



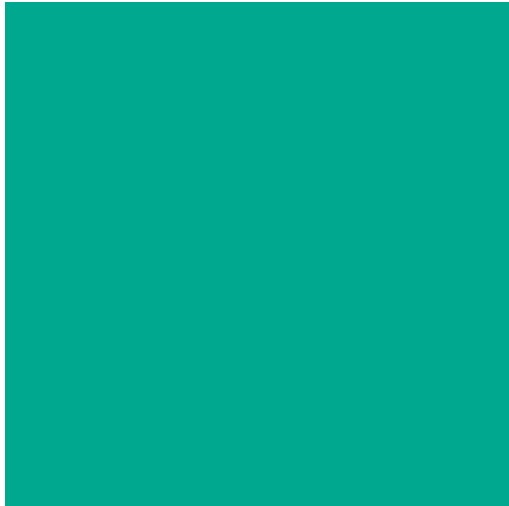
## PLANNING STATEMENT

**Site:** The Barn Hotel, West End Road, Ruislip, HA4 6JB

**For:** Chase New Homes

**Project Ref:** 23064

**Date:** September 2024



**Prepared by:**

Kenya Sharland MPlan (Hons) MRTPI  
Associate

Barker Parry Town Planning Ltd

33 Bancroft, Hitchin, Herts SG5 1LA

T: 01462 420224 / E: [office@barkerparry.co.uk](mailto:office@barkerparry.co.uk)



**RTPI**

Chartered Town Planners

## **CONTENTS PAGE**



<b>SECTION</b>	<b>TITLE</b>	<b>PAGE</b>
1.0	INTRODUCTION	3
2.0	SITE CONTEXT	5
3.0	PLANNING HISTORY & PRE-APPLICATION ENGAGEMENT	9
4.0	STATEMENT OF COMMUNITY INVOLVEMENT	14
5.0	RELEVANT PLANNING POLICY	18
6.0	THE PROPOSED SCHEME	21
7.0	PLANNING ASSESSMENT	23
8.0	DRAFT HEADS OF TERMS	55
9.0	SUMMARY & PLANNING BALANCE	58

<b>APPLICATION DOCUMENTATION</b>
APPLICATION FORMS
CIL FORM
LOCATION PLAN
FULL SET OF APPLICATION PLANS – SEE DRAWING ISSUE SHEET
SCHEDULE OF ACCOMMODATION
PLANNING STATEMENT, INCLUDING STATEMENT OF COMMUNITY INVOLVEMENT AND DRAFT HEADS OF TERMS
DESIGN AND ACCESS STATEMENT
AIR QUALITY ASSESSMENT
ARCHAEOLOGICAL ASSESSMENT

BIODIVERSITY NET GAIN REPORT & METRIC, INCLUDING CONDITION ASSESSMENT
CONTAMINATED LAND SURVEY
DAYLIGHT & SUNLIGHT ASSESSMENTS
ECOLOGICAL IMPACT ASSESSMENT & SURVEYS
ENERGY STATEMENT
FLOOD RISK ASSESSMENT & DRAINAGE STRATEGY REPORT
FINANCIAL VIABILITY ASSESSMENT
FIRE SAFETY STRATEGY & D12 FIRE STATEMENT
HERITAGE & TOWNSCAPE VISUAL IMPACT ASSESSMENT
LANDSCAPE PROPOSALS
LISTED BUILDINGS - INITIAL STRUCTURAL SURVEY AND APPRAISAL
NOISE IMPACT ASSESSMENT
DYNAMIC OVERHEATING REPORT
REFUSE MANAGEMENT & SERVICING PLAN
HEALTHY STREETS TRANSPORT STATEMENT
TRAVEL PLAN
TREE SURVEY & IMPACT ASSESSMENT, TREE CONSTRAINTS PLAN & TREE PROTECTION PLAN
SUSTAINABILITY STATEMENT
URBAN GREENING FACTOR
UTILITIES – INFRASTRUCTURE & FOUL WATER STATEMENT



1.0 **INTRODUCTION**

1.1 Barker Parry Town Planning has been commissioned by Chase New Homes Ltd to prepare a Planning Statement to support a full planning and listed building consent application for development at The Barn Hotel, West End Road, Ruislip, HA4 6JB.

1.2 This submission follows the refusal of full planning permission in June 2023 and grant of Listed Building Consent in October 2023, as well as detailed pre-application engagement between January and July 2024.

1.3 This new scheme is a fresh design approach to development on the Site which has taken account of all matters raised during engagement with the Local Planning Authority to date. This approach has enabled the Applicant to develop a sensitive and attractive scheme which responds to local context, including the Site's heritage significance, and will add positively to the quality of the area.

1.4 Overall, the proposals aim to contribute to urban repair and provide the former hotel site and its heritage assets with the most viable new use to ensure their long-term appreciation and conservation, whilst delivering much needed new homes for Ruislip.

1.5 The proposed description of development is as follows:

*Partial demolition of 1no. Grade II Listed Building and conversion of listed buildings to provide 3no. dwellings. Demolition and redevelopment of the remainder of the site for residential use with associated infrastructure, public open space and landscaping.*

1.6 Section 2.0 of this Statement outlines the baseline site context matters. Section 3.0 provides a summary of the planning history and LPA engagement to date. A Statement of Community Involvement is outlined at Section 4.0. Relevant planning policy applicable to the proposals is summarised at Section 5.0, whilst the proposed scheme details are summarised at Section 6.0. An assessment of the scheme against relevant policy matters is undertaken at Section 7.0. Draft Heads of Terms are provided at Section 8.0 followed by an overall summary of the development scheme at Section 9.0.



2.0 **SITE CONTEXT**

2.1 The Application Site is a 0.96ha area comprising the former 'The Barn Hotel' buildings, access and surrounding grounds. It lies immediately east of West End Road, which is elevated at this section to overpass the adjacent underground line creating a level of containment for the Site on its western boundary. There is suburban housing to the east of the Site, but its northern, western and southern contexts are defined by flatted development. A part three, part four storey flatted development at Garden Close is immediately south of the Site and four-storey flatted development is located at Sherleys Court on the west side of West End Road. To the north, beyond Ruislip station is Rye House, a part 7, part 8 storey residential block in the town centre.



**Figure 1** – Indicative Site Location and surrounding context

2.2 The Site is in a highly sustainable location with a PTAL rating of 4 and is c.200 metre walk to Ruislip Underground Station which is on the Metropolitan and Piccadilly lines. Station Approach is also well served by bus services to Northwood, Mill Hill, Ealing and Uxbridge. The Site is also within easy walking distance of all services within Ruislip Town Centre.

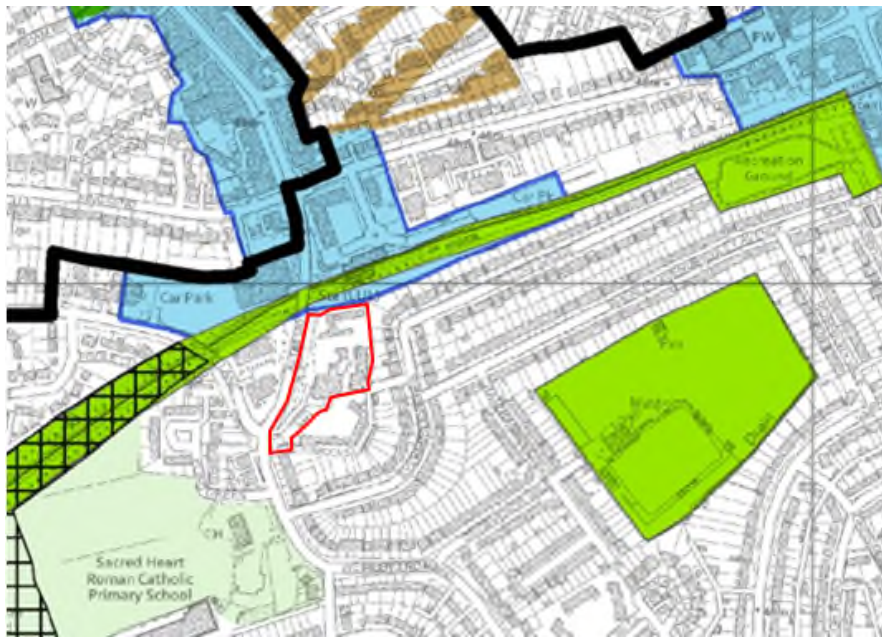
2.3 The former hotel accommodation comprised 73 bedrooms plus the main reception and dining area spread across five buildings of varying styles and ages, parking and other ancillary areas. The hotel building includes two Grade II listed buildings, Sherley's Farmhouse and Barn and Outbuilding to South East of Sherley's Farmhouse. The latter listed building comprises two historic structures which have been amalgamated into one through modern additions.

#### Planning Designations

2.4 The Site is not subject to any specific planning designations within the Hillingdon Local Plan, but it is immediately adjacent to the Ruislip Town Centre boundary to the north. The Application Site does not fall within a Conservation Area.

2.5 The Site is within Flood Zone 1 and has a low probability of flooding from rivers and the sea. It is also predominantly at very low risk of surface water flooding with some very small pockets of higher risk.





