity:** 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). 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.
- **Noise:** 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.
- **Impact on Neighbours:** The proposed separation distances between the windows of habitable rooms of the proposed dwellings and the residential accommodation fronting Victoria Road should be at least 21 metres
- **Parking:** The Council's adopted 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. It is considered that a 'car-free' proposal may be further considered in this case subject to the findings of an on-street parking stress survey. This 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.

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- **Access:** 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.
- 4.4. Having considered various design approaches, the Applicant has developed a responsive design approach taking account of feedback received from LBH in previous meetings

## 5. The Proposal

- 5.1. The proposed development comprises the extension of the existing terrace along 25 – 49 Victoria Road to accommodate a total of 9 new units arranged over 2 additional storeys, along with internal reconfiguration and revised access arrangements including a rear deck access and new pedestrian access routes onto Victoria Road.

### Scale and Massing

- 5.2. The proposed development comprises of up to two additional storeys of development above the existing terrace at 25 – 49 Victoria Road. The amended building will extend to four storeys in height, with the central element of the scheme remaining at three storeys to provide variation of height profiles across Victoria Avenue, to a similar form to the existing design of the site.
- 5.3. The proposed development retains the existing two-three storey structure on site, which currently comprises of 14 units across a range of one bed, two bed and three bed apartments. An additional one-two storeys are proposed on top of the existing buildings within the red line boundary to a maximum height of four storeys.
- 5.4. The extension seeks to create a differentiated element on top of the existing building, providing a modern design intent using traditional materials for the prosed additional development. The overall visual composition will be brought together by an extension of the existing massing to the upper floors with balconies and windows aligning with the existing residential accommodation beneath.
- 5.5. The flat roof form proposed is in keeping with existing build profile of the site and surrounding area.

### Amount

- 5.6. It is intended that the building will be put to the following uses:
- **Ground Floor** – Existing retail units, together with new residential entrances serving the upper residential flats and an extension to re-provide displaced commercial floorspace;
  - **First Floor** – Existing residential flats and existing offices, together with new stairwell cores.

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Alterations are proposed to No. 27A, No. 33A and No. 45A Victoria Road;

- **Second Floor** – Existing residential flats (Nos 27, 33, 35, 37, 39, 41 and 43 Victoria Road), together with new residential flats (Nos. 25, 29, 31, 43, 45, and 49 Victoria Road) and associated stair cores.
- **Third Floor** - New residential flats (Nos. 25, 29, 31, 33, 41, 43, 45, 47 and 49 Victoria Road) and associated stair cores.

5.7. The proposed unit mix for the scheme consists of a range of dwelling sizes, as detailed in Table 2 below.

Studio 1B1P	1B2P	2B3P	2B4P	3B5P	3B6P	Total
<b>Existing</b>						
1	0	7	1	5	0	14
<b>Proposed</b>						
1	4	7	1	8	0	23
<b>Uplift</b>						
0	4	0	1	3	1	9

- 5.8. All dwellings have been designed to be of high quality and meet or exceed the nationally described space standards. The residential accommodation has also been designed to address key accessibility requirements with all of the new homes designed to comply Building Regulations Part M4(1) standards.
- 5.9. 100% of the total units will be dual aspect, and new dwellings have private outdoor space. The proposals improve the quality of two of the existing dwellings on site by providing outdoor amenity space for two units which did not previously have outdoor amenity space.
- 5.10. Amenity space will be provided via a series of terraces above the existing properties.
- 5.11. Full details of the proposal are provided in the Design and Access Statement provided by IDP.

