



Planning Statement

12 Great Central Avenue, Ruislip, HA4 6UD

Demolition of existing bungalow and ancillary building
and erection of a detached 2-storey dwelling and separate
apartment block containing 4 units (Outline)

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1 Introduction, Purpose and Development Proposals

1.1 Introduction

- 1.1.1 This statement comprises the Planning Statement submitted in support of the outline planning application for the demolition of the existing dwelling and ancillary building and erection of a detached two storey dwelling and separate apartment block containing 4 units (the proposed 'development') at 12 Great Central Avenue, Ruislip, HA4 6UD (the 'site').
- 1.1.2 The application is submitted in outline with Appearance and Landscaping reserved for future consideration.
- 1.1.3 Therefore, this application considers:
- 'Access' – the accessibility to and within the site, for vehicles, cycles and pedestrians in terms of the positioning and treatment of access and circulation routes and how these fit into the surrounding access network.
 - 'Layout' – the way in which buildings, routes and open spaces within the development are provided, situated and orientated in relation to each other and to buildings and spaces outside the development.
 - 'Scale' – the height, width and length of each building proposed within the development in relation to its surroundings.
- 1.1.4 Accordingly, the application includes details of how the new development will be accessed by pedestrians and cyclists, by residents and how generally the development is accessed from the wider area including by public transport. It also includes details of how the development is accessed for servicing. The submitted drawings provide these details.
- 1.1.5 In addition, the submitted drawings provide the dimensions of the height, width, and length of the new buildings and how this relates to the context as well as the layout of the site as well as the relationship between and with adjoining properties.
- 1.1.6 The Statement includes the Fire Safety Statement (Section 4.11) as required by London Plan Policy D12.

1.2 Purpose

- 1.2.1 Planning law¹ requires that applications for planning permission must be determined in accordance with the Development Plan unless material considerations indicate otherwise. The purpose of this statement is therefore:
- to identify development plan policies that may be relevant in the assessment of the development proposal; and
 - to consider whether the proposal conflicts with their provisions and, if so, whether there are material considerations that outweigh any conflict with the development plan.

¹ Section 70(2) of the Town and Country Planning Act 1990 and Section 38(6) of the Planning and Compulsory Purchase Act 2004

1.2.2 The Courts² have determined that it is enough that a proposal accords with the Development Plan when considered as a whole. It is not necessary to accord with each and every policy contained within the Development Plan. Indeed, it is not at all unusual for development plan policies to pull in different directions.

1.2.3 The position was confirmed by Patterson J in his judgement in *Tiviot Way Investments Ltd v Secretary of State for Communities and Local Government and Stockton-on-Tees BC* [2015] EWHC 2489 Admin) at paragraph 31:

I do not accept, lest it be thought to establish the proposition, that the case of Hampton Bishop (supra) establishes that a breach of one key policy was sufficient to find conflict with the development plan as a whole.

1.2.4 In addition, *R (Kverndal) v Hounslow LBC* [2015] EWHC 3084 (Admin) confirms that the Development Plan must be read as a whole so that conflict with one or more policies does not mean that planning permission should be refused.

1.2.5 Furthermore, the NPPF (2023) also recognises this in paragraph 3 where it is made clear that the Framework should be read as a whole.

1.2.6 The Planning & Compulsory Purchase Act 2004 defines the Development Plan for the purposes of this assessment process as the strategy for the region in which the site is located and Development Plan documents, taken as a whole, which have been approved or adopted for the area.

1.2.7 The purpose of this statement is therefore to identify Development Plan policies that are relevant in the assessment of the development proposals. Then to determine if the proposals conflict with their provisions and if they do, to determine whether there are material considerations which outweigh such conflict.

1.3 Development Proposals

1.3.1 The proposed development seeks the demolition of the existing dwelling and the erection of two buildings – referred to as Building 1 and Building 2.

1.3.2 Building one fronts Great Central Avenue and contains:

- UNIT 1 - 61sqm GIFA - 2 bed simplex unit
- UNIT 2 - 61sqm GIFA - 2 bed simplex unit
- UNIT 3 - 78sqm GIFA - 2 bed duplex unit
- UNIT 4 - 78sqm GIFA - 2 bed duplex unit

1.3.3 Building two fronts Primrose Gardens and contains:

- UNIT 5 - 72sqm GIFA - 2 bed detached dwelling

² Laura Cummins and London Borough of Camden, SSETR and Barrett Homes Limited [2001]; R. v Rochdale MBC ex parte Milne [2000] & City of Edinburgh Council v. Secretary of State for Scotland [1997]

- 1.3.4 In Building 1, units 1 and 2 are located at ground floor level with a garden. Units 3 and 4 are located at first and second floor levels with a roof terrace.
- 1.3.5 Unit 5 is a separate building facing Primrose Gardens and is at ground and first floor levels with an amenity area.
- 1.3.6 Unit 5 has a car parking space. The proposed development also provides cycle and refuse storage for the dwellings.
- 1.3.7 These details are discussed in more detail below.

2 Site Location, Description and Planning History

2.1 Site Location and Description

- 2.1.1 The application site comprises an existing single-storey residential property located on the southern side of the corner between Great Central Avenue and Primrose Gardens.



Site in street scene

- 2.1.2 The property currently consists of a bungalow which contains a living room, kitchen / dining room, bathroom and two bedrooms. An outbuilding is located to the rear.
- 2.1.3 The site is bounded to the east and south by two storey dwellings with the rear garden adjoining 1 Primrose Gardens. To the east, adjacent to the rear garden is an area of hardstanding which is used for car parking for adjoining properties. The surrounding area is characterised by a variety of architectural styles, periods and site layouts with a mix of bungalows, detached and semi-detached two-storey properties and blocks of flats. Several properties also include accommodation within the roofspace, some with rear dormers.
- 2.1.4 The site is not located in a Conservation Area and does not contain any statutorily or locally listed buildings. No relevant Article 4 Directions apply to the site.
- 2.1.5 The subject site is within Flood Zone 1 which means that it has a low probability of flooding.
- 2.1.6 The site is approximately 100m from South Ruislip railway and Underground station with frequent services towards Marylebone, High Wycombe and Central Line services. In addition, there are nearby bus stops on West End Road and Victoria Road. As a consequence, the site has a Public Transport Access Level (PTAL) of 3.
- 2.1.7 The Local Centre is also within 100 metres of the site.