**Figure 2** – Extract of Proposals Map with Site Location outlined in Red

### Heritage Designations

- 2.6 There are two Grade II listed buildings within the grounds of the Application Site. The Historic England listing descriptions for these are set out below.

SHERLEY'S FARMHOUSE (THE C17 BARN MOTEL), WEST END ROAD:

*"1. 5018 WEST END ROAD (East Side) RUISLIP Sherley's Farmhouse (The C17 Barn Motel) TQ 08 NE 41/444 II GV 2. C17 timber-framed house. 2 storeys, L-shaped with irregular fenestration. Visible framing with whitewashed brick filling. Old tiled roof. 2--and 3-light modern casements.*

*Sherley's Farmhouse and the barn and outbuilding forms a group."*

BARN AND OUTBUILDING TO SOUTH EAST OF SHERLEY'S FARMHOUSE (THE C17 MOTEL):

*"1. 5018 WEST END ROAD (East Side) RUISLIP Barn and Outbuilding to south-east of Sherley's Farmhouse (The C17 Barn Motel) TQ 08 NE 41/445 II GV 2. Late C16 or early C17 2-bay barn, timber framed with queen strut roof truss, somewhat restored. Later C17 2-bay structure to north, also timber framed,*



*with queen post roof truss. Painted brick filling, old tiled roofs. Group value with Sherley's Farmhouse. Some modern extensions to east. Sherley's Farmhouse and the barn and outbuilding form a group."*



- 2.7 Full details on these heritage assets are set out in the accompanying Heritage and Townscape Impact Assessment prepared by Icení.

## 3.0 **PLANNING HISTORY & PRE-APPLICATION ENGAGEMENT**

### **Planning History**

3.1 On 2 June 2023, full planning permission was refused for the “*Redevelopment of the site for residential use involving the partial demolition of the existing Grade II Listed Building and conversion to 2 new residential units, demolition of surrounding buildings and erection of 2 new residential blocks with associated amenity space, landscaping and parking*” (LPA Ref. 7969/APP/2023/1473).

3.2 The application was refused for 11 reasons, these are summarised as follows:

1. The development would be detrimental to the setting of the Grade II listed buildings. A lack of detail for the listed buildings was provided to enable the scheme benefits to be weighed against any potential harms.
2. The proposal would be visually dominant harming the visual amenity and character of the area.
3. The unit mix fails to provide sufficient family sized units to reflect needs.
4. Cycle parking design does not conform to standards.
5. Insufficient information on overheating and any mitigation required.
6. Insufficient information on levels of daylight and sunlight amenity.
7. Suitable SuDs was not shown to be incorporated.
8. Inadequate information on potential harm to bat roosts.
9. Failure to provide adequate provision of disabled units.
10. Failure to provide adequate levels of amenity space for future occupants.
11. Absence of a completed S106 Agreement.

3.3 Reasons 4 to 10 relate to technical design matters which the LPA recognised in the officer’s report could likely be addressed with further information. Reasons 1 to 3 were heritage and design matters which the LPA did not consider could be resolved through revisions to the scheme.

3.4 On 24 October 2023 the parallel Listed Building Consent (LBC) application was granted (LPA Ref. 7969/APP/2023/1833). This approval therefore addressed part of reason for refusal 1.

3.5 The LBC was an '*Application for Listed Building Consent for the partial demolition and conversion of existing Grade II Listed Buildings for residential use with associated landscaping and parking*'. The LBC established the principle of the proposed demolitions and internal and external works to the listed buildings.

### **Pre-Application Engagement**

3.6 In order to seek further clarity on the approach to design matters for the Site, a pre-application request with supporting documentation was submitted on 31 January 2024.

3.7 This was registered by the LPA on 2 February 2024 and given the reference number 7969/PRC/2024/23. A site meeting between officers and key project team members was undertaken on 28 March 2024 following which some updated information was provided by the Application on 22 April 2024.

3.8 Formal written pre-application advice was subsequently received from the LPA on 11 July 2024. The response was a lengthy 37-page document, but key feedback points can be summarised as follows:

- Principle of the loss of the hotel and redevelopment for residential use was accepted.
- Low-rise residential forms the prevailing wider character, but there is also a transitional mid-rise residential character by the railway and West End Road flyover.
- There is scope for introducing new elements and new character, but the site is particularly sensitive to increases in height and density.

- The new character must constitute a fundamental improvement to what is already on the Site. One more closely aligned with Garden Close likely to be more appropriate as collectively could act as a unified yet varied backdrop to the listed buildings.
- The proposed layout whilst an improvement to the refused scheme still requires significant changes for permeability, walkability and wayfinding.
- Strongly encouraged pulling back the railway block from the western edge to facilitate a more generous public realm and create a positive frontage along the northern alleyway.
- Proposed Maisonettes on east side contribute to urban repair & establish a back-to-back relationship with Eversley Crescent.
- Entrance block was a considerable improvement, but further refinement is required, should explore simplifying its form.
- Built form along the northern edge could act as a gateway into the Site & the residential area. Built form here should be of exemplary appearance, architectural and landscaping quality.
- Height, scale, massing and form of railway block is not supported as it would harm the setting of the listed buildings.
- Should explore more rural and rustic-inspired, casual landscaping features and surfacing, including play equipment and features.
- Single aspect dwellings should be avoided and north facing single aspect units will not be supported.
- Render not supported as primary façade material.
- Concerns about overlooking from habitable rooms and roof terraces on the northern block towards Eversley Crescent dwellings, plus potential overbearing impact of the block.
- Recommended that the Farmhouse is retained as one dwelling.
- Concerns that demolition works to the Leaning Barn could compromise structural integrity, consider a catslide roof or buttress.
- The proposed housing mix is considered to be acceptable.

- Should be demonstrated that a shortfall in private amenity space is outweighed by the wider benefits of the scheme.
- Unclear on what is communal vs public open space. Need a plan(s) showing different types of spaces and boundary treatments.
- London Plan car parking standards take precedence, except where the Local Plan specifies lower local maximum standards.
- Quantum and proposed locations of cycle parking are appropriate for the designs presented.
- No objection in principle relating to new Garden Close access.

3.9 In response to this feedback, the proposed scheme has been significantly re-designed, including in the following ways:

- Railway buildings reduced in height and massing to a maximum of 4-storeys stepping down in height towards Eversley Crescent.
- Number of dwellings reduced to 72 dwellings and parking provision proportionally reduced to 26 car spaces.
- A new character more closely aligned with Garden Close proposed with consistent high quality design style and materiality to all new buildings which vary in scale and form to provide a unified yet varied backdrop to the listed buildings.
- Railway block re-designed to facilitate a more generous public realm, including new access/connectivity route to the existing public stairs and provide an active frontage along the northern alleyway, with new boundary treatment and landscaping.
- A more casual and rustic landscaping scheme proposed in terms of layout, surfacing, and more informal, integrated play equipment and features. Landscape proposals centred around a new public heritage courtyard around the listed buildings including a heritage plaque to provide an enhanced setting for the assets and increase public accessibility.

- All proposed dwellings are dual-aspect.
- The primary façade material for new building is brick.
- The roof terrace omitted from the railway block in favour of green roofs to prevent overlooking towards Eversley Crescent, a small number of oriel window are also used for the same purpose.
- The Farmhouse is retained as one dwelling.
- The Leaning Barn conversion is designed with a buttress feature for structural support.
- More than 20% of dwellings are proposed as 3-bedroom.
- Connectivity and public realm improvements are central to the revised scheme with new dedicated pedestrian access to West End Road and a landscaped, linear walking route linking from Garden Close through the new heritage courtyard to the public staircase and existing PROW. This enables enhanced permeability to Ruislip Station and the Town Centre for the wider community.

3.10 Further details on how the proposed scheme's design has responded to the pre-application feedback is provided within the DAS and the Heritage and Townscape Visual Impact Assessment.

4.0 **STATEMENT OF COMMUNITY INVOLVEMENT**

4.1 The Applicant has sought to undertake pre-submission engagement with relevant local residents and stakeholders. The details of this engagement are set out below along with how this engagement has influenced the final scheme.

**Public Engagement**

4.2 On 12 June, public consultation leaflets were delivered to the addresses around the Application Site along Eversley Crescent, Shenley Avenue, Willow Grove and Garden Close.

4.3 The scheme details outlined on the leaflet reflected the scheme which had been submitted to the London Borough of Hillingdon for pre-application engagement and which the Applicant was still awaiting feedback on at the time. Residents were requested to submit comments by email by 12 July 2024.

4.4 Responses from five members of the public were received. These are summarised in the below table.

Summary of Comments
Requests for full details of the new proposals and clarity on when the application will be submitted.
Concerns about removal of mature hedgerow along West End Road and increased prominence of existing poor quality flat buildings.
Six storeys is too tall and should be reduced.
Requested more details of the railway block and raised concerns about loss of privacy and sunlight and the effect on property values.
Queried why the tall building was not being put by West End Road.
Requested information on the current status of the site as was concerned about emergency services attending the site.



