

Supporting Planning Statement

Proposed Development of 22 Flats
1-6 Station Parade, Ickenham Road, West Ruislip

May 2020

Contents

1.	Introduction	1
2.	Contextual Appraisal	2
3.	The Proposed Development	9
4.	Planning Policy Review	10
5.	Material Planning Considerations	21
6.	Response to Design Policies	29
7.	Concluding Thoughts	40

1 Introduction

- 1.1 This application proposes a residential development of 22 dwellings, comprising of 13 x 1-bedroom, 7 x 2-bedroom and 2 x 3-bedroom apartments at 1-6 Station Parade, Ickenham Road, Ruislip. The existing building, which comprises 6 retail units on the ground floor, with 3 residential apartments above, would be demolished. This would provide a net increase of 19 dwellings. This application is submitted on behalf of B&V Investments Ltd (hereafter referred to as the Applicant).
- 1.2 House prices are rising rapidly, and many people are being forced to live further out from the City, or they have to live in housing that doesn't meet their needs. There is a particularly high level of need for affordable homes, with a third of the borough's residents unable to afford to buy housing on the open market. Only by following the Government's objective of boosting the supply of housing can the current imbalance between supply and demand be remedied. This has been recognised by the Secretary of State, who has recently made it clear that the next iteration of the London plan will need to provide a step-change in the provision of housing across London.
- 1.3 The housing proposed by this application would make a very valuable contribution towards meeting the substantial need for housing in London, including through the provision of 2 affordable homes. It would also make efficient use of brownfield land. These are matters which accord with the Government's key policy objectives, and which weighs very heavily in favour of the application proposals.
- 1.4 The proposed development would provide a good standard of accommodation for its new residents. It would, for instance, provide 2 ground-floor apartments which would be entirely wheelchair accessible, and which would each benefit from their own disabled parking space within the site.
- 1.5 The application site is in a highly sustainable location close to West Ruislip Railway Station, with good public transport services within easy walking distance, and a range of local services and facilities within Ruislip town centre. The proposals would maximise the use of sustainable travel options in residents, with limited car parking, but ample cycle parking.
- 1.6 We believe that this would be an entirely sustainable form of development, which would comply with local, regional and national policies taken as a whole. We believe that planning permission should be granted without delay.

2 Contextual Appraisal

Contextual Appraisal

Local Shopping Opportunities

- 2.1 The application site is located within the ward of West Ruislip, at 1-6 Station Parade. This is a small parade off Ickenham Road. It is around 800m west of Ruislip town centre, so within easy walking and cycling distance, along a good quality and well-lit road and footpath route, and designated cycle lanes.
- 2.2 Ruislip is identified as a '**District Centre**' in the Hillingdon Local Plan. This means Ruislip town centre provides convenience goods and services for local communities, and it is identified as being easily accessible by public transport, walking and cycling. Ruislip High Street has an excellent selection of supermarkets, shops, services, banks, restaurants and cafes.
- 2.3 Station Parade is identified as a '**Local Parade**' within the Local Plan. The Local Plan notes that the purpose of a Local Parade is to fulfil a convenience shopping function for local residents, in order to minimise the need to travel by car or public transport. The ground floor of the existing building has most recently been used to provide car sales, a newsagents, a hairdresser and laser hair removal clinic.



The application site, and its proximity to convenience stores, schools, Ruislip town centre and public transport services.

2.4 There are a number of other convenience stores and services close to the application site, which are easily accessible on foot or bicycle, as is illustrated in the image above. Around 130 - 170m to the west of the application site is a coffee shop and a convenience store selling food, and also an estate agent and a company selling blinds and curtains; these shops are located adjacent to the railway station. Beyond this, still only 300m (less than 5 minutes' walk) to the west of the application site, on High Road, is a group of shops which includes a Tesco Express supermarket, several takeaways providing Indian and Chinese food, fish & chips, and pizza, a hairdresser and an electronic security shop.

2.5 Around 65m to the east of the site is a petrol filling station, which also sells convenience food items such as bread and milk. The High Street, which we have noted is within around a 10-minute' walk, or accessible by public transport, contains a wide range of shops, ranging from convenience to major national chains, and providing a wide range of convenience and comparison shopping opportunities.



Local shops close to the application site.

2.6 It is clear that the immediate local area is extremely well served for convenience shops, which would prevent local residents from having to travel far to access a wide range of convenience shopping needs. It is clear that this will remain the case following the application site's redevelopment.

Public Transport Connections

2.7 West Ruislip Railway Station is located just 150m to the south-west of the application site. From here railway services to Aylesbury and London Marylebone are available approximately once an hour. The Central Line underground service

also connects to West Ruislip Station, providing a regular service to Bond Street, Oxford Circus and other central London locations and onward connections.

- 2.8 The nearest bus stop is at West Ruislip Railway Station. The 278 bus runs approximately every 15 minutes, Monday to Saturday, linking the site to Heathrow Central Bus Station and Brickwall Lane (Ruislip Town Centre). Bus U1 also runs approximately every 15 minutes, travelling to Ruislip Town Centre and Ruislip and West Drayton Station. The U10 Bus service passes the stop every hour, Monday to Saturday travelling between Uxbridge Station and Ruislip Station¹.
- 2.9 The site has a Public Transport Accessibility Level of 2 and 3; two different ratings split the site. This means that the site has good means of public transport for this area. The carriageway, directly outside the application site, has dedicated cycle lanes travelling both west and east-bound. Section 6 of the accompanying Transport Statement provides further details of public transport connections and the range and accessibility of and local facilities.

Local Services

- 2.10 Within a 1km radius of the application site there are 3 primary schools and one special educational needs school. Just slightly further afield are several more primary schools. Ruislip High School is close to Ruislip Gardens tube station, which is an easy trip to make from West Ruislip station on the Central Line, and the journey can be undertaken in about 15 minutes from the application site.

The Local Area

- 2.11 The local area is of a mixed character. The application site is surrounded by residential development to the north and east, which mainly consist of semi-detached post-war houses that face the main road. The houses on the southern side of Ickenham Road have small front gardens and are located close to the highway, there are some permit holders' parking spaces in a layby off the highway. The houses on the northern side are set further back and have driveway parking.
- 2.12 Ickenham Road is the main road linking Ruislip to Ickenham village. The carriageway that the application site faces is quite wide. It serves vehicular traffic travelling in both directions as well as providing designated cycle lanes on both sides of the road, and a central turning lane for access to both Station Parade (providing access to the rear of the application site and the commercial units behind it) and Ickenham Court (providing access to the station car park, a car home and further commercial units). There is also a pedestrian crossing island.

¹ Bus Information sourced from tfl.gov.uk on 8th April 2020.



Photograph of the carriage way looking westbound from the roadside parking spaces at West Ruislip Court. The application site is to the left facing the pedestrian crossing.



Looking towards the application site and Ickenham Road from Station Parade. In the foreground is the Bainbridge Auction Rooms.

- 2.13 On the opposite side of Ickenham Road there is the Ruislip Golf Club, which also has a Green King pub and restaurant. The golfing green extends to the north beyond the club.
- 2.14 Adjacent to the golf course (also opposite the application site) development has begun on the HS2 high speed railway line. The aim of HS2 is to provide a high-capacity train service connecting many of the UK's major cities. This railway includes a 6.7km section that runs through the Borough of Hillingdon; the new

railway will come out of a tunnel to the south of Ruislip Golf Course (what will be known as the Ruislip Portal). When complete this service will be accessible to residents from Ruislip by travelling to London Euston to board the HS2.

2.15 To the rear of the application site is a large building that is the Bainbridge Auction Rooms, and beyond this is a tyre and auto repairs centre. Just around the corner from the car repair shop is a play and display car park for the train station and access to the station platforms. To the west of the application site, facing Ickenham Road is a 3-storey care home, which reaches 4 storeys at one corner.



An aerial image of the local area, showing blocks of development that are identified as up to 4, 5 and 6 storeys high.

2.16 Slightly further along Ickenham Road, south of the railway line, is a relatively new housing development. Comprising of a mixed style of houses this area is the redevelopment of RAF West Ruislip, with planning permission granted in 2007. The resulting Josiah Drive, Perkins Gardens and Coyle Drive consist of 4, 5 and 6 storey blocks of flats and 2 and 3-storey terraced houses.

2.17 The aerial image above shows that within the local area there is a mixture of development, this includes residential care homes and private residential blocks of flats of between 4 and 6 storeys. They are also surrounded by 2 and 3 storey houses. This is new development that has optimised the use of land by providing new housing at a relatively high density.

The Application Site

2.18 The application site contains a mixed-use 3 storey building. The ground floor has recently been in commercial use, and it contains 6 units. Unit no.1 has most recently been used as a barber shop, and it closed recently due to restrictions relating to Covid19. Units 2 & 3 have at the time of writing been vacant for around 6 months, and they previously contained a laser hair removal clinic and hairdresser respectively. Unit 4 remains in use as a newsagent. Units 5 & 6 were most recently in use as a car showroom (sui generis use), but they have been vacant for nearly a year.