## Access, Transport & Servicing

- 5.12. Two new pedestrian access routes are proposed through the existing retail frontage providing direct access for residents onto Victoria Road. This will improve the existing access arrangements for both the new and existing residents and create a safer more direct connection to shops, service and transport infrastructure.
- 5.13. The development is proposed to be car free, with cycle parking provided within dedicated storage space for each of the proposed dwellings.
- 5.14. The proposals make provision for a total of 28 cycle spaces, which comprises of 15 spaces for the existing residential units and 13 spaces for the proposed units. The residents cycle spaces will be provided in the form of 14 Sheffield stands located at the end of the existing access road. The cycle storage area has been provided with an uplift spaces to enable existing residents to access the cycle storage area.
- 5.15. The existing bins storage arrangements to the rear of the existing properties will be formalised into a sheltered area located along the eastern boundary of the site and adjacent to Linden Avenue, where servicing and collection will take place. The existing bin storage capacity will be upgraded to increase its capacity to accommodate a total of 23 residential units.
- 5.16. The proposed vehicular access to the site is as per the existing arrangements, with primary access to the Site via Linden Avenue from the south. Pedestrian access is also proposed which will formalise existing arrangements by providing a pedestrian path running along the eastern boundary.

## Sustainable Design Measures

- 5.17. The Proposed Development incorporates sustainable design and construction measures as set out in the submitted Energy and Sustainability Statement and SuDS Drainage Strategy, and other accompanying reports. This includes measures that will be incorporated into the design, construction and operational management of the buildings across the Site with a view to minimising waste, surface water run-off, optimising the potential for energy generation from renewable energy sources, and in securing low operational costs for future residents over the long-term.
- 5.18. Further details are set out in Section 6 of this Statement as well as within the submitted Energy and Sustainability Statements but the measures include (inter alia):

- High levels of insulation, airtightness and energy efficient lighting;
  - The specification of water efficient fittings to limit water consumption to less than 105 litres per person per day for domestic uses;
  - Highly efficient air source heat pumps;
  - Low-profile photovoltaics (PV) integrated on flat roof space to generate on-site electricity;
  - Whole life carbon and circular economy principles;
  - Provision of Green Roof to reduce surface water run-off from the site and enhance biodiversity;
  - Green and active travel measures to promote walking and cycling, and sustainable travel behaviour amongst future residents and the local community, including improvements to the pedestrian environment around the Site.
- 5.19. The proposed energy strategy is expected to deliver a minimum on-site reduction of at least 35 per cent beyond Building Regulations, and has the potential to achieve an 85% reduction in carbon emissions for the new build portion of the development.

## 6. Planning Assessment

### Planning Policy Context

- 6.1. In accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004:
- “when making any determination under the planning Acts, regard is to be had to the development plan, the determination shall be made in accordance with the plan unless material considerations indicate otherwise”*
- 6.2. For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act, 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).
- 6.3. Material considerations include: the National Planning Policy Framework (NPPF) 2021; Planning Practice Guidance (PPG); adopted and emerging supplementary planning guidance produced by the Mayor of London and borough.

## Planning Assessment

### Principle of Development

- 6.4. 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.
- 6.5. 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.
- 6.6. The site falls within the defined boundary of Ruislip Manor Town Centre under the Hillingdon Local Plan Part 2 ('LPP2').
- 6.7. Policy DMTC1 of the LPP2 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 site is also located within a sustainable location, very close to the town centre amenities and public transport links. There are also 14 existing residential dwellings on site and significant residential dwellings in the locality. To this regard, it is considered that the principle of residential development in this sustainable town central location is acceptable and accords with the aims and objectives of Policy DMTC1.
- 6.8. Given the general thrust of the NPPF (2021) towards housing provision and the efficient use of brownfield sites, the provision of 9 new flats would help boost housing supply and provide additional housing for which there is an identified need. The development would also make good use of previously developed land.
- 6.9. Officers previously raised concerns in pre-app that the proposals would "*compromise the vitality and viability of the town centre*". In addition, it was suggested that the development would "*displace access and servicing for the existing units*", thereby creating negative impacts through the alternative servicing arrangements from Victoria Road directly.

