



PLANNING STATEMENT: PROPOSED RESIDENTIAL SCHEME

Chelmsine Court, Bury Street, Ruislip, Middlesex HA4 7TL | January 2020

On behalf of Trout Rise Developments Ltd

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1.0 Introduction and Background

1.1 This Planning Statement (the 'Statement') is prepared by SF Planning Limited on behalf of Trout Rise Developments Ltd (the 'Applicant') to support an application for planning permission for the residential redevelopment of land and buildings at Chelmsine Court, Bury Street, Ruislip (the 'Site').

1.2 The proposals seek to demolish the existing buildings on the site and redevelop the land to provide a new residential building comprising of four storeys containing a total of eight flats with associated parking, amenity areas and other works.

1.3 The description of proposed development is set out below;

"Redevelopment of the site (following demolition of existing building) to provide new residential building of four storeys to provide eight flats (six additional) with associated parking, amenity areas and other associated works."

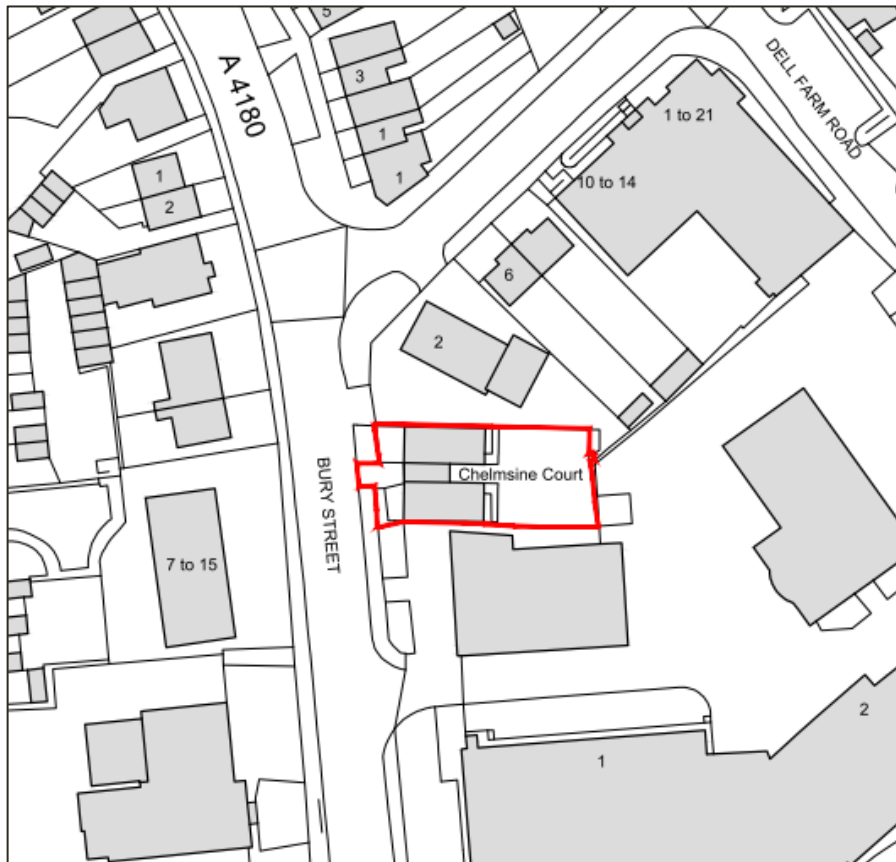
1.4 This Statement considers the Site, its context, relevant planning history in relation to the Site, including positive and proactive pre-application discussions with the Council and surrounding and comparable cases.

1.5 The scheme is considered against relevant local and national level planning policy which generally support housing delivery in appropriate locations such as this.

1.6 The Statement then goes on to fully justify the proposals in planning terms and highlights the key benefits of the proposals which will provide much needed additional housing in London to support a significant shortfall.

2.0 The Site & Surroundings

- 2.1 The Site is identified as outlined in red on the OS extract plan below and as shown on the submitted site location plan.



Site location plan

- 2.2 It comprises of an underutilised two storey brick built building and associated car park and hardstanding to the rear of the site, which is accessed from the west off Bury Street.
- 2.3 The existing building comprises a mix of offices and two flats, with vehicle access through an archway at the centre of the building providing parking to the rear of the building.



Aerial photograph of site & surroundings



Photograph of existing buildings looking from the south



Photograph of existing buildings looking from the north

- 2.4 The site falls in an area which is mixed in character with the immediate vicinity containing various office and other commercial uses as well as residential properties including single family dwellings and flatted blocks directly opposite the site.
- 2.5 The site does not have any specific local plan designations based on the adopted proposals maps below but is adjacent to a London Distributor Road (yellow) with green belt (light green), a national nature reserve (green hatching) and a SSSI (orange outline) further afield.



Local plan proposals map extract

- 2.6 The emerging local plan proposals map shows very similar set of designations, with additionally the site being located within an archeological priority area.
- 2.7 The site is located within level 1b of the PTAL access level map for London with two bus routes (H13 & 331) running past the site and stops within close proximity.

3.0 Planning History

- 3.1 Recent planning history available on the Council's website for the site is detailed in the table below.