Requested more information on the two buildings at the entrance of Garden Close near the West End Road roundabout. Queried whether these are to be houses / flats & if it would involve The Lodge being demolished.

Advised that the changes look very positive. Queried details on traffic management during construction and after, how green spaces, trees etc will be preserved or enhanced and how the proposals will reduce the impact of the environment during construction and afterwards.

### **Local Councillor Engagement**

4.5 Following the leaflet drop, on 24 June 2024, the Applicant was contacted by local ward councillors with a suggestion to meet to discuss the proposals.

4.6 A site meeting was undertaken on 13 August 2024 with a site walkover of the Barn Hotel grounds to discuss the proposals. Councillors Douglas Mills and Susan O'Brien of Ruislip Manor Ward along with Councillor Philip Corthorne of the Ruislip Ward were in attendance.

4.7 Feedback was provided verbally on site and included sentiments that the Councillors:

- Want something to be done to the Site.
- Want the listed buildings to be conserved.
- Raised concerns on behalf of the residents to matters such as overlooking and privacy.
- Generally pleased with how the scheme has moved on and has been reduced.
- Highlighted the need to re-generate the entrance area to Garden Close due to complaints of anti-social behaviour.

### **Ruislip Residents' Association**

4.8 Following the ward councillor site meeting, the Applicant was put in contact with the planning lead for the Ruislip Residents' Association. The RRA seeks to protect and represent the interests of local residents. The RRA website provides updates on relevant planning matters to local residents with an update on The Barn Hotel last published on 26 July 2024.

4.9 The Applicant met the planning representative of the RRA on site on 16 August 2024 to outline the proposals. Only informal, verbal feedback was provided at the meeting, but the general perception was that the RRA welcomes a sensitive and positive development on the Site and that the current proposals with heights limited to four-storeys were considered of interest.

### **Ruislip, Northwood and Eastcote Local History Society (RNELHS)**

4.10 The Applicant contacted a representative from the RNELHS and offered to facilitate a site meeting to outline the proposals which was subsequently held on 5 September. The RNELHS raised their concerns about the sensitivity of the Site and the Applicant talked through the amended scheme proposals. The impression of the verbal feedback received was that, on balance, the Applicant has listened to the previous concerns and issues and the revised scheme sought to respond to the Site's sensitivities.

### **Influence on Final Proposals**

4.11 As a result of public and stakeholder engagement, the proposals have been reduced significantly in height and bulk. The roof terrace has been omitted from the railway block in favour of green roofs to prevent overlooking, or perceived overlooking, towards Eversley Crescent and a small number of oriel window are also used for the same purpose.

4.12 The scheme has been designed to provide new public routes and open space around the heritage assets on the Site to enable the wider public to appreciate their significance and feel more connected to the Site.

4.13 The Applicant welcomes continued engagement with the public and stakeholder during the application determination process.



5.0 **RELEVANT PLANNING POLICY**

5.1 Policies from the relevant adopted Development Plan Documents (DPDs) are summarised below.

**Hillingdon Local Plan (HLP): Part One – Strategic Policies (2012)**

5.2 Relevant policies from this DPD include:

- Policy H1 Housing Growth
- Policy H2 Affordable Housing
- Policy HE1 Heritage
- Policy BE1 Built Environment
- Policy EM1 Climate Change Adaptation and Mitigation
- Policy EM4 Open Space and Informal Recreation
- Policy EM6 Flood Risk Management
- Policy EM7 Biodiversity and Geological Conservation
- Policy EM8 Land, Water, Air and Noise
- Policy T1 Accessible Local Destinations

**HLP: Part Two - Development Management Polices (2020)**

5.3 Relevant policies from this DPD include:

- Policy DME 5 Hotels and Visitor Accommodation
- Policy DMH 2 Housing Mix
- Policy DMH 7 Provision of Affordable Housing
- Policy DMHB 1 Heritage Assets
- Policy DMHB 2 Listed Buildings
- Policy DMHB 11 Design of New Development
- Policy DMHB 12 Streets and Public Realm
- Policy DMHB 12 Housing Standards
- Policy DMHB 17 Residential Density
- Policy DMHB 18 Private Outdoor Amenity Space

- Policy DMHB 19 Play Space
- Policy DMEI 9 Management of Flood Risk
- Policy DMEI 14: Air Quality
- Policy DMCI 4 Open Spaces in New Development
- Policy DMCI 5 Children’s Play Areas
- Policy DMCI 7 Planning Obligations and CIL
- Policy DMT 1 Managing Transport Impacts
- Policy DMT 5 Pedestrians and Cyclists
- Policy DMT 6 Vehicle Parking

### **HLP: Part Two – Site Allocations and Designations (2020)**

5.4 The Application Site is not allocated for development and therefore no policies from this DPD are relevant to the proposed scheme. However, Section 7 sets out Community Infrastructure information.

### **London Plan (2021)**

5.5 Relevant policies from this DPD include:

- GG2 Making the Best Use of Land
- GG4 Delivering the Homes Londoners Need
- Policy E10 Visitor Infrastructure
- Policy D3 Optimising Site Capacity Through the Design-led Approach
- Policy D5 Inclusive Design
- Policy D6 Housing Quality and Standards
- Policy D7 Accessible Housing
- Policy D8 Public Realm
- Policy S4 Play and Informal Recreation
- Policy SI1 Improving Air Quality
- Policy SI4 Managing Heat Risk
- Policy SI12 Flood Risk Management
- Policy SI13 Sustainable Drainage

- Policy H1 Increasing Housing Supply
- Policy H10 Housing Size Mix
- Policy H4 Delivering Affordable Housing
- Policy H10 Housing Size Mix
- Policy G4 Urban Greening
- Policy G6 Biodiversity and Access to Nature
- Policy G7 Trees and Woodlands
- Policy SI4 Managing Heat Risk
- Policy T5 Cycling
- Policy T6.1 Residential Parking
- Policy HC1 Heritage Conservation and Growth

### **National Planning Policy Framework (2023) (NPPF)**

- 5.6 The NPPF is a material consideration in decision-making and sets out the national policy approach to matters such as the assessment of heritage impacts.
- 5.7 The NPPF advocates for supporting sustainable development, encouraging the efficient use of land, focusing development in sustainable locations and achieving well designed places.

6.0 **THE PROPOSED SCHEME**

6.1 The proposals have been a design-led iterative process to develop a sensitive and attractive scheme which responds to local context, including the Site’s heritage significance, and will add positively to the quality of the area.

6.2 The description of development is:

*Partial demolition of 1no. Grade II Listed Building and conversion of listed buildings to provide 3no. dwellings. Demolition and redevelopment of the remainder of the site for residential use with associated infrastructure, public open space and landscaping.*

6.3 The application scheme comprises the following elements:

- Demolition of modern hotel buildings, with retention of the historic listed buildings.
- Erection of new built form comprising:
  - o Gate Houses: 2 x 2-storey dwellinghouses.
  - o Entry Building: 3-storey building to provide 12 flats.
  - o Railway Building: 2-storeys rising to 4-storeys providing 41 flats.
  - o Maisonette flats to provide 14 flats.
- Conversion of the listed buildings to provide:
  - o Farmhouse: 1 x 4-bed dwellinghouse.
  - o Leaning Barn/Oak Room: 2 x flats.
- Overall provision of 72 dwellings with the following mix:

Dwelling Size	Quantity	%
Studios	4	5.6%
1-Beds	32	44.4%
2-Beds	21	29.2%
3-Beds	14	19.4%
4-Beds	1	1.4%
<b>TOTAL</b>	<b>72</b>	<b>100%</b>



- 11% of dwellings as M4(3) and the remainder (85%) as M4(2) with the exception of the listed building conversions which are only possible as M4(1).
- Private balconies or gardens for the majority of new dwellings with communal gardens for the maisonettes.
- New Public Open Space comprising the heritage square creating a setting around the listed buildings.
- Reduced car parking ratio of 0.36 spaces per dwelling to reflect the Site's PTAL and enhance the Site setting/landscape.
- 125 long stay cycle parking spaces and 3 short stay spaces.

6.4 Overall, the proposals aim to contribute to urban repair and provide the former hotel site and its heritage assets with the most viable new use to ensure their long-term appreciation and conservation, whilst delivering much needed new homes for Ruislip.

## 7.0 **PLANNING ASSESSMENT**

### **Principle of Development**

#### Loss of Hotel Use

7.1 The current lawful use of the Site is as Class C1 Hotel. London Plan Policy E10 outlines that in outer London, serviced accommodation should be promoted in town centres and within Opportunity Areas. Local Plan Policy DME 5 states that visitor accommodation is supported in accessible sustainable locations as defined in the Site Allocations and Designations document.

7.2 The Application Site is not within a Town Centre, Opportunity Area, or a dedicated area identified for hotel growth. As such, there is no direct policy conflict with the loss of the hotel use. Within this context the principle of the change of use can be supported and this is the position taken by the LPA in the previous application and re-affirmed at the pre-application stage for this submission.

7.3 Furthermore, the hotel has been closed since the end of 2023 and the Site, most notably the listed buildings require significant maintenance and improvements as identified by the Structural Report which accompanies this submission. This makes any prospect of the hotel use re-opening on the Site unfeasible and also means residential development is the optimum viable use for the Site when considering heritage asset preservation.