- 6.10. A review of the servicing arrangements has been undertaken and the proposals have been designed having regard to the needs of the existing commercial premises. For convenience the vast majority of the existing commercial units service there premises from Victoria Road. The rear service road is only used in limited instances by smaller vehicles. The proposals are designed so rear vehicular access to all existing is retained so that servicing by small and larger vehicles to the rear remains.
- 6.11. It is important to clarify that the access road is not designed or suitable for staff or customer car parking as is shown on existing Google aerial mapping. Occupants of commercial premises are only permitted to park off the service road to the rear of their relevant units. Such car parking along the access road is in breach of the relevant leases. The applicant has informed the tenants of this and proposes to implement a fine system to control parking.
- 6.12. The applicant is therefore of the position that the proposed development would not 'displace access and servicing of the existing units' and subsequently 'harmfully impact on the vitality and viability of the town centre' as all of the current servicing arrangements would remain in place.
- 6.13. In accordance with Policy DMTC1 of the LPP2 and in order to maintain and enhance the existing retail offering on site 84sqm of new Class E commercial floorspace is proposed via rear extensions at ground floor level to justify the loss of a similar extent of commercial floorspace associated with the addition of the new residential entrances and access cores onto Victoria Road. Officers have also previously raised that the proposed development should not prejudice the potential for the Linden Avenue Public Car Par, to the east of the site, to come forward for residential development by having windows that overlook the car park. By virtue of the proposals predominately representing a vertical extension to the existing building, in contrast to the pre application proposals which proposed development immediately adjacent to the Linden Avenue Car Park, the proposals do not prejudice the potential for development to come forward on the adjacent site.

## Design and Layout

- 6.14. Chapter 3 of the London Plan sets out key urban design principles to guide development in London. Design policies in this chapter seek to ensure that development optimises site capacity; is of an appropriate form and scale; responds to local character; achieves the highest standards of architecture, sustainability and inclusive design; enhances the public realm; provides for green infrastructure; and respects the historic environment.
- 6.15. London Plan Policy D3 encourages the optimisation of sites, having regard to a site's context and capacity for growth, and existing and planned supporting infrastructure capacity, including transport. Policy D3 also states that the design-led optimisation of sites should consider details of form and layout, experience, and quality and character.
- 6.16. The extent of development proposed is characteristic of a sustainable town centre location, seeking to deliver an additional 9 units alongside the existing 14 units already on site. As such, a total of 23 units over a site area of 0.25 ha will constitute a development density of 92 u/ha, which represents a lower density than many of the recently approved developments in the surrounding area, such as the 69-83 Park Way development at 147 u/ha. The density of the proposed development is therefore in keeping with regard to the local precedents set by surrounding developments.
- 6.17. Policy DMHB 11 of the LPP2 states that development should seek to be high quality, well designed, well sited and of a scale, design, appearance and detail that is sympathetic and appropriate to the location.
- 6.18. The proposals have been designed so that they are subservient to the existing terrace on site fronting Victoria Road. There is significant development along Victoria Road comprising 3-storey developments with pitched roofs, where the massing is frequently more substantial than that of the proposed. Additionally, four storey developments have been permitted and / or built at the central junction of Victoria and Pembridge Road. This reflects the Council's desires to meet housing needs and promote an intensification of uses within the town centre. As a result it is considered that Ruislip Manor Town centre is now characterised by modest-scale, three and four storey buildings.
- 6.19. It is considered that the proposals meet the requirements of Policy DMHB 11 of the LPP2 and Policies D1 to D3 of the London Plan, as well as the NPPF, in so far as they have regard to matters of layout, design and character.

## Housing Mix

- 6.20. With regards to housing mix, Policy DMH 2 states that “*the Council will require the provision of a mix of housing units of different sizes in schemes of residential development to reflect the Council’s latest information on housing need*”, suggesting that the most appropriate housing mix for a site is dependent upon the identified local need.
- 6.21. Policy H10 of the London Plan states that schemes should generally consist of a range of unit sizes and sets out several factors that should be considered when determining the appropriate housing mix of a scheme, including the nature and location of a site.
- 6.22. The proposed development provides one, two and three bedroom flats. The proposed unit mix is more weighted towards larger sized dwellings as a result of the higher number of duplex dwellings proposed which have private amenity space at terrace level above the existing building. This design approach was taken as it was considered that providing private balconies above at third floor level and above did not align with the character of the local area. Due to the close proximity to transport infrastructure, a range of shops and services and local parks the site is considered to be well suited for the proposed larger dwellings which may include families.

