

Supporting Planning Statement

Proposed Commercial & Residential Development
1-6 Station Parade, Ickenham Road, West Ruislip

March 2021

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1 Introduction

- 1.1 This Supporting Planning Statement accompanies a full planning application for a mixed-use development of 2 retail units and 9 residential 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. The proposed development would provide new, modern commercial units and a net increase of 6 dwellings. This application is submitted on behalf of B&V Investments Ltd (hereafter referred to as “the Applicant”).
- 1.2 This proposal follows the withdrawal of planning application 75568/APP/2020/1432, which proposed 22 residential units. Following this, pre-application advice was sought from the Council in relation to revised proposals, and these proposals have been amended to respond to the Council’s comments. The current proposals would retain the existing retail use (although expanded in relation to the new wider use class E), and reduce the number of proposed residential units; it would also respond to advice received in terms of design and layout.
- 1.3 House prices are rising rapidly, and many people are being forced to live further from where they wish to live, or in accommodation which doesn’t meet their needs. 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 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. The London Plan has recently been adopted and sets out new housing targets for each borough, including Hillingdon. The housing proposed by this application would make a valuable contribution towards meeting the substantial need for housing in London. It would also make efficient use of brownfield land. These are matters which accord with the Government’s key policy objectives, and which weigh 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 an apartment which would be entirely wheelchair accessible, and would benefit from its 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 provide ample cycle parking, whilst limiting the car parking provision to less than one space per apartment to encourage the use of more sustainable travel methods.

- 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.

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 (PTAL) 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 has 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 care home and further commercial units). There is also a pedestrian crossing island.

¹ Bus Information sourced from tfl.gov.uk on 10th March 2021.



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 an established 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 over a year, and they previously contained a laser hair removal clinic and hairdresser respectively. Unit 4 was most recently 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 2 years.
- 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. All residential units are in an average to poor condition and are in significant need of modernising.



This photograph shows the sites frontage onto Ickenham Road; the newsagent 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.

Planning History

- 2.24 Planning application 75568/APP/2020/1432, for the demolition of the existing building, and erection of a 5-storey building comprised of 22 residential units was submitted in 2020, it was not supported by the Council and subsequently withdrawn.
- 2.25 Following this, pre-application advice was sought for a revised scheme that re-provided retail units at the ground floor along with 10 residential units on the upper floors. The Council welcomed the re-introduction of commercial units to preserve the shopping parade, and agreed to the principle of providing an increase in residential units. The current application proposals have been further revised, and reduced to 9 dwellings, in response to the Council's comments at the pre-application stage.

3 The Proposed Development

- 3.1 This application proposes to demolish the existing building and construct a new building comprising of 2 commercial units on the ground floor and 9 residential units on the upper floors. The proposed residential mix is 3 x 1-bedroom, 4 x 2-bedroom and 2 x 3-bedroom apartments. The commercial units would be in the new use class E, which incorporates retail and other uses such as cafes, offices and non-residential institutions (see Section 5 below).
- 3.2 Each commercial unit would face Ickenham Road, with large display windows and separate entrances. Dividing the commercial units would be the front entrance and lobby leading to the stairs and lift to access the residential units above.
- 3.3 All apartments on the upper floors would meet the space standards set out in Table 3.3 of The London Plan. The 2-bedroom apartment on the second floor would be fully wheelchair accessible and built to M4(3) Building Regulation standards. The apartment would be easily accessed by a wheelchair accessible lift and the occupants would be provided with a designated disabled car parking space, located close to the rear of the building.
- 3.4 All of the proposed apartments would be provided with a private enclosed balcony / winter garden space. The winter gardens would have sliding windows that would allow good daylight and ventilation into the apartments, but also provide the option to enclose the space for warmth and privacy.
- 3.5 The north-eastern part of the new building would be limited to 2 storeys, with the second floor of accommodation provided within the roof space. In terms of height, this would retain a similar relationship with the neighbouring properties at West Ruislip Court to the existing building. Fenestration on the north-eastern elevation would be limited to small obscure-glazed windows on the first and second floor only, to avoid any direct overlooking in this direction.
- 3.6 Oriel windows placed on the south elevation at first and second floor would direct views away from properties on Ickenham Close, to avoid any direct overlooking. The Design and Access Statement, which accompanies this application, demonstrates how the windows have been arranged on the proposed development to respect the privacy of the surrounding properties. There would be no windows on the third floor which could lead to overlooking of adjacent properties.
- 3.7 the building would be provided with a green roof, to enhance biodiversity within the site, and for its benefit in treating surface water runoff.
- 3.8 The main access to the development would be from Ickenham Road, via Station Parade, leading to eight designated car parking spaces. The building would front Ickenham Road, from which its main pedestrian access would be provided. The existing dropped kerb on this road frontage would be replaced with full-height