#### New Residential Development

7.4 All levels of planning policy support delivering new housing and making best use of previously developed land to deliver additional housing, particularly in sustainable locations. The current Government has also made a

- commitment to delivering 1.5 million new homes over the next 5 years, equating to 300,000 homes per year.
- 7.5 The NPPF requires planning decisions to give substantial weight to the value of using suitable brownfield land within settlements for homes and promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing.
- 7.6 The proposals seek the comprehensive redevelopment of the former hotel Site to provide a high-quality residential scheme immediately adjacent to a transport hub. Such sustainable development must be supported in principle.
- 7.7 The proposed scheme is therefore acceptable in principle subject to consideration of heritage, design and technical matters which are outlined below.

### **Proposed Density**

- 7.8 When applying the Density Matrix under Policy DMHB 17, the Site has a PTAL rating of 4 and immediately abuts a town centre boundary within 200m of an underground station which gives it the character of an urban, town centre density of development where a higher density is appropriate.
- 7.9 The LPA has previously recognised this and applied the density value of between 495 - 1,100 habitable rooms per ha and between 165 - 405 units per ha for a scheme of mostly flatted accommodation. However, it is recognised by both the LPA and the Applicant that the Site accommodates Grade II listed buildings which makes this a sensitive location. As such, the residential density should ultimately be determined by a design led approach. London Plan Policy D3 also advocates for this design-led approach to increasing density.

7.10 Nevertheless, the below table provides a comparison between the scheme evolution on the Site to compare proposed densities. This shows that the current proposals are far below the density range for this Site which reflect the sensitive approach which has been taken.

Scheme	Density (at 0.96ha)
Refused Scheme – 96 units	99dph
Pre-app – 78 units	81dph
Application Proposals – 72 units	75dph

7.11 The current proposals are a fundamental Site re-design to create a protected setting (a heritage square) around the heritage assets and provide more visual openness and landscaping. The approach to massing and dwelling density is drastically different with a maximum height of four-storeys on just part of the railway building with the majority of new built form being restricted to 2-storeys.

7.12 Furthermore, the former hotel use comprises 73-bedrooms and as part of this application 72-dwellings are proposed which is similar in functional activity.

7.13 This design-led approach is considered to strike an appropriate balance between aspirations to make efficient use of the Site, reflective of its accessibility, whilst protecting and enhancing the heritage sensitivity of the Site in a design-led approach that respects the historic character and appearance of the Site and the context of the wider local area. The proposal is therefore considered to accord with Local Plan Policy DMHB 17 and London Plan Policy D3.

## **Design & Character**

- 7.14 Policy DMHB 11 requires all development to be designed to the highest standards and incorporate principles of good design, including harmonising with the local context and protecting features of positive value within and adjacent to the Site. This policy aspiration must be balanced against London Plan Policy D3 which requires development to make best use of land and promotes increased densities, particularly on sustainable urban sites like this. Nevertheless, any redevelopment should still be design led and appropriate to local context and other considerations, which in this case are the onsite heritage assets.
- 7.15 The current proposals have been design led from the outset to focus on the creation of an enhanced setting around the Assets to better reveal the special and valued features of this unique Site. A dedicated landscape setting is proposed to be created around the assets to enhance opportunities for public views and appreciation of the assets and provide a physical and visual separation from surrounding new, built form. Following the recent pre-application engagement, the scale of development around the assets has been further reduced.
- 7.16 The maximum storey height on Site is now 4-storeys (14.1m) for only part of the railway block nearest West End Road. Heights on the remainder of the Site are limited to 2 to 3-storeys with all built form set away from the listed buildings to enable a protected setting in the form of the heritage square to be created around the assets. All new buildings utilise a consistent palette of materials which are in contrast to the central heritage buildings but are restrained and reflective of surrounding more modern built form.
- 7.17 The layout and arrangement of built form also enables an activation of the Site with West End Road by providing the gate houses as an entry feature with new landscaped pedestrian routes into the main Square immediately

adjacent to the Entry Block. Similarly, a pedestrian route through the Site is created to the existing public right of way (PROW) and staircase which provides a new connection from the surrounding residential housing to the train station and town centre via an attractive and welcoming area of public realm. Whilst the removal of the boundary wall to the existing, adjacent PROW and activation of this frontage with windows and private amenity spaces looking out onto this pedestrian route will make this area feel more public, safe and usable as a gateway into this area of Ruislip. This is a public benefit weighing in favour of the proposals.

- 7.18 The Entry Block is designed to appear as a completion of the urban block with 1-36 Garden Close whilst maintaining a core relationship with the Application Site as an attractive and welcoming element of built form. The proposed low-rise maisonettes along the eastern edge of the Site contribute to activation of this boundary by establishing a back-to-back relationship with the existing dwellings on Eversley Crescent.
- 7.19 Full details on the design rationale and response are set out within CYMK's Design and Access Statement, the Landscape Plan and the application drawings.
- 7.20 A visual assessment is also undertaken within the Heritage, Townscape & Visual Impact Assessment. This considers the potential changes to visual amenity of people experiencing views of the Site using a worst-case scenario and finds the development will have a minor effect on views which will either be beneficial in nature or of a negligible effect.
- 7.21 The overall effect of the design approach is a fundamental improvement to the existing Site in terms of layout, permeability, materiality, appearance and landscape character. The proposals establish a unifying character across the varied new building typologies (low and mid-rise) which relates well to one

another as well as the heritage assets and their character, as well as the character of the wider surrounding area.

- 7.22 On this basis, it is considered that the proposals will respect and enhance the local character and the features of positive value within the Site whilst making an efficient use of this sustainable, vacant brownfield site in accordance with Local Plan Policies DMHB 11 and DMHB 12 and London Plan Policy D3.

### **Landscaping & Public Realm**

- 7.23 London Plan Policy D8 outlines that development proposals should encourage and explore opportunities to create new public realm where appropriate. Public realm should be well-designed, safe, accessible, inclusive, attractive, well-connected, related to the local and historic context, and easy to understand, service and maintain. It should also create a sense of place and maximise its contribution to active travel.
- 7.24 Under Local Plan Policy BE1 the Council 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 serves the long-term needs of all residents. This is achieved by development being designed to be appropriate to the identity and context of the area and achieving 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 creates a sense of place.
- 7.25 A detailed, annotated Landscape Plan accompanies the application outlining the rationale to the landscaping approach including pathways, settings and spaces, opportunities for play, boundary treatments, trees and planting and hardstanding.



7.26 The landscape scheme is rustic-inspired, with casual landscaping features and surfacing, including informal play equipment to resonate with the historic setting these listed buildings would have enjoyed, whilst being functional as new public open space. Some private garden areas for the converted listed building dwellings are sensitively enclosed from the public square by proposed hedgerows and estate rail style fencing. This will provide privacy to future occupiers of these dwellings whilst simply appearing as a landscaped backdrop from the public areas.

7.27 As set out in the Heritage and Townscape Assessment, the proposed landscaping is considered to provide a public benefit by enhancing the setting of the listed buildings.

7.28 Overall, the landscaping proposals for the development ensure that the scheme will be high quality and will harmonise with the local context whilst also enhancing the Site's ecological value in accordance with Local Plan Policies DMHB 11 and DMHB 14 and London Plan Policies D4 and G5 to G7.

### **Heritage & Townscape**

7.29 Local Plan Policy HE1 states that the Council will conserve and enhance Hillingdon's distinct and varied environment, its settings and the wider historic landscape, which includes designated heritage assets such as statutorily Listed Buildings and Conservation Areas. The Council also actively encourages the regeneration of heritage assets.

7.30 Policy DMHB 1 outlines that development which has an effect on heritage assets will only be supported where the proposal would relate appropriately in terms of siting, style, scale, massing, height, design and materials and does not compromise the setting of the asset. National and London Policy require great weight to be given to assets' conservation regardless of the level of

- harm caused. Under the NPPF, less than substantial harm should be weighed against the public benefits of the proposal.
- 7.31 The Site has two on-site heritage assets – the Grade II listed Sherley’s Farmhouse and the Barn and Outbuildings to South East of Sherley’s Farmhouse (known as the Leaning Barn and the Oak Room). Two further heritage assets are in proximity of the Site, the Grade II Ruislip Station with associated footbridge and signal box located approximately 50m north of the Site and Ruislip Village Conservation Area – located approximately 100m north of the Site.
- 7.32 The NPPF sets out the policy approach to identifying heritage harm, and if such harm is identified, balancing this harm again public benefits whilst giving great weight to assets’ conservation.
- 7.33 The proposed scheme includes for a substantial extent of on-site demolitions of detached, curtilage listed buildings and also demolitions to more modern extensions around the Leaning Barn and Oak Room. The approval of the Listed Building Consent (LBC) (LPA Ref. 7969/APP/2023/1833) established the principle of the scope of proposed demolitions at the Site.
- 7.34 However, developing a new build and conversion scheme which is appropriate to the setting of the onsite heritage assets has been at the centre of these revised proposals.
- 7.35 A Heritage, Townscape and Visual Impact Assessment accompanies the application to undertake the required assessment of the heritage impacts of the proposed scheme.
- 7.36 The assessment looks at the historic development of the Site and its surroundings. For the Site itself this identified that the original listed

buildings on the Site date to the 17th century with all extensions and additions being added post 1940 to as recently as this millennia. An Assessment of significance for all relevant assets is also undertaken. For both on-site heritage assets their significance is considered to derive from their architectural and historic interest as 17th century farm related buildings. This interest is limited, however, by the extensive evidence of alterations to the assets' historic fabric, layouts and use. Collectively the assets also derive significance as a group given their former farmstead use. This group value is, however, severely undermined by a limited ability to appreciate the spatial, architectural and functional relationship between the assets, caused by the obscuring presence of modern extensions to the Leaning Barn and Oak Room. A heritage opportunity is identified for this group value to be revealed and made legible through the removal of these detractive extensions. The setting of the assets is also considered to be ill defined due to the encroachment of newer development. As a result, the value of the assets as part of a historic farmstead is limited for the Farmhouse and very limited for the Leaning Barn and Oak Room.