## Residential Quality

- 6.23. LP Policy D6 states that “*housing development should be of high quality design and provide adequately-sized rooms (see Table 3.1) with comfortable and functional layouts which are fit for purpose and meet the needs of Londoners without differentiating between tenures*”. It then goes on to specify the key considerations that should inform proposals to ensure such quality can be achieved. This includes maximising dual aspect units, providing adequate daylight and sunlight and protecting the privacy of residents.
- 6.24. LP Policy D6 also sets out minimum requirements for private internal spaces drawn from the nationally described space standards. The Mayor’s Housing SPG (March 2016) and draft GLA Good Quality Homes for All Londoners Guidance (October 2020) provide a further framework to guide the quality of new residential units.

- 6.25. At a local level and consistent with national and regional policy, LPP2 Policy DMHB16 sets out that “*all housing development should have an adequate provision of internal space in order to provide an appropriate living environment*” and states that this should meet or exceed the most up to date space standards. Supporting LPP2 paragraph 5.40 confirms “*single aspect dwellings should be avoided*”.
- 6.26. The proposals have also been designed to avoid single aspect north facing homes and dual aspect accommodation has been maximised. All new proposed flats comply with minimum space standards. Each flat is provided with a good source of light and ventilation and there is a communal refuse storage and cycle parking area. Given that this is a purpose-built residential extension, there are not any significant stacking anomalies that would result in disturbance or noise transmission between the proposed dwellings.
- 6.27. The residential accommodation has also been designed to address key accessibility requirements with all of the new homes designed to comply Building Regulations Part M4(1) standards. The living space for these units is located on the upper floors as this provides a much better outlook with some apartments having access to large private terraces onto adjacent roof-space.
- 6.28. 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.
- 6.29. The proposals ensure that terraces are provided for all new dwellings on site. To improve the quality of the existing dwellings on site, two existing units have been provided with new private amenity terraces. This represents a significant improvement to the existing scheme which does not provide any private amenity space for the existing dwellings.
- 6.30. The scheme is considered, therefore, to meet the requirements of Policy DM14 of the Local Plan.

## Impact on Neighbouring Amenity

- 6.31. 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. Paragraph 130 of the NPPF states that decisions should ensure high standards of amenity for existing and future users.
- 6.32. Paragraph 5.38 of the Local Plan includes a requirement for at least 21 metres to be provided between the windows of habitable rooms.
- 6.33. The site is bounded to the west and south by the existing shops, inaccessible land adjacent to the tube station to the north and an existing car park to the east along Linden Avenue.
- 6.34. Officers previously commented that the proposed development should not prejudice the potential for the Linden Avenue Public Car Par, to the east of the site, to come forward for residential development by having windows that overlook the car park. This includes maintaining the 21 meter separation distance for future residential development.
- 6.35. Noting that future development at Linden Avenue is unlikely to build right up to the shared boundary with the appraised site, allowing for a two meter set back, the proposed development will maintain the 21 meter separation distance as required by Paragraph 5.38 of the Local Plan.
- 6.36. Notwithstanding the above, rather than applying separation distances rigidly, the GLA Housing SPG paragraph 2.3.36 outlines the need for flexibility to allow for a design-led approach involving the consideration of the position and aspect of habitable rooms, gardens and balconies, and placement of windows where privacy distances are tight. It states:
- 6.37. *“....In the past, planning guidance for privacy has been concerned with achieving visual separation between dwellings by setting a minimum distance of 18 – 21m between facing homes (between habitable room and habitable room as opposed to between balconies or terraces or between habitable rooms and balconies/terraces). These can still be useful yardsticks for visual privacy, but adhering rigidly to these measures can limit the variety of urban spaces and housing types in the city, and can sometimes unnecessarily restrict density...”*