2.19 The photograph below shows the existing building, including the car showroom and the newsagents on the ground floor. It also shows two further empty units; the barber shop is just out of the shot to the right.

2.20 The first and second floors are in residential use, and comprise of 3 apartments of either 2 or 3 bedrooms. There are extensions to the rear of the building that also serve the apartments, as can be seen in the photograph below. Two of the apartments are occupied at present, and one is vacant. All residential units are in an average to poor condition and are in significant need of modernising.



This photograph shows the site's frontage onto Ickenham Road, the newsagents was open at the time the picture was taken, this has now closed.

2.21 The existing building fronts Ickenham Road, adjacent to 5 & 6 West Ruislip Court, which can be seen in the photograph below. It sits forward of the semi-detached houses on West Ruislip Court.

2.22 To the rear of the site there is an access road, which can be seen in the photograph below, and which provides vehicular access to the site off Ickenham Close and Station Parade. This access is included within the red line of the application site seen on drawing 19073-GAA-TA-RF-DR-T-0101 that accompanies this application. The access would be retained, and we understand that neighbouring properties have a right to use it.



5 & 6 West Ruislip Court, behind is the existing building on the application site.

2.23 The rear gardens of houses on Ickenham Close back onto the access road, separated by 1.8m high close boarded fences. The site's access is also clearly separated from the Bainbridge premises by a high curb.



Access to the rear of the application site facing towards Ickenham Close.

3 The Proposed Development

- 3.1 This application proposes to demolish the existing building and construct a new building comprising of 22 residential apartments. The proposed mix is 13 x 1-bedroom, 7 x 2-bedroom and 2 x 3-bedroom apartments.
- 3.2 Two of the 1-bedroom apartments on the ground floor would be fully wheelchair accessible and built to M4(3) Building Regulation standards. They would also each be provided with an easily accessible designated disabled car parking space.
- 3.3 All of the proposed apartments would be provided with a private balcony or garden area. There would also be a communal terrace/ roof garden available to all residents with the exception of the two wheelchair accessible units that would each have a larger private garden area accessible from both the bedroom and the main living area. The lift shaft has not been continued up to the roof garden, in order to avoid increasing the building's height by a further storey.
- 3.4 New landscaping would be provided on site. This includes hedges that border Ickenham Road and the planting of trees on the corners and between private amenity spaces. All landscaping would be maintained for the pleasure of the residents by a management company, funded by a service charge.
- 3.5 The terraces on the 4th and 5th storeys would not be made accessible, in order to avoid overlooking adjacent properties on West Ruislip Court. Fenestration is also limited on the north-east elevation for the same purposes. The only windows present on this side of the building would be on the 4th storey that would be stepped back approximately 3.75m from the edge of the terrace, this would intercept views towards West Ruislip Court.
- 3.6 The fifth floor would also be stepped back on the north-east and south-east elevations to avoid direct overlooking of the properties on West Ruislip Court and Ickenham Court. Furthermore, terraces would only be accessible on the north and south-west elevations looking towards Ickenham Road.
- 3.7 The main access to the development would be from Ickenham Road, via Station Parade, leading to the two disabled car parking spaces. The building would front Ickenham Road, from which the main pedestrian access to the building would be provided. The existing dropped kerb to the front would be replaced with full-height kerbing to improve the safety of pedestrians, whilst the footway surfacing would also be improved.
- 3.8 The proposed building includes an integrated cycle store (capable of storing 26 cycles), and a refuse and recycling store at ground level. The recycling and refuse store would have a separate entrance from Ickenham Road providing easy access for the refuse collectors.

4 Planning Policy Review

- 4.1 Planning law requires that applications for planning permission must be determined in accordance with the development plan, unless material considerations indicate otherwise². The development plan for the London Borough of Hillingdon (LBH) comprises the Hillingdon Local Plan Part 1- Strategic Policies (2012), the Hillingdon Local Plan Part 2 – Development Management Policies (2020), the West London Waste Plan (2015) and the London Plan consolidated with alterations since 2011 (2015 – also known as the Further Alterations to the London Plan). The policies of the emerging new London Plan are also a material consideration, although the weight which can be attributed to them remains limited whilst questions remain over the potential for its policies to be altered (see below). The Council has also produced a number of Supplementary Planning Documents, and in addition, the National Planning Policy Framework (NPPF) and the National Planning Practice Guidance (NPPG) constitute important material considerations.
- 4.2 The policies highlighted below are elements of this broad body of planning policies and guidance which we consider to be of particular relevance to the application proposals. This application is also supported by other documents, which themselves highlight policies, some of which are not mentioned below, as they consider the application's response to specific requirements, such as in relation to air quality, flood risk or transport.

National Planning Policy Framework (February 2019)

- 4.3 Plans and decisions are required to apply a '**presumption in favour of sustainable development**'. This is set out at paragraph 11. For decision making this means:
 - c) **'approving development proposals that accord with an up-to-date development plan without delay; or'**
 - d) **where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:**
 - i) **The application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or**
 - ii) **Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when**

² See Section 38(6) of the Planning and Compulsory Purchase Act 2004 and section 70(2) of the Town and Country Planning Act 1990.

assessed against the policies in this Framework taken as a whole.'

- 4.4 Footnote 6 clarifies that the policies referred to in d(i) are only those in the NPPF, and not those in development plans. It also clarifies that these are policies relating to various matters such as habitat sites, Sites of Special Scientific Interest, Green Belt land, Local Green Space and Areas of Outstanding Natural Beauty, none of which relate to this site.
- 4.5 Footnote 7 clarifies that the policies which are most important for determining the application will be considered out-of-date where the local planning authority is unable to demonstrate a 5-year supply of deliverable housing sites, or where the Housing Delivery Test is failed.
- 4.6 Paragraph 8 sets out the three aspects of sustainable development, which include economic, social and environmental objectives. The social objective includes a requirement '**to support strong, vibrant and healthy communities, by ensuring a sufficient number and range of homes can be provided to meet the needs of present and future generations**'. The environmental objective includes a requirement to make '**effective use of land**'.
- 4.7 Paragraph 38 states that '**local planning authorities should approach decisions on proposed development in a positive and creative way**', and that they '**should seek to approve applications for sustainable development wherever possible**'.
- 4.8 Paragraph 59 notes that it is the Government's objective to significantly boost the supply of homes. Paragraph 67 requires local planning authorities to identify a supply of specific deliverable sites for the immediate 5-year period.
- 4.9 Paragraph 68 requires local authorities to '**support the development of windfall sites through their policies and decisions – giving great weight to the benefits of using suitable sites within existing settlements for homes**'. This application would help to meet the need for housing within an established residential area, by making efficient use of a windfall site.
- 4.10 NPPF paragraph 103 states that '**Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health.**'
- 4.11 Section 11 (paragraphs 117-123) concerns the need to make effective use of land. Paragraph 117 states that planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses.
- 4.12 Paragraph 118 requires planning policies and decisions to '**give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs**'.

- 4.13 Paragraph 123 states that '**where there is an existing or anticipated shortage of land for meeting identified housing needs, it is especially important that planning decisions avoid homes being built at low densities, and ensure that developments make optimal use of the potential of each site**'.
- 4.14 Paragraph 123(a) requires that new Local Plan policies should '**seek a significant uplift in the average density of residential development within these areas, unless it can be shown that there are strong reasons why this would be inappropriate**'.
- 4.15 Paragraph 213 notes that development plan policies should be given weight '**according to their degree of consistency with this Framework (the closer the policies in the plan to the policies in the Framework, the greater the weight they may be given)**'.

London Borough of Hillingdon Local Plan: Part 1 Strategic Policies (November 2012)

- 4.16 Policy NPPF1 seeks to duplicate the presumption in favour of sustainable development, as set out within the NPPF, although it is based on the wording of the original (2012) version of the NPPF. It also confirms that the Council will take a positive approach to determining planning applications.
- 4.17 Policy H1 seeks to provide an average of 425 dwelling per year in the period 2011-2026, equating to a total provision in this period of 6,375 dwellings. This is based on the housing target set out in the 2011 version of the London Plan. As we note below, this target has now been increased to 559 dwellings per annum, by the 2015 adopted alterations to the London Plan. It is also currently under review again for the emerging new London Plan. This is a minimum target that is likely to be increased further by the requirements identified in the emerging London Plan, and in light of the Secretary of State's view on the pressing need for housing in London (see Section 5). With regard to the implementation of Policy H1, the Local Plan notes that the Council will adopt a number of measures, including '**ensuring development makes the most efficient use of brownfield land**'.
- 4.18 Policy H2 seeks the provision of affordable housing on sites capable of accommodating 10 or more new dwellings. The supporting text clarifies that the Council will normally require 35% of new housing to be affordable, with a tenure split of 70% social rented and 30% intermediate housing. However, the supporting text also clarifies that any provision will be subject to the viability of the proposed development; this matter is discussed further in Section 5, and in the Financial Viability Assessment which accompanies this application.
- 4.19 Policy BE1 requires '**all new development to improve and maintain the quality of the built environment in order to create successful and sustainable neighbourhoods**'. There are several requirements set out within this policy, and we discuss how the proposed development responds in Section 5 of this statement.