- 7.37 The Assessment of the effect of the development proposals can be summarised as set out below.
- 7.38 From a townscape perspective, the new buildings present a high-quality design which will contribute interest to views in this location. The most prominent visual impact of the development will be in views looking south along West End Road from the bridge. Here, the proposed development will facilitate an improved and generous public realm at the north-western corner of the Site and provide a gateway which will better define the approach to and from Ruislip town centre and the station. Limited parts of the proposed development will also be visible from the residential areas along Eversley Crescent and Garden Close. The scheme design in terms of form and materiality, mitigates the visual impact of additional massing, allowing it to

- improve the composition of the view by indicating the town centre in the background of the view, without distracting from the aesthetic value of existing residences.
- 7.39 From a heritage aspects, the proposal takes the opportunity to improve the Site's existing architectural and landscape quality and better express its significance as a site of heritage value. The proposed scale, form and arrangement of the new buildings has been designed to mitigate the presence of additional massing within the setting of the listed buildings. The development is laid out to position new built form away from the listed buildings, orientated to frame the open space immediately surrounding the buildings, facilitating a greater reinstatement of open space around the assets.
- 7.40 Whilst care has been taken to ensure the design of the new buildings is responsive to the setting of the listed buildings, the scale of additional massing is considered to impact the character of the setting. As such, the proposed new buildings are considered to cause some less than substantial harm to the setting of the listed buildings. However, this harm is considered to be mitigated by enhancements to the condition of the listed buildings with regards to their improved quality and the removal of detractive partitions to the Leaning Barn/Oak Room, as well as the establishment of an open green setting to the buildings.
- 7.41 The assessment concludes that, on balance the harm to the setting of the listed buildings within the Site is considered to be mitigated by the proposed enhancement to both the fabric of the listed buildings and their setting.
- 7.42 Overall, whilst giving 'great weight' to the less than substantial harm (as required by NPPF paragraph 205), the harm is assessed to be a low level of

less than substantial harm. This level of harm is judged to be outweighed by the public benefits promoted by the proposed development.

7.43 Further to those outlined in the Heritage Assessment, the overall public benefits of the development are considered to be:

- The sustainable delivery of additional housing on a brownfield site located close to the town centre and adjacent to the station.
- Provision of 72 homes to meet housing needs.
- Enhancements to the Site's landscape setting and quality.
- Provision of a new public open space and new public realm.
- Providing an activated frontage onto the adjacent PROW to increase the safety and usability of this pedestrian link.
- Provision of a new public route through the Site via attractive public realm providing greater pedestrian permeability for the area.
- Securing the optimal viable use of the heritage assets.
- Enhancing public access to the heritage assets enabling better appreciation of their significance, including through provision of a heritage plaque within the Heritage Square.

7.44 Within this context, there is no conflict with Local Plan Policy HE1, London Plan HC1 or the NPPF in terms of heritage impact.

### **Archaeology**

7.45 Local Plan Policy DMHB 7 states that the Council, as advised by the Greater London Archaeological Advisory Service, will ensure that sites of archaeological interest within or, where appropriate, outside, designated areas are not disturbed. If that cannot be avoided, satisfactory measures must be taken to mitigate the impacts of the proposals through archaeological fieldwork to investigate and record remains in advance of development

- works. This should include proposals for the recording, archiving and reporting of any archaeological finds.
- 7.46 The report concludes that archaeological remains are anticipated on the Site and these could be adversely impacted by the proposals.
- 7.47 It is therefore likely that if permission was granted, an archaeological evaluation via trial trenching would be required, sought through a suitably worded pre-commencement condition.
- 7.48 This is what was recommended in the previous application by The Greater London Archaeological Advisory Service (GLAAS) which states:
- “in this case consideration of the nature of the development, the archaeological interest and/or practical constraints are such that I consider a two-stage archaeological condition could provide an acceptable safeguard. This would comprise firstly, evaluation to clarify the nature and extent of surviving remains, followed, if necessary, by a further investigation.”*
- 7.49 GLAAS also previously noted that *“The site also has potential for public engagement with local heritage - for example by on-site interpretation and engagement of local community groups such as a school, older people or an arts or historical society.”* This potential has been realised with the current scheme by proposing a heritage plaque within the new public heritage square, full details on this are to be conditioned.
- 7.50 This is clearly a heritage matter which can be adequately mitigated and therefore does not change the overall heritage public benefits balance undertaken at paragraph 7.41 or the conclusions of compliance with relevant heritage policy.

## **Housing Mix**

- 7.51 Policy DMH 2 requires a mix of different sized housing units to reflect the Council's latest information on housing need. In assessing the previous application, the Officer's report states that "*Major developments should deliver a minimum of 20% 3-bed or more units in accordance with the needs identified with the Councils Strategic Housing Market Assessment*". This is not an absolute policy requirement, but is a clear expectation based on identified need in the SHMA. This was re-iterated during pre-application engagement.
- 7.52 The proposed scheme provides 21% of dwellings as 3+bedroom units, one of which is a flexible 4-bedroom dwelling with a ground floor bedroom, in accordance with the LPA's expectations. The remainder of dwellings are a mix of one and two-bedroom units, including a small number of studios, which is considered appropriate to the Site's highly accessible location adjacent to Ruislip station.
- 7.53 The proposed dwellings are therefore considered to provide a mix of different housing unit sizes in accordance with Policy DMH 2.

## **Affordable Housing & Viability**

- 7.54 London Plan Policy H4 requires that boroughs should seek 50% of all new homes delivered across London to be genuinely affordable.
- 7.55 Local Plan Policy DMG 7 requires developments with a capacity to provide 10 or more units to maximise the delivery of on-site affordable housing, subject to viability, as a minimum 35% of all new homes on sites of 10 or more units should be delivered as affordable housing.

- 7.56 The application proposals have been viability tested to assess the level of planning obligations the scheme can reasonably sustain, including affordable housing provision.
- 7.57 The Financial Viability Assessment (FVA) concludes that providing a scheme of 100% private housing falls short of delivering a recognised acceptable level of profit, including any on-site affordable housing would only reduce this profit level further rendering the proposals unviable.
- 7.58 The reduction in viability can largely be attributed to the reduced density of development on-site which has been a necessary response to the on-site heritage constraints. The proposals have been design-led to establish the maximum, appropriate scale of development whilst prioritising and enhancing the significance of the listed buildings, as encouraged by all levels of policy and during engagement with the LPA.
- 7.59 As such, with the quantum of development proposed on this brownfield site, it is regrettably not viable to provide any affordable housing with the development. This policy conflict attracts negative weight in the planning balance which must be weighed against the planning benefits of the scheme including the provision of a range of market housing with a policy compliant mix of housing to best meet needs within the Housing Market Area.

### **Private Amenity Space**

- 7.60 Policy DMHB 18 outlines that all new residential development and conversions will be required to provide good quality and usable private outdoor amenity space. Table 5.3 outlines the target amenity space standards. Policy DMHB 18 also requires that balconies should have a depth of not less than 1.5 metres and a width of not less than 2 metres and that



- non-street facing ground floor units have a defensible space at least 3 metres in depth in front of any habitable room/bedroom window.
- 7.61 The supporting text confirms that dwellings on upper floors should all have access to a private balcony or terrace, where this is consistent with the overall design of the building. Houses and ground floor flats should have private gardens. Communal provision of private outdoor space is generally not supported unless there are strong planning reasons, and the proposed scheme is of high quality with clear planning merits. Roof gardens should only be considered where balconies are not achievable.
- 7.62 However, the London Plan which is the more up-to-date development plan document requires lower private amenity provision of a minimum of 5 sqm of private outdoor space should be provided for 1-2 person dwellings, an extra 1 sqm. should be provided for each additional occupant, and it must achieve a minimum depth and width of 1.5m.
- 7.63 However, London Plan paragraph 3.6.9 also states that private outside space should be practical in terms of its shape and utility, and care should be taken to ensure the space offers good amenity. All dwellings should have level access to one or more of the following forms of private outside spaces: a garden, terrace, roof garden, courtyard garden or balcony. The use of roof areas, including podiums, and courtyards for additional private or shared outside space is encouraged.
- 7.64 Each new dwelling within the flat blocks is provided with a dedicated area of private amenity space in exceedance of the London Plan standards by either a balcony or ground floor terrace. Each balcony also has a depth greater than 1.5 metres and a width of more than 2 metres in accordance with the remainder of policy DMHB 19. All dwellinghouses (the gatehouses and listed building conversion) are provided with more generous private gardens.