kerbing to improve the safety of pedestrians, whilst the footway surfacing would also be improved.

- 3.9 The proposed building includes an integrated cycle store, capable of storing 18 cycles for the residents, and 3 to serve the commercial units. An additional 2 short-stay cycle parking spaces would also be provided outside for visitors.
- 3.10 Separate integrated refuse and recycling stores for the residential and units respectively, at ground level. Each would have a separate entrance to the rear of the property, providing easy access for the refuse collectors, from Station Parade.

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 (very recently adopted, in March 2021). 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 the aspects 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 assessed against the policies in this Framework taken as a whole.'**

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.

- 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. This target has now been increased to 10,830 dwellings for Hillingdon over the next ten years, covering the period 2019/20 – 2028/29 by the recently adopted London Plan³; this equates to 1,083 dwellings per year. 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. Nine dwellings are proposed, and the development is therefore not required to provide affordable housing.
- 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

³ Table 4.1 – 10 year targets for net housing completions (2019/20 -2028/29), The London Plan (March 2021)

being located within Flood Zone 1. The proposals would utilise SuDS where possible. A Drainage Strategy 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, 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, 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:**

- i) 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.'**

The proposals would result a slight reduction in commercial floorspace, equating to a loss of approximately 4% of the existing. This loss of commercial floorspace is negligible, and furthermore the proposals would bring benefits such as larger more flexible commercial spaces, of a more modern contemporary design, which would be attractive to potential businesses.

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

Over 50% (96%) of the existing commercial floorspace would be re-provided as new commercial units, and the proposals would accord with this policy's requirements.

- 4.27 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.
- 4.28 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.
- 4.29 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.

- 4.30 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.
- 4.31 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 1 of the 9 proposed units would be built to M4(3) building regulations and would be entirely accessible for wheelchair users.
- 4.32 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. This matter is discussed further in Section 6.
- 4.33 The provision of good quality and useable private outdoor amenity space is controlled by policy DMHB 18. This matter is discussed in Section 6.
- 4.34 Policy DMEI 1 promotes the use of living walls and roofs and on-site vegetation. The proposals would include a green roof. 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 which accompanies this application, sets out the proposals to reduce carbon emissions through design and fittings.
- 4.35 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.
- 4.36 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 (March 2021)

- 4.37 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. The application proposals would accord with these requirements.