2.2 Relevant Planning History

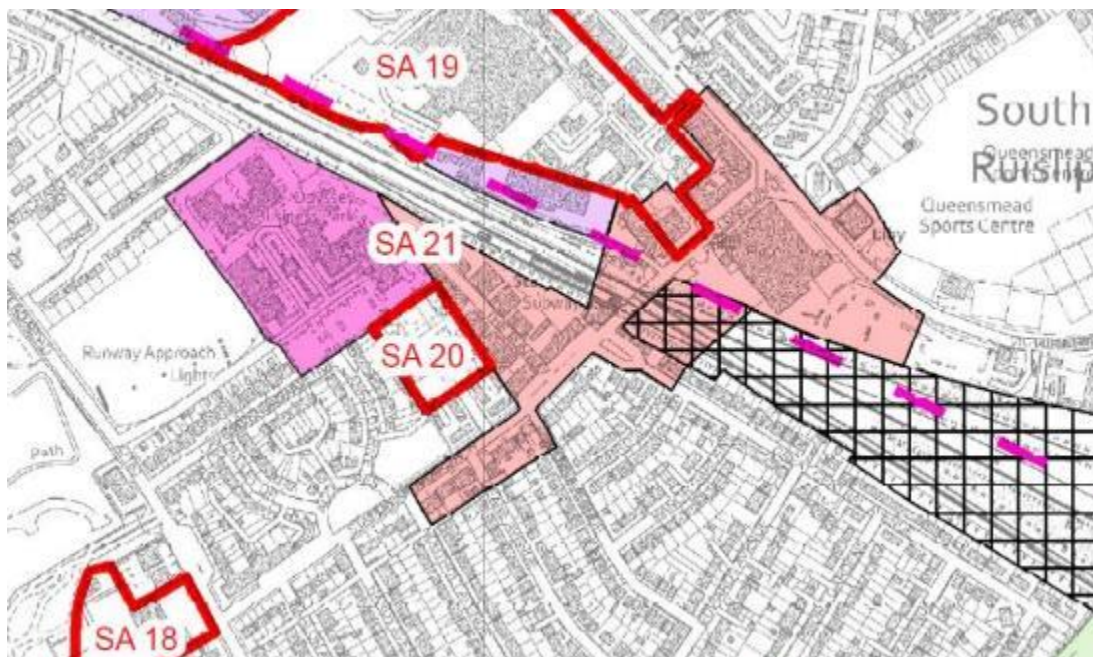
- 2.2.1 The planning history of the site does not show any previous planning history.

3 Development Plan Context, Designations and Assessment

3.1 Development Plan Context and Designation

3.1.1 For the purposes of this assessment the Development Plan for the area consists of the [London Plan](#) (2021) along with the Hillingdon Local Plan which consists of the [Local Plan Part 1 – Strategic Policies](#) (2012) and the [Local Plan Part 2 – Development Management Policies](#) (2020).

3.1.2 The Policies Map confirms that the site has no specific site designation but is close to the Local Centre.



3.2 Relevant Development Plan Policies

3.2.1 As a result of the above, the following policies Development Plan policies have been identified as most relevant to the proposed development:

- London Plan
 - Policy GG2: Making the best use of land
 - Policy GG4: Delivering the homes Londoners need
 - Policy GG6: Increasing efficiency and resilience
 - Policy D3: Optimising site capacity through the design-led approach
 - Policy D4: Delivering good design
 - Policy D5: Inclusive design
 - Policy D6: Housing quality and standards
 - Policy D7: Accessible housing
 - Policy D12: Fire Safety
 - Policy D14: Noise
 - Policy H1: Increasing housing supply
 - Policy H2: Small sites
 - Policy H10: Housing size mix

- Policy G7: Trees and woodlands
- Policy SI 1: Improving air quality
- Policy SI 2: Minimizing greenhouse gas emissions
- Policy SI 5: Water infrastructure
- Policy SI 7: Reducing waste and supporting the circular economy
- Policy T2: Healthy Streets
- Policy T4: Assessing and mitigating transport impacts
- Policy T5: Cycling
- Policy T6: Car parking
- Policy T6.1: Residential parking
- Policy T7: Deliveries, servicing and construction
- Local Plan Part 1 – Strategic Policies
 - Policy H1: Housing Growth
 - Policy H2: Affordable Housing
 - Policy BE1: Built Environment
 - Policy EM1: Climate Change Adaptation and Mitigation
 - Policy EM6: Flood Risk Management
 - Policy EM7: Biodiversity and Geological Conservation
 - Policy EM8: Land, Water, Air and Noise
 - Policy EM11: Sustainable Waste Management
 - Policy T1: Accessible Local Destinations
- Local Plan Part 2 – Development Management Policies
 - Policy DMH 1: Safeguarding Existing Housing
 - Policy DMH 2: Housing Mix
 - Policy DMH 4: Residential Conversions and Redevelopment
 - Policy DMH 6: Garden and Backland Development
 - Policy DMH 7: Provision of Affordable Housing
 - Policy DMHB 11: Design of New Development
 - Policy DMHB 14: Trees and Landscaping
 - Policy DMHB 16: Housing Standards
 - Policy DMHB 17 Residential Density
 - Policy DMHB 18: Private Outdoor Amenity Space
 - Policy DMEI 2: Reducing Carbon Emissions
 - Policy DMEI 9: Management of Flood Risk
 - Policy DMEI 14: Air Quality
 - Policy DMCI 7: Planning Obligations and Community Infrastructure Levy
 - Policy DMT 1: Managing Transport Impacts
 - Policy DMT 5: Pedestrians and Cyclists
 - Policy DMT 6: Vehicle Parking

3.2.2 These are discussed in more detail below, where relevant.

3.3 Material Considerations - National Planning Policy Framework (NPPF)

3.3.1 The Government's National Planning Policy Framework (2023) (the 'Framework') is a material consideration in the assessment of development proposals. The Framework confirms that the purpose of the planning system is to contribute to the achievement of sustainable development.

3.3.2 The Framework confirms that achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways:

- an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;
- a social objective – 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; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and
- an environmental objective – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.

3.3.3 The Framework emphasises that these objectives should be delivered through the preparation and implementation of plans and the application of the policies in the Framework; they are not criteria against which every decision can or should be judged.

3.3.4 The Framework confirms that at its heart is a presumption in favour of sustainable development and that for decision taking this means approving development proposals that accord with an up-to-date development plan without delay.

3.3.5 In respect of housing, paragraph 60 confirms that to support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay.

3.3.6 Paragraph 70 recognises that small and medium sized sites can make an important contribution to meeting the housing requirement of an area and are often built-out relatively quickly and confirms that local planning authorities should 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.

3.3.7 In terms of design, the Framework confirms that the creation of high-quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.

3.3.8 Planning decisions are required to ensure that developments:

- will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;
- are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;

- are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);
- establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;
- optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and
- create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users⁴⁶; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.

3.3.9 Paragraph 139 advises that development that is not well designed should be refused, especially where it fails to reflect local design policies and government guidance on design, taking into account any local design guidance and supplementary planning documents such as design guides and codes. Conversely, significant weight should be given to:

- development which reflects local design policies and government guidance on design, taking into account any local design guidance and supplementary planning documents such as design guides and codes; and/or
- outstanding or innovative designs which promote high levels of sustainability, or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings.

3.3.10 The proposed development will meet the above objectives. This is discussed below.

3.3.11 The Framework also provides policy guidance on promoting sustainable transport and in paragraph 115 confirms that 'Development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe'.

3.3.12 The Framework also provides policy guidance on 'Making effective use of land' (Section 11). In paragraph 124 c) the Framework advises that planning decisions should give **substantial weight**³ to the value of using suitable brownfield land within settlements for homes and other identified needs and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land. Paragraph 124 d) advises that planning decisions should promote and support the development of under-utilised land and buildings especially if this would help meet the identified needs for housing where land supply is constrained, and available sites could be used more effectively.