Further, the four maisonettes backing onto Garden Close share a 91sqm garden area and the 10 maisonettes backing onto Eversley Crescent share a 277sqm communal garden. This is considered to provide a better quality provision of amenity space that will be more usable than segregated, smaller private areas. It also has a landscape benefit through less boundary treatments.

- 7.65 The under provision of private amenity space must be weighed against the design and heritage benefits of creating the generous public open space at the centre of the Site which will ensure all residents have immediate access. Therefore, the overall provision of amenity space is considered to be appropriate for the Site despite falling below local policy requirements.

### **Open Space**

- 7.66 Local Plan Policy DMCI 3 outlines that proposals for major new residential development will be supported where they make provision for new open space which meets the needs of future occupiers and contributes to the mitigation of any local deficiency.
- 7.67 Policy DMHB 19 further requires that residential development resulting in an occupancy of ten or more children is also required to provide children's and young people's play facilities on-site with further details set out by Policy DMCI 5. This includes that, where possible, children and young people should be within 400m of an equipped playground.
- 7.68 The proposed Heritage Square as a public open space is 0.2 hectares with additional public realm around it including the linear, landscaped walk providing a connection to the existing PROW. This is a generous public open space offering for a 0.96 hectare site at 21% of the Site area and goes some way to offsetting the lower provision of private amenity space for the dwellings. The open space will also have good level of passive surveillance

- and will be a welcoming and safe space that is likely to be well used by existing residents in the area, particularly as it is a pedestrian through route to the town centre and train station.
- 7.69 The proposed open space will provide some informal play equipment but not a formal equipped playground. The Site is, however, within 500 metre walking distance of Shenley Park which has a well-equipped playground. This provision is considered acceptable in this circumstance due to the setting impact formal play space could have upon the heritage assets.
- 7.70 Overall, the proposed scheme is considered to provide a new high quality open space provision in accordance with Policy DMCI 3.

### **Highways & Parking**

- 7.71 The Application Site is in a sustainable location immediately south of Ruislip Station and within short walking distance of Ruislip Town Centre.
- 7.72 A Healthy Streets Transport Statement (HSTS) has been prepared by Paul Basham Associates and outlines site accessibility, servicing arrangements, visibility and access arrangements, parking provision and the impact of the proposed scheme on the local road network. These matters are summarised in turn below.

### Site Accessibility

- 7.73 The HSTS looks at all elements of accessibility for the Site and concludes that the Site is located in proximity to a number of local facilities, pedestrian infrastructure and public transport connections. The Site meets the definition of a 'walkable neighbourhood' meaning the Site is highly accessible in terms of access to amenities and is easily accessible by public transport with a PTAL rating of 4. There are frequent public transport services which operate to local

stations and provide a connection into Central London. The Site therefore presents an excellent opportunity to promote a sustainable development to future site users.

### Visibility

- 7.74 The HSTS demonstrates that safe and suitable access is achievable, from both the re-use of the existing West End Road access and the new Garden Close access, without causing detriment to the safety or operation of the local road network.

### Servicing arrangements

- 7.75 A refuse strategy details bin carry distances for residents (not exceeding 30m) and refuse operators (not exceeding 25m) as well as where management company staff will intervene to transfer bins to the relevant collection points on a weekly basis.

### Parking Provision & Management

#### *Car Parking*

- 7.76 London Plan Policy T6 outlines a maximum parking ratio of 0.5-0.75 parking spaces per dwelling for developments in Outer London with a PTAL of 4. For the proposed 72 dwellings, this equates to a maximum requirement of 36-54 spaces. The development provides 26 parking spaces including 8 accessible spaces to directly serve the 8 accessible dwellings which is a parking ratio of 0.36. However, all spaces will have active charging facilities exceeding policy requirements.

- 7.77 The HSTS confirms that this reduced parking ratio is considered acceptable due to the accessible location of the Site and the opportunity to encourage sustainable travel for future residents and visitors.
- 7.78 Car parking will also be monitored and managed via a management company. All residents will be issued with detailed car parking guidance on occupation which will include details regarding the restrictions on the use of car parking spaces, signage will be installed by the parking spaces and the management company will be empowered to enforce restrictions on vehicles parking inappropriately. These measures are considered to allow a combination of both passive and active management of the proposed development parking provision. Parking provision will be reviewed on an annual basis to ensure parking is efficiently and fairly provided.
- 7.79 One accessible parking space will be assigned directly to each of the eight accessible dwellings, with numbered spaces allocated accordingly. The provision of accessible spaces will be monitored by the management company to ensure the appropriate provision is maintained.
- 7.80 A Travel Plan also accompanies the submission, as set out below, to reinforce sustainable travel patterns.

#### *Cycle Parking*

- 7.81 Policy T5 of the London Plan sets out the minimum cycle parking standards for residential developments. Using these standards the development would require 114 long-stay spaces and 3 short-stay spaces. The proposed development provides 125 long stay cycle parking spaces across three separate secure stores and 3 short stay spaces. As such, the proposals exceed the minimum standards.

### Impact on the Road Network

- 7.82 The HSTS finds that from comparing existing and proposed vehicle trip generation that the proposed development is expected to have a very modest impact and will not cause detriment to the existing safety or operation of the local road network. This has also been confirmed by the Local Highway Authority in considering the previous application and pre-application proposals which were both for a greater quantum of development and parking.

### Transport Summary

- 7.83 Overall, it is considered that the proposal would not raise any measurable highway safety concerns or parking stress and provides compliant cycle parking in accordance with Local Plan Policies DMT 1, DMT 2 and DMT 6 as well as London Plan Policies T4, T5 and T6.

### **Travel Plan**

- 7.84 In accordance with TfL guidance, a Framework Travel Plan (TP) has also been prepared by Paul Basham Associates to support the planning application. A number of key objectives are set out and a number of measures are proposed, primarily focusing on cycling and walking for shorter journeys and car sharing, and travel by bus/rail for longer distance journeys.
- 7.85 The TP confirms that a Travel Plan Co-ordinator (TPC) will be appointed to oversee the implementation of all aspects of the TP. The TPC will raise awareness of sustainable travel and encourage changes in behaviour through effective communication strategies. The TPC will organise surveys to obtain accurate baseline information against which the final TP targets will be set and liaise with the LPA's Travel Plan Officer to ensure targets and measures

are fully agreed. Monitoring reports will be undertaken bi-annually and the findings will be published to residents and other interested parties.

- 7.86 Overall, it is considered that the development as a whole has maximised available opportunities to increase levels of sustainable travel.

### **Accessibility**

- 7.87 London Plan Policy D7 requires 10% of dwellings to be M4(3) and all other dwellings to be M4(2). The proposed scheme included 11% of dwellings as M4(3) in full compliance with this policy requirement.

- 7.88 All M4(3) dwellings are proposed in the Entry Block which is directly opposite the dedicated disabled parking provision for these units and with easiest access to the step-free pedestrian route to West End Road at the main entrance.

- 7.89 All other dwellings are to be M4(2) as required, except the conversions of the listed buildings which require some leniency and can only achieve M4(1) due to their heritage constraints.

- 7.90 As such, the proposals accord with Policies D5 and D7 of the London Plan.

### **Daylight and Sunlight**

- 7.91 London Plan Policy D6 sets out that single aspect dwellings should only be provided where it is considered a more appropriate design solution than a dual aspect dwelling to meet the requirements of optimising site capacity in areas appropriate for high density development and if it can be demonstrated that it will have adequate passive ventilation, daylight and privacy, and avoid overheating.

7.92 The revised scheme omits all single aspect units with all new dwellings on site proposed as dual aspect as a minimum.

7.93 A Daylight and Sunlight assessment for the proposed dwellings and sunlight to proposed amenity spaces has been undertaken. A separate report to assess impact on the surrounding existing residential properties is outlined later in this section.

7.94 The report for the occupiers of the proposed dwellings concludes that:

- Daylight and sunlight to 193 habitable rooms across the proposed development were assessed.
- All rooms within the new built form assessed for daylight show excellent adherence to the BRE Guidelines. The only 3 rooms which do not fully comply are within the listed building which have been designed with the existing structure in mind whilst maximising daylight availability.
- For sunlight, the proposed development shows good adherence to the BRE Guidelines for sunlight exposure, with the majority of the main living areas meeting or exceeding the BRE's criteria for sunlight availability.
- The majority of the proposed amenity spaces will meet or exceed the BRE's guideline values on the 21 March assessment date for sunlight. All of the assessed amenity spaces achieve very good levels of sunlight amenity in the summer months, when the spaces are more likely to be used and enjoyed.