- 6.38. The design has been carefully designed to ensure that each unit has adequate privacy, with the massing and fenestration design mitigating against amenity impacts for future neighbouring developments. It is considered that in the context of the development and the design-led approach to optimising the site, and the measures implemented to minimise overlooking between the new homes, the proposals will deliver appropriate privacy for future residents.
- 6.39. The application is accompanied by a Daylight and Sunlight Assessment prepared by T16 Design which provides an assessment of the potential impact of the development on sunlight and daylight to neighbouring residential properties based on the approach set out in the Building Research Establishment's (BRE) 'Site Layout Planning for Daylight and Sunlight: A Good Practice Guide'.
- 6.40. Detailed consideration has been given to daylight and sunlight impacts from an early stage of design development to ensure that the proposals minimise impacts on neighbours. With regards to daylight, the assessment concludes that the results are very positive for an urban location with all of assessed the windows meeting the target using the VSC test for daylight. The assessed residential units all meet the stringent targets of BS EN 17037:2018 (with UK Annex) for internal daylight levels.
- 6.41. With regards to sunlight, all neighbouring windows fully meet the BRE targets. In addition, all assessed neighbouring gardens fully meet the BRE guidance by retaining in excess of 80% of their areas which receive 2 hours of sunlight on March 21st.
- 6.42. The results demonstrate an excellent level of compliance with the BRE guidance for an urban location, thus demonstrating that the proposals will not give rise to adverse impacts on neighbouring amenity in relation to daylight, sunlight and overshadowing impacts.
- 6.43. Given the above it is considered that the proposed residential development would not have a detrimental impact on the amenities of adjoining neighbouring occupiers, as it would not appear overbearing, nor give rise to a harmful loss of light and overshadowing. The proposed dwelling complies with local and national policies aims in this respect.

## Highways and Parking

- 6.44. 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.
- 6.45. Policy DMT 6: Vehicle Parking states that 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.
- 6.46. 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.*
- 6.47. *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.”*
- 6.48. The Site itself is well served by public transport, with Ruislip Manor station, which is served by London Underground Metropolitan and Piccadilly Line services, 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. The nearest bus stops are located at Ruislip Manor station, approximately 75m to the north of the site, which provide access to the 114 and 398 services. Further bus stops are located approximately 280m to the north of the site, along Victoria Road, which provide access to the 696 and H13 services.
- 6.49. Based on the TfL PTAL calculator, the site has a 'Moderate' PTAL of 3. However, under the '2021 (Forecast)' scenario, the site has a 'Good' PTAL of 4. It is noted that the improved Aldgate to Uxbridge (slow) Metropolitan line route has already been upgraded from five to six services per hour.

- 6.50. As such, it can be concluded that the site has moderate to good access to public transport, although it should be noted that the proximity to an Underground station is likely to result in increased public transport use when compared to sites with the same PTAL rating but not served by Underground services.
- 6.51. Further details on the transport, access, parking and movement strategies for the Site are set out within the submitted documents prepared by PJA as the project transport consultant and should be referred to in full, with the below providing a summary only. This includes a Healthy Streets Transport Assessment (including Active Travel Zone Assessment, Travel Plan, Outline Construction Logistics Plan and Delivery and Servicing Plan). An Active Travel Zone Assessment has been undertaken to support the application in accordance with the latest TFL guidance as a means of identifying how people of all abilities can make key journeys that are essential to support car-free lifestyles. This forms part of the submitted TA and provides details on pedestrian and cycle movement routes connecting the Site.

## *Access*

- 6.52. Vehicular access to the site will be retained via the existing access from Linden Avenue via a vehicular crossover. The existing internal access road will be retained to provide access to the existing ground floor commercial units, a new bin store and new cycle storage.
- 6.53. Pedestrian access to the new residential and existing residential units will be accommodated via new residential accesses onto Victoria Road.
- 6.54. Vehicle swept path analysis demonstrates the suitability of the access proposals and that all existing commercial units can be suitably accessed and serviced from the retained access road.

## *Trip Generation*

- 6.55. The submitted TS considers the transport impact of the Proposed Development on the existing transport infrastructure, to include the local highway network and public transport. Based on analysis of comparable schemes from the TRICS trip generation database, it is anticipated that the proposed residential units would result in eight additional two-way person movements in the AM peak period and four two-way person movements in the PM peak period. Across the whole day the development was found to result in an uplift of 52 additional two-way person movements. A modal split of expected trips was generated using published 2021 Census data.
- 6.56. Over the course of a 12-hour day, it is forecast that a total of 52 two-way person trip (23 arrivals and 29 departures) would be generated from the proposed development. Therefore, it can be concluded that the development proposals would not result in any material impact on the operation of the local highway network.
- 6.57. On the basis of the above and the submitted TS, the Proposed Development will not result in any adverse impacts on the local or strategic transport network and will not result in an increase in road danger. The Proposed Development ensures no adverse transport impacts and in turn, provides wider sustainable travel benefits. As such, it is considered to be wholly acceptable in transport terms, in accordance with Local Plan Policies DMT 1, DMT 2 & DMT 6.