3.3.13 An assessment of the Framework confirms that the proposed development can be considered consistent with national planning policies, and this provides support for the proposed development. This is discussed in more detail below with reference to the relevant development plan policies and guidance.

³ Emphasis added

3.4 Material Considerations - Supplementary Planning Guidance

- 3.4.1 The Mayor's **Housing SPG** (2016) contains the residential design, density and space standards that will apply to new residential developments. These reflect the space and density standards set out in the London Plan, but also provide more detailed guidance on individual room sizes and internal layouts.
- 3.4.2 The proposed development has been designed to meet these standards.
- 3.4.3 Other guidance of relevance includes the **Planning Obligations SPD** (2014).

3.5 Material Considerations - Nationally Described Space Standards

- 3.5.1 These standards deal with internal space within new dwellings and are suitable for application across all tenures. They set out requirements for the Gross Internal (floor) Area of new dwellings at a defined level of occupancy as well as floor areas and dimensions for key parts of the home, notably bedrooms, storage and floor to ceiling heights.
- 3.5.2 To a large extent these standards align with those set out in London Plan Policy D6.
- 3.5.3 The proposed development has been assessed against these standards and is considered compliant.

4 Planning Assessment

4.1 Introduction

- 4.1.1 The following assessment considers the relevant Development Plan policies identified in the preceding section and the degree to which the proposed development complies with their provisions or not as the case may be.
- 4.1.2 From a review of the Development Plan it is considered that the following planning issues are material to the determination of the application.
- Principle of development and land use
 - Urban design and impact on the character of the area
 - Mix of units
 - Standard of accommodation
 - Residential amenity
 - Highways, access and parking
 - Servicing, waste and recycling
 - Biodiversity and trees
 - Sustainability
 - Fire Safety
 - S106 / CIL
 - Other matters.
- 4.1.3 These are discussed below along with any other relevant material considerations.

4.2 Principle of development and land use

- 4.2.1 The National Planning Policy Framework (NPPF) seeks to significantly boost the housing supply and introduces a presumption in favour of sustainable development. The proposed development clearly falls into the category of sustainable development providing much needed housing within the urban area on brownfield land with good connectivity to public transport network and within walking distance of the local centres.
- 4.2.2 Paragraph 70 of the NPPF states that small and medium sized sites can make an important contribution to meeting the housing requirement of an area and are often built-out relatively quickly. In this respect the site meets these aims.
- 4.2.3 Policy GG4 of the London Plan seeks to ensure that more homes are delivered.
- 4.2.4 Policy GG2 of the London Plan seeks development on brownfield land and seeks to proactively explore the potential to intensify the use of land to support additional homes and workspaces, promoting higher density development, particularly in locations that are well-connected to jobs, services, infrastructure and amenities by public transport, walking and cycling.
- 4.2.5 The proposed development also seeks to help towards the housing targets as set out in Policy H1 of the London Plan and Local Plan Policy H1.

- 4.2.6 In addition, Policy H2 of the London Plan confirms that Boroughs should pro-actively support well-designed new homes on small sites (below 0.25 hectares in size) and Policy H1 seeks to optimise the potential for housing delivery on all suitable and available brownfield sites on sites including sites with existing or planned public transport access levels (PTALs) 3-6 or which are located within 800m distance of a town centre boundary (including District Centres) as well as housing intensification on other appropriate low-density sites in commercial, leisure and infrastructure uses.
- 4.2.7 The site meets these requirements with a PTAL of 3.
- 4.2.8 Local Plan Policy DMH 1 seeks to safeguard existing housing and resists a net loss of housing. The proposed development results in a net gain of 4 dwellings.
- 4.2.9 Local Plan Policy DMH4 confirms that residential conversions and the redevelopment of dwellings into new blocks of flats will be permitted where it is on a residential street where the proposal will not result in more than 10% of properties being redeveloped into flats.
- 4.2.10 The site sits on Great Central Avenue which does not have more than 10% of properties as flats and the majority of dwellings are family houses.
- 4.2.11 As the proposed development is not a conversion the remainder of the policy does not apply.
- 4.2.12 Local Plan Policy DMH 6 states that there is a presumption against the loss of gardens due to the need to maintain local character, amenity space and biodiversity. In exceptional cases a limited scale of backland development may be acceptable, subject to the following criteria:
- i. neighbouring residential amenity and privacy of existing homes and gardens must be maintained and unacceptable light spillage avoided;
 - ii. vehicular access or car parking should not have an adverse impact on neighbours in terms of noise or light. Access roads between dwellings and unnecessarily long access roads will not normally be acceptable;
 - iii. development on backland sites must be more intimate in mass and scale and lower than frontage properties; and
 - iv. features such as trees, shrubs and wildlife habitat must be retained or re-provided.
- 4.2.13 In this respect, although the proposed house (Building 2) will sit within a former back garden, the proposed development consists of a comprehensive development of an underused and sustainable site.
- 4.2.14 The house will have a street frontage and will not be seen as a backland development. As shown in the submitted drawings it will be subservient to both the main building and the neighbouring dwelling and accessed directly and independently from Primrose Gardens.
- 4.2.15 Landscaping is reserved for future consideration and there will be no loss of amenity for neighbours, as discussed below.
- 4.2.16 In this respect, subject to design and the other considerations below there should be no objection to the principle of the development.

4.3 Urban design and impact on the character of the area

- 4.3.1 In respect of design considerations Paragraph 131 of the NPPF confirms that good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.
- 4.3.2 Paragraph 135 states that planning decisions should aim to ensure that developments function well and add to the overall quality of the area; establish a strong sense of place; optimise the potential of the site to accommodate development; are sympathetic to local character and history, and are visually attractive as a result of good architecture, layout and appropriate and effective landscaping.
- 4.3.3 Paragraph 139 advises that significant weight should be given to development which reflects local design policies and government guidance on design, taking into account any local design guidance and supplementary planning documents such as design guides and codes; and/or outstanding or innovative designs which promote high levels of sustainability, or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings.
- 4.3.4 In this respect the NPPF offers support to the proposed development which is of a high-quality design and will have not have any detrimental impact on the character of the area and will improve the appearance of the building.
- 4.3.5 Policy D3 of the London Plan seeks that development is of the most appropriate form and land use for the site. The design-led approach requires consideration of design options to determine the most appropriate form of development that responds to a site's context and capacity for growth.
- 4.3.6 In addition, London Plan Policy D4 sets out the criteria for good design.
- 4.3.7 Local Plan Policy BE1 requires all new development to improve and maintain the quality of the built environment in order to create successful and sustainable neighbourhoods, where people enjoy living and working and that serve the long-term needs of all residents. All new developments should:

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;*

As discussed below, the proposed development will seek to achieve a high-quality design which will enhance the appearance of the street scene. However, as Appearance is reserved for future determination the detailed design can be secured at the reserved matters stage.

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 detailed design can be secured at the reserved matters stage but as discussed below, the site layout does not lead to amenity issues.