- 4.38 Policy GG4 focuses on delivering the homes Londoners need. This means, for instance, ensuring more homes are delivered, that homes are of a good quality and that they meet high design standards.
- 4.39 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). 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.
- 4.40 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.
- 4.41 Policy D7 requires at least 10% of dwellings meet Building Regulation requirement M4(3); as noted above, 1 dwelling would meet this requirement to provide a wheelchair user dwelling.
- 4.42 Policy H1 seeks to increase housing supply, by setting new housing completion targets for each Borough. As we have noted above the target for Hillingdon is 10,830 over the plan period of 10 years. The policy states that this should be achieved through **'delivery-focused Development Plans'** and by optimising **'the potential for housing delivery on all suitable and available brownfield sites through their Development Plans and planning decisions'**.
- 4.1 Policy H2 requires Boroughs to pro-actively support well-designed new homes on small sites (below 0.25 hectares in size). Table 4.2 of the London Plan sets Hillingdon a target of 2,950 net housing completions on small sites in the plan's ten-year period. A net increase of 6 new dwellings on this site will help the Borough towards achieving this target.
- 4.2 Policy T1 states that **'all development should make the most effective use of land, reflecting its connectivity and accessibility by existing and future public transport, walking and cycling routes'**. Policies T5 and T6 provide guidance on cycle and 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. It is proposed to retain the existing retail use on the ground floor (in the new broader use class E), with a very slight reduction in floorspace by only 4%. This is a negligible loss, that would be mitigated by the provision of new modern premises, of a more flexible open plan layout, which could better meet modern needs.
- 5.3 It is also worthy of note that the ground floor accommodation would be in the new use class E. It is not possible to apply for it to be in a retail use any more, as the Government has abolished that use class. Class E is a more flexible use class than previously existed, and incorporates the old A1 (retail), A2 (financial and professional services), A3 (café or restaurant), B1a (office), B1(b) (research and development) and D1 (non-residential institutions). This reflects the Government's desire for existing premises to be used flexibly to meet changing needs. These uses mean the site may potentially accommodate an increase in the amount of employment it previously provided, depending on what use it should be put to in the future. The flexible modern accommodation proposed will help this space to remain useful and relevant in the future, and help to ensure it remains in active use.

Local Shopping Parade

- 5.4 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.

- 5.5 The local area is 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.
- 5.6 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 over 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.
- 5.7 We have shown in Section 2 that the local area is very well served by 'essential' shops. In order to maintain the viability of this Local Parade, it is proposed to replace the existing small units with 2 larger purpose-built units in use class E. These would be open-plan, with a design which would be flexible and adaptable, and would appeal to a wider range of uses. We believe that this would encourage local businesses to locate here and provide them with a better chance of success. In turn, this could contribute to a wider range of essential shops and employment opportunities for the local community and revitalise Station Parade in accordance with the requirements 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. 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 new London Plan (2021), 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.

- 5.11 Prior to its very recent adoption the London Plan's housing target was under significant scrutiny and objections during the Plan's development. Notably the Secretary of State for Housing, Communities and Local Government criticised the housing target, in an open letter addressed to the Mayor of London⁴. 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 also noted that housing delivery in London has averaged at 37,000 new homes a year over the last 3 years, falling well short of the previous 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 stated that the average house price in London reached £515,000 in 2018, which equates to 14 times average earnings (see below). It also noted 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 noted 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. 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 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.

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.

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

- 5.14 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.
- 5.15 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.
- 5.16 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 housing, and the new housing which the proposed development would provide, forms a significant material consideration, which weighs heavily in favour of the application proposals.

Social Sustainability

Mix of Housing

- 5.17 The proposed dwellings would provide a mix of 1, 2 and 3 bedroom apartments. 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.
- 5.18 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 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'**⁶. 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%⁷
- 5.19 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-

⁶ Development Plan Authority Monitoring Report 2012/2013, Hillingdon, December 2013, paragraph 3.4.

⁷ Development Plan Authority Monitoring Report 2012/2013, Hillingdon, December 2013, page 47 – this is the most recent AMR to set out a requirement in this regard.

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

- 5.20 National policy recognizes that the provision of a sufficient quantity and range of types of housing is important for 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'**.
- 5.21 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.
- 5.22 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.

Economic Sustainability

Job creation

- 5.23 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.
- 5.24 The new commercial units would also provide new job opportunities, and those employed would most likely be based locally. It is proposed to provide 254 sqm of Class E floorspace, which equates to approximately 12 to 17 employees for a high street retail shop or food store⁸, or around 20 employees if it were to be in office use.