4.20 Policy EM1 concerns climate change adaptation and mitigation. It contains a number of requirements, and these are addressed throughout this statement and within other documents supporting this application.

4.21 Policy EM6 seeks to restrict development which would be at risk of flooding, and to promote the use of sustainable urban drainage systems (SuDS) within new developments. The proposed development would be at a low risk of flooding being located within Flood Zone 1. The proposals would utilise SuDS where possible. A Drainage Strategy prepared by Patrick Parsons accompanies this application.

4.22 Policy EM8 concerns land, water and air quality, and noise emissions. With regard to the issues covered by this policy, we note the following:

- The Phase 1 Geo-Environmental Site Assessment by Ensafe Consultants, which accompanies this application, confirms that the site is not considered likely to be subject to contamination.
- The proposals would not result in any unacceptable impact on air quality, given that new residents would largely travel by sustainable modes. Matters relating to air quality during the construction period can be addressed by suitably worded planning conditions.
- The proposals are also not expected to have a negative effect on water quality, and surface water would be cleaned through SuDS prior to discharge from the site.
- The Acoustic Impact Assessment by KP Acoustics, which also accompanies this application, sets out details of ambient noise, which largely relates to traffic on Ickenham Road, and proposed noise mitigation measures which would ensure the development would meet planning requirements.

4.23 Policy T1 seeks to steer development to the most accessible locations. We note in Sections 2 and 6, the application site is within a sustainable location.

London Borough of Hillingdon Local Plan: Part 2 Development Management Policies (January 2020)

4.24 Policy DME 2 concerns employment sites outside designated employment areas. The policy states that **'proposals which involve the loss of employment floorspace or land outside of designated employment areas will normally be permitted if:**

- the existing use negatively impacts on local amenity, through disturbance to neighbours, visual intrusion or has an adverse impact on the character of the area; or**

- ii) **the site is unsuitable for employment reuse or development because of its size, shape, location, or unsuitability of access; or**
- iii) **sufficient evidence has been provided to demonstrate there is no realistic prospect of land being reused for employment purposes; or**
- iv) **the new use will not adversely affect the functioning of any adjoining employment land; or**
- v) **the proposed use relates to a specific land use allocation or designation identified elsewhere in the plan.'**

4.25 The policy only requires compliance with any one of its criteria. We consider that residential redevelopment of the site would be entirely acceptable in this location, the use of the site as only residential (omitting the existing commercial use at ground floor) would not adversely affect the functioning of any adjoining employment land, within or close to the site. We discuss this further in Section 6.

4.26 Ruislip is identified as a District Centre in the town centre hierarchy in the Hillingdon Local Plan, as noted in Section 2 above.

4.27 Policy DMTC 3 seeks to maintain the viability of Local Centres and Local Parades. Station Parade is identified as a Local Parade in the Local Plan. The policy concerns the change of use of shops. It states the following:

'The Council will protect and enhance the function of local centres and local shopping parades by retaining uses that support their continued viability and attractiveness to the locality they serve. In considering applications for changes of use of shops the Council will ensure that:

- i) **the local centre or shopping parade retains sufficient essential shop uses to provide a range and choice of shops appropriate to the size of the parade, and its function in the Borough shopping hierarchy;**
- ii) **at least of 50% of the local centre or shopping parade is retained as Use Class A1 shops; and**
- iii) **the surrounding residential area is not deficient in essential shop uses.'**

4.28 The supporting text at paragraph 3.15 clarifies that, when considering applications for the change of use (or loss) of shops in a local parade, a catchment of 800m walking distance will be considered. It states that residential areas which are not within walking distance of at least 5 essential shops are deficient; essential shops are defined as pharmacies, post offices, grocers, bakers, butchers, greengrocers and newsagents. We have explained in Section 2

that the application site is within an area which is already very well served by these essential shops. We discuss this policy further in Section 5 below.

- 4.29 Policy DMH 1 aims to safeguard existing housing. The Policy states that '**the net loss of existing self-contained housing, including affordable housing, will be resisted unless the housing is replaced with at least equivalent residential floorspace**'. These proposals would replace existing dwellings, but would comply with the policy due to providing a net increase in dwellings.
- 4.30 Policy DMH 2 seeks a mix of housing units reflecting the Council's latest information on housing need. This is discussed further in Section 5.
- 4.31 Policy DMH 7 requires developments that provide 10 or more dwellings to maximise the delivery of on-site affordable housing; subject to viability 35% should be affordable housing. These proposals would provide 2 affordable homes, equating to 10% of the development. The amount of affordable housing proposed is based on the findings of the Financial Viability Assessment which accompanies the application. The affordable housing would be built to the same standards and would share the same amenity space and facilities as the private housing.
- 4.32 High buildings are considered in policy DMHB 10. These are defined as buildings which would cause significant change to the skyline. We do not believe that the proposal should be regarded as a high building in its local context, and we discuss this further in Section 6.
- 4.33 Policy DMHB 11 concerns the design of new development. The policy sets out several criteria with which the design of the development must comply. We discuss this further in Section 6.
- 4.34 Policy DMHB 16 requires new housing development to comply with the Local Plan's latest internal space standards, and in the case of major developments 10% of new housing should be accessible or easily adapted for wheelchair users. The proposed development would meet these space standards, and 2 of the 22 proposed units would be built to M4(3) building regulations and would be entirely accessible for wheelchair users.
- 4.35 Policy DMHB 17 relates to the Local Plan's Residential Density Matrix. The supporting text explains that the Council will apply the density standards within the London Plan (see below) flexibly, and that the density matrix forms a starting point for discussions on residential density. The matrix suggests that developments of mostly apartments should have a density of 50-110 units per hectare, or 150 – 330 habitable rooms per hectare, in residential areas within suburban/urban character 800m of a town centre. This matter is discussed further in Section 6.
- 4.36 The provision of good quality and useable private outdoor amenity space is controlled by policy DMHB 18. This matter is discussed in Section 6.
- 4.37 Policy DMEI 1 promotes the use of living walls and roofs and on-site vegetation. The proposals would include landscaping and a roof garden. Policy DMEI 2

requires new developments to make the fullest contribution to minimising carbon dioxide emissions in accordance with London Plan targets. The Energy Assessment by Dynamic Energy Assessors, which accompanies this application, sets out the proposals to reduce carbon emissions through design and fittings.

- 4.38 Policy DMEI 10 requires all new-build developments to include a drainage assessment demonstrating that appropriate sustainable drainage systems (SuDS) have been incorporated into the design in accordance with the London Plan. As previously noted, a Drainage Strategy has been provided that provides detail on surface water management.
- 4.39 Policy DMT 1 requires new development proposals to provide a transport assessment to demonstrate how any potential impacts would be mitigated, and how the proposals would be implemented. Development proposals must also accord with vehicle parking standards in accordance with policy DMT 6. A Transport Statement accompanies this application which responds to these policies.

The London Plan (Consolidated with Alterations) (2016)

Housing Need

- 4.40 The London Plan was published in 2011, and the most recently adopted updated version with alterations was published in March 2016. The latest version is referred to here as the Further Alterations to the London Plan (FALP), and this plans for the period up to 2036. Recent changes to the Plan have seen revisions to the housing targets for London, in recognition that the City's population has been growing at a far faster rate than had previously been anticipated. The FALP anticipates a population growth for the City, from 8.2 million in 2011 to 10.11 million in 2036.
- 4.41 The FALP includes provision for an overall supply of at least 42,000 dwellings per annum (dpa) (Policy 3.3). The Strategic Housing Market Assessment (SHMA) which underpins the Plan recognised that the level of housing need is in fact between 49,000 and 62,000 dpa. This implies that there may be an annual shortfall in the region of between 7,000 and 20,000 dwellings per annum. This equates to between around 140,000 and 400,000 dwellings over the 20-year period covered by the FALP.
- 4.42 In light of this, the Inspector examining the FALP stated in his report that the Mayor of London would need to explore options for the provision of this housing in adjoining areas. The GLA subsequently advised surrounding local authorities that they will need to consider whether they can meet some of London's unmet housing needs. However, the Minister of State for Housing and Planning at the time, Brandon Lewis MP, wrote to the Mayor on the adoption of the 2015 London Plan Alterations, to advise that these authorities may well not be able to meet this need.
- 4.43 In light of the need for housing, the FALP increased Hillingdon's housing target from an annual average of 425 dwellings to 559. This equates to a minimum

housing target of 5,593 between 2015 and 2025. This is clearly a minimum target because of the high level of need for housing, and Policy 3.1 requires Boroughs to seek to exceed the minimum targets

4.44 The FALP is now an old plan, and the new London Plan is in advanced stages of preparation, yet this is also under scrutiny over the amount of homes it aims to provide; we discuss this further in Section 5. The new London Plan is not yet adopted and although some policies of the new plan may carry some weight as a material consideration the relevant policies at present are those of the FALP. As we note in Section 5, it is likely that the new London Plan, when it is adopted, will seek a substantial uplift in housing provision, above the level required by the FALP.

