

82-84 High Street
Ruislip
HA4 7AB

Gillings
Planning

82 – 84 High Street, Ruislip, HA4 7AB

Planning Supporting Statement



February 2026

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1 Introduction

1.1 This Planning Statement, prepared by Gillings Planning on behalf of Bika Construction Ltd (“the Applicants”), is submitted in support of an application for full planning permission for the conversion of the existing building to create 6 no. residential flats, with extensions and alterations at ground, first and second floors, conversion of existing roof and retention of commercial use (Class E) at ground floor, and alterations to existing fenestrations at 82-84 High Street, Ruislip, HA4 7AB.

1.2 The description of development for which planning permission is sought is as follows:

“Extensions and alterations at ground, first and second floors, conversion of existing roof and conversion of first floor from office (Class E), to provide 6no. residential flats (Class C3) with associated cycle and refuse storage, retention and reconfiguration of Class E unit at ground floor and alterations to fenestrations”

1.3 This Statement provides a planning analysis to demonstrate that the submitted proposals are acceptable in planning terms and in accordance with relevant planning policy and guidance.

1.4 **Table 1.1** below sets out the documents submitted in support of the planning application which should be read alongside this Planning Statement. A Drawing Schedule is included at **Table 1.2** below.

Table 1.1: Schedule of Supporting Documentation

DOCUMENT	TECHNICAL CONSULTANT
Planning Application Form and ownership certificate	Gillings Planning
Design and Access Statement	Proun Architects (TBC)
Transport Statement and Travel Plan	Pulsar
Bat Emergence Survey	Grove Ecology
Preliminary Roost Assessment	Grove Ecology
Ecological Technical Statement	Ethos Environmental Planning
Heritage Statement	Portico Heritage
Daylight & Sunlight Assessment	T16 Design
Air Quality Neutral Statement	Eight Versa

Table 1.2: Drawing Schedule

DRAWING TITLE	DRAWING REFERENCE
Site Location Plan	3616 / L / 01
Existing Block Plan	3616 / L / 02
Existing Floor and Roof Plans	3616 / P / 01
Existing Elevations and Sections	3616 / P / 02
Proposed Floor and Roof Plans	3616 / P / 141
Proposed Elevations and Sections	3616 / P / 142
Illustrative CGIs	N/A

1.5 The remainder of this statement is structured as follows:

Section 2: Site Location and Description (including Planning History)

Section 3: Development Proposals

Section 4: Planning Policy Context

Section 5: Planning Analysis

Section 6: The Planning Balance

2 Site Location and Description

Site Location



- 2.1 The application site comprises a mid-terrace three storey building (and basement level), situated on the western side of High Street where it meets a junction with Midcroft.
- 2.2 The site is located within the centre of Ruislip, a busy town centre. Due to its town centre location, the site is readily accessible to a host of facilities, services, amenities and public transport options (discussed in more detail below). In addition, the site benefits from excellent access to local public green open spaces.
- 2.3 The wider area is characterised by High Street, formed predominantly by a parade of town centre Class E uses including shops, cafes and eateries, a large number of which comprise living accommodation (Class C3) on the floors above and some with ancillary office space. In terms of the area's physical characteristics, the surrounding buildings present a mixture of two and three storey development of differing time periods and architectural appearances.

Site Description

- 2.4 The site extends to 0.03 ha and is irregular in shape. Pedestrian access is gained from High Street, with vehicular access provided to the rear of the site via King Edwards Road. The site's eastern boundary forms High Street and its western boundary meets a service road to the rear with parking beyond.
- 2.5 The site comprises a former bank building, consisting of three-storeys (and basement level). In terms of uses, the ground and first floors form a Class E unit (formally a bank with ancillary offices on the first floor). At second floor level, is a self-contained three-bedroom flat (Class C3).
- 2.6 The building is locally listed and was constructed during the 1920s. The building is typical of that which would have once housed a bank, such that it features as a prominent landmark within the streetscape. Architecturally, the existing building is of a Georgian Classical style, such that was popular during the inter-war period. A symmetrical and attractive façade, comprising five bays of long, sash windows spanning across the first and second floors, along with vertical decorative brick detailing, Juliet balconies and a prominent stone fascia visually splitting the ground and first floors addresses High Street. The former bank entrance is located to the right and access to the upper floors to the left. In

terms of roof form, the building comprises a hipped tiled roof with large brick chimney stacks at either side. To the rear, the buildings attractive contribution to the locality becomes lost, through unsympathetically considered extensions that extend towards the western boundary.

2.7 Existing residential properties sit adjacent to the site (considered in detail below), and a five-storey residential apartment block is located to the rear of the site.

2.8 In addition to the building being locally listed, the site also sits within the Ruislip Village Conservation Area, and the Primary Shopping Area of the Ruislip Town Centre, as identified within the adopted Hillingdon Local Plan. Regarding flood risk, according to the Environment Agency Flood Map for planning, the Site is located within Flood Zone 1.

Photographs of the site:





Planning History

2.9 A review of the Council's (available) online records confirms that there is a number of previous planning applications of relevance to this application. these are set out below:

- 78935/APP/2024/1992: Extensions and alterations to ground, first and second floors with change of use of first floor from office (Class E) to residential (Class C3) to provide 4 x 1-bed flats and 1 x 2-bed flat with associated cycle and bin storage. Retention and reconfiguration of Class E unit at ground floor and alterations to fenestration.

2.10 This application was refused on the 11th of October 2024. Five reasons were cited as follows:

"1) The partial change of use of the ground floor commercial space to ancillary residential space would erode the quality of commercial Class E space on offer which would affect its overall marketability and thereby having detrimental impact on the function and vitality of the primary retail shopping area of Ruislip Town Centre. The proposal therefore conflicts with Policy E5 of the Hillingdon Local Plan: Part One -Strategic Policies (2012), Policies DMTC 1 and DMTC 2 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020), Policy SD6 of the London Plan and Chapter 7 of the National Planning Policy Framework (2023).

2) The proposal by reason of its siting, scale, massing and design of the proposed development would result in an overdevelopment of the site and an incongruous addition that would fail to harmonise with the character and architectural composition of the Locally Listed Building, as well as failing to preserve the character and appearance of the Ruislip Village Conservation Area. The proposal therefore conflicts with Policies BE1 and HE1 of the Hillingdon Local Plan: Part One - Strategic Policies (2012), Policies MHB 1, DMHB 3, DMHB 11 and DMHB 12 of the Hillingdon Local Plan: Part Two – Development Management Policies (2020), Policies HC1, D3 and D4 of the London Plan (2021) and the NPPF (2023).

3) The development would fail to provide a high-quality internal amenity space, in terms of layout, outlook, privacy and security, resulting in harm to residential amenity and unsatisfactory living conditions for the occupiers. In addition, in the absence of sufficient information to support the BRE daylight and sunlight assessment the application has failed to demonstrate that the proposed development would provide adequate Daylight and Sunlight to future residents. The proposal therefore fails to comply with Policy DMHB 15 and 16 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020), Policy D3 and D6 of the London Plan (2021) and the NPPF (2023).

