

Planning Statement

RE: 12 GREAT CENTRAL AVENUE, RUISLIP, HA4 6UD

BACKGROUND

1. This is an application for Permission-in-Principle ('PiP') for the 'Demolition of existing bungalow and ancillary building and erection of a residential development comprising between 2 and 4 units' (the 'proposed development') at 12 Great Central Avenue, Ruislip, HA4 6UD ('site').
2. The application is made under the provisions of the Town and Country Planning (Permission in Principle) (Amendment) Order 2017 as amended. The proposal seeks permission-in-principle for residential development comprising the erection of a minimum of 2 and maximum of 4 dwellings. The Permission-in-Principle consent route has two stages. The first stage establishes whether a site is suitable in principle. The second stage, i.e. the technical details consent, is where the detailed development proposals are assessed.
3. The current proposal relates to the first stage and therefore only the principle of the proposal in respect of its location, land use and amount of development can be considered. Issues relevant to these 'in principle' matters can only be considered at this stage with other matters considered at the technical details consent stage.
4. National Planning Practice Guidance clarifies that the scope of permission in principle is limited to location, land use and amount of development. Issues relevant to these 'in principle' matters should be considered at the permission in principle stage. Other matters should be considered at the technical details consent stage. In addition, local authorities cannot list the information they require for applications for permission in principle in the same way they can for applications for planning permission [NPPG, Paragraph: 012 Reference ID: 58-012-20180615].

5. Local planning authorities must specify the location of the site, the type of development and provide an indication of the amount of development the site has permission in principle for. The amount of residential development must be expressed as a range, indicating the minimum and maximum net number of dwellings (i.e. taking into account any existing dwellings on the site) which are, in principle, permitted [NPPG, Paragraph: 052 Reference ID: 58-052-20180615].
6. It is not possible for conditions to be attached to a grant of permission in principle and its terms may only include the site location, the type of development and amount of development [NPPG, Paragraph: 020 Reference ID: 58-020-20180615].
7. Once a valid application for permission in principle has been received, the local planning authority should make a decision on the proposal as quickly as possible, and in any event within the statutory time limit unless a longer period has been agreed in writing with the applicant. The statutory time limit is 5 weeks, counting from the day after the local authority has received a valid application [NPPG, Paragraph: 053 Reference ID: 58-053-20180615].

CONTENT OF APPLICATION

8. The application is supported by the following documents and drawings:
 - a. Application Form
 - b. Planning Statement
 - c. Location Plan.

CONSIDERATIONS

A. LOCATION

9. The application site comprises a corner plot, bounded by Great Central Avenue to the north and Primrose Gardens to the west, measuring circa 360m² in area. The site is currently occupied by a 2-bedroom bungalow and has a small, paved area to the front and large garden space to the rear with a vehicular access to Primrose Gardens.
10. The street scene is suburban in character and comprises a mix of single storey bungalows, and two storey detached and semi-detached properties. The one exception to this is the Great Central

House building located to the north, within the South Ruislip Local Centre, which is a pre-existing office building converted to residential flats.

11. The site is located just outside the South Ruislip Local Centre which is designated to the north and encompasses the land surrounding the South Ruislip Train Station, along Station Approach.
12. The site forms part of the declared Hillingdon Air Quality Management Area and sits a short distance to the east of the A40/ South Ruislip Air Quality Focus Area. According to the TfL webCAT planning tool, the site has a moderate PTAL equal to 3.
13. The site is not constrained by a Conservation Area, Area of Special Local Character or Tree Preservation Order designation.
14. In summary, the site is located within the established settlement area of South Ruislip and the surrounding area is predominantly residential.
15. The location of the site is considered an appropriate one for residential development for these reasons.

B. LAND USE

16. The question posed by an application for PiP is simply: - is the proposed land use acceptable. In their determination of an outline planning for a residential re-development of the site¹, the Officer's Delegated Report confirmed that "The existing use of the site is established as C3 residential. The proposed development would not change this and as such, the land use is accepted".
17. The same report stated that "The Environment Agency's Flood Map indicates that the site is in Flood Zone 1 and not at risk of flooding from rivers or the sea. The site is not at risk of surface water flooding but there is a low risk of surface water flooding on Primrose Gardens. The proposed development would maintain the use of the site for C3 residential and as such, would not result in any change to the level of risk to receptors".