## *Parking*

- 6.58. 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.
- 6.59. Policy T6 of the London Plan states that car-free development should be the starting point for all development proposals in places that are well-connected by public transport.
- 6.60. The proposed scheme will be car free, in compliance with Policy T6 of the London Plan and respective of the good public transport availability for the site and existing local highway parking capacity in the surrounding area. It is important to note that the parking standards set by Hillingdon Council are set as maximum allowed parking provision, and thus the proposals comply with Local and London Plan policy.

- 6.61. Furthermore, it is noted that the following planning applications received consent for the provision of car-free development, all of which are located in the vicinity of the site:
- Ref no. 71956/APP/2016/2130 and 71956/APP/2018/4058 – Rear of 26-28 Victoria Road
  - Ref no. 20094/APP/2018/794 – 34- 36 Victoria Road
- 6.62. The Officer's reports for the above applications identified that the sites would be suitable for car free development, stating the following:
- 6.63. *"With regards to car parking, no parking provision is included within this proposal. It is noted that the site is located in an area well served by public transport (PTAL 3), with Ruislip Manor Station situated approximately 80 m to the North and bus stops serving a number of services are located on the main road in front of the existing terrace. In consideration of the previous application (20094/APP/2015/1399) for the first floor extension, the inspector advised that in view of the good connectivity and access to services the future occupiers would not necessarily be reliant on the private car and the lack of parking at the site would be consistent with the objectives of the NPPF to promote sustainable transport. It would therefore be unreasonable to refuse this scheme on the basis of a lack of car parking provision."*
- 6.64. It is considered that the proposed development site is located in an equally accessible location, when compared to the consented applications above. Furthermore, the pedestrian desire line from the site to Ruislip Manor station would not require pedestrians to cross Victoria Road. Therefore, it is considered that the proposals are suitable for car-free development.
- 6.65. Furthermore, while the existing site is not provided with any formal car parking provision, it is observed that some informal parking currently occurs along the internal access road. This informal parking would be restricted as part of the proposals. 'Pay and display' car parking is provided in the vicinity of the site for use of visitors, therefore no overspill parking on the local highway network would occur.

- 6.66. A total of 28 cycle parking spaces are proposed at the site, which would be provided in the form of 14 Sheffield stands within a cycle store located at the end of the existing access road.
- 6.67. This provision would exceed the cycle parking requirements for the additional nine units as set out within the LBH Local Plan and within LBH's March 2020 pre-application response (total requirement 13 cycle parking spaces).
- 6.68. It is also worth noting that the proposed level of cycle parking would exceed the minimum standards set out within the London Plan 2021, which would require a total of 16 long stay cycle parking spaces and two short-stay cycle parking spaces.
- 6.69. As such, the proposals would provide sufficient cycle parking to benefit existing residents, as well as residents of the proposed development.

## *Delivery & Servicing*

- 6.70. Consistent with the existing arrangements, 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 within the Transport Statement.
- 6.71. 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.
- 6.72. 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.
- 6.73. It is acknowledged that the proposed arrangement would not meet the maximum carry distances set out within the previous 2020 pre-application response, 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.

- 6.74. It should also be noted that similar arrangements, whereby carry distances 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.
- 6.75. Waste and recycling storage has been provided in conformity with Local Plan Standards.