Housing Policies

4.45 The Mayor's Housing Supplementary Planning guidance (SPG) (March 2016), which supports the implementation and interpretation of the London Plan, notes the important role which small residential development sites play in the provision of housing in London.

'Boroughs should proactively enable and fully realise the potential for small sites to make a substantial contribution to housing delivery in London, taking into account the strategic need to optimise housing output (Policy 3.4) and increase housing supply (Policy 3.3). Small sites (below 0.25ha) play a crucial role in housing delivery in London. Between 2005 and 2013 on average 10,100 net housing completions were provided each year on small sites, representing 38% of overall housing supply in London. Projected housing delivery on small sites accounts for 25% of London's overall capacity identified in the SHLAA and is expected to comprise over 50% of overall supply in the case of a number of individual boroughs.'³

4.46 Policy 3.4 of the FALP requires development proposals to optimise the amount of housing which can be accommodated in new developments, although with regard to local context and character, and wider design principles. It sets out density ranges for different locations. These indicate that the application site should accommodate a density at around 70-170 dwellings per hectare. This calculation is based on the site being in an urban area (800m walking distance of a District Centre), and in PTAL zone 2 to 3. However, there are a number of factors which allow for a higher density of development on the site, and these are discussed in Section 6.

4.47 Policy 3.5 requires new residential development to be of the highest quality, and to enhance the quality of local places. It sets minimum space standards for new development, which the proposals would meet or exceed. The Policy also includes various requirements which are considered in Section 6 of this Statement.

³ Housing Supplementary Planning Guidance, paragraph 1.2.25, Mayor of London (March 2016).

4.48 Policies 3.12 and 3.13 seek affordable housing provision from individual residential developments. This matter is considered further in Section 5 below.

4.49 Policy 3.14 concerns existing housing. Section B notes that '**loss of housing, including affordable housing, should be resisted unless the housing is replaced at existing or higher densities with at least equivalent floorspace**'. Section D states that '**boroughs should promote efficient use of the existing stock by reducing the number of vacant, unfit and unsatisfactory dwellings, including through setting an monitoring targets for bringing properties back into use, boroughs should prioritise long-term empty homes, derelict empty homes and listed buildings to be brought back into residential use**'. One of the existing apartments within the site has been vacant since April 2019, and is in a poor state. These proposals would replace the existing apartments with a higher density of residential units, with an increase in residential floorspace, and would comply with these policy requirements.

Development Management Policies

4.50 Policy 4.8 seeks to support a successful and diverse retail sector. It states that local development frameworks should '**support convenience retail particularly in District, Neighbourhood and more local centres, to secure a sustainable pattern of provision and strong, lifetime neighbourhoods**'. We have noted in Section 2 how the site is located in a sustainable location with a number of other local shops within around 300m to the west, and Ruislip town centre 800m to the east. The local area has a good provision of shops and convenience stores, several of the retail units on the application have laid empty for some time and this suggests that shops in this location are not essential.

4.51 Policy 5.2 seeks to minimise carbon dioxide emissions, and it requires a reduction in carbon emissions in new buildings. As noted in the Design and Access Statement, the Green Guide to Specification will be implemented as far as it is practicable and viable, and an Energy Assessment has been provided. The Council could seek the approval of details as part of a planning condition, should it be deemed necessary.

4.52 Policy 5.3 concerns sustainable design and construction, and it includes a number of requirements, which are considered in Section 6.

4.53 Policy 5.10 promotes 'urban greening'; the proposed development would meet the aims of this policy, by introducing new areas of green space at the site's boundaries, and a communal green roof terrace. This also complies with the requirements of Policy 5.11, which encourages the use of green roofs and walls in new development. A Landscape Plan (drawing 10065-LA-01) has been provided which provides further details on the landscaping scheme at ground level and the roof terrace.

4.54 Policy 5.12 concerns the management of flood risk. This application is accompanied by a Drainage Strategy by Patrick Parsons, which confirms that the site is not at risk of flooding, and that the application site is an appropriate location for the proposed residential development. The same statement sets out

details of the proposed drainage strategy, in accordance with Policy 5.13, concerning sustainable drainage, and Policy 5.14 with regard to waste water.

- 4.55 Policy 6.3 requires that development proposals should be assessed in terms of their likely impact on transport capacity and the transport network. Policy 6.9 requires new development to provide secure, integrated, convenient and accessible cycle parking, and Table 6.3 sets minimum standards for cycle parking provision. Policy 6.13 concerns parking provision in new development. These matters are considered in the Transport Statement by Patrick Parsons, which also accompanies this application.
- 4.56 Policy 7.3 sets out design requirements, which are intended to deter crime, and reduce the fear of crime. These are discussed in Section 6.
- 4.57 Policy 7.14 concerns the need to tackle air pollution, and requirements for new development, with regard to air quality management. These matters and the application's response are set out in the Air Quality Assessment prepared by EN Safe which accompanies this application.
- 4.58 Policy 7.19 requires new development to, wherever possible, make a positive contribution to the protection, enhancement, creation and management of biodiversity, and also to not adversely affect protected species and habitats. It is not anticipated that the proposed development would cause any harm to protected species or habitats, and it has the potential to create a net benefit in biodiversity, through measures to enhance foliage and landscaping on the site.

The Draft London Plan 2019

- 4.59 Policy GG2 encourages making the best use of land. This includes the development of brownfield land, prioritising sites which are well-connected by existing or planned public transport, and promoting higher density development, particularly in locations that are well-connected to jobs, services, infrastructure and amenities by public transport, walking and cycling.
- 4.60 Policy GG4 focuses on delivering the homes Londoners need. This means ensuring more homes are delivered, that 50% of all new homes are genuinely affordable, that homes are of a good quality and meeting high design standards.
- 4.61 Policy D2 states that the density of development should be proportionate to the site's connectivity and accessibility by walking, cycling, and public transport to jobs and services (including PTAL and access to local services).
- 4.62 Policies D3 and D4 set out criteria that would optimise a site's capacity through a design-led approach and ensure the provision of good design. We believe that these proposals respond positively to these policies, and details of how the proposal has been designed to optimise the use of the site can be found in section 6 of this statement where we refer to similar policies of the Hillingdon Local Plan and the existing London Plan.

- 4.63 Policy D6 requires certain housing quality and standard measures. This includes adequately sized rooms and functional layouts. If the dwellings cannot be dual-aspect, then dwellings must benefit from adequate passive ventilation, daylight and privacy, and avoid overheating. The proposed bedrooms and balconies would meet the minimum size standards specified within the policy.
- 4.64 Policy T6 provides guidance on car parking provision, and as noted above, this is discussed in the Transport Statement.

5 Material Planning Considerations

The Principle of Development

Residential Use

5.1 The application site sits within a predominantly residential area and it already contains residential accommodation. The proposal to provide further housing, on this brownfield site in the existing urban area, accords in principle with local and national planning policies, as outlined in Section 4. In these circumstances, it is important to ensure that the proposals make an efficient use of land in this suitable location, to provide as much housing to meet London's need as possible.

Employment Sites

5.2 The application site does not sit within a designated employment area. Policy DME 2 of the Hillingdon Local Plan concerns the loss of employment floorspace or land outside of designated employment areas. Part (iv) of this policy allows for the change of use of employment space where '**the new use will not adversely affect the functioning of any adjoining employment land**'. To the rear of the site is the Bainbridge Auction Rooms and beyond that a car repair garage. We understand that neither of these businesses are currently adversely affected by the presence of the residential use on the upper floors of the existing building, or other nearby housing in what is already a predominantly residential area. The Noise Impact Assessment which accompanies this application confirms that these businesses do not generate any noise which could not be adequately mitigated. It is not anticipated that this situation would change following the site's redevelopment for residential use.

Local Shopping Parade

5.3 As we have noted above, Station Parade is identified as a Local Parade in the Hillingdon Local Plan. Policy DMTC 3 seeks to maintain the viability of local parades. However, the majority of the shop units within the site are vacant, and have been for some time; units 2 and 3 have been vacant since November 2019 and units 5 and 6 (the car showroom) have been vacant since July 2019. The only units which have continued to operate are a barber's shop (unit 1), and a newsagent (unit 4). We understand that these shops have struggled to survive in recent years, due to the high level of competition which they have faced from shops in Ruislip town centre, and also the presence of a number of other shops close to the site.

5.4 The local area is very well provided with convenience shopping opportunities. This includes a grocer / baker / off-licence (Epic Market, adjacent to the station) around 170m (1.5 minutes' walk) from the application site, and a Tesco supermarket around 300m (less than 4 minutes' walk) from the site. These shops sell a wide variety of product lines, and they both compete directly with the

newsagent. Their presence would also help to ensure that the local area would continue to be well served by 'essential' shops, as defined by the Local Plan.