4) *The proposal by virtue of its size, scale, fenestration and proximity, would be detrimental to the amenities of the neighbouring occupiers at 80a High Street and the Thomas Moore residential building by reason of noise, disturbance, loss of outlook and sense of enclosure and by reason of loss of visual intrusion, loss of privacy and perceived overlooking, respectively. Furthermore, in the absence of sufficient information to support the BRE daylight and sunlight assessment the application has failed to demonstrate that the proposed development would not lead to a loss of light or significant overshadowing to both adjoining neighbouring properties. The proposal would therefore be contrary to Policy BE1 of the Hillingdon Local Plan: Part One - Strategic Policies (2012), Policy DMHB 11 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020) and the National Planning Policy Framework (2023).*

5) *The proposed development is located within the LBH Air Quality Management Area, and within the Ruislip Town Centre Focus Area. No appropriate mitigation was offered by the applicant and therefore the proposed development is contrary to local and regional policies, Policy DMEI 14: Air Quality, London Borough of Hillingdon Air Quality Action Plan and the London Plan, Policy SI1.”*

2.11 Following this refusal, an appeal was submitted under section 78 of the Town and Country Planning Act 1990, on the 6th of December 2024 (appeal ref: APP/R5510/W/24/3356952). The appeal was dismissed by the Planning Inspectorate on the 25th of July 2025. Whilst the appeal was dismissed, the Inspector did not uphold a number of the reasons for refusal provided by the Council and these are as listed below:

- Living conditions in relation to space standards, layout, access to daylight and sunlight;
- Effect on the living conditions of residents at the Thomas Moore building and No.80a High Street regarding noise and access to light;
- Impact on the marketability of the ground floor commercial unit and Ruislip Town Centre; and
- Effect of the proposed development on the character and appearance of the host building and Conservation Area.

2.12 Notwithstanding the above, the Inspector did however uphold the Council’s reason for refusal with respect to:

- Outlook from flat 3 and flat 1;
- Overlooking from flat 3 upon the nearest balcony of the Thomas Moore building;
- Tunnelling effect impact upon 80a High Street created by a 1.8m fence on the northern boundary; and
- No contribution had been secured in respect of air quality.

2.13 Following the outcome of this appeal, the applicant submitted an application proposing a revised scheme to the Council, under application reference 78935/APP/2025/2287. The description of development was as follows:

“Creation of 5no. self-contained flats with associated cycle and bin storage, following the change of use of first floor from office (Class E) to residential (Class C3), the erection of a two storey rear extension at first floor level, an infill first floor extension, and the retention and reconfiguration of the Class E unit at ground floor level with alterations to fenestration.”

2.14 The revised proposals were considered to have overcome the outstanding issues left following the appeal decision and received an Officer recommendation for approval. Despite being recommended for approval, the application was called in by a locally elected member, and as such was determined via the Council's Planning Committee. The application was approved by the Planning Committee and planning permission granted on the 16th of January 2026. This remains an extant permission.

3 Development Proposals

Overall Concept

3.1 As noted above, the proposal seeks full planning permission for extensions and alterations at ground, first and second floors, along with the conversion of the existing roof, facilitating the conversion of the upper floors to provide 6no. residential flats with associated cycle and refuse storage, and the retention and reconfiguration of the Class E unit on the ground floor. The description of development is as follows:

“Extensions and alterations at ground, first and second floors, conversion of existing roof and conversion of first floor from office (Class E), to provide 6no. residential flats (Class C3) with associated cycle and refuse storage, retention and reconfiguration of Class E unit at ground floor and alterations to fenestrations”

3.2 The overarching concept of the scheme is to maximise and make the most efficient use of the existing building, in a considered, sustainable and sensitive manner. Through this, six high-quality residential flats in a sustainable town centre location will be delivered, whilst retaining a commercial unit at the ground floor level which will ensure the building continues to positively contribute towards the vitality of the Town Centre.

3.3 Externally the concept is heritage driven, ensuring the buildings importance as a locally listed building and its positive contribution to the character of the Conservation Area is retained and in places enhanced, ultimately securing the longevity of the building long into the future. The proposed development is described in full in the Design and Access Statement, which accompanies the planning application and should be referred to in full.

Proposed Use and Layout

3.4 The proposal utilises the existing building in its entirety and is heritage led. As a result, the proposals work with the existing building and its features to ensure its significance is preserved.

3.5 The internal configuration in terms of uses is split as follows:

- Basement/Lower Ground Floor and Ground Floor: Class E (Commercial)
- First Floor: Class C3 (Residential)
- Second Floor: Class C3 (Residential)
- Third Floor: Class C3 (Residential)

3.6 The Class E use at ground and basement level are retained as existing (albeit the unit is reduced slightly in terms of total floor area to facilitate the proposals on the floors above, as accepted under the current extant permission as discussed in detail below). This commercial element will continue to positively address the public realm on High Street. Also, at ground floor level in the southwestern most corner of the building, is the proposed refuse and cycle storage along with rear residential entrance serving the floors above. A residential entrance is also incorporated from the front of the building via an existing doorway.

3.7 As per the current extant permission, the first floor is to be converted from Class E (previously ancillary office space serving the bank) to Class C3 (Residential) and comprises 2no. 1B (bed) /1P (person) flats (flats 1 & 2) within the main existing building. To the rear, the ground floor of a 2B/4P duplex is proposed (flat 3), facilitated by a small infill extension to the existing flat roof modern rear extension to the main building (the extent of said infill extension matches that of the recently permitted scheme). Between the main building and the rear extension, a private communal roof garden is proposed providing attractive private amenity space for future residents.

3.8 Also, as per the current extant permission, within the second floor of the main building, the existing 3-bedroom flat is to be converted into 2.no further 1B/1P flats (flats 4 & 5). To the rear, a mansard roof extension is proposed upon the existing modern flat roof extension at the rear, facilitating the first floor of the proposed duplex (flat 3).

3.9 At third floor level, the existing roof space is altered (described in detail below) to facilitate the creation of a sixth flat, comprising a 2B/3P flat (flat 6).

3.10 A breakdown of the proposed unit size mix is set out below:

- 3 x 1B/1P
- 1 x 2B/4P
- 1 X 2B/3P

The proposal therefore seeks the creation of a more diverse mix of unit sizes beyond that of the extant permission.