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;*

This can be secured by conditions, if necessary.

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);*

This is not relevant to the proposed development.

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;*

This is not relevant to the proposed development.

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 has no impact on transport networks.

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;*

There is no impact on the public realm other than the enhancement of the corner site. There is no impact on biodiversity. As appearance is a reserved matter, things such as living walls or roofs, bat boxes or swift bricks can be secured at the reserved matters stage, if necessary.

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 will increase the overlooking of the street and will be designed to achieve secure by design standards, as necessary.

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;*

This is discussed above in relation to Policy DMH 6. There is no flood risk.

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*

The proposed development will seek to be sustainable and as stated below can be controlled by conditions.

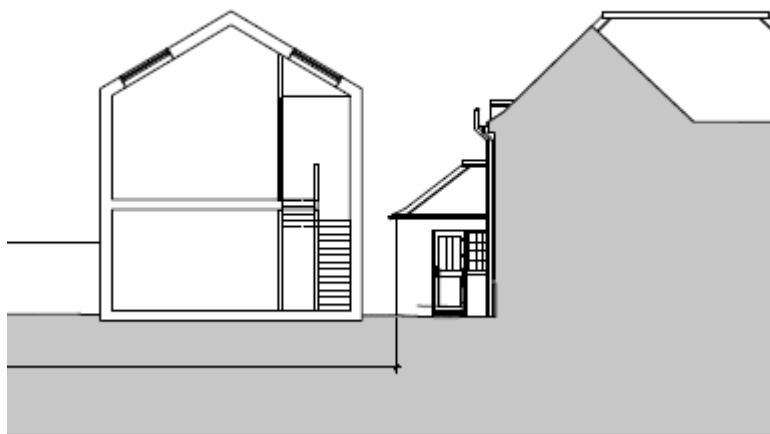
4.3.8 Therefore, no conflicts are identified with the above policy.

4.3.9 In addition, Local Plan Policy DMBH 11 states that all development, including extensions, alterations and new buildings will be required to be designed to the highest standards and, incorporate principles of good design including:

i. harmonising with the local context by taking into account the surrounding:

- *scale of development, considering the height, mass and bulk of adjacent structures;*

The scale is comparable to the local area which contains many two storey dwellings and the ridge height is comparable to the adjacent dwellings, especially with No. 1 Primrose Gardens, as shown below:



To No. 14 Great Central Avenue, the higher ridge is set back behind the terrace which will reduce its appearance in the street scene.

Larger three storey buildings exist along Great Central Avenue towards the junction with Station Approach and ridge heights along Great Central Avenue are mixed in height with a mix of housing styles and heights, as shown below:





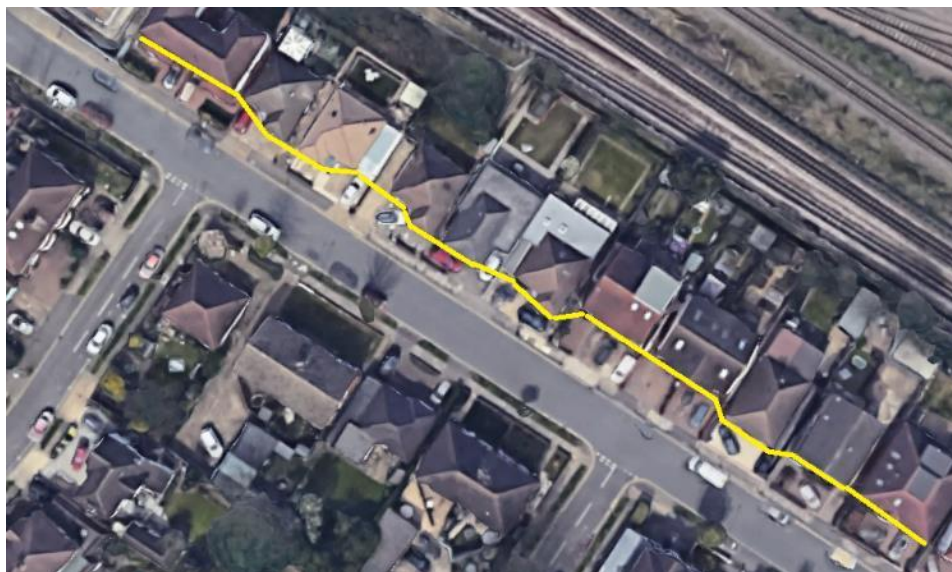
- *building plot sizes and widths, plot coverage and established street patterns;*

The proposed development will respect the established pattern of development. The proposed development introduces a larger footprint into the application site. However, as shown below, the area already consists of buildings with a deeper footprint and high plot ratio:



- *building lines and setbacks, rooflines, streetscape rhythm, for example, gaps between structures and other streetscape elements, such as degree of enclosure;*

The proposed building line remains consistent with the local area. Although slightly forward on Great Central Avenue compared to the neighbouring dwelling. There is already an inconsistent building line in this part of the street, especially opposite the site, as shown below:



Along Primrose Gardens the building line of the proposed block is similar to the existing and the proposed detached dwelling matches the neighbour at No. 1.

- *architectural composition and quality of detailing;*

This would be subject to reserved matters approval.

- *local topography, views both from and to the site; and*

There are no important views to or from the site and the topography is flat.

- *impact on neighbouring open spaces and their environment.*

There is no impact on any open spaces.

- ii. *ensuring the use of high quality building materials and finishes;*

This would be subject to the reserved matters application.

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

The proposed layout optimises the site and improves its sustainability. The internal design meets the relevant standards, as discussed below.

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

There are no valuable features and no nearby heritage assets.

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

This would be subject to the reserved matters application.

4.3.10 Local Plan Policy DMBH 11 also states that development will be required to ensure that the design safeguards the satisfactory re-development of any adjoining sites which have development potential.

- 4.3.11 In this respect, the proposed development will not prejudice any adjacent sites and no conflicts are identified with the above policy.
- 4.3.12 The proposed development is therefore suitable in terms of scale and layout. Further information in relation to appearance is not for consideration as part of this outline application.

4.4 Housing mix

- 4.4.1 Local Plan Policy DMH 2 states that the Council will require the provision of a mix of housing units of different sizes in schemes of residential development to reflect the Council's latest information on housing need.
- 4.4.2 Furthermore, London Plan Policy H10 'Housing size mix' confirms that the aim is to optimise the housing potential on sites (paragraph 7) and to have regard to the need for additional family housing and the role of one and two bed units in freeing up existing family housing (paragraph 9).
- 4.4.3 The Strategic Housing Market Assessment (2018) identified the greatest need for 2-bedroom properties.
- 4.4.4 In addition, parking constraints suggest that smaller units which are less likely to require a car would be more suitable for the site.
- 4.4.5 As discussed below, no affordable housing is required.
- 4.4.6 Therefore, although all the proposed dwellings are 2-bed there is a mix of flats, duplexes and a detached house.
- 4.4.7 Therefore, on balance the proposed mix is deemed to be appropriate for the location and the local context with its good accessibility to the local centre and the public transport network.