5.5 The car showroom (units 5 and 6), which takes up much of the site's frontage, is a sui generis use, and it has been vacant for nearly a year; its loss would not adversely affect convenience shopping opportunities in the area. Units 2 and 3 are vacant, and they previously contained a hairdresser and laser hair removal shop, whilst Unit 1 contains a barber. Again the loss of these shops would not adversely affect convenience shopping opportunities, and they are all uses which people would travel a little extra distance to reach, and they are well represented in the wider area. Only the newsagent is within the Local Plan's 'essential' shop category.

5.6 We have shown in Section 2 that the local area is very well served by 'essential' shops. The Local Plan notes that a catchment of 800m is applied when considering a shop's catchment. Within this catchment of the application site are a number of local shops, and the edge of the town centre, all of which are accessible within an easy walk or cycle, on good footpaths and cycle paths. If the catchment is extended only 200m, to a 1km radius, it would encompass much of the High Street and town centre, which includes a wide variety of shops and further supermarkets. However, within 800m there are far more than the minimum 5 essential shops required by the Local Plan, and indeed this area is extremely well served by convenience shops. In practical terms, the shops mentioned above (and particularly the Tesco supermarket) serve as several of these essential shops, for instance providing services associated with a grocer, baker, butcher, greengrocer, newsagent and to some extent a pharmacy, all for lower prices than independent retailers can match. It is not at all unusual for a small supermarket such as this Tesco to drive other shops selling similar products out of business. As such, the loss of the newsagent would also not materially affect local convenience shopping opportunities.

5.7 Policy DMTC 3 concerns proposals for the change of use of shops, and not specifically their loss through redevelopment. Nevertheless, addressing its objectives, we note that there would remain sufficient essential shop uses to provide a range and choice of shops within the local area, which would not be deficient in essential shop uses. Given the excellent range of shops within the local area, we do not believe that the application proposals would give rise to a material conflict with the objectives of Policy DMTC 3.

The Need for Housing

5.8 We have explained in Section 4 that there is a very pressing need for housing in London, which is not being met by the housing target set out in the latest iteration of the London Plan (FALP). The housing target set for Hillingdon is a minimum which should ideally be exceeded. A failure to meet housing need can lead to severe adverse social and economic consequences. This is recognised by the NPPF, which clearly identifies the importance of providing sufficient housing, as we have also noted in Section 4 above.

5.9 The Council's publication '*5 Year Supply of Deliverable Housing Sites*' (December 2019) reviews the Borough's housing target and its ability to meet the identified

housing need. At the time of the review the Council claimed it was able to demonstrate a significant oversupply of housing for the Borough's own 10-year housing target (21.99 year housing supply).

5.10 However, the Borough must also carry the burden of providing housing to help meet the wider needs of London, and the effects of migration between local authority areas. Taking into account the housing target set for Hillingdon in the emerging draft London Plan (2019), the new target for housing completions by the year 2028/29 becomes 10,830. This significantly increases the minimum level of housing required, and reduces Hillingdon's demonstrable 5-year housing land supply to 6.22 years. At the time these figures were produced it was expected that the London Plan would soon be adopted. However, this has not yet been the case due to scrutiny and objections, and it now seems likely that the London Plan will be revised to increase the housing target. This follows the Secretary of State for Housing, Communities and Local Government's criticism of the proposed housing target, in an open letter addressed to the Mayor of London⁴.

5.11 The Secretary of State noted that there is great need to provide more homes in London. He also noted that, in order to protect the countryside, housing development must be focused within urban areas, and '**this means densifying, taking advantage of opportunities around existing infrastructure and making best use of brownfield and underutilised land**'. The Secretary of State then goes on to note how housing delivery has averaged at 37,000 new homes a year over the last 3 years, falling well short of the existing London Plan target (of 42,000 dwellings per annum, and against an estimated need for up to 49,000 dwellings per annum), and this has been reflected in an increase in house prices due to the demand for homes. The letter states that the average house price in London reached £515,000 in 2018, which equates to 14 times average earnings (see below). It also notes that '**the housing delivery shortfall you have overseen has led to worsening affordability for Londoners; and things are not improving, with housing starts falling a further 28 per cent last year compared to the previous.**'

5.12 The Secretary of State also notes that the Planning Inspectorate found the new plan capable of only providing 52,000 homes a year, rather than the Plan's own identified need of 66,000 homes. The demand for homes in London is high and the identified provision does not meet this demand.

5.13 As the Secretary of State has noted, house prices are an indicator of the balance of supply against demand, and where they are rising, it is clear that supply is outstripping demand. House prices in London are rising rapidly. This leads to worsening affordability and makes it more difficult for established communities to remain within an area.

5.14 A good indicator of the affordability of housing is the ratio between lower quartile incomes and lower quartile house prices. This reflects the ability of people on the lowest incomes, who are generally in the greatest need of suitable

⁴ Letter addressed to Sadiq Kahn, Mayor of London from Rt Hon Robert Jenrick, Secretary of State for Housing, Communities and Local Government dated 13th March 2020 – included at Appendix A.

housing, to afford to buy housing which meets their needs. This is shown in the table below.

	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019
Hillingdon	8.43	8.73	8.61	8.67	9.74	11.09	12.60	13.47	13.59	13.51
London	8.61	9.00	8.96	9.26	10.10	11.38	12.80	13.27	13.00	13.00
England	6.86	6.72	6.58	6.57	6.91	7.11	7.16	7.26	7.34	7.27

Ratio of lower quartile house prices to lower quartile earnings⁵.

5.15 This table shows that the gap between lower quartile earnings and house prices is large, and that housing has remained out of reach for many people in recent years. The Hillingdon Local Plan reports that '**approximately 33% of households in the borough are unable to afford market housing**⁶'. This implies that there is a very substantial need for affordable housing, to meet the needs of local people. This situation is likely to have become worse under the current Covid 19 restrictions, and the anticipated recession which will follow.

5.16 The table above shows that by 2019 a lower-quartile house in Hillingdon cost 13.5 times the annual earnings of someone with a lower quartile income. This rate is worse than the average across London and is nearly twice the national average. This ratio must be considered in the context of the level of money which a mortgage lender may provide, which would typically be only up to 4 or 5 times a person's salary.

5.17 This data clearly shows that there is an imbalance of supply and demand. In this context, it is important that as many houses should be provided as possible. It is only by increasing the supply of housing that rising house prices can be stabilised, and in the long term reduced.

5.18 The NPPF sets out the Government's objective, at a national level, to significantly boost the supply of homes (NPPF paragraph 59). National policy clearly places great importance on the need to provide land suitable to meet the need for housing. We consider that the pressing need for market and affordable housing, and the new housing which the proposed development would provide, forms a significant material consideration in favour of the application proposals. We also consider that the proposed provision of housing is a matter which weighs heavily in favour of the application proposals.

The Relative Need for Types of Development

5.19 We have explained above that the need for the existing retail shop units within the site is extremely limited, given the good level of provision within the local area. However, there is a high level of need for housing within London, to which this application would respond positively. The Secretary of State's comments

⁵ Taken from *Office for National Statistics, Ratio of house price to workplace-based earnings (lower quartile and median), 1997 to 2019*.

⁶ Hillingdon Local Plan, Part 1, Strategic Policies, November 2012, page 11.

highlight this, and they clearly indicate that the direction of Government policy is firmly in favour of providing sufficient housing to meet social and economic needs, meaning a far higher level than has been provided in the past.

5.20 We consider that, if an element of retail development were to be included within the development, this would have a negative effect on the viability of the proposed development, both through increased build costs, and a reduced end value. The proposed development is already unable to provide the 35% affordable housing which local policies seek, and only a reduced provision of around 10% is viable. It is anticipated that providing retail units on the ground floor of the development would mean that the development could not support any affordable housing, and it may render the development as a whole unviable.

5.21 In light of the material considerations we discuss in this statement, it is our view that the application proposals represent a suitable approach, considering the relative need for local retail development, which is already in plentiful supply in this area, or market and affordable housing, of which there is a substantial shortfall.

Social Sustainability

Mix of Housing

5.22 The proposed dwellings would provide a mix of 1, 2 and 3 bedroom flats. They have been designed to Lifetime Homes standards, so that they would be sufficiently flexible to allow them to cater for the needs of a range of people, from single people and young professionals, to small families and downsizers.

5.23 Policy DMH 2 requires a mix of housing units of different sizes, to reflect the Council's latest information on housing need. No recent information has been published on the Council's website, but the policy's supporting text notes a need for larger affordable and private rented units, particularly 3 bedroom properties. The latest Authority Monitoring Report for the Borough (2013) notes that **'Hillingdon has a relatively young population, with around 38% of Hillingdon's population under 30 years of age'**⁷. The report also sets out the required mix of housing over the next 15 years, which is divided between household sizes as follows:

- 1 bedroom household 32%
- 2/3 bedroom household 38%, and
- 4 bedroom or larger household 30%⁸

5.24 We believe that the application proposals respond positively to the requirement of Policy DMH2, by providing a mix of 1, 2 and 3-bedroom apartments. Given the nature of the proposals, it is not possible to provide a majority of larger 3-

⁷ Development Plan Authority Monitoring Report 2012/2013, Hillingdon, December 2013, paragraph 3.4.