Economic Development

- 5.25 New residential development is a key component that supports 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

⁸ Homes & Communities Agency Employment Density Guide 3rd Edition, November 2015.

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'**.

- 5.26 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

- 5.27 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

- 5.28 The application site's sustainable location, with regard to accessibility by walking, cycling and public transport, provides good potential to prioritise non-car uses. A limited amount of car parking would be provided; by not over-providing car parking, the proposals would ensure that residents and customers of the commercial units 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

- 5.29 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'**. 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

- 5.30 The proposed development can benefit biodiversity within the site, for example through the provision of new planting on the green roof, which can provide food and habitats for a variety of species.

6 Response to Design Policies

Density

- 6.1 The proposed development would create 9 new dwellings. This would include 3 x 1-bedroom, 4 x 2-bedroom and 2 x 3-bedroom flats. It would make an efficient use of the site, with a density of approximately 112 dwellings per hectare.
- 6.2 This is well within the indicative density range suggested by the Mayor's Housing Supplementary Planning Guidance⁹ for residential developments in urban areas, within PTAL 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.
- 6.3 The recently adopted London Plan does not set specific density targets in different PTAL zones. However, it states that the density of development proposals should **'be proportionate to the site's connectivity and accessibility by walking, cycling, and public transport to jobs and services (including both PTAL and access to local services)'**. As we have shown in Section 2 of this Statement, the site is in a sustainable location with a PTAL rating of 2-3.
- 6.4 The Housing SPG also 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.

⁹ Table 3.2 Density Matrix (Habitable rooms and dwellings per hectare) - Mayor of London, Housing Supplementary Planning Guidance, March 2016

- 6.7 The recently adopted 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 consider 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 car and cycle parking, refuse facilities, etc..
 - The proposed development would provide residents with a high standard of accommodation, including private amenity areas with enclosed balconies (winter gardens); these would be both attractive and functional, providing space that could be used as either indoor or outdoor space.
 - The layout of the proposal uses the available land in a highly efficient way, with one wheelchair accessible unit and a large secure cycle store on the ground floor. The 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 within London and nationally. In light of this, 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 an additional storey.

- 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 3 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 3 storeys in height, with a fourth storey accommodated within the roof scape. The ground floor would accommodate the commercial units, lobby and access to the residential units and cycle and refuse stores. The bulk of the building would be largely contained within the first 3 storeys and set back from the principal elevation at ground floor. The side adjacent to West Ruislip Court only rises to 3 storeys, with the 4th storey accommodated within the roof.
- 6.13 The building's appearance in long distance 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 views of the proposed development, at pages 28 - 30. However, we have reproduced one of these images below for ease of reference.



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

- 6.14 This image shows how the proposed apartment block would complement the street scene. The proposed building would be seen in context of the houses at West Ruislip Court and the care home beyond. It would not dominate the street scene, and the proposed design relates well to the height of surrounding development. The site's location on a corner, where it is more easily visible, also suggests a need for a taller building, which can provide a positive response to its surroundings, and aim legibility within the local area.

- 6.15 As we have noted in Section 2 above, there are many 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 out of keeping with its surroundings. We consider that the site can easily accommodate a building of 3 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.

Appearance

- 6.16 The proposed development would be of a modern yet traditional 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.
- 6.17 Although the character of the local area is mixed, the proposals would make use of high quality materials that would be entirely in keeping with the character of the local area. Red bricks and off-white render 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, white uPVC windows can.