3.11 In terms of outdoor private amenity space, flats 3 and 6 are served by their own private outdoor terraces/balconies, the exact extent of which is set out in detail below. Flats 1, 2, 4 and 5 are served by the private communal roof terrace, an arrangement already permitted under the extant scheme. The introduction of a sixth flat therefore does not result in any further pressure on the private communal roof terrace area. The proposed floor plans and layouts are shown below:



Scale and External Appearance

- 3.12 Externally, the design approach has been carefully considered to ensure that it responds positively to the area. The proposals are supported by a comprehensive contextual analysis, ensuring that the new dwelling reflects a deep understanding of the existing building and its surrounding context, resulting in a high-quality and sensitive proposal which makes a positive contribution to the locality.
- 3.13 The proposals largely reflect the extent of that permitted under the extant permission. The key difference between the schemes is reflected at the front of the building and its roofscape.
- 3.14 To accommodate the introduction of flat 6, the proposal seeks a sensitively designed roof extension, taking it from a hipped to a mansard design, whilst retaining the parapet wall capping the front façade. Five traditionally styled dormer windows are incorporated into the proposed roof design, all of which follow the corresponding fenestration below in terms of spacing and design. To the rear of the proposed roofscape, three modest dormer windows are introduced, again, following the corresponding fenestration on the floors below. Through the proposed roof extension, the building's façade is enhanced in its status as a landmark within the street scene, reflective of its heritage related significance and it continues to follow the height of the roofscape in this row of buildings on High Street.
- 3.15 As per the extant permission the existing building is to be extended to the rear at first and second floor level, though under the proposed scheme, this extends to incorporate the third floor facilitating flat 6.
- 3.16 To the rear of the main building, at second floor level, a modest and sympathetically designed mansard roof extension is proposed to the existing flat roof modern extension, which houses the first floor serving flat 3. Contextually, the mansard roof design sits in harmony with that of the adjacent Thomas Moore Building, and several other mansard roof forms within the locality, particularly along High Street.
- 3.17 Each flat has been meticulously designed to ensure appropriate relationships with nearby neighbouring properties and amenities, whilst maximising and ensuring appropriate internal outlook, and suitable levels of sunlight and daylight; and each of the flats comfortably conform with the minimum internal space standards for dwellings as set out in Table 3.1 of the London Plan 2021.
- 3.18 The proposals utilise a high-quality palette of materials, matching those used throughout the existing building wherever possible and informed by contextual analysis as noted above.

Landscaping

- 3.19 Given the brownfield nature of the site, there are no existing trees or landscaping and further landscaping opportunities are limited. Notwithstanding this, the proposed communal roof terrace is to be landscaped and planted appropriately and the proposed mansard roof to the rear is to be a green roof.

Access, Servicing/Refuse and Parking

- 3.20 In terms of access, the Class E use on site will continue to be accessed via the front ground floor entrance from High Street as existing. The residential units on upper floors will be partially accessed via a separate existing entrance from High Street, and via a main residential entrance at the rear.
- 3.21 Due to the sites excellently sustainable location within the centre of Ruislip, no vehicular parking is proposed (as per the extant permission). Adequate safe and secure cycle parking is however proposed and will be accessible at the rear.

3.22 With regard to servicing and refuse, both the Class E unit and the residential flats will be serviced at the rear of the site. Refuse storage and delivery arrangements for the Class E unit will remain as existing, and a new enclosed refuse storage area is incorporated at the rear of the site, serving the proposed residential flats.

4 Planning Policy Context

4.1 Section 38 (6) of the Planning and Compulsory Purchase Act 2004 requires that the determination of planning application be made with regard to the Development Plan, unless material considerations indicate otherwise.

4.2 This is reiterated at paragraph 48 of the National Planning Policy Framework (NPPF), which also makes it clear that the NPPF is a material consideration in decision making.

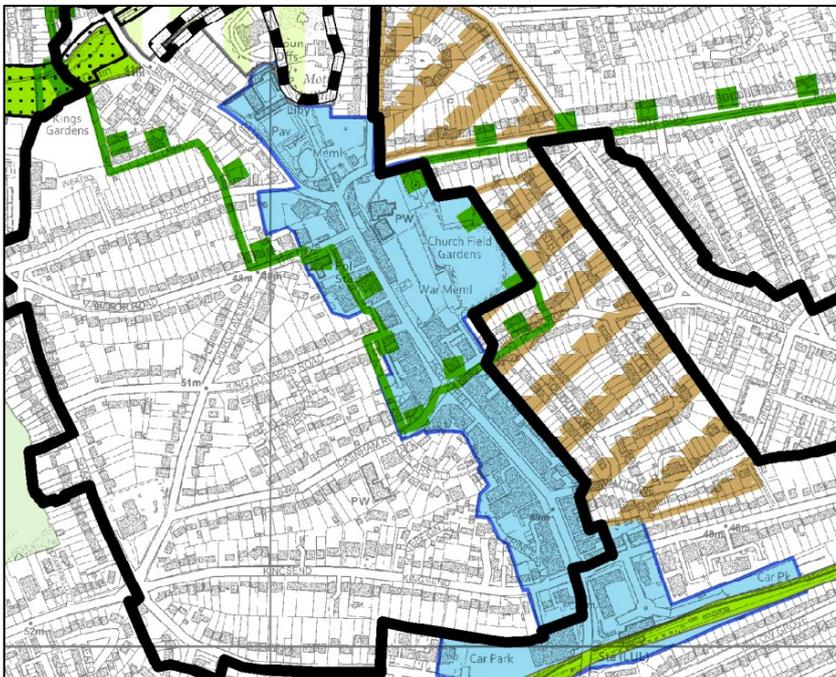
4.3 The main planning policy considerations pertinent to the proposed development are considered below.

The Development Plan

4.4 The site is situated within the administrative area of Hillingdon Council. The Development Plan for Hillingdon Council comprises:

- The London Plan (2021)
- The Hillingdon Local Plan: Part 1- Strategic Policies (November 2012)
- The Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020)
- The Hillingdon Local Plan: Part 2 - Site Allocations and Designations (January 2020)
- The West London Waste Plan (July 2015)

4.5 The site is shown within the excerpt below, taken from the adopted policy map:



4.6 The adopted policy map as above confirms that the Site is located within a Town Centre, and within a Conservation Area.

London Plan 2021

- 4.7 Policy GG1 (**Building strong and inclusive communities**) sets the requirements for development proposals in relation to delivering strong and inclusive communities as well as setting some high level requirements in relation to design.
- 4.8 Policy GG2 (**Making the best use of land**) confirms that Boroughs should enable the development of brownfield land, especially on sites within town centres and the utilisation of small sites. The policy goes on to advise that decision makers should proactively explore the potential to intensify the use of land to support additional homes.
- 4.9 Policy SD6 (**Town centres and high streets**) supports the identification of sites for mixed-use of housing-led intensification to optimise residential growth.
- 4.10 Policy D3 (**Optimising site capacity through the design led approach**) confirms that all development must make the best use of land by following a design-led approach that optimise the capacity of sites. The policy also confirms that higher density developments should generally be promoted in locations that are well connected to jobs, services infrastructure and amenities by public transport, walking and cycling. Further, this policy specifies the design requirements in relation to appearance, scale, bulk, materials and the character of original buildings and the areas around them. Policy D4 (**Delivering good design**) expands on design quality further.
- 4.11 Policy D5 (**Inclusive Design**) confirms that all development proposals must achieve the highest standards of accessible and inclusive design.
- 4.12 Policy D6 (**Housing quality and standards**) advises that new housing development should be of high-quality design, providing adequately sized rooms, functional layouts and sufficient standards of living with respect to daylight and sunlight, overheating and adequate storage provision. This policy also confirms the minimum quantum of outdoor private space.
- 4.13 Policy D7 (**Accessible housing**) confirms the requirements in relation to dwelling accessibility standards.
- 4.14 Policy H1 (**Increasing housing supply**) sets ten-year targets for net housing completions and advises how these should be achieved. The Policy goes on to confirm that Boroughs should optimise the potential for housing delivery on all suitable and available brownfield sites through planning decisions, especially on sites with access levels (PTALs) 3-6.
- 4.15 Policy H10 (**Housing size mix**) advises that schemes should generally consist of a range of unit sizes, and in particular, in determining applications Boroughs should consider the nature and location of the site, with a higher proportion of one and two bed units being generally more appropriate in locations which are closer to a town centre or with higher public transport access and connectivity. The policy also confirms that Boroughs should aim to optimise housing potential on sites.
- 4.16 Policy SI 1 (**Improving air quality**) advises that development proposals should not lead to further deterioration of existing poor air quality and that development proposals must be at least air quality neutral.
- 4.17 Policy HC1 (**Heritage conservation and growth**) confirms that development proposals, where they affect heritage assets and their settings, must conserve their significance.