4.5 Standard of accommodation

- 4.5.1 Policy D6 of the London Plan states that housing development should be of high-quality design and provide adequately sized rooms (see Table 3.1) with comfortable and functional layouts which are fit for purpose.
- 4.5.2 Policy D6 also states that housing development should maximise the provision of dual aspect dwellings and normally avoid the provision of single aspect dwellings.
- 4.5.3 Local Plan Policy DMHB 16 confirms that all housing development should have an adequate provision of internal space in order to provide an appropriate living environment. To achieve this all residential development or conversions should:
 - i. meet or exceed the most up to date internal space standards, as set out in Table 5.1; and
 - ii. in the case of major developments, provide at least 10% of new housing to be accessible or easily adaptable for wheelchair users.
- 4.5.4 In this regard, the standards are the same as within London Plan Policy D6 and the Nationally Described Space Standards. The proposed development is not a major development.

4.5.5 For two-bedroom units the standards confirm the following:

Number of bedrooms	Number of bed spaces	Minimum Gross Internal Area (m ²)			Built-in storage (m ²)
		1 storey dwellings	2 storey dwellings	3 storey dwellings	
1b	1p	39 (37)*			1.0
	2p	50	58		1.5
2b	3p	61	70		2.0
	4p	70	79		
3b	4p	74	84	90	2.5
	5p	86	93	99	
	6p	95	102	108	

4.5.6 In this regard units 1 and 2 both meet the standards for a 2-bed 3-person dwelling over one storey (61sqm).

4.5.7 Units 3, 4 and 5 meet the standards for a 2-bed 3-person dwelling over two storeys (70sqm).

4.5.8 The proposed bedrooms and habitable rooms have also been designed to meet the relevant standards. There is also sufficient space for 2sqm of built in storage.

4.5.9 The floor to ceiling heights of the dwellings are 2.5m in accordance with the requirements.

4.5.10 In addition, the house is dual aspect, and the flats are triple aspect.

4.5.11 In this respect, the proposed development would benefit from adequate daylight, sunlight and outlook through their windows on the front and rear elevations.

4.5.12 The proposed development will provide residential accommodation in accordance with the space standards as set out in the London Plan Policy D6, London Housing SPG and the Nationally Described Space Standards.

4.5.13 In relation to the provision of private outdoor amenity space, Policy D6 of the London Plan requires 5sqm for 1-2 person dwellings and an extra 1sqm for each additional occupant with a minimum width and depth of 1500mm.

4.5.14 This is supported by Standard 26 of the Mayor of London's Housing SPG (2016). Therefore, for a 3 person dwelling the standard would be 6sqm of amenity space.

4.5.15 Policy D6 of the London Plan also states that the London Plan standard only applies when there are no higher local standards.

4.5.16 In this regard, Local Plan Policy DMHB 18 states that all new residential development and conversions will be required to provide good quality and useable private outdoor amenity space. Amenity space should be provided in accordance with the standards set out in Table 5.3.

4.5.17 This requires that 2-bedroom flats require a minimum of 25sqm of amenity space. Units 1 and 2 meet this requirement. Unit 5 has amenity space larger than 25sqm.

4.5.18 In addition, units 3 and 4 have amenity space which meets the London Plan standard.

4.5.19 Policy DMHB 18 states that balconies should have a depth of not less than 1.5 metres and a width of not less than 2 metres. The roof terraces meet the minimum depth and width requirements.

- 4.5.20 Any ground floor and/or basement floor unit that is non-street facing should have a defensible space of not less than 3 metres in depth in front of any window to a bedroom or habitable room.
- 4.5.21 The proposed amenity space will exceed the London Plan standard. The site is also within close proximity of local open space including Stonefield Park (410m) and large areas of open space at Ickenham Marsh.
- 4.5.22 Therefore, the proposed development sits in an area with ample public open space, meets the London Plan standards and provides a good-sized private garden. Therefore, on balance, the proposed development will provide sufficient amenity space.
- 4.5.23 In addition, the internal standard of accommodation is also acceptable.

4.6 Residential amenity

- 4.6.1 London Plan Policy D3 states that development proposals should deliver appropriate outlook, privacy and amenity.
- 4.6.2 In addition, Local Plan Policy DMH 6 seeks the protection of neighbouring amenity from garden development. Policy DMHB 11 states that development proposals should not adversely impact on the amenity, daylight and sunlight of adjacent properties and open space.
- 4.6.3 The proposed development sits to the south of the neighbouring dwelling at 14 Great Central Avenue. Unit 2 faces this property. At ground floor level only one habitable room faces the flank wall of this property which will not result in any overlooking.
- 4.6.4 At first floor level no habitable rooms face in this direction, only a stairway and obscured glazed bathrooms and the same at second floor level.
- 4.6.5 Oblique views from the rear window will not result in any significant loss of privacy and would be similar to the relationship between neighbouring dwellings. Nevertheless, the views of the adjacent property would be over a parking / garage area and not amenity space.
- 4.6.6 The proposed roof terrace will face over the front of the property where no privacy currently exists.
- 4.6.7 Other windows in the block of flats will face towards the public highway.
- 4.6.8 The detached dwelling will have ground floor windows facing towards the boundary fence and towards the highway. At first floor level one bedroom window will face to the rear over a parking area with no impact on any amenity space.
- 4.6.9 No 1 Primrose Gardens does not have any facing habitable window. Views to the rear garden of No. 1 would be obstructed by the trees. In addition, a similar relationship exists between neighbouring dwellings already.
- 4.6.10 There will be no material increase in overlooking and no loss of amenity to any neighbouring occupiers.
- 4.6.11 No overshadowing of any neighbouring windows will occur, and the development sits to the north of neighbouring gardens. Therefore, overshadowing of gardens is unlikely.

- 4.6.12 London Plan Policy D14 seeks to avoid significant adverse noise impacts on health and quality of life and Local Plan Policy EM8 states that the Council will seek to ensure that noise sensitive development and noise generating development are only permitted if noise impacts can be adequately controlled and mitigated.
- 4.6.13 The proposed creation of five self-contained residential dwellinghouses and the comings and goings associated with the prospective occupiers are unlikely to cause any significant noise or other disturbance impacts upon neighbouring amenity in a residential area. The associated levels of noise would reflect those expected within a typical urban / suburban residential setting.
- 4.6.14 Given the existing and proposed residential use no other pollution impacts would be expected.