⁸ Development Plan Authority Monitoring Report 2012/2013, Hillingdon, December 2013, page 47.

bedroom homes, as there simply isn't space within the site. However, the Applicant has been careful to provide a range of sizes of accommodation, with as many larger properties as can be accommodated within a viable development. As the accompanying Financial Viability Assessment indicates, the development's viability is already finely balanced, and providing fewer but larger properties would render it unviable.

The Provision of Housing

5.25 National policy recognizes that the provision of a sufficient quantity and range of types of housing is essential to the social element of sustainable development. NPPF paragraph 8 states that one of the overarching objectives to achieving sustainable development is to support '**strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations**'.

5.26 A lack of housing can lead to people living in accommodation which does not meet their needs. We therefore believe that whilst planning applications for housing such as this should be seen in the context of the overall need for housing, as set out above, they should also be seen in terms of the real housing that they would provide for real people, and the direct benefits that they would bring to their new residents.

5.27 We have noted that the site is in a sustainable location, with shopping facilities, schools and employment near at hand. The application site is in an inherently suitable location to meet the housing needs of the local community.

Affordable Housing

5.28 The proposed development would provide 2 affordable homes, this being the maximum amount which can be provided without compromising the development's financial viability⁹. Whilst this provision is below the ideal level of 35%, which the Council's policies seek, it is nevertheless a valuable contribution, which weighs in favour of the application proposals.

Economic Sustainability

Job creation

5.29 The construction period for the proposed development would create employment, which has the potential to benefit those particularly in need, such as the unemployed and young people. We understand that a development such as that proposed could provide in the order of 20 jobs during its construction, and it is likely that many of those employed on the site would be based locally.

⁹ Details are set out in the Financial Viability Assessment by Aspinall Verdi, which accompanies this application.

Economic Development

5.30 New residential development is a key component that supports and builds economic development within its local area. The role that housing plays, as a driving force for a successful economy, is one of the main reasons that Governments are keen to boost house building in times of economic stress. Insufficient housing can lead to serious negative social and economic effects, through worsening affordability and a lack of choice. For instance, a lack of housing restricts choice in the market, encouraging those who can move further (generally higher earners) to move away, whilst those who cannot are forced to live in housing which does not meet their needs. For these reasons, paragraph 81 of the NPPF identifies '**inadequate infrastructure, services or housing**' as a '**barrier to investment**'.

5.31 Businesses will therefore naturally be drawn to areas with a good supply of housing. They will want to be in an area where all of their employees can find suitable housing, which is affordable to them. They will also want to be located in an area where there is a good range of housing available. A lack of housing generally, or of a particular type of housing, can deter businesses from locating in any one area. The quality of the local living environment, and the quality of its housing stock, can thereby have a direct effect on the area's economic prospects.

Environmental Sustainability

Energy Efficiency and Renewable Energy

5.32 This application is supported by an Energy Statement by Dynamic Energy Assessors, which describes how the proposed development would meet the London Plan's requirement to reduce its carbon emissions by 35%, when compared to the 2013 building regulations. This would be achieved by minimising energy demand, through the use of energy efficient materials, fittings, and technologies, and using renewable energy sources. This would be a far more environmentally sustainable development, in terms of its ongoing impact, than the existing building, which is far less efficient.

Sustainable Travel

5.33 The application site's sustainable location, with regard to accessibility by walking, cycling and public transport, provides good potential to prioritise non-car uses. Only disabled parking has been provided as part of these proposals. This would ensure that residents would travel by sustainable means. As we have noted in Section 3, the site is within walking distance of Ruislip town centre, along a good quality and direct route. It is also within a couple of minutes' walk of a railway station, with a high frequency underground service linking it to central London. At the railway station there is also a frequent bus service, which links the area to the town centre and further afield. The proposals also seek to promote cycle travel, with a good provision of secure cycle parking.

Air Quality

5.34 This application is accompanied by an Air Quality Assessment by enSAFE Consultants. This concludes that through good practice and appropriate mitigation measures the release of dust during the construction period can be effectively controlled, so that its effect would be '**not significant**'. As only 2 car parking spaces are proposed the development would not result in an increase of traffic movements, and there would be a net reduction in vehicular traffic. The report concludes that the development would be '**air quality neutral**' and no further action would be required to reduce excess emissions. As such, the proposals would comply with the requirements of national and local planning policies.

Biodiversity

5.35 The proposed development can benefit biodiversity within the site, for example through the provision of new planting of shrubs and trees of native species, which can provide food and habitats for a variety of species. Details of proposed pollinator plants are provided on the Landscape Plan by Studio Loci which accompanies this application.

6 Response to Design Policies

Density

- 6.1 The proposed development would create 22 new dwellings. This would include 13 x 1-bedroom, 7 x 2-bedroom and 2 x 3-bedroom flats. It would make an efficient use of the site, with a density of approximately 220 dwellings per hectare.
- 6.2 This is above the indicative density range suggested by Policy 3.4 of the London Plan for residential developments in urban areas, within PTAL zones 2-3, and an average of 2.7 - 3.0 habitable rooms per dwelling. This indicates that the density of the proposed development should be in the range of 70-170 dwellings per hectare, although it allows for higher density development, subject to its compliance with guidance in the Mayor's Housing SPD.
- 6.3 The proposed development is also above the density range set out by the Residential Density Matrix at Local Plan Table 5.2. This suggests that developments of mostly apartments should have a density of 50-110 units per hectare, in residential areas within suburban/urban character 800m of a town centre. However, this is not an absolute requirement, but the starting point for discussions, and the Local Plan notes that the Council will approach this matter in a flexible way.
- 6.4 The Mayor's Housing SPG clarifies that the key issues for consideration in optimising housing proposals relate broadly to good design, public transport capacity, access to social infrastructure, open space and play provision (paragraphs 1.3.1 and 1.3.51). The SPG also notes that '**housing density in itself may be less significant to resident satisfaction than dwelling type and the neighbourhood characteristics**', and that '**a number of studies explore how high density schemes can provide good quality, attractive housing and ensure the most efficient use of land**' (paragraph 1.3.2).
- 6.5 The SPD quotes the London Commission's independent consultants, who note that '**the actual density calculation of an acceptable development (in terms of units or habitable rooms per hectare) is a product of all the relevant design and management factors; if they are all met, the resultant figure is what it is and is arguably irrelevant**' (paragraph 1.3.5).
- 6.6 The SPD notes that '**small sites may require little land for internal infrastructure such as internal roads, amenity space and social infrastructure, and it is appropriate for density to reflect this**' (paragraph 1.3.49). The site's characteristics allow for a highly efficient use of space, with the majority of the site's footprint already used for built form. We believe that the proposed density is entirely appropriate for this site, given its sustainable location and the building's relationship with its surrounding context.

6.7 The emerging draft London Plan and national policy encourage proposals that make an efficient use of land. Policy GG2 of the emerging London Plan prioritises the development of brownfield sites at high densities, particularly in well-connected locations. Likewise, paragraph 123 of the NPPF states it is '**especially important that planning policies and decisions avoid homes being built at low densities**' when there is an existing or anticipated shortage of housing land.

6.8 We believe that the proposed density of development is acceptable for the following reasons:

- The application site has good accessibility to public transport, and is within easy reach of Ruislip town centre, as noted in Section 2, and in the accompanying Transport Statement. It is on a bus corridor, and very close to a railway station, with access to the Central Line. This is one of the most accessible locations within the Borough.
- The form of the proposed development is entirely acceptable with regard to its relationship with neighbouring properties, its appearance, and its effect on the character and appearance of the local area, and the provision of adequate cycle parking, refuse facilities, etc..
- The proposed development would provide residents with a high standard of accommodation, both within and outside the building, including a good level of private amenity areas including both balconies and a shared garden, which would be both highly attractive and functional.
- The layout of the proposal uses the available land in a highly efficient way, with two wheelchair accessible units and a large secure cycle store on the ground floor, and the shared amenity space is provided in the form of a roof garden. the high density is simply a reflection of the ergonomic and efficient use of space within the site.
- As we have explained in Section 5, there is a high level of need for housing, which is not fully reflected in the adopted development plan. The Secretary of State's dissatisfaction with the draft London Plan, and his requirement for it to be reviewed, will inevitably lead to higher housing targets for London boroughs. In light of the clear and pressing need for housing, the national policy requirement to make an increasingly efficient use of land is of particular relevance. This is a matter which carries great weight in the determination of this application.

6.9 In light of the above considerations, we believe that the proposed density is entirely acceptable.

Relationship with the Surrounding Area

Height and Scale

6.10 We consider that the proposed height and scale of the building is an appropriate response to the site's local context. The existing building is two storeys high with

a 3rd storey incorporated within the roof space and a central gable within the front elevation. The roof pitch is rather tall and the ridge line effectively sits at a height typical of 3 storey development, at approximately 10m. Nevertheless, the existing building appears somewhat small when viewed along the Ickenham Road, given its location on a junction. We consider that the site's relative visibility and relatively spacious context, when viewed along the main road, allow scope for greater height.