4.18 Policy T4 (**Assessing and mitigating transport impacts**) confirms how developments should mitigate impacts in relation to transport and the requirements in this regard.

4.19 Policy T5 (**Cycling**) confirms the requirements in relation to new development proposals and the provision of adequate cycle parking/storage.

The Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020)

4.20 Policy DME 2 (**Employment Sites Outside Designated Employment Areas**) sets out the instances where the loss of commercial floorspace could be accepted.

4.21 DMTC 1 (**Town Centre Developments**) confirms the type of development supported within Town Centres.

4.22 DMH 1 (**Safeguarding Existing Housing Stock**) confirms that the loss of existing self-contained housing will be resisted unless it is replaced with at least equivalent residential floorspace.

4.23 DMH 2 (**Housing Mix**) advises that a mix of housing units of different sizes will be expected within proposals for residential development.

4.24 DMHB 1 (**Heritage Assets**) confirms that development proposals will be expected to avoid harm to the historic environment and where assets are affected, they must preserve their significance.

4.25 DMHB 3 (**Locally Listed Buildings**) confirms that proposals will be permitted where they retain the significance, appearance, character or setting of a locally listed building.

4.26 DMHB 4 (**Conservation Areas**) confirms that new development must preserve or enhance the character or appearance of conservation areas.

4.27 DMHB 11 (**Design of New Development**) confirms the requirements in relation to the design of new development setting the basic principles expected.

4.28 DMHB 12 (**Streets and Public Realm**) confirms that new development should be well integrated with the surrounding area and be accessible.

4.29 DMHB 16 (**Housing Standards**) confirms that all new housing development should have an adequate provision of internal space in order to provide an appropriate living environment, including conversions. The policy goes on to prescribe minimum internal space standards.

4.30 DMHB 18 (**Private Outdoor Amenity Space**) confirms that all new residential development and conversions will be required to provide good quality and usable private outdoor amenity space.

4.31 DMEI 7 (**Biodiversity protection and enhancement**) sets the requirements for new developments in this regard.

4.32 DMEI 14 (Air Quality) confirms that development should be at least air quality neutral.

4.33 DMT 1 (**Managing Transport Impacts**) confirms that all development proposals will be required to meet the transport needs of the development proposed.

4.34 DMT 2 (**Highway Impacts**) confirms the expectations of new development in relation to impacting the local highway network.

4.35 DMT 5 (**Pedestrians and Cyclists**) states that all development proposals are required to ensure safe, direct and inclusive access for pedestrians and cyclists. The policy also confirms the requirements in relation to cycle parking provision.

Other Material Considerations

4.36 The following documents also form material considerations of relevance to this application:

- National policy (primarily set out in the National Planning Policy Framework and Planning Practice Guidance).
- Additional guidance contained in Supplementary Planning Documents (SPD) and other guidance.

4.37 The following Supplementary Planning Documents (SPD) and guidance have also been considered in developing the submitted proposals:

- Ruislip Village Conservation Area Appraisal (2010)
- Accessible Hillingdon SPD (2017)
- Housing Design Standards LPG (2023)
- Optimising Site Capacity: A Design-led Approach LPG (2023)

National Planning Policy Framework

4.38 The NPPF was originally published in March 2012, and most recently updated in December 2024. It is material consideration in planning decisions. The following chapters and paragraphs are considered to be of relevance to this application:

- The purpose of planning is to contribute to the achievement of sustainable development and Paragraph 8 outlines the three overarching objectives of this:
 - *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 well-designed, beautiful and safe places, 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 protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.'*
- **Paragraph 9** advises that planning policies and decisions should play an active role in guiding development towards sustainable solutions, also taking local circumstances into account to reflect the character, needs and opportunities of each area.

- **Paragraph 10** sets a presumption in favour of sustainable development to ensure that sustainable development is pursued in a positive way.
- **Chapter 4** (Decision Making) advises that local planning authorities should approach decisions on proposed development in a positive and creative way and work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area. Decisionmakers should seek to approve applications for sustainable development where possible.
- **Chapter 5** (Delivering a sufficient supply of homes) relates to the delivery of a sufficient supply of homes and emphasises the Government’s objective to significantly boost the supply of housing. Paragraph 61 advises that it is important that a sufficient amount and variety of land can come forward in order to meet demand, aiming to meet an area’s identified housing need and mix appropriate to the area.
- **Chapter 8** (Promoting healthy and safe communities) seeks to deliver healthy, inclusive and safe places which promote social interaction; are safe and accessible; and enable and support healthy lifestyles. Local authorities should guard against the unnecessary loss of local services to enhance the sustainability of communities and residential environments. An integrated approach to the location of housing, economic uses and community facilities and services should be adopted.
- **Chapter 9** (Promoting sustainable transport) seeks to ensure that transport matters are considered at the earliest stages of development. **Paragraph 116** advises that development should only be refused on highway grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.
- **Chapter 11** (Making effective use of land) seeks to promote an effective use of land in meeting the need for homes and other uses whilst safeguarding and improving the environment and ensuring safe and healthy living conditions). Strategic policies should ensure that as much use as possible is made of previously developed land.
- **Chapter 12** (Achieving well-designed and beautiful places) advises that the creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Design quality should be considered throughout the evolution and assessment of individual proposals.
- **Chapter 14** (Meeting the challenge of climate change, flooding and coastal change) seeks to secure a transition to a low carbon future ensuring that climate change adaptation, flood risk and coastal change is considered in in new development.
- **Chapter 16** (Conserving and enhancing the historic environment) seeks to conserve heritage assets in a manner appropriate to their significance so that they can be enjoyed by existing and future generations.

Planning Practice Guidance (PPG)

4.39 On 6 March 2014, the Department for Communities and Local Government (“DCLG”) launched the Planning Practice Guidance web-based resource. Relevant guidance pertaining to the proposals is referred to where necessary.

Draft National Planning Policy Framework December 2025

4.40 The MHCLG is currently consulting on proposed reforms to the NPPF, with this consultation closing on the 10th of March 2026. With this, whilst it currently holds very limited weight, the draft NPPF confirms the direction of travel at a national level.

4.41 Of particular relevance to these proposals, the Draft NPPF introduces a number of national decision-making policies. Specifically, draft policy S3 'presumption in favour of sustainable development' has been introduced, and refers to draft policy S4, which sets the parameters for the principle of development within settlements, and states that in applying the presumption in favour of sustainable development, decisions must apply policy S4.

4.42 Policy S4 states that development proposals within settlements should be approved unless the benefits of doing so would be substantially outweighed by any adverse effects, when assessed against the national decision-making policies within the framework.