## Energy & Sustainability

- 6.76. Policy SI 2 of the London Plan (2021) requires major developments to be net zero-carbon.
- 6.77. 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.
- 6.78. Policy DMEI 2 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020) requires that all developments make the fullest contribution to minimising carbon dioxide emissions in accordance with London Plan targets.
- 6.79. One of the key benefits of extending the existing building is the significant carbon savings associated with re-use. This proposal therefore constitutes an efficient re-use of an existing building with a good, energy efficient new-build addition.
- 6.80. The planning application is supported by an Energy & Sustainability Statement prepared by T16. The development will reduce emissions by incorporating a range of passive design and energy efficiency measures for all buildings, including improved building fabric standards beyond the requirements of Part L of the Building Regulations and energy efficient mechanical and electrical plant. After reduction of the energy demand, the strategy proposes implementation of PV panels and/or an integrated ASHP system connected to a site-wide district heating network which will supply hot water and space heating to all homes.
- 6.81. Photovoltaics (PV) have been maximised at roof level and these will be positioned facing south or south-east, where they are most effective.

- 6.82. Overall, the new build portion of the development is expected to achieve a significant reduction in regulated CO<sub>2</sub> emissions, using the GLA's carbon emission reporting spreadsheet which is anticipated to greatly exceeds the target and provides room for changes should they be required through the detailed design process. The requirement for a 10% improvement at the Be Lean stage has also been achieved.
- 6.83. In terms of sustainability, the development proposes to utilise passive design measures in order to reduce the energy consumption and environmental impact of the scheme. These techniques include solar orientation, natural ventilation, dual aspect design where possible, low-medium thermal mass, air tightness, and fenestration design.
- 6.84. In terms of broader sustainability measures, the scheme includes reductions in potable water use, resource efficiency and pollution and promotes biodiversity both through the build process and post-occupation.

## Flood Risk and Drainage

- 6.85. NPPF (2021) Chapter 14 sets out government views on how the planning system should consider the risks caused by flooding. The planning practice guidance under the chapter titled 'flood risk and climate change' gives detailed advice on how planning can take account of the risks associated with flooding in the application process
- 6.86. 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.
- 6.87. Policy DMEI 10 of the Local Plan: Part Two (2020) states that 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.
- 6.88. The site is located within Flood Zone 1 'Low Probability' less than a 1 in 1000 (0.1%) Annual Probability of flooding from rivers. Due to the presence of 'high' surface flood risk, a Flood Risk Assessment is required to accompany a planning application to meet the requirements of the National Planning Policy Framework (NPPF). All sources of flooding have been evaluated in this report.

- 6.89. A Flood Risk & Drainage Statement has been prepared by EAS. This confirms that the site is at low risk of flooding from fluvial flooding. The north west corner of the proposed development is shown to be within an area with a high, medium, and low risk of surface water flooding. During the low risk event, surface water flood depths were mainly shown to be 0-300mm deep with areas of 300-600mm and 600-900mm also shown within the site.
- 6.90. It demonstrates that access to the residential units is via external staircases to the rear of the existing building and that these staircases are located outside of the surface water flood extents. As such, residents are able to access and egress from the site during a flood event. No mitigation measures are therefore required for the existing or proposed residential units, other than suitable flood warning measures.
- 6.91. The proposed vertical extension will not result in an increase in impermeable area within the site. As such, the roof area of the proposed extension will drain via the existing drainage system at the site. This will be achieved by extending the existing rainwater downpipes to the new roof line.
- 6.92. The surface water management strategy will utilise Sustainable Drainage Systems (SuDS) measures to provide water quality and surface water attenuation benefits. It is therefore considered that the proposals accord with national, regional and local planning policy with regards to flood risk and surface water drainage.

## Fire Strategy

- 6.93. Policy D12 of the London Plan (2021) requires that an independent fire strategy, produced by a third party suitably qualified assessor, is submitted in support of applications for residential development.
- 6.94. A Fire Statement has been prepared by a qualified assessor and is submitted with this application. The report provides a summary of the overall fire strategy for the purposes of planning, demonstrating compliance with relevant legislation in relation to the provision of evacuation lifts.

- 6.95. The strategy outlines that appropriate space has been made available for fire appliances; that appropriate provision has been made for evacuation; and that the proposals are designed to incorporate appropriate features to reduce the risk to life and serious injury in the event of fire (including fire alarm systems, sprinklers, ventilation and compartmentation). Consideration has also been given to the buildings construction methods and materials; means of escape, water supply; firefighting lifts and stairs.