7.95 Overall, the report concludes that the layout of the proposed development follows reasonable application of the BRE Guidelines and will provide very good daylight and sunlight conditions within the proposed accommodation. As such, there is no conflict with London Plan Policy D6.

### **Energy, Overheating & Sustainability**



## Energy

7.96 London Plan Policy SI 2 seeks for major development to be zero carbon but a minimum on-site reduction of at least 35 per cent beyond Building Regulations is required. Local Plan Policy DMEI 2 requires all major development proposed to minimise carbon dioxide emissions and be accompanied by an energy assessment. Policy DEMI 3 further seeks developments to be able to connect to a decentralised energy network.

7.97 The Energy Statement for the scheme outlines that an energy strategy has been formulated following the London Plan Energy Hierarchy: Be Lean, Be Clean and Be Green. Key points from the strategy are that:

- The proposed development to significantly reduce regulated CO<sub>2</sub> emissions by 13% over the Part L 2021 baseline through energy efficiency measures alone. These include very well insulated building fabric, efficient mechanical ventilation systems and low energy lighting throughout.
- For the listed buildings sensitive improvements to thermal performance will result in approximately 18% CO<sub>2</sub> emissions reduction over the baseline scenario determined by Part L 2021 limiting values for existing dwellings.
- The proposed scheme will achieve an improvement on total regulated carbon dioxide emissions over the baseline scenario of over 73%, exceeding the London Plan carbon emissions reduction target of 35%.
- A connection to a district heating is concluded to be impractical and unfeasible.

## Overheating

- 7.98 London Plan Policy SI 4 outlines that development proposals should demonstrate how they will reduce the potential for internal overheating and reliance on air conditioning systems in accordance with the cooling hierarchy.
- 7.99 A Dynamic Overheating Report has also been prepared. This report concludes that all dwellings tested demonstrate compliance with relevant standards. The results are based on key design features and passive mitigation measures following the London Plan cooling hierarchy.

### Sustainability

- 7.100 A Sustainability Statement has also been prepared to support the application. This report look at how the proposed scheme incorporates sustainable design and construction methods, energy and water saving measures, waste reduction techniques as well as measures to enhance the ecological value of the Site. The report concludes that a good quality and sustainable development is proposed.

### **Impact on Neighbouring Properties**

- 7.101 Guidance for Policy DMHB 11 states that the Council will aim to ensure that there is sufficient privacy for residents and will resist proposals where there is an unreasonable level of overlooking between habitable rooms of adjacent residential properties or onto private open spaces. A minimum of 21 metres separation distance between windows of habitable rooms will be required to maintain levels of privacy and to prevent the possibility of overlooking.
- 7.102 The layout and massing of the proposed scheme has been designed to minimise impact on surrounding existing neighbours. Following public engagement, no roof terraces are now proposed to prevent perceived or actual overlooking towards Eversley Crescent. A small number of oriel window are also utilised on the eastern boundary of the railway block for the

same purpose. The maisonettes are also designed to have only a singular, obscured window facing Eversley Credent / Garden Close.

7.103 Separation distances between the proposed development and surrounding existing properties can be seen on the below diagram as well as the storey heights. Whilst there are some points of minor non-compliance with the 21 metres separation distance, given the above design features, it is considered that sufficient privacy is maintained for residents.



**Figure 3** – Extract from the DAS showing scale and interface distances

7.104 Further, a standalone assessment of Daylight and Sunlight for surrounding properties has been undertaken. This assessment concludes that the layout

of the proposed development follows the BRE guidelines and will not significantly reduce sunlight or daylight to existing surrounding properties including to their amenity spaces.

7.105 Overall, it is considered that the proposed development would not result in an undue reduction of outlook, daylight or sunlight to neighbouring properties and in this regard, the proposed scheme is complies with Local Plan Policy DMHB 11 and London Plan Policy D6.

### **Ecology**

7.106 An ecological objection was maintained to the previous application at the Site due to insufficient information on bats (no bat surveys). Further the previous Preliminary Ecological Appraisal (PEA) carried out in January 2023, an Ecological Impact Assessment (EcIA), prepared by The Landscape Partnership Ltd supports this application.

7.107 The EcIA comprises a desk study, UK Habitat Classification survey, Habitat Suitability Index (HSI) assessment of ponds, an assessment of the potential of site features to support bats, bat surveys, together with an assessment of the impacts of the proposed development at the Site.

7.108 The following conclusions can be drawn from the EcIA:

- No bats were found to be roosting within the buildings during the preliminary roost assessment and subsequent bat emergence surveys.
- No further surveys are recommended for any species.
- The Site has potential to support the following protected species or groups of species: breeding birds and foraging/commuting bats.
- The proposed development could give rise to the potential destruction of birds' nests, but mitigation has been proposed, including removal of vegetation outside the nesting bird season or following a nest check and

a sensitive lighting scheme for bats. This mitigation would reduce the impacts of the development proposals upon the habitats and species present, to give rise to an overall Neutral impact.

- A number of ecological enhancements have been proposed, which would improve the quality of the Site for native flora and fauna, including habitat piles, hedgehog tunnels, bat boxes, bird boxes and native planting. Delivery of these enhancements would lead to an overall Minor Beneficial impact.

7.109 The EcIA concludes that if the mitigation measures and all or most of the enhancement measures are implemented, the scheme will result in a minor beneficial impact upon the ecological value of the Site. As such, subject to standard conditions, there is no ecological reason not to support the proposed development.

7.110 Within this context, the proposals comply with Londin Plan Policy 'G6 and Local Plan Policies EM& and DMEI 7.

### **Biodiversity Net Gain (BNG) & Urban Greening Factor (UGF)**

#### BNG

7.111 Under The Environment Act 2021, a minimum of 10% net gain in Biodiversity must be achieved post development of the scheme.

7.112 A BNG Report and Metric support this application which demonstrate that the development will currently achieve a net gain of 16.31% in Habitat Units, and a net gain of 103.11% in Hedgerow Units. The trading rules for both habitats and hedgerows have been met.

7.113 This exceeds all requirements and therefore this provision weighs in favour of the proposed scheme.

## UGF

- 7.114 London Plan Policy G5 requires major development proposals to contribute to the greening of London by including urban greening as a fundamental element of site and building design, and by incorporating measures such as high-quality landscaping (including trees), green roofs, green walls and nature-based sustainable drainage. For residential developments a score of 0.40 is required.
- 7.115 An UGF calculation document has also been prepared - this demonstrates that the Site exceeds the 0.40 UGF target to achieve a score of 0.61. This weighs in favour of the redevelopment proposals.

## **Flood Risk & Drainage**

- 7.116 The application Site is within Flood Zone 1 but as the proposals are a classed as major development it is accompanied by a Flood Risk Assessment (FRA) and Drainage Strategy. This document is prepared against all relevant local, regional and national policy.
- 7.117 The FRA & Drainage Strategy Report demonstrates the following:
- The existing Site is at low risk of fluvial flooding, low to medium risk of surface water flooding and low risk of groundwater flooding. There is no risk of flooding from reservoirs.
  - The proposed scheme has been designed to ensure a low risk of surface water flooding, and groundwater flooding.
  - Foul water drainage for the proposed scheme will be via a gravity drain to the existing sewer in Garden Close.
  - A hierarchal approach has been taken to the consideration of SuDS for the surface water drainage. The scheme includes SuDS features of permeable paving, cellular storage, green roofs and rainwater harvesting as the most appropriate for the Site.

- The proposed surface water run-off for up to 1 in 100 years storm events plus 40% climate change has been controlled via hydrobrakes as close as possible to the greenfield run-off rate.
- A Management and Maintenance regime has been set up for the drainage generally and all the SuDS features. The responsibility for maintaining all elements of the development remains with Chase New Homes until it is handed over to the management company.

7.118 Overall, the FRA & Drainage Strategy demonstrates that the proposed scheme will not increase flood risk either onsite or off-site and complies with all relevant flood risk policy.

### **Noise**

7.119 Local Plan Policy EM8 outlines that the council will seek to ensure that noise sensitive development is only permitted if noise impacts can be adequately controlled and mitigated.

7.120 Noise was not a matter of contention on the previous application with officers stating that *"It is recommended that no objection is made on noise grounds subject to the inclusion of a suitable condition which should be achievable based on the information provided and considering measurement and prediction uncertainty."*

7.121 An updated Noise Impact Evaluation has been undertaken to support the proposed development. The report uses worst case scenarios where construction details are not finalised.

7.122 It confirms that acceptable internal noise levels will be achievable in the development subject to the installation of suitable glazing and ventilation systems. Overall, the proposed development is, in principle, acceptable with regards to the noise levels that will exist within the habitable rooms.

- 7.123 The results of the noise survey indicate that some areas of the development (facing West End Road) may exceed noise limits when windows are opened. The overheating strategy therefore is not likely to be able to rely solely on open windows in these areas. Glazing and ventilator performance requirements are specified to meet appropriate design criteria.
- 7.124 The report concludes that the Site is suitable for residential development in terms of noise and noise does not present a barrier to planning permission being granted in accordance with Local Plan Policy EM8.