4.43 In addition, draft policy L2 (Making effective use of land), confirms that substantial weight should be given to the benefits where a development proposal would achieve one or more of the following (the list below is of relevance to this application and bold is our emphasis added):

- *"Making better use of vacant and under-utilised land and buildings (**such as by bringing back into residential use empty homes and other suitable buildings; converting space above shops; redeveloping under-utilised retail sites; and building on or above service yards, lock-ups, car parks and other transport infrastructure**);*
- ***Creating additional homes within settlements by using the airspace above existing residential and commercial premises, or through sensitive redevelopment or additional development within existing plots (including, but not limited to, the addition of mansard roofs, proposals to fill gaps in the existing roof line, the introduction of higher buildings at street corners and additional units within residential curtilages).**"*

4.44 In this case, the proposals as presented, are strongly aligned with the aspirations of the draft NPPF and the direction of travel being set. This is particularly where in this instance:

- The site is situated within an existing settlement boundary where the adverse effects would not substantially outweigh the substantial benefits associated with the scheme and should therefore be permitted.
- The proposals make much better use of what is a currently vacant and under-utilised building, and includes converting the space above a commercial premises; and
- Creates additional homes within a settlement by using the airspace above an existing commercial premises through a sensitive redevelopment, including the addition of mansard roofs.

5 Planning Analysis

5.1 This section analyses the suitability of the proposed development in the context of local and national planning policy. Starting with the principle, this section demonstrates that the proposed development represents sustainable development which is in accordance with the Development Plan and that the benefits of the scheme outweigh any other material considerations.

5.2 Reference is made within this section to assessments within technical reports that have been submitted in support of the planning application. Those should however be referenced in full as part of the assessment of the planning application.

Principle of Development

5.3 This section sets out how the proposed development is acceptable in principle in terms of use and form. There are two strands to consider in this regard:

- Use and Form; and
- Reduction in Class E Floor Space in a designated Town Centre.

Use and Form

5.4 The proposal seeks the partial conversion and extension of an existing mixed-use building to create 6 self-contained flats, at first, second and third floors, situated within the Ruislip Town Centre. The NPPF and London Plan Policies GG2, H1, H10, D3 and D6 all support and encourage the optimisation of sites to increase housing provision; especially where they are previously developed or 'brownfield' sites that are situated within a highly sustainable location with regard to access to services, facilities, amenities, public transport infrastructure and provided that proposals are well designed and provide an acceptable standard of living accommodation.

5.5 The site is brownfield, within a town centre location where the principle of creating residential accommodation within the upper floors of buildings is well established and supported in principle. The site also has a PTAL of 4, reflective of its sustainable location for the type of development proposed, being within walking distance of a full range of services, employment opportunities and public transport infrastructure, wholly in accordance with London Plan Policy H1. Extensions to existing buildings are also acceptable in principle where they demonstrate high-quality design in accordance with policy DMHB 11 of the Hillingdon Council Local Plan Part 2.

5.6 The principle of converting the upper floors and the partial extension of the existing building to facilitate the creation of five self-contained flats has also been established under the extant permission under application ref: 78935/APP/2025/2287 (permitted 16th January 2026).

5.7 In further accordance with London Plan Policy D3, this application seeks a design-led optimisation of the sites capacity, in order to ensure the use of the site is as efficient as it can be. This is delivered through the addition of a sixth self-contained flat facilitated by a modest roof extension, and the increase in size of one of the previously permitted five self-contained flats to increase the number of 2 bedroom units created and to improve upon the housing mix being delivered and furthering the schemes accordance with London Plan Policy H10 and Hillingdon Council's Local Plan Part 2 Policy DMH 2.

5.8 In total, the proposal will provide for a net increase of 5.no residential units at the site (accounting for the existing 3-bedroom self-contained flat within the site), providing a modest but crucial contribution towards the Council's and London's significant housing targets within a highly sustainable town centre location. Crucially, the Inspector in determining appeal ref: APP/R5510/W/24/3356952 at the site, stated the same in that (bold text is our emphasis added):

*"The latest housing delivery test figures show only 91% of houses as required have been delivered in the 3 years up to 2023. However, the circumstances set out in footnote 8 of the Framework do not apply. Accordingly, paragraph 11(d) of the Framework and the presumption in favour of sustainable development is not engaged. **Even so, the proposal would add to the housing stock and it would represent the efficient use of an existing building in an urban location. The benefits in these regards attract significant weight**".*

Reduction in Commercial Floor Space

5.9 The site is situated within a primary shopping area, within Ruislip Town Centre. The adopted local plan policy in relation to the loss of existing commercial floorspace is set out within policy DME 2 of the Hillingdon Local Plan Part 2.

5.10 The proposal seeks to retain the commercial unit at the ground and lower ground floor (basement) levels. However, the overall amount of commercial floorspace is to be reduced to facilitate the servicing and entrance requirements in support of the proposed residential units on the upper floors.

5.11 The principle of reducing the total amount of commercial floorspace at the site was considered at length and accepted by the Inspector in the planning appeal decision at the site ref. APP/R5510/W/24/3356952. The Inspector concluded that no concern was raised regarding the retention or marketability of the commercial unit, which ultimately maintains an active frontage and contributes to the vitality of the town centre. No adverse harm was found in respect of impact upon the wider function and vitality of the town centre.

5.12 Since the appeal decision noted above, the principle of reducing the size of the commercial unit as is proposed here, has been accepted under the extant permission application ref: 78935/APP/2025/2287 (permitted 16th January 2026).

5.13 Within the same context, the mixed-use arrangement as proposed aligns with London Plan Policy SD6, and policy DMTC 1 of the Hilling Local Plan Part 2.

Conclusion on the Principle of Development

5.14 In summary, and against the assessment set out above, the proposals are wholly compliant with the London Plan and Hillingdon Council Local Plan overall, where:

- The site is brownfield and is within a highly sustainable location where the proposals demonstrate a design-led approach to optimise the sites use and capacity to provide additional high quality residential units. The proposals are therefore in accordance with London Plan policies GG2, H1, H10, D3 and D6.
- The proposals deliver an acceptable mix of housing in accordance with London Plan Policy H10 and Hillingdon Council's Local Plan Part 2 Policy DMH 2.
- The proposals successfully retain a commercial unit at ground floor level within the Ruislip Town Centre without adversely affecting the unit's marketability and vitality and whilst maintaining the vitality of the surrounding Town Centre.