## Noise

- 6.96. The application is accompanied by a Noise Impact Assessment by Quantum Acoustics Ltd.
- 6.97. A noise survey has been carried out on the Site and this identified that the main noise sources around the site was road traffic noise.
- 6.98. The report provides mitigation measures which will be implemented to ensure an appropriate acoustic environment for future residents. This will include proposed fabric construction and suitable ventilation provisions. With these in place, the predicted internal noise levels will be in accordance with British Standard 8233:2014 and relevant London and Local Plan policy criteria.

## Air Quality

- 6.99. Paragraph 174 of the NPPF states that development should contribute to and enhance the local environment and where possible, seek to improve the local environmental conditions such as air and water quality. Paragraph 186 requires planning policies and decisions to sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and Clean Air Zones.
- 6.100. 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.

- 6.101. 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 is provided in support of the application.
- 6.102. The submitted Air Quality Assessment identifies that the principle of residential use at the site has already been established by virtue of the existing block of flats which are occupied, and that the existing/current residential uses of the site do not pose a risk of unacceptable air pollution from the site. As the surrounding uses are also residential in character it is not considered that any adjacent land uses would create air quality risks on the site.
- 6.103. Whilst the property fronts onto an existing main road, the windows of future occupiers will be double glazed and therefore effectively protect from air pollutants produced from associated traffic. Air quality conditions for future residents, as per the case for existing residents, would therefore be acceptable. The operational air quality impacts on the development are also judged to be insignificant due to the car-free nature of the proposals.
- 6.104. The Proposed Development does not, in air quality terms, conflict with national or local policies, or with measures set out in the Local Plan. There are no constraints to the development in the context of air quality. As such, the proposals comply with the relevant parts of Local Plan policy.

## 7. Planning Benefits and Conclusion

- 7.1. This Town Planning Statement has been prepared on behalf of 'Urbanhold Ltd' for development at 25 – 49 Victoria Road, Ruislip Manor comprising of 9 no. new residential units (Use Class C3), 84sqm of new commercial floorspace (Class E), revised access arrangements, private amenity space and associated infrastructure.
- 7.2. This proposed description of development is as follows:

*"Extension of the existing buildings along 25 – 49 Victoria Road to provide 9 additional dwellings arranged over up to 2 additional storeys alongside new commercial floorspace; proposals include revised access arrangements, private amenity space, car and cycle parking, refuse storage, and other associated infrastructure."*
- 7.3. The proposals will bring forward the delivery of an exemplary residential-led development designed by IDP. The proposals will deliver a high quality, beautiful and sustainable development which will contribute positively to local character, enhancing the local townscape. The design-led and innovative design approach responds to its context, will raise the standard of design generally in the area, and will optimise the potential of the site, delivering 9 new homes in a mix of housing typologies and sizes.
- 7.4. The Applicant has carried out pre-application engagement with Planning Officers and the feedback received from the engagement process has informed the design proposals.
- 7.5. This Statement demonstrates that the proposed development has been carefully developed in accordance with Hillingdon's Local Planning Policies, the London Plan, and having regard to material considerations including site specific circumstances, the NPPF, PPG, other adopted and emerging supplementary planning guidance.

- 7.6. The Statement has assessed the Proposed Development against the prevailing planning policy framework and has demonstrated that the proposals comprise sustainable development. The proposals accord with the objectives of the NPPF and the Development Plan as a whole, having regard to site specific and material considerations relevant to the site and proposals. The principle of a residential development is wholly acceptable, and there are material considerations which support the principle of extending the height of the existing building, building having regard to the exemplary design-led approach adopted by the design team in developing the proposals.
- 7.7. The benefits of the proposals should be afforded significant weight, including: the delivery of much-needed housing in a sustainable location; the exemplary design approach which will have a positive contribution on the character and townscape of the local area; the high standard of residential quality which in many respects exceed policy standards; the energy strategy exceeding minimum requirement on-site and the economic benefits arising from the proposals. The proposals will not give rise to any unacceptable impacts on habitat sites, heritage assets or areas at risk of flooding; and as such there are no adverse impacts of granting planning permission which would significantly and demonstrably outweigh the benefits of the proposals, when assessed against the policies in the NPPF as a whole. As such the presumption in favour of sustainable development applies and planning permission should be granted.

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