Vehicle Parking and Transport

- 6.18 The site has a PTAL rating of 2 / 3, meaning it is in an area with good access to public transport. It is proposed to provide 1 disabled car parking space, which would be dedicated to the wheelchair-accessible unit proposed, and 7 standard parking spaces.
- 6.19 Table 10.3 of the London Plan 2021, notes a maximum car parking provision in Outer London PTAL zone 2-3 as up to 1 space per 3+ bedroom dwelling and up to 0.75 spaces per 1 – 2 bedroom dwellings. Excluding the disabled parking provision, this would equate to a maximum provision of 6.5 car parking spaces. The proposals provide 6 car parking spaces for residents.
- 6.20 Table 10.5 of the London Plan states at maximum parking provision of up to 1 space per 75 sqm of gross internal retail floor area (for outer London retail below 500sqm). The application proposes just over 250 sq m of commercial floorspace. It is proposed to provide 2 car parking space to serve the commercial units. These proposals accord with the London Plan's requirements.
- 6.21 The proposed development also encourages travel by sustainable modes, with 18 cycle spaces proposed to serve the residential units and 3 to serve the commercial units, all within secure stores on the ground floor of the

development. A further 2 short stay visitor cycle spaces would be provided outside. This would exceed the London Plan's minimum standards, set out in Table 10.2, and comply with the requirements of Policy T5. Further detail on the car and cycle parking provision is provided in the accompanying Transport Statement.

Refuse and Recycling Facilities

- 6.22 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

- 6.23 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 Criteria		Application's Response
1.	Does the scheme integrate into its surroundings by reinforcing existing connections and creating new ones, while also respecting existing buildings and land uses around the development site?	The proposed development would provide suitable and legible highway and pedestrian connections. The access points would not cause any 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 includes the provision of two commercial units to provide essential facilities for the local community. These could, for instance, be shops, offices or community uses.
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 and 3 bedroom apartments. 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, which would respond to the better elements of the local character.
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. Due to the site's constraints there are limited opportunities to accommodate landscaping at ground level.
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 allow them to function as social spaces?	The parking spaces are to the rear of the development, accessed 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 8 car parking spaces would be provided, in accordance with the London Plan's standards; 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 would be clearly defined and appropriately separated. Private winter gardens would be provided for each apartment.
12.	Is there adequate external storage space for bins and recycling as well as vehicles and cycles?	Adequate internal, secure storage space would be provided for bins and bicycles, and so it is well integrated, secure and easy to use.

6.24 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

- 6.25 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 surrounding land and buildings, particularly residential properties.	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.
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. One unit 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 would achieve a more than satisfactory assessment rating.
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	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.

	appropriate to their historic context, make use of heritage assets and reinforce their significance.	
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 is proposed which would help to encourage local biodiversity.
8.	Create safe and secure environments that reduce crime and fear of crime, 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.	The proposed development would provide safe and secure private areas for amenity. The proposals also include secure cycle parking and storage. The proposals have been reviewed by a Secure by Design specialist 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. It would not increase the risk of flooding.
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	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.

	techniques to increase the re-use and recycling of construction, demolition and excavation waste and reduce the amount disposed to landfill.	
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.

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

Presumption in Favour of Sustainable Development

6.27 National policy sets out in paragraph 11 the presumption in favour of sustainable development. The proposed development complies with the relevant local and national policies, and so benefits from this presumption. NPPF paragraph 11 directs that planning permission should be granted, provided that the proposals would not result in any adverse impacts which would significantly and demonstrably outweigh the benefits. As we have set out throughout this statement, there would be no such adverse impacts, whilst there would be a number of benefits. As such, we consider that planning permission should be granted without delay.

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.
- 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. The recently adopted London Plan requires a large amount of development within the Borough on small sites such as this.
- 7.3 The 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 well over 6 months. Around half of the commercial frontage was in any case in a non-retail use. These proposals would provide new commercial floorspace, in the new Class E, which allows for uses including retail, office and community uses. This would be flexible modern accommodation, which would better meet future business and community needs. It would replace a similar area of ground-level floorspace. It would also help to ensure future viability of the local shopping parade.
- 7.5 The proposals would make efficient use of previously developed land, according with local, regional and national policies in this regard.
- 7.6 We consider that the proposed development has been designed in a way which ensures that it 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. The proposals benefit from the presumption in favour of sustainable development. We consider that this application should accordingly be approved without delay.