Other Material Considerations

Design

External Appearance

- 5.15 This application is accompanied by a Design and Access Statement prepared by Proun Architects and should be referred to in full in this regard. This provides an analysis of the site context and its surroundings and how this has informed the proposals from the outset.
- 5.16 London Plan Policy D3 and Hillingdon Local Plan Part 2 Policy DHMB 11 require development proposals to be well designed, respecting the appearance, scale, bulk, form proportions, materials and character of original buildings and their surroundings. London Plan Policy GG1 also states that the design of new buildings and the spaces they create should help reinforce or enhance the character of a neighbourhood.
- 5.17 Externally, the design approach has been carefully considered to ensure that it responds positively to the context of the locality. A comprehensive contextual analysis, has ensured that the proposed extensions reflect a deep understanding of the existing building, resulting in a high-quality and sensitive proposal which makes a positive contribution to the locality. The overall scale, built form, and traditional Georgian architectural features are maintained and enshrined throughout the proposals.
- 5.18 As discussed earlier in this statement, the proposals largely reflect the extent of that permitted under the extant permission. The key difference between the schemes is reflected at the front of the building and its roofscape.
- 5.19 To accommodate the introduction of flat 6, the proposal seeks a sensitively designed roof extension, taking it from a hipped to a mansard design, whilst retaining the parapet wall capping the front façade; a roof design that is readily appreciable throughout the surrounding area. Five traditionally styled dormer windows are seamlessly incorporated into the proposed roof design, all of which follow the corresponding fenestration below in terms of spacing and design with window panes to match the existing. To the rear of the proposed roofscape, three modest tile hung dormer windows are introduced, again, following the corresponding fenestration on the floors below.
- 5.20 Through the proposed roof extension, the building's façade is enhanced in terms of its status as a landmark within the street scene, reflective of its heritage related significance (discussed in detail below) and its prominent corner plot. Furthermore, it continues to follow the height and general pattern of the roofscape in this row of buildings on High Street. A CGI in this regard is provided below:



5.21 As per the extant permission the existing building is to be extended to the rear at first and second floor level, though under the proposed scheme, this extends to incorporate the third floor facilitating flat 6. Whilst extending to include the third floor, the overall proportionality and scale is maintained, as is the rear building line of that permitted under the extant permission.

5.22 To the rear of the main building, at second floor level, a modest and sympathetically designed mansard roof extension is proposed to the existing flat roof modern extension, which houses the first floor serving flat 3. Contextually, the mansard roof design sits in harmony with that of the adjacent Thomas Moore Building, and several other mansard roof forms within the locality, particularly along High Street. Above all, the extensions and alterations at the rear are considered to considerably enhance the appearance of this part of the building and substantially enhances the contribution it makes to this part of the surrounding area. A CGI in this regard is shown below:



5.23 Each flat has been meticulously designed to ensure appropriate relationships with nearby neighbouring properties and amenities, whilst maximising and ensuring appropriate internal outlook, and suitable levels of sunlight and daylight; and each of the flats comfortably conform with the minimum internal space standards for dwellings as set out in Table 3.1 of the London Plan 2021.

5.24 The proposals utilise a high-quality palette of materials, matching those used throughout the existing building wherever possible and informed by contextual analysis as noted above.

5.25 The proposals, by virtue of their selectively considered design, siting and scale, are therefore considered to wholly accord with policies D3 and GG1 of the London Plan and policy DHMB 11 of the Hillingdon Local Plan Part 2.

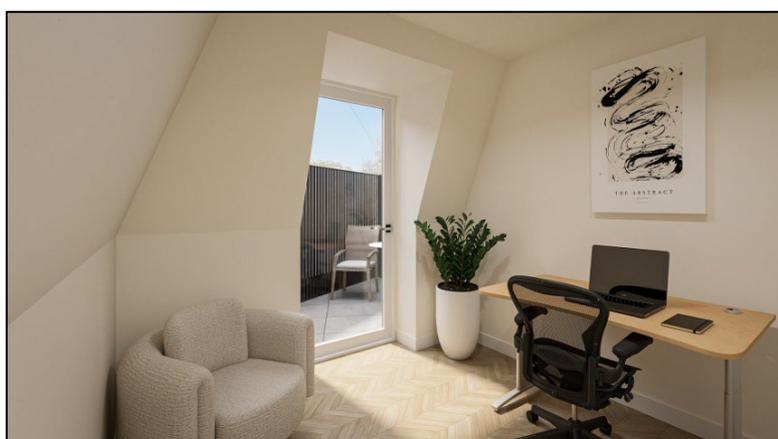
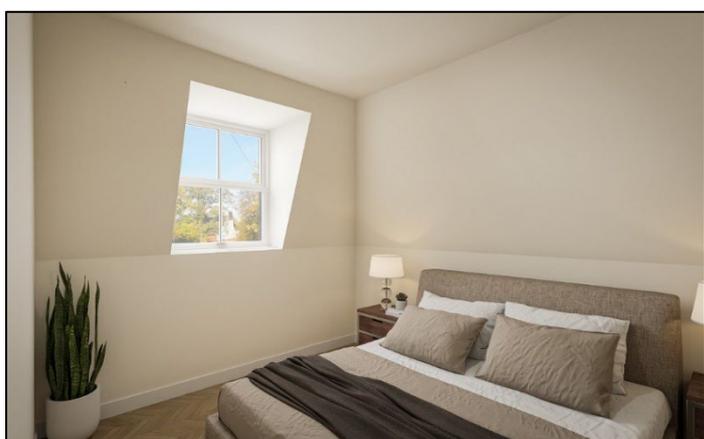
Standard of Accommodation

5.26 Each flat has been meticulously designed to ensure appropriate relationships with nearby neighbouring properties and amenities, whilst maximising and ensuring appropriate internal outlook, and suitable levels of sunlight and daylight; and each of the flats comfortably conform with the minimum internal space standards for dwellings as set out in Table 3.1 under Policy D6 of the London Plan 2021. This is demonstrated in the table below:

Flat Number	Size Type	Number of storeys	Required GIA (sqm)	Proposed GIA (sqm)	Required built-in storage (sqm)	Proposed built-in storage
Flat 1	1B/1P	1	37	41.7	1	1
Flat 2	1B/1P	1	37	51.3	1	1.8
Flat 3	2B/4P	2	79	96.9	2	3.9
Flat 4	1B/1P	1	37	42.1	1	1
Flat 5	1B/1P	1	37	50.7	1	1.8
Flat 6	2B/3P	1	61	64	2	2

5.27 As confirmed in the table above, and as detailed within the accompanying proposed floor plans prepared by Proun Architects, the proposed flats are entirely in accordance with the internal space standards prescribed by London Plan Policy D6. In fact, each individual flat provides beyond the minimum specified internal GIA requirement, thus providing a high-quality level of accommodation for future residents. Each flat also includes a policy compliant provision of internal storage space.

5.28 In terms of outlook, it is understood that the outlook from flat 3 was carefully considered under the application for the extant scheme. Therefore, internal CGIs accompany this submission, demonstrating suitable outlook from both floors of flat 3; the CGI in this regard is provided below:





5.29 Policy D6 of the London Plan also requires new housing development to maximise the provision of dual aspect dwellings. In this case, four out of the six flats are dual aspect (flats 2, 3, 5 & 6). Flats 1 and 4 however, are single aspect units due to the design constraints of utilising an existing building. The arrangement of these flats however is identical to that approved under the current extant permission; and notwithstanding this, acceptable living conditions are achieved through ventilation to mitigate the potential for overheating within these units, as supported by the overheating analysis report prepared by eight versa that accompanies this application.

5.30 Whilst flats 2, 3, 5 & 6 are dual aspect, these flats were also assessed in relation to overheating and as demonstrated in the accompanying overheating assessment, all passed the test.