### **Air Quality**

- 7.125 Hillingdon's Air Quality Action Plan 2019-2024 does not identify the Site as within an Air Quality Management Area (AQMA). However, the Site does fall within the 'Ruislip Town Centre Focus Area'. The London Plan requires developments to be air quality neutral as minimum whilst the Air Quality Action Plan expects development proposals within Focus Areas to be air quality positive, contributing to the reduction of emissions in these areas. However, as per the Air Quality Positive London Plan Guidance, an AQP assessment is usually only required for 'large-scale development proposals subject to an EIA' which the application Site is not and is also not within an AQMA.
- 7.126 In accordance with policy, an Air Quality Assessment accompanies this submission. This assesses the potential air quality effects associated with the proposed residential development. The overall effect of the proposed development is considered 'not significant' with regard to air quality.
- 7.127 An Air Quality Neutral Assessment was undertaken following Mayor of London / GLA guidance. This indicated that the development is likely to generate trips in excess of the relevant benchmark. However, the development meets the aspirations of the NPPF with regard to projects in



sustainable locations and, taking into account Travel Plan and other intrinsic emissions mitigation measures, it is judged that the development will comply with Air Quality Neutral criteria, without the requirement for additional mitigation or an offsetting payment.

- 7.128 The Assessment concludes that the Site is suitable for the development in terms of air quality and that there are no air quality constraints with respect to planning consent. As such, the proposed development complies with Local Plan policies DMEI 14 and London Plan policy SI1.

### **Contamination**

- 7.129 Local Plan Policy DMEI 12 expects proposals for development on potentially contaminated sites to be accompanied by at least an initial study of the likely contaminants. The Council will support the development of land where it can be demonstrated that any contamination issues have been adequately assessed and the Site can be safely remediated so that the development can be made suitable for the proposed use.
- 7.130 A Desk Study, Geotechnical and Geoenvironmental Interpretive Report (2023) prepared by Card Geotechnics Ltd accompanies this application. This report was submitted with the previous application and provides details of Phase 1 desk study and Phase 2 site investigation works conducted at the Site. The LPA has previously confirmed that the conclusions of this report, that the contamination risk ratings at the Site as low to moderate are accepted and the development can be supported in contamination terms subject to the imposition of standard conditions.

### **Fire Strategy**

- 7.131 London Plan Policy D12 requires all development proposals to achieve the highest standards of fire safety.

7.132 In compliance with part B of Policy D12, the application is supported by a Planning Fire Safety Strategy and D12 Fire Statement. This document sets out details of the fire safety measures for the development, full details will be finalised at the post-planning as secured by a suitably worded condition. As such the proposed scheme complies with Policy D12.



8.0 **DRAFT HEADS OF TERMS**

8.1 The Community Infrastructure Regulations 2010 (as amended) introduced limits on the use of planning obligations whereby they must only be sought for the development if the obligation is:

- (a) necessary to make the development acceptable in planning terms;
- (b) directly related to the development; and
- (c) fairly and reasonably related in scale and kind to the development.

**Community Infrastructure Levy (CIL)**

8.2 The CIL applies to all proposals that create 100sqm or more of new floorspace. The Application Site is subject to Hillingdon CIL and Mayoral CIL (MCIL). For Hillingdon the CIL charging rate for residential dwelling is £95 per sqm plus indexation. MCIL is collected by Hillingdon at £60 and is transferred to Transport for London to be spent on Elizabeth Line financing and other transport infrastructure.

8.3 Hillingdon CIL monies are used to pay for the infrastructure required to support new development. This includes transport schemes, flood defences, schools, health and social care facilities, parks, open spaces and leisure centres.

8.4 The 2022-2023 CIL Funding Statement outlines that CIL money has been spent on access improvements, community facility refurbishment and community safety. This includes public footpath improvements, air quality initiatives, country park improvement, traffic calming measures and library refurbishments.

8.5 The application is accompanied by a completed CIL Form 1.

## Planning Obligations

- 8.6 Hillingdon's Planning Obligation SPD (2014) provides guidance on the likely type and scale of planning obligations that will be sought for development.
- 8.7 This application is also supported by a Financial Viability Assessment which looks at the planning obligations the proposed development could potentially support. Following the LPA's independent review of viability, the agreed level of contributions the Site can viably support will be agreed.
- 8.8 Without prejudice to that process, the Applicant recognises that an application of this scale and nature would typically require obligations as follows:
1. Affordable housing
  2. Public Realm contributions
  3. Children's Play Space contribution
  4. Carbon Offset
  5. Construction Management and Delivery/Service Plans
  6. Construction Training
  7. Health contribution
  8. Travel Plan Monitoring
  9. Parking Permit Restrictions
- 8.9 Not all of these are financial obligations and some may be required regardless of the viability outcome. As such, the Applicant is committed to entering into a S106 Agreement to cover relevant obligations.
- 8.10 No off-site highways works are required to access the Site so no S.278 Agreement is anticipated.

8.11 The Air Quality Assessment concludes that the proposed mitigation measures, in the context of a site which is ideally situated for public transport use, should be sufficient to offset the calculated emissions cost without the requirement for additional mitigation or an offsetting payment. Unless the LPA can demonstrate that an air quality offsetting contribution is necessary, directly related to the development and fairly and reasonably related in scale and kind to the development, the seeking of a financial contribution would not comply with the CIL Regulations.



## 9.0 **SUMMARY & PLANNING BALANCE**

9.1 This Statement has demonstrated that the proposed scheme has been designed to be as policy compliant as feasible within the context of the Site's constraints. There are a few minor conflicts with Local Plan policies but in these instances, such as private amenity space, it is considered that more weight should be given to the London Plan standards given this is the more up-to-date Development Plan document.

9.2 It is clear that the Application Site is an underutilised brownfield site in a highly sustainable location and there would be benefits in its efficient use for residential development. The proposed scheme seeks the redevelopment of the former 73-bedroom hotel to provide a comprehensive and high-quality residential development of 72 dwellings including the retention and conversion of listed buildings on the Site. The new development is centred around these important assets, and this has dictated the proposed layout, appearance and scale and massing of the new development. Overall, the proposals are considered to provide a new/repaired character for the Site which is centred around enhancing the setting of the listed buildings through the creation of a public Heritage Square.

9.3 Key scheme elements comprises:

- A maximum of 4-storey building height with most development limited to 2 and 3 storeys.
- A new character is proposed with a consistent, high quality, design style and materiality to all new buildings to provide a unified yet varied (in scale and massing) backdrop to the listed buildings.
- Landscape proposals centred around creating a rustic setting for the listed buildings in the form of the public Heritage Square.

- Connectivity and public realm improvements are central to the revised scheme with generous areas of public realm. This includes a new dedicated pedestrian access to West End Road and a landscaped, linear walking route linking from Garden Close through the new heritage courtyard to the public staircase and existing PROW. This enables enhanced permeability to Ruislip Station and the Town Centre for the wider community. Activation of the boundary with the PROW is also achieved to make this area safer and more pleasant for the community.
- A high quality of residential accommodation with a compliant mix of homes which are all at least dual aspect and will have good levels of outlook, ventilation, sunlight and daylight and internal space and all have access to amenity space.
- Car parking is limited to reflect the accessibility of the Site and to promote sustainable travel patterns.

9.4 Overall, the proposed development is considered to be sustainable development for which the NPPF sets out a presumption in favour. However, this does not change the statutory status of the development plan whereby development which conflicts with up-to-date development plans should not usually be granted unless material considerations in a particular case indicate that the plan should not be followed.

9.5 In weighing up the planning benefits of the scheme against areas of policy conflict, it is considered that the below matters should be taken into consideration.

9.6 The proposed development has the following policy conflicts:

- Lack of on-site affordable housing.
- Under provision of private amenity space in conflict with policy DMHB 18.

- Lack of provision of on-site formal, equipped children's play given this can be off-site via financial contribution.

9.7 However, the following material considerations should be attributed significant positive weight:

- The re-use and regeneration of a sustainably located brownfield site to optimise its potential for development.
- Deliver 72 additional homes for the Borough in a compliant mix of market housing to meet needs.
- Securing the optimum viable use of on-site heritage assets to ensure their long-term maintenance and perseverance.
- Enhancements to the landscape setting and quality of the listed buildings.
- High quality public realm and new open space is proposed as a benefit to the wider community as well as future occupiers.
- Providing an activated frontage onto the adjacent PROW to increase the safety and usability of this pedestrian link.
- The proposed scheme exceeds policy requirements for BNG and Urban Green Factor and will deliver ecological enhancements providing a significant environmental benefit.

9.8 Similarly, moderate positive weight should be given to the following material considerations:

- Exceedance of policy requirements for CO2 reductions.
- Policy compliant provision of M4(3) accessible homes with dedicated disabled parking.
- Provision of a new public route through the Site via attractive public realm providing greater pedestrian permeability for the area.
- Economic and employment benefits during construction.



9.9 Overall, the positive planning benefits of the proposed scheme are considered to be substantial material considerations which heavily weigh in favour of the proposed scheme and strongly indicate that planning permission should be granted on this occasion.