- 6.11 Although primarily residential, the area's character is mixed. Close to the site are a 3/4 storey care home, and bulky commercial buildings. As we have noted in Section 2, other relatively recent development in this area also includes the blocks of flats just the other side of the railway line, over the bridge, which are up to 6 storeys in height. A building of 5 storeys would not be out of keeping in this context. The provision of an attractive building placed on this corner plot also has the potential to make a positive contribution to the area's character, as well as its legibility.
- 6.12 The proposed building would be 5 storeys in height, with a communal roof garden on top. The bulk of the building would be largely contained within the first 3 storeys, and the 4th and 5th storeys would be set back from the road. This would have the effect of reducing the building's apparent scale, particularly when viewed from close-quarters. The top two floors would not be easily visible in nearby views from the street, as they would recede from view. Furthermore, the top storey would be clad in zinc, which would provide a matt grey finish that would blend with the sky, particularly when viewed from nearby.
- 6.13 The site would be visible in long distance views. However, the building's appearance in these views has been considered carefully, to ensure that it would complement and blend with its surroundings. The accompanying Design and Access Statement provides more detailed comparative views of the existing and proposed development, at pages 27 - 29. However, we have reproduced two of the images in this statement below for ease of reference.
- 6.14 The images below show how the proposed apartment block would complement the street scene. The top image shows how the proposed building would be seen in context with the existing care home, which would still dominate this view when seen from the top of the railway bridge. We also note the modelled image does not include the trees and hedges that exist to the front of the care home. These would in reality also obstruct views of the proposed building.
- 6.15 The second image, looking west, shows the proposed development in the context of the houses that front Ickenham Road. Again, this shows that the building would not dominate the street scene, and it would not be easily visible until the viewer is in close proximity to the site.
- 6.16 As we have noted in Section 2 of this Statement there are many other examples of taller buildings in the local area that range between 4 and 6 storeys in height. As such, the proposed development would not be substantially higher than its surroundings. We believe that the site can easily accommodate a building of 5 storeys in a way that complements and responds positively to its local context. It would certainly not be substantially taller than its surroundings, or result in any

significant change to the local skyline, and so Policy DMHB 10 is not relevant to these proposals, as this would not qualify as a high building under the definition within the Local Plan.



Proposed view from Ickenham Road, looking east toward the application site.



Proposed view from Ickenham Road, looking west toward the application site.

Appearance

- 6.17 The proposed development would be of a modern design. It would not be out of keeping with its surroundings, which contain a mix of architectural styles. There is inter-war housing constructed of red brick on the Ickenham Road. On Station Parade are buildings with more of an industrial appearance, and the care home, which is in a mix of red and yellow brick, with render and stained timber on the upper floors. Whilst these buildings represent a variety of styles and materials, none of them provide a good example of a suitable design for the application site.
- 6.18 Although the character of the local area is mixed, the proposals would make use of high quality materials that would not be at all out of keeping with the character of the local area. Buff bricks would provide a smart and clean appearance. Dark coloured powder-coated aluminium windows would be a subtle and complementary addition, which would not dominate the building's appearance in the way that, for instance, uPVC windows can. The top storey would be clad in zinc, and it would blend with the sky, reducing the building's visibility in both close and long-distance views.

Vehicle Parking and Transport

6.19 The site has a PTAL rating of 2 / 3, this means that the site has good access to public transport. It is proposed to provide 2 disabled car parking spaces, which would be dedicated to the 2 wheelchair-accessible ground-floor units proposed.

6.20 Standard 17 of the London Plan Housing SPG (2016) notes that in areas of a PTAL rating between 2 – 4, a maximum of 1.5 car parking spaces per dwelling should be provided. We note that this is a maximum requirement and that standard 17 also notes that '**all developments in areas of good public transport accessibility (in all parts of London) should aim for significantly less than 1 space per unit**'. The London Plan does not set minimum standards for car parking provision.

6.21 However, the draft London Plan sets out policies that support the city's desire to provide carbon neutral developments in the future, and policy T6 states that '**car-free development should be the starting point for all development proposals in places that are (or are planned to be) well-connected by public transport**'. The application site is well-connected to public transport and as such the only car parking proposed on site is 2 disabled spaces for blue-badge holders. Although the draft London Plan is not yet adopted, carbon neutral development is of national and local importance and a development that encourages the use of sustainable travel methods such as walking, cycling and public transport is clearly beneficial.

6.22 Twenty-six cycle spaces are proposed within a large secure store on the ground floor of the development, only accessible from inside the building. This accords with the Local Plan's requirements. Further detail on the car and cycle parking provision is provided in the accompanying Transport Statement.

Refuse and Recycling Facilities

6.23 Refuse and recycling facilities would be provided on the ground floor of the building. They would be easily accessible to all residents and located close to an exit so they can be easily accessed from the street for collection.

Building for Life

6.24 Local Plan Policy BE1 requires new developments to achieve a satisfactory assessment against the latest Building for Life Standards; these are Building for Life 12 (January 2015), and they are considered in the table below. The application's performance is also assessed in terms of the traffic light assessment used by Building for Life, as red, amber or green.

Building for Life 12 Criteria	Application's Response
1. Does the scheme integrate into its surroundings by reinforcing existing connections and creating new ones, while also respecting existing	The proposed development would provide suitable and legible highway and pedestrian connections. The access points would not cause any

	buildings and land uses around the development site?	adverse impacts on neighbouring development.
2.	Does the development provide (or is it close to) community facilities, such as shops, schools, workplaces, parks, play areas, pubs or cafes?	The development does not provide any community facilities, as it is not of a sufficient scale to accommodate or support them.
3.	Does the scheme have good access to public transport to help reduce car dependency?	The application site does have good access to public transport, with a mainline railway and tube station just 150m from the site. A bus stop is located at the railway station and Ruislip Town Centre is a 10-minute walk or less than a 5 minute cycle (partly on designated cycle lanes) from the site.
4.	Does the development have a mix of housing types and tenures that suit local requirements?	The development is a single block of flats on a relatively small site, and so is limited in terms of the tenures which can be provided, but it does include 1, 2 & 3 bedroom apartments, and 2 affordable homes are proposed. These are designed to meet Lifetime Homes standards, and so are suitable for a broad range of potential residents.
5.	Does the scheme create a place with a locally inspired or otherwise distinctive character?	The proposed development would have a distinctive character, with a high quality of architecture. However, there is no particularly distinctive local style on which to draw.
6.	Does the scheme take advantage of existing topography, landscape features (including water courses), wildlife habitats, existing buildings, site orientation and microclimates?	The proposed development has been designed to respect the local topography. The building's orientation is dictated by its context. It is not of a sufficient scale to have a significant effect on the local microclimate.
7.	Are buildings designed and positioned with landscaping to define and enhance streets and spaces and are buildings designed to turn street corners well?	The building has been designed to address the site's surroundings appropriately, with a public façade on the street. New landscape planting is proposed to enhance the site's appearance and that of the public realm.
8.	Is the scheme designed to make it easy to find your way around?	The building's key features, such as its entrances, are easily legible.
9.	Are streets designed in a way that encourage low vehicle speeds and	The disabled parking spaces are to the rear of the development accessed

	allow them to function as social spaces?	by an existing access road. Vehicle speeds will be limited entering the site.
10.	Is resident and visitor parking sufficient and well integrated so that it does not dominate the street?	As noted above only 2 car parking spaces would be provided; these would be to the rear of the development and would not dominate the street.
11.	Will public and private spaces be clearly defined and designed to be attractive, well managed and safe?	Public and private spaces are clearly defined and appropriately separated. The communal roof garden area would be private, for residents' exclusive use, and it would also be well managed by a private company. Private balconies would also be provided for each apartment.
12.	Is there adequate external storage space for bins and recycling as well as vehicles and cycles?	There is internal, secure storage space for bins and bicycles, and so it is well integrated, secure and easy to use.

6.25 We believe that this demonstrates that the proposed development would achieve a more than satisfactory score with regard to the Building for Life criteria.

Policy BE1, Built Environment

6.26 Policy BE1 sets out a number of criteria for new development, to ensure that it would improve and maintain the quality of the built environment. These are set out below, alongside the applications response.