5.31 Furthermore, all habitable rooms within the proposed flats exceed the minimum levels required in relation to internal sunlight/daylight. This is confirmed by the accompanying report prepared by T16 Design, where details of the modelling can be referred to in full.

5.32 With regard to private external amenity space, London Plan Policy D6 states that for flatted developments, a minimum of 5sqm should be provided for 1-2 person units and a further 1sqm should be provided for each additional occupant. In this respect flat 3 (2B/4P) provides 12.4sqm in the form of balconies/terraces which is comfortably above the minimum requirement. Flat 6 (2B/3P) provides a total of 10.7sqm in the form of a balcony/terrace, which also is comfortably above that of the minimum requirement. For the remaining four flats (all 1B/1P units), due to the urban and dense location of the site and the need to balance acceptable relationships with neighbouring buildings/uses, a shared private roof terrace is provided and totals 32.2sqm, equivalent to 8.02sqm per flat.

5.33 Notwithstanding this, this communal arrangement is identical to the arrangement permitted under the extant permission and serves an identical number of flats of the same size. Based on this, each flat has access to more than the minimum requirement of private external amenity space and is wholly in accordance with policy D6 of the London Plan.

5.34 Although the proposed development incorporates a sufficient amount of private external amenity space for each of the flats on site, albeit four of these are to share a communal roof terrace, the site also has excellent access to public open spaces, including Church Field Gardens Park, Ruislip Common and an extensive park and woodland just 0.7 miles north of the site. Beyond this, it is typical for residential schemes, and in particular conversion schemes, in town centre locations to not provide private amenity space in the form of balconies and rely on public open space in close proximity to such sites. This is a concept acknowledged within the committee report which recommended that the extant scheme, which provided for the same level of shared private amenity space, be permitted.

Impact on Neighbouring Amenity

- 5.35 Policy DMHB 11 of the Hillingdon Local Plan Part 2 confirms that development must not adversely impact the amenity in terms of daylight or sunlight, quality of living conditions, visibility and noise of adjoining residential occupants.
- 5.36 In relation to sunlight and daylight, the accompanying daylight and sunlight assessment prepared by T16 Design considered the impact on neighbouring properties, namely:
- 2 (inc. 2a) Ickenham Road (Rear Elevation)
 - 8 Ickenham Road (Side Elevation)
 - 78-80 (inc. 80a) High Street (Rear Elevation)
- 5.37 From these, a total of 17 windows have been scoped into the assessment. Carried out in accordance with the BRE guidance (Site Layout Planning for Daylight and Sunlight), the assessment focused on the most sensitive windows and those most likely to be affected by the proposals, including those serving principal living rooms and bedrooms within the adjoining properties. The Vertical Sky Component was used to evaluate daylight and annual probably sunlight hours to assess sunlight availability.
- 5.38 The results of the assessment sufficiently demonstrate that all 17 of the windows scoped into the assessment pass the BRE guidelines (2022). It confirms that all windows would retain in excess of 80% of their existing VSC values, meaning that no material loss of daylight would occur to any of the neighbouring windows as a result of the proposals. Based on this, no adverse impact is considered to be demonstrated in this regard upon adjoining residential amenities in accordance with policy DMHB 11 of the Hillingdon Local Plan Part 2.
- 5.39 With regard to privacy and outlook, in terms of adjoining residential amenities, 80a High Street and 2a Ickenham Road are the closed properties to the proposals.
- 5.40 Previous applications on the site have scrutinised the relationship between the first-floor rear bedroom window of 80a High Street and the proposed boundary treatment serving the communal roof terrace. To resolve this, the extant permission on the site increased the setback of the boundary fence by an additional metre to reduce its prominence and widening the visual corridor adjacent to the affected window which was considered acceptable. The current proposals comprise exactly the same relationship in this regard and therefore no adverse impact is considered to be demonstrated upon the outlook of 80a High Street.
- 5.41 The proposed extensions to the rear in terms of their overall scale, bulk and mass are considered to be in line with existing surrounding built forms already present and do not project further than any nearby established building lines. It is therefore considered that the proposals do not result in an unacceptable level of enclosure or loss of outlook from any of the adjoining properties.
- 5.42 In terms of overlooking, previous applications on the site have carefully assessed the relationship between the site proposals and 2a Ickenham Road. The key concern was in relation to the proposed external staircase serving the new communal roof terrace. This was dealt with via condition 8 of the extant permission requiring the erection of a 1.8m privacy screen at the top of the staircase; the current proposals seek an identical arrangement, and the applicant is willing to accept a similarly worded condition again, to control this.

5.43 In specific assessment of the addition of flat 6 and its roof terrace, this has been carefully designed to ensure no adverse levels of overlooking upon 80a High Street or 2a Ickenham Road are possible. This is prevented by the inclusion of a 1100 mm angled metal fin privacy screen; this product is designed as such that no views are available in a direct line to both neighbouring properties. This is as demonstrated in the CGI below:



5.44 In relation to the updated proposals pertaining to flat 3, and the addition of a mansard roof, the additional windows proposed at the newly created first floor level serving the flat 3 duplex have been carefully positioned and located to ensure no additional adverse levels of overlooking are demonstrated. One of the first-floor windows facing towards 80a High Street and 2a Ickenham Road, serves a bathroom and will be obscure glazed preventing any overlooking. The second window is purely to provide light into a staircase and does not serve any habitable room.

5.45 At the rear of the 1st floor serving flat 3, is a small roof terrace serving a study. This terrace is treated with a 1100 mm angled metal fin privacy screen which will prevent any direct overlooking towards the nearest balconies of the Thomas Moore building at the rear of the site, as per that accepted under the extant permission in relation to the roof terrace serving the lower floor of flat 3. This is demonstrated in the CGI below:



- 5.46 Beyond the specific relationships considered above, all other proposed windows due to their scale and location are not considered to give rise to unacceptable levels of overlooking towards neighbouring amenities.
- 5.47 Policy D14 of the London Plan also seeks to avoid significant adverse noise impacts on health and quality of life. Due to the sites busy urban town centre location, there is an existing moderate degree of activity generating noise already present and characteristic of this location. The introduction of 6 upper floor flats is not considered to significantly increase noise beyond the levels typically associated with a town centre location. In relation to the proposed communal roof terrace, under previous applications neighbours raised concerns regarding the potential for noise to be generated from this area and to address this, condition 13 was included. The applicant is willing to accept a similarly worded condition.
- 5.48 Based upon the assessments made above, it is considered that the proposals are in compliance with policy DMHB 11 of the Hillingdon Local Plan Part 2, and policies D6 and D14 of the London Plan.