¹ 78809/APP/2024/1425 - 24th July 2024

18. The site is adjoined on two sides by residential properties and on the other two sides by public highways.
19. The site is already in residential use and is adjoined and generally surrounded by residential uses. Continued residential use of the site is therefore considered appropriate.

C. AMOUNT

20. The site is 360m² in area (0.036ha). For the PiP application the key question to address is whether the site can accommodate a minimum of 2 and a maximum of 4 dwellings.
21. In their determination of an Outline Planning Application² which proposed a detached 2-storey dwelling and separate apartment block containing 4 units following the demolition of the existing dwelling, the Council considered "The site is moderately accessible with a PTAL rating of 3. Accordingly, a lower to moderate density of development would generally be considered to be appropriate in such a location, subject to the detailed consideration of all material planning considerations. The proposal for 5 units, comprising 4 flats and one detached house, would exceed the stated maximum density of the site. This is not a reason for refusal in and of itself but it is a material consideration which weighs against the scheme in the planning balance".
22. The Planning Officer in the Delegated Report stated that "Table 5.2 of the Hillingdon Local Plan: Part 2 (2020) sets out a residential density matrix and states that a site with a PTAL rating of 3 within a suburban/urban setting within 800m of a town centre should provide between 150 to 330 habitable rooms per hectare or between 50 to 110 units per hectare. For a site measuring 360m² in area (or 0.04 hectares), this equates to:
 - 6 to 13 habitable rooms; or
 - 2 to 4 units."
23. The London Plan (2021) post-dates the Hillingdon Plan and advocates more of a design-led approach stating that "All development must make the best use of land by following a design-led approach that optimises the capacity of sites, including site allocations. Optimising site capacity

² 78809/APP/2024/1425 dated the 24th July 2024

means ensuring that development is of the most appropriate form and land use for the site” [Policy D3].

24. London Plan Policy H1 states at sub-paragraph B, 2), b) that to ensure that ten-year housing targets are achieved, boroughs should optimise the potential for housing delivery on all suitable and available brownfield sites through their Development Plans and planning decisions, especially the following sources of capacity: a) sites with existing or planned public transport access levels (PTALs) 3-6 or which are located within 800m distance of a station or town centre boundary.
25. The site has a PTAL of 3 and therefore would qualify for optimisation under the provisions of this policy. It also qualifies as a brownfield site.
26. London Plan at paragraph 4.2.2 states that “Incremental intensification of existing residential areas within PTALs 3-6 or within 800m distance of a station or town centre boundary is expected to play an important role in contributing towards the housing targets for small sites set out in Table 4.2”.
27. Regard must be had in determining the amount of development that is appropriate for the site to the NPPF and in particular, paragraph 70 which 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”; and paragraph 123 which states that “Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses,....”.
28. NPPF paragraph 124 d) is also relevant in stating that planning policies and decisions should “promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained”.
29. NPPF paragraph 130 states:

“In applying paragraphs 129a and b above to existing urban areas, significant uplifts in the average density of residential development may be inappropriate if the resulting built form would be wholly out of character with the existing area. Such circumstances should be evidenced through an authority-wide design code which is adopted or will be adopted as part of the development plan.”
30. Notwithstanding the policy emphasis in the London Plan and NPPF to optimising the potential for housing delivery on all suitable and available brownfield sites, the amount of development proposed is a minimum of 2 dwellings and a maximum of 4 dwellings and this is entirely consistent

with the density parameters applied by the Council in their determination of the Outline Planning Application 78809/APP/2024/1425 on the 24th July 2024.

31. The proposed amount of development is therefore considered commensurate with the site's location in an area with a PTAL of 3, the policy imperative of national and strategic planning policy to make more effective use of brownfield land but most importantly it conforms to Table 5.2 of the Hillingdon Local Plan: Part 2 (2020).

CONCLUSION

32. In conclusion, the proposed location, land use and amount of a development comprising a minimum of 2 or maximum of 4 dwellings is considered appropriate and policy compliant and supports the reasonable and legitimate expectation that this application for PiP should be supported and benefit from approval.
33. If further information or clarification on any aspect of the application is required, please contact the undersigned.

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08 November 2024
1420/AGJ