4.7 Highways, access and parking

- 4.7.1 Paragraph 108 of the NPPF states that transport issues should be considered from the earliest stages of plan-making and development proposals, so that:
- a. the potential impacts of development on transport networks can be addressed;
 - b. opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised – for example in relation to the scale, location or density of development that can be accommodated;
 - c. opportunities to promote walking, cycling and public transport use are identified and pursued;
 - d. the environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account – including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains; and
 - e. patterns of movement, streets, parking and other transport considerations are integral to the design of schemes, and contribute to making high quality places.
- 4.7.2 The London Plan Policy T4 states development proposals should ensure that development proposals should not increase road danger and that development proposals should reflect and be integrated with current and planned transport access, capacity and connectivity.
- 4.7.3 In addition, Local Plan Policy T1 states that the Council will steer development to the most appropriate locations in order to reduce their impact on the transport network. All development should encourage access by sustainable modes and include good cycling and walking provision.
- 4.7.4 The Council will ensure access to local destinations which provide services and amenities.
- 4.7.5 Local Plan Policy DMT 1 states that in order for developments to be acceptable they are required to be accessible by public transport, walking and cycling either from the catchment area that it is likely to draw its employees, customers or visitors from and/or the services and facilities necessary to support the development.
- 4.7.6 In addition, London Plan Policy T2 seeks to encourage walking and cycling.
- 4.7.7 As discussed above the site is accessible by public transport with a PTAL of 3 and therefore sits in a sustainable location close to a station and the proposed development can comply with the above requirements and promote sustainable forms of transport. The site is also within close walking distance of shops and facilities at the Local Centre.

- 4.7.8 In respect of car parking, Policy T6 of the London Plan states that car parking should be restricted in line with levels of existing and future public transport accessibility and connectivity.
- 4.7.9 In addition, 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, with developments.
- 4.7.10 Local Plan Policy DMT 6 states that development proposals must comply with the parking standards outlined in Appendix C Table 1 in order to facilitate sustainable development and address issues relating to congestion and amenity. The Council may agree to vary these requirements when:
- i. the variance would not lead to a deleterious impact on street parking provision, congestion or local amenity; and/or
 - ii. a transport appraisal and travel plan has been approved and parking provision is in accordance with its recommendations.
- 4.7.11 The Parking Standards confirm that for 2-bedroom dwellings the maximum parking should be 1.5-1 spaces per unit.
- 4.7.12 However, in addition, the more recent London Plan Policy T6.1 states that new residential development should not exceed the maximum parking standards set out in Table 10.3.
- 4.7.13 The parking standards require that 2-bedroom dwellings in outer London with a PTAL of 3 require a maximum of up to 0.75 spaces per dwelling. Hillingdon is not defined as an 'Inner London Borough' by the London Government Act 1963.
- 4.7.14 Therefore, the proposed development would be in accordance with the London Plan parking standard for Outer London Boroughs as the proposed parking is below the maximum standard.
- 4.7.15 The proposed house would have one off-street parking space. The four flats would be car free.
- 4.7.16 The wider immediate area falls within the CPZ and therefore additional parking controls can be secured by condition or agreement, if necessary.
- 4.7.17 London Plan Policy T5 seeks cycle parking facilities. In addition, Local Plan Policy DMT 5 seeks cycle parking in accordance with the standards.
- 4.7.18 The London Plan specifies minimum cycle parking standards in Table 10.2, including for residential developments which should provide 1 cycle space per 1-bedroom 1-person unit, 1.5 space per 1-bedroom 2-person unit and 2 spaces per all other units. For developments with over 5 units, 2 short stay cycle spaces should be provided.
- 4.7.19 The required provision would be for 2 spaces per dwelling. As shown on the submitted drawings a cycle store is provided and details can be secured by conditions, if necessary, to ensure that the standards are met, but it is clear that the proposed development has the capacity to provide cycle storage and parking in accordance with the London Plan standards.
- 4.7.20 Paragraph 115 of the NPPF confirms that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.
- 4.7.21 In this respect, subject to conditions there are no identified unacceptable or severe highways impacts which would prevent the granting of planning permission.

4.8 Servicing, waste and recycling

- 4.8.1 London Plan Policy SI 7 identifies that development needs to minimise the production of waste, to promote the reuse and recycling of waste materials and to ensure that waste disposal is environmentally responsible.
- 4.8.2 Local Plan Policy EM11 requires all new development to address waste management at all stages of a development's life from design and construction through to the end use and activity on site, ensuring that all waste is managed towards the upper end of the waste hierarchy.
- 4.8.3 Policy DMHB 11 states that development proposals should make sufficient provision for well-designed internal and external storage space for general, recycling and organic waste, with suitable access for collection. External bins should be located and screened to avoid nuisance and adverse visual impacts to occupiers and neighbours.
- 4.8.4 The plans show that all units would have a bin store and this can be further controlled by condition to ensure compliance with the above policies or secured at the Reserved Matters stage.
- 4.8.5 Policy T7 of the London Plan confirms that development proposals should facilitate safe, clean, and efficient deliveries and servicing. Provision of adequate space for servicing, storage and deliveries should be made off-street, with on-street loading bays only used where this is not possible. Construction Logistics Plans and Delivery and Servicing Plans will be required and should be developed in accordance with Transport for London guidance and in a way which reflects the scale and complexities of developments.
- 4.8.6 Any servicing of the site will be the same as the existing situation with refuse vehicles or deliveries stopping in the street adjacent to the relevant property. This also happens on all other dwellings in the street.

4.9 Biodiversity and trees

- 4.9.1 Paragraph 186 of the NPPF states that when determining planning applications, local planning authorities should apply the following principles:
 - a. if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;
 - b. development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted. The only exception is where the benefits of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest;
 - c. development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists; and

- d. development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to improve biodiversity in and around developments should be integrated as part of their design, especially where this can secure measurable net gains for biodiversity or enhance public access to nature where this is appropriate.
- 4.9.2 In addition, Local Plan Policy EM7 seeks the provision of biodiversity improvements from all development, where feasible.
- 4.9.3 It is noted that the site is not located in any protected designation in relation to biodiversity.
- 4.9.4 Given the application is in outline with landscaping a matter reserved for future consideration it would be appropriate for such details to be part of any reserved matters application.
- 4.9.5 Paragraph 136 of the NPPF (2023) states that trees make an important contribution to the character and quality of urban environments and can also help mitigate and adapt to climate change.
- 4.9.6 Policy G7 of the London Plan sets out that London's urban forest and woodlands should be protected and maintained, and new trees and woodlands should be planted in appropriate locations in order to increase the extent of London's urban forest – the area of London under the canopy of trees. It also states that 'development proposals should ensure that, wherever possible, existing trees of value are retained'.
- 4.9.7 Local Plan Policy DMH 14 also seeks the protection of trees and also seeks improvement in landscaping.
- 4.9.8 There are no protected or significant trees within or surrounding the site and details of landscaping will be submitted at the reserved matters stage, when the scope for any biodiversity enhancements will also be clear.

4.10 Sustainability

- 4.10.1 Paragraph 159 of the NPPF states that new development should be planned for in ways that can help to reduce greenhouse gas emissions, such as through its location, orientation and design.
- 4.10.2 London Plan Policy SI2 states that residential development should achieve 10 per cent, and non-residential development should achieve 15 per cent through energy efficiency measures. Where it is clearly demonstrated that the zero-carbon target cannot be fully achieved on-site, any shortfall should be provided, in agreement with the borough, either:
 - 1. through a cash in lieu contribution to the borough's carbon offset fund, or
 - 2. off-site provided
- 4.10.3 Similar aims are sought by Local Plan Policy DMEI 2 all developments are required to make the fullest contribution to minimising carbon dioxide emissions in accordance with London Plan targets.
- 4.10.4 Local Plan Policy EM1 encourages the installation of renewable energy for all new development in meeting the carbon reduction targets savings set out in the London Plan.
- 4.10.5 The Council's Validation Checklist confirms that **major development** proposals will require an energy assessment.
- 4.10.6 The proposed development is not a major proposal as it only seeks approval for 5 dwellings.