Policy BE1 Criteria	Application Response
1. Achieve a high quality of design in all new buildings, alterations, extensions and the public realm which enhances the local distinctiveness of the area, contributes to community cohesion and a sense of place.	We believe that the proposed building would achieve this requirement for a high-quality design and finish. The proposed building would be a notable improvement on the appearance of the existing building, and it would help to enhance the character and distinctiveness of the local area.
2. Be designed to be appropriate to the identity and context of Hillingdon's buildings, townscapes, landscapes and views, and make a positive contribution to the local area in terms of layout, form, scale and materials and seek to protect the amenity of	The proposed building contains references to local built form using traditional materials, whilst it makes a new and positive contribution to the character of the area.

	surrounding land and buildings, particularly residential properties.	
3.	Be designed to include "Lifetime Homes" principles so that they can be readily adapted to meet the needs of those with disabilities and the elderly, 10% of these should be wheelchair accessible or easily adaptable to wheelchair accessibility encouraging places of work and leisure, streets, neighbourhoods, parks and open spaces to be designed to meet the needs of the community at all stages of people's lives.	The proposed development would be designed to Lifetime Homes standards. Two ground floor units would be wheelchair accessible.
4.	In the case of 10 dwellings or over, achieve a satisfactory assessment rating in terms of the latest Building for Life standards (as amended or replaced from time to time).	The Building for Life standards are considered above, and the proposed development achieves a more than satisfactory assessment.
5.	Improve areas of poorer environmental quality, including within the areas of relative disadvantage of Hayes, Yiewsley and West Drayton. All regeneration schemes should ensure that they are appropriate to their historic context, make use of heritage assets and reinforce their significance.	The application site is not in an area of poor environmental quality, but it has been designed to ensure that a high-quality environment would be created.
6.	Incorporate a clear network of routes that are easy to understand, inclusive, safe, secure and connect positively with interchanges, public transport, community facilities and services.	The proposed development is not of sufficient scale to include a network of routes, but routes into the building and car parking areas would be easily legible and safe.
7.	Improve the quality of the public realm and provide for public and private spaces that are attractive, safe, functional, diverse, sustainable, accessible to all, respect the local character and landscape, integrate with the development, enhance and protect biodiversity through the inclusion of living walls, roofs and areas for wildlife, encourage physical activity and where appropriate introduce public art.	The public and private areas within the development have been designed to be of a high standard. They would be clearly separated and would have a good degree of functionality. They would also respect and enhance local character. A green roof and nw planting are proposed, which would help to encourage local biodiversity.
8.	Create safe and secure environments that reduce crime and fear of crime,	The proposed development would provide safe and secure private areas

	anti-social behaviour and risks from fire and arson having regard to Secure by Design standards and address resilience to terrorism in major development proposals.	for amenity, in balconies and in the shared roof garden. The proposals also include secure cycle parking and storage. The proposals have been reviewed by a Secure by Design Officer to ensure they would perform well in this regard. See also below regarding security.
9.	Not result in the inappropriate development of gardens and green spaces that erode the character and biodiversity of suburban areas and increase the risk of flooding through the loss of permeable areas.	The proposed development is not on garden land, and it will instead make efficient use of previously developed (brownfield) land.
10.	Maximise the opportunities for all new homes to contribute to tackling and adapting to climate change and reducing emissions of local air quality pollutants. Achieve reductions in carbon dioxide emissions in line with the London Plan targets through energy efficient design and effective use of low and zero carbon technologies. Make the most efficient use of natural resources whilst safeguarding historic assets, their settings and local amenity and include sustainable design and construction techniques to increase the re-use and recycling of construction, demolition and excavation waste and reduce the amount disposed to landfill.	The ways in which the proposed development would reduce energy demand, and generate energy from renewable sources, are set out in the Energy Statement which accompanies this application. The ways in which it would seek to minimise air pollution is set out in the Air Quality Assessment. A sustainable drainage strategy is outlined in the Drainage Strategy.
11.	In the case of tall buildings, not adversely affect their surroundings including the local character, cause harm to the significance of heritage assets or impact on important views.	The proposed development is not for a tall building.

6.27 We therefore conclude that the proposed development complies with the requirements of Policy BE1.

Policy 5.3, Sustainable Design and Construction

6.28 As we have noted in Section 4, Policy 5.3 of the London Plan sets out a number of design principles for new development, to ensure that it is sustainable in the long-term. These are set out in the table below, alongside the application's response.

Policy 5.3 Criteria		Application Response
a.	Minimise carbon dioxide emissions across the site, including the building and services.	The Energy Statement sets out the ways in which carbon dioxide emissions would be minimised.
b.	Avoid internal overheating and contributing to the urban heat island effect.	The proposed building has been designed to be thermally efficient, to avoid overheating in summer. This would be achieved by means such as the use of suitable glazing, and with new green spaces around the building.
c.	Make efficient use of natural resources (including water), including making the most of natural systems both within and around buildings.	The proposed development would comply with the requirements of London Plan Policy 5.15, by incorporating water saving measures and equipment, and aiming to limit water use.
d.	Minimise pollution (including noise, air and urban runoff).	The proposed development would not cause any unacceptable pollution. A residential use would be entirely acceptable in this residential area. Separate reports accompanying this application confirm that there would be no unacceptable impact with regard to surface water runoff or air pollution.
e.	Minimise the generation of waste and maximise reuse or recycling.	The proposals include an area for the storage of waste and recyclable material. This is within the building, where it would be easily accessible and attractive to use. This also complies with the requirements of London Plan Policy 5.17.
f.	Avoid impacts from natural hazards (including flooding).	The application site is not expected to be at risk of natural hazards.
g.	Ensure developments are comfortable and secure for users, including avoiding the creation of adverse local climatic conditions.	The proposals would not be likely to create adverse climatic conditions, or create any uncomfortable microclimates for new or existing residents.
h.	Secure sustainable procurement of materials, using local supplies where feasible.	Where feasible, it is intended that materials would be from sustainable sources.
i.	Promote and protect biodiversity and green infrastructure.	The proposals would not lead to any unacceptable adverse impacts on local biodiversity. The proposals would provide the opportunity to improve the biodiversity of the site by providing green space at ground level, on balconies and in the roof terrace.

Security

6.29 Policy 7.3 of the London Plan sets out requirements for the design of new developments which are intended to deter crime and reduce the fear of crime. These are considered below, alongside the application's response.

Policy 7.3 Criteria	Application Response	
a.	Routes and spaces should be legible and well maintained, providing for convenient movement without compromising security.	The site would have a legible frontage, designed to facilitate easy movement of pedestrians and vehicles.
b.	There should be a clear indication of whether a space is private, semi-public or public, with natural surveillance of publicly accessible spaces from buildings at their lower floors.	There would be a clear demarcation of public and private spaces, which would be separate. Public spaces would be overlooked by the new apartments.
c.	Design should encourage a level of human activity that is appropriate to the location, incorporating a mix of uses where appropriate, to maximize activity throughout the day and night, creating a reduced risk of crime and a sense of safety at all times.	The proposed development is not of sufficient scale to include a mix of uses, but it would be designed to ensure that spaces around the building were overlooked and their safety would be improved by human activity.
d.	Places should be designed to promote an appropriate sense of ownership over communal spaces.	The communal space would be attractive and of a high quality, with the aim that this would encourage all residents to use it regularly.
e.	Places, buildings and structures should incorporate appropriately designed security features.	It is intended that the proposed building would incorporate a range of security features, to be specified at the detailed design stage.
f.	Schemes should be designed to minimise on-going management and future maintenance costs of the particular safety and security measures proposed.	The building and surrounding spaces within the site would be maintained by a management company, funded by a service charge on the new apartments.

7 Concluding Thoughts

- 7.1 This application proposes new residential development, which would make a valuable contribution towards meeting the very substantial need for housing in London. This need has been growing steadily in recent years, as demand has substantially outstripped supply, leading to rapidly rising house prices. The worsening affordability of housing has many adverse social and economic consequences, and increasing the supply is the only certain way of addressing this. The Secretary of State has recently made it clear that the next iteration of the London Plan must provide a step change in the provision of housing, to meet this high level of need. This will require a corresponding step-change in the way new homes are provided within each borough.
- 7.2 Small sites are required to make a significant contribution towards the provision of housing in London, if its housing needs are to be met. Enabling small sites to contribute to overall housing supply can also help to accelerate housing delivery, as they can come forward for development relatively quickly.
- 7.3 This application site is located in a sustainable location, which is entirely suitable for new residential development. It is within walking distance of Ruislip town centre, and West Ruislip Station which connects to the London underground Central Line, and it benefits from a frequent bus service from just outside the train station. The proposed development would promote sustainable modes of travel, by limiting car parking, and providing plenty of secure cycle parking.
- 7.4 The majority of the shop units within the site are vacant, and have remained empty for over 6 months. Around half of the retail frontage was in any case in a non-retail use. Whilst some small shop units would be lost as part of the application proposals, the local community has very good access to a range of other convenience stores, within around 300m of the application site; these include convenience stores and a Tesco supermarket. The site is also within easy walking and cycling distance of Ruislip town centre, which contains a range of shops and facilities, including further supermarkets. The things which are sold in the newsagent within the site are also sold in numerous other local stores.
- 7.5 There is a pressing need for the housing which this application proposes. It is not possible to include new shop units without compromising the development's financial viability. There is clearly a greater benefit in providing a net increase of 19 dwellings, including 2 new affordable homes, than in duplicating retail provision which already exists in the local area.
- 7.6 We consider that the proposed development would be a positive addition to the local area. We also consider that the proposals are consistent with local, regional and national planning policies taken as a whole. In particular, the proposals respond to the Government's key objectives, of boosting the supply of housing, providing development in sustainable locations, and making efficient use of previously developed land.