Heritage

- 5.49 This application is supported by a Heritage Impact Assessment prepared by Portico Heritage and should be referred to in full in this regard. The assessment provides a detailed analysis of the historic and architectural significance of the existing site and the surrounding area, and goes on to make a comprehensive assessment and justification of the proposals against both designated and non-designated heritage assets; ultimately, the assessment concludes that the proposals do not lead to substantial harm to or total loss of significance of a designated heritage asset, and in this case, that the proposals preserve the character of the conservation area and in fact comprises an enhancement to the Conservation Area at the rear of the site. Regarding the sites status as a locally listed building, the assessment considers that the proposals retain the significance, appearance and character of the locally listed building.
- 5.50 From a planning assessment perspective, policy DMHB 1 of the Hillingdon Local Plan Part 2 confirms that proposals must sustain and enhance the significance of heritage assets. Policy DMHB 3 of the Hillingdon Local Plan Part 2 confirms that proposals in relation to locally listed buildings, must retain their significance, appearance and character.
- 5.51 As set out in detail within the accompanying Heritage Impact Assessment, the proposals have been carefully considered to ensure they are complimentary to both the existing buildings and the wider conservation area. To the front of the existing building, the proposed alterations to the roof are traditional in form and takes its cue from no.74 High Street. The materials proposed are also traditional with clay tiles, timber dormers containing sash windows and with a composition that sits appropriately between the existing chimney stacks. The classical proportions of the existing building are also maintained, thus maintaining the pre-eminence of the former bank building – which in turn also preserves the character of this part of the Conservation Area and ensure that the buildings architecture character in its own right is preserved.
- 5.52 To the rear, the proposed extensions to the main building will be finished by a mansard roof, sitting comfortably within the surrounding roofscape, and are of a design, scale and mass that harmonises with this part of the Conservation Area. Furthermore, the design quality of the proposals to the rear are considered an enhancement to the Conservation Area and will set a positive precedent to any future developments to the rear of properties on High Street.
- 5.53 In addition, the proposals will bring back into use what is currently a vacant building, ensuring the long-term maintenance and care of this locally listed building and therefore securing its significance for the enjoyment of current and future generations.

5.54 To conclude on heritage, the proposals are considered to comply with policies DMHB1, DMHB3 and DMHB4 of the Hillingdon Local Plan Part 2. Furthermore, the proposals are considered to comply with chapter 16 of the NPPF.

Transport

5.55 This application is supported by a Transport Statement prepared by Pulsar Transport Planning and should be referred to in full. This provides a detailed assessment in relation to the potential transport related impacts of the proposals.

5.56 The London Plan sets out the Mayor of London's strategic target for 80% of all trips in London, by 2041 to be made on foot, cycling or by public transport. Policy T4 of the London plan requires all development proposals to be accompanied by transport assessments/statements to ensure that the capacity of the transport network (including local, network-wide and at strategic levels) are fully assessed. DMT 1 and DMT 2 set the requirements at a local level in relations to transport impacts of new developments within the Hillingdon Local Plan part 2.

5.57 In summary, the accompanying Transport Statement confirms that the proposals will not result in significant adverse impacts on transport, in terms of trip generation, delays or queues at junctions, or in terms of highway safety. Furthermore, with a PTAL rating of 4, the site is considered to be highly sustainable, and within walking and/or cycling distance of daily services, amenities, health and recreational facilities. The site is also very well connected to schools and public transport connections. Reflective of its well-connected town centre location, the proposal is a car free development.

5.58 In relation to services and deliveries, the existing arrangements for the commercial serving/deliveries and refuse collection are to be retained which is supported by the Transport Statement. Regarding the proposed residential properties, refuse provision is provided to the rear of the building, and collection would be via Council kerbside collection as per other adjoining residential units facing the High Street. Secure cycle storage in the form of 8 spaces is also provided at the rear.

5.59 Based upon the above, the proposals are considered to be acceptable in highway/transport terms and accord with polices T4 and T5 of the London Plan and policies DMT 1 and DMT 2 of the Hillingdon Local Plan Part 2.

Ecology and Biodiversity

5.60 The NPPF requires all new development to minimise the impact on biodiversity and geodiversity. Policy DMEI 7 of the Hillingdon Local Plan Part 2 states that the design and layout of new development should retain and enhance any existing features of biodiversity and/or geological value within sites.

5.61 This application is accompanied by an Ecology Technical Note prepared by Ethos Environmental Planning and should be referred to in full. The note confirms that based on the site's location, lack of suitable potential roost features, and there being no evidence of bats on the site, that there is negligible potential for bats on the site. Bat emergence surveys were also undertaken for the avoidance of doubt, and no bats were recorded entering or being active on the site.

5.62 With regard to biodiversity net gain, the proposed development meets the de-minimis exemption for mandatory BNG, i.e. it affects less than 25 square meters of on-site habitat and less than 5 meters of linear habitat (such as hedgerow). Notwithstanding this, the proposals include soft landscaping and a green roof, which will provide biodiversity enhancements to the site.

5.63 Based on this, it is considered that the proposals accord with policies DMEI 7 of the Hillingdon Local Plan Part 2.

Air Quality

5.64 The site is situated within the Hillingdon Air Quality Focus Area and the Ruislip Town Centre NO₂ Focus Area. Policy D14 of the London Plan (2021) and Policy DMEI 14 of the Local Plan Part Two (2020) require development to minimise air quality impacts and avoid worsening local exposure.

5.65 This application is accompanied by an Air Quality Neutral Statement prepared by eight versa and should be referred to in full. The proposals have been assessed for both impacts in relation to transport and building operation against the AQN guidance and it is considered to meet the requirements for AQN.

5.66 The statement notes that whilst mitigation measures to reduce the exposure of future occupants to pollutant are not required, the design mitigation hierarchy has been applied to maximise air quality for future residents where feasible. Such measures include the inclusion of cycle storage, improvement to on-site green infrastructure, and an all-electric heating system.

5.67 Accordingly, the proposals are considered to comply with Policy SI 1 of the London Plan and Policy DMEI 14 of the Hillingdon Local Plan Part 2.

6 The Planning Balance

6.1 On the basis of the analysis set out in the above section, it is considered that the proposed development comprises sustainable development in the context of the policies set out within the NPPF and accords with the Development Plan. In summary, the proposal is considered:

- **Environmentally Sustainable:**
 - Regeneration and effective re-use of previously developed land which is considered to be a highly sustainable approach to development;
 - The site is located in a sustainable location, within walking and/or cycling distance of local amenities and services and accessible by non-car modes;
 - Conservation of existing designated and non-designated heritage assets; and
 - Biodiversity enhancements beyond the sites current condition.
- **Economically Sustainable:**
 - Creation of jobs at the construction stage;
 - Brings back into use a currently vacant commercial unit, contributing to the vitality and viability of the Ruislip Town Centre; and
 - Contributing to the local economy via the spending of future residents which in turn will also contribute positively to the longevity of the Town Centre.
- **Socially Sustainable:**
 - The delivery of 6 new high-quality homes.

- 6.2 The proposed use is acceptable in principle in this location and the technical assessment work undertaken in support of the application confirms that there are no other material considerations which suggest any harm would outweigh the benefits of the proposed development. The benefits are extensive and weigh heavily in favour of the scheme.
- 6.3 The proposal comprises a well-designed and high-quality development which is entirely appropriate to its context in terms of urban form and materials. The scheme is of a scale that responds to the surrounding area and respects the amenity of neighbouring properties. Residential amenity of both existing and proposed residents is protected. The proposals preserve the significance of the locally listed building and preserve and in places enhance the character of the Conservation Area.
- 6.4 The proposals fully conform with the policies of the London Plan, Local Plan and the NPPF.
- 6.5 On this basis, and taking into account the significant benefits arising from the scheme, it is respectfully considered that planning permission should be granted.

**Gillings
Planning**