- 4.10.7 Therefore, an energy assessment is not a validation requirement. However, further details can be secured by conditions, if necessary.
- 4.10.8 London Plan Policy GG6 stipulates that development must ensure buildings and infrastructure are designed to adapt to a changing climate which includes making efficient use of water.
- 4.10.9 Policy SI 5 further states that developments should minimise the use of mains water in line with the Optional Requirement of the Building Regulations (residential development), achieving mains water consumption of 105 litres or less per head per day (excluding allowance of up to five litres for external water consumption).
- 4.10.10 Such matters can be secured by condition, if necessary and appropriate.

4.11 Fire Safety Statement

- 4.11.1 In respect of Fire Safety Policy D12 of the London Plan states that in the interests of fire safety and to ensure the safety of all building users, all development proposals must achieve the highest standards of fire safety and ensure that they:

1) *identify suitably positioned unobstructed outside space:*

a. *for fire appliances to be positioned on*

b. *appropriate for use as an evacuation assembly point*

This is shown below.

2) *are designed to incorporate appropriate features which reduce the risk to life and the risk of serious injury in the event of a fire; including appropriate fire alarm systems and passive and active fire safety measures*

Interlinked integrated smoke and fire alarm detection can be installed throughout the building and will be agreed, signed off by the Building Control Officer. Heat detectors can be installed within the kitchen areas.

3) *are constructed in an appropriate way to minimise the risk of fire spread*

a) External and internal separating walls can be built to achieve at least 1 hour fire resistance.

b) All units can be installed with min. FD60 front doors.

c) Min. FD30 doors can be installed to all rooms serving the hallway of each flat.

4) *provide suitable and convenient means of escape, and associated evacuation strategy for all building users*

a) 1hr Fire resistant lobby can be designed to ensure safe evacuation in case of fire.

b) Clear and fully compliant Fire safety signage will be installed inside lobby.

c) Fire safety equipment will be provided and installed as required.

5) *develop a robust strategy for evacuation which can be periodically updated and published, and which all building users can have confidence in*

a) A robust Fire safety strategy will be provided by specialist's consultant and will be kept updated as required.

b) Fire equipment will be regularly tested and replaced as required.

6) *provide suitable access and equipment for firefighting which is appropriate for the size and use of the development.*

Suitable access and equipment for firefighting will be discussed with the Local Fire Authority and provided as required.

4.11.2 The proposed development involves the demolition of an existing building and the erection of five modern dwellings. In this respect, the proposed development will improve the fire safety of the site by bringing it up to modern standards and complying with the Building Regulations.

4.11.3 Paragraph 3.12.2 of the London Plan states:

"The matter of fire safety compliance is covered by Part B of the Building Regulations. However, to ensure that development proposals achieve the highest standards of fire safety, reducing risk to life, minimising the risk of fire spread, and providing suitable and convenient means of escape which all building users can have confidence in, applicants should consider issues of fire safety before building control application stage, taking into account the diversity of and likely behaviour of the population as a whole."

4.11.4 Paragraphs 3.12.3 and 3.12.4 further advise that:

"Applicants should demonstrate on a site plan that space has been identified for the appropriate positioning of fire appliances. These spaces should be kept clear of obstructions and conflicting uses which could result in the space not being available for its intended use in the future."

Applicants should also show on a site plan appropriate evacuation assembly points. These spaces should be positioned to ensure the safety of people using them in an evacuation situation."

4.11.5 The highway is of sufficient width that any fire appliances would not result in any obstruction and also offers sufficient space for assembly on the pavement.



4.11.6 Paragraph 3.12.5 states:

“Developments, their floor layouts and cores need to be planned around issues of fire safety and a robust strategy for evacuation from the outset, embedding and integrating a suitable strategy and relevant design features at the earliest possible stage, rather than features or products being applied to pre-determined developments which could result in less successful schemes which fail to achieve the highest standards of fire safety. This is of particular importance in blocks of flats, as building users and residents may be less familiar with evacuation procedures”.

4.11.7 The proposed dwellings will have a single stair which will be fire protected in accordance with the building regulations.

4.11.8 Paragraph 3.12.6 advises that “Suitable suppression systems (such as sprinklers) installed in buildings can reduce the risk to life and significantly reduce the degree of damage caused by fire, and should be explored at an early stage of building design”; and paragraph 3.12.7 that the provision of stair cores which are suitably sized, provided in sufficient numbers and designed with appropriate features to allow simultaneous evacuation should also be explored at an early stage and provided wherever possible”.

4.11.9 Suppression systems can be fitted into the proposed floor plans and details of this can be secured by condition.

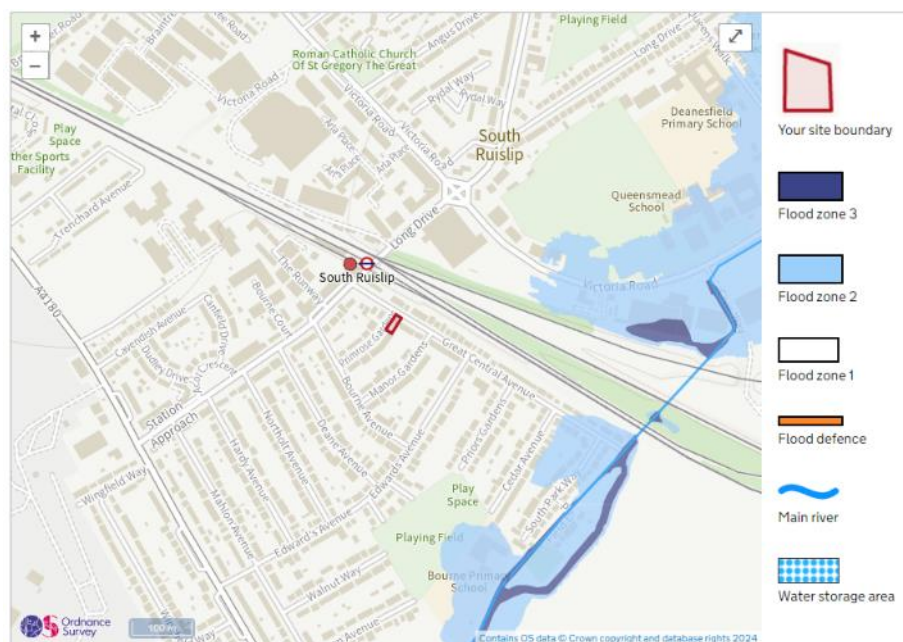
4.11.10 Therefore, the proposed development will not result in any additional fire safety risks and the details required by Policy D12 have been provided. These can be further controlled by conditions, if necessary and appropriate.

4.12 S106 / CIL Affordable Housing

- 4.12.1 The proposed development for the creation of new residential units is liable to MCIL2 and Hillingdon CIL. In this respect, the planning application is accompanied by the completed 'Form 1: CIL Additional Information'.
- 4.12.2 London Plan Policy H4 confirms that **major development of 10 or more units** triggers an affordable housing requirement. Local Plan Policies H2 and DMH 7 also confirm that the threshold is ten units.
- 4.12.3 The proposed development only provides 5 dwellings and therefore, there are no policy requirements for affordable housing to be provided.
- 4.12.4 Local Plan Policy DCMI 7 states that to ensure development is sustainable, planning permission will only be granted for development that clearly demonstrates there will be sufficient infrastructure of all types to support it. Infrastructure requirements will be predominantly addressed through the Council's Community Infrastructure Levy (CIL).
- 4.12.5 In addition, planning obligations will be sought on a scheme-by-scheme basis:
- i. to secure the provision of affordable housing in relation to residential development schemes;
 - ii. where a development has infrastructure needs that are not addressed through CIL; and
 - iii. to ensure that development proposals provide or fund improvements to mitigate site specific impacts made necessary by the proposal.
- 4.12.6 The Planning Obligations SPD provides additional detail in this regard. However, from a review of the SPD no s106 requirements have been identified at this stage.

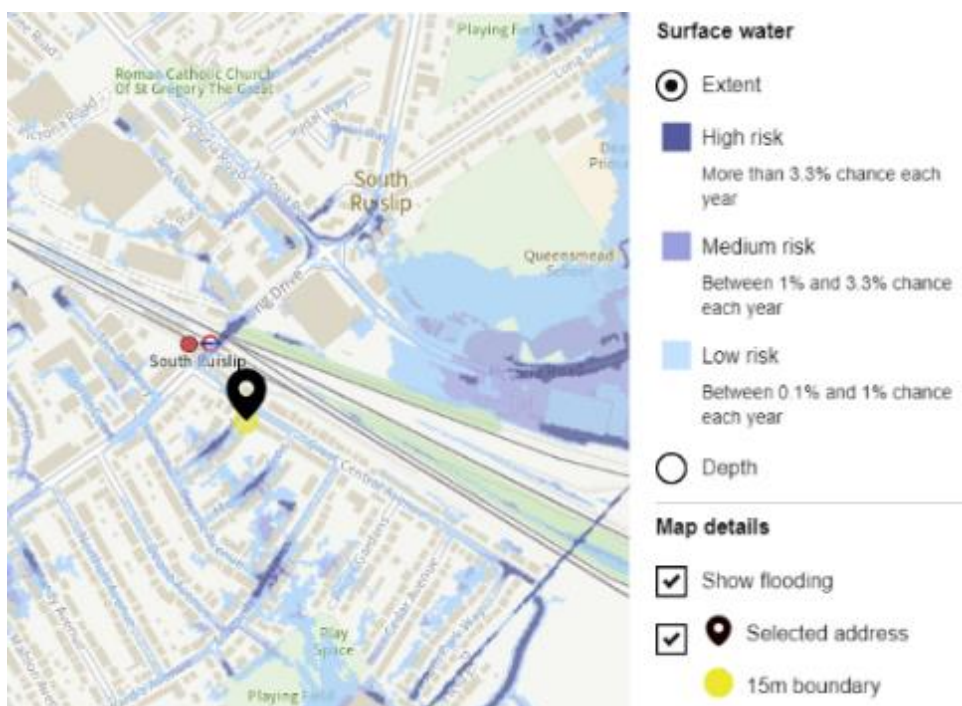
4.13 Other Matters

- 4.13.1 London Plan Policy SI 12 states that development proposals should ensure that flood risk is minimised and mitigated, and that residual risk is addressed. This should include, where possible, making space for water and aiming for development to be set back from the banks of watercourses.
- 4.13.2 In addition, London Plan Policy SI 13 confirms that development proposals should aim to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible.
- 4.13.3 Local Plan policies EM6 and DME1 9 seek a similar aim.
- 4.13.4 As shown in the Flood Map extract below, the site is located within Flood Zone 1.



4.13.5 The site is therefore at the lowest risk of flooding and residential developments in such locations do not require full Flood Risk Assessments.

4.13.6 In addition, the site is not at risk from surface water flooding, as shown below:



4.13.7 Therefore, there are no conflicts with the above policies relating to flood risk or drainage and any requirements for sustainable drainage can be secured by condition, if necessary and appropriate.

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

- 4.13.9 In addition, Local Plan Policy EM8 states that all development should not cause deterioration in the local air quality levels and should ensure the protection of both existing and new sensitive receptors.
- 4.13.10 All major development within the Air Quality Management Area (AQMA) should demonstrate air quality neutrality (no worsening of impacts) where appropriate.
- 4.13.11 There is no requirement in the Local Plan for an Air Quality Assessment for this minor development and given the car lite approach to the proposed development there is unlikely to be significant increases in vehicle movements.
- 4.13.12 Conditions requiring the development to be designed to ensure boiler emissions are at acceptable levels would be sufficient, if necessary and considered appropriate.
- 4.13.13 Given the previous residential use there are no land contamination impacts anticipated.
- 4.13.14 London Plan Policy D5 states that development proposals should achieve the highest standards of accessible and inclusive design. London Plan Policy D7 requires that dwellings (which are created via works to which Part M volume 1 of the Building Regulations applies) meet Building Regulation requirement M4(2) 'accessible and adaptable dwellings'.
- 4.13.15 This can be controlled by conditions, if necessary and is discussed in the accompanying Accessibility Statement.
- 4.13.16 No other technical constraints have been identified.

5 Summary and Conclusion

5.1 Summary

- 5.1.1 In summary, the purpose of this statement is to identify Development Plan policies that are relevant in the assessment of the development proposal; and to consider whether the proposal conflicts with their provisions and, if so, whether there are material considerations that outweigh any conflict with the Development Plan.
- 5.1.2 An assessment of the relevant planning policies in the adopted Development Plans confirms that there is no conflict with their provisions and that the statutory test imposed by Section 70(2) of the Town and Country Planning Act and Section 38(6) of the Planning and Compulsory Purchase Act 2004 is met.
- 5.1.3 The National Planning Policy Framework is a material consideration in the assessment of the development proposal. An assessment of the Framework in terms of design, transport, making effective use of land and housing confirms that the proposed development is consistent with national planning policies, and this provides further support for the application.
- 5.1.4 The Framework also advises that planning decisions should give substantial weight to the value of using suitable brownfield land within settlements for homes.
- 5.1.5 There are no issues identified in respect of the design, impact on the character of the area, residential amenity, living standards, highways, sustainability, fire safety or other technical matters which would prevent a legitimate conclusion that the application is both technically sound and policy compliant.
- 5.1.6 In addition, further information in relation to detailed design and landscaping will be subject to a subsequent reserved matters application.

5.2 Conclusion

- 5.2.1 In conclusion, this assessment confirms that the development proposal accords with the provisions of the Development Plan and consequently a presumption in favour of a grant of planning permission is derived.
- 5.2.2 Material considerations in the form of the NPPF provide further support to justify a grant of planning permission.