Reference No.	Application Description	Decision
22031/B/85/1492	Change of use to Office use 65sq.m.(P)	Approved 6 th September 1985
890/APP/2011/2795	Three storey detached building, ground and first floor for use as Pharmaceutical Laboratory and second floor for use as 2 x 2 bed flats, involving demolition of existing building.	Approved 16 th November 2011
890/APP/2012/1029	Demolition of existing building and erection of three storey detached building involving basement, ground and first floor for use as Pharmaceutical Laboratory and second floor for use as 2 x 2 bed flats	Approved 27 th April 2012
890/APP/2015/1907	Erection of a three storey building to include 6 x 2 bed self contained flats with associated parking, cycle store, bin store and amenity space involving demolition of existing two storey building	Approved 26 th May 2015

- 3.2 This principle of redeveloping the site for residential purposes has already been considered to be acceptable through previous applications for redevelopment.

4.0 Pre-Application Discussions

- 4.1 A pre-application enquiry was submitted to London Borough of Hillingdon on the 12th September 2019, with a meeting taking place on the 14th October 2019 and a subsequent response received on the 3rd December 2019.
- 4.2 The request for pre-application planning advice related the proposed residential redevelopment of the site to provide 8 flats in a 4 storey building.
- 4.3 The Council found that the principle of redevelopment of this building to be acceptable and the initial design submitted to be in character with the street scene and surrounding area.
- 4.4 The scheme has been further worked upon to respond to the pre-application comments, with additional information and design development undertaken to ensure the scheme meets all relevant development plan standards.

5.0 Planning Justification

- 5.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 (PCPA) requires that planning applications be determined in accordance with the development plan, unless material considerations indicate otherwise.
- 5.2 Moreover, Section 70 (as amended) of the Town and Country Planning Act states that Local Planning Authorities should have regard to:

"(a) the provisions of the development plan, so far as material to the application;

(b) any local finance considerations, so far as material to the application; and

(c) any other material considerations."

- 5.3 In order to consider the acceptability of this proposal, it is necessary to assess it against both the adopted development plan, relevant national planning policy as well as other material considerations, including the emerging development plan. The adopted development plan and national planning policies include;
- *National Planning Policy Framework (NPPF) (2018);*
 - *The London Plan (Further Alterations & Minor Alterations (2015 & 2016));*
 - *Hillingdon's adopted Local Plan Strategic Policies (2012);*
 - *Hillingdon's Local Plan Part 2 (2020).*
- 5.4 A full review and summary of all relevant policy and associated planning justification is provided within each of the following sections.

Principle of Development

- 5.5 The site is located within an existing developed area, in close proximity to local level services and public transport routes. The building is not listed or within a conservation area and therefore the principle of residential redevelopment should be considered wholly acceptable in this regard.

- 5.6 There is a need to meet and exceed identified increased minimum housing targets in the latest alterations to the London Plan (2015 & 2016) including bringing forward small brownfield sites such as this site.
- 5.7 The revised NPPF came into force on February 2019 and throughout the document, the Government has clearly sought to emphasise the use of brownfield and underutilised redundant land and buildings¹ (such as this site) within settlements for additional housing.
- 5.8 Paragraph 59 of the NPPF sets out that to support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed.
- 5.9 What is clear is that the Government are now looking beyond housing land supply and are requiring additional checks and balances to be put in place to ensure that homes are actually being delivered in practice.
- 5.10 In the case of the Proposed Development, the Applicant is keen to commence work on the Site at the earliest opportunity as it is currently sitting vacant and underutilised. Once completed, it will improve the Council's delivery rate figures.
- 5.11 In this regard, paragraph 68 notes the important contribution that small and medium sites (again such as this site) can make to meeting the housing requirement of an area and notes that such sites are often built out quickly. The paragraph seeks development of a good mix of sites with LPAs being asked to accommodate at least 10% of their housing requirement on sites of 1ha or less.
- 5.12 Paragraph 68(c) states that LPAs should *"support the development of windfall sites through their policies and decisions – giving great weight to the benefits of using suitable sites within existing settlements for homes."*
- 5.13 Paragraph 80 emphasises planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on these proposals which would support economic growth and productivity including boosting local businesses within adjacent town centres and the existing shops and services in the vicinity.

¹ See the Government's press release relating to the consultation version of the NPPF prior to adoption <https://www.gov.uk/government/news/prime-minister-launches-new-planning-rules-to-get-england-delivering-homes-for-everyone>, accessed 30 July 2018.

5.14 Paragraph 85 (f) asks councils to recognise that; “*residential development often plays an important role in ensuring the vitality of centres*” and asks them to encourage residential development on appropriate sites. The Site is clearly appropriate for housing, for all of the reasons already outlined within this Statement.

5.15 Paragraph 118 (c), (d) and (e) are highly relevant and support the proposals since it makes it clear planning policies and decisions should (Applicant’s emphasis):

“give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land.”

“promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively (for example converting space above shops, and building on or above service yards, car parks, lock-ups and railway infrastructure).”

“support opportunities to use the airspace above existing residential and commercial premises for new homes. In particular, they should allow upward extensions where the development would be consistent with the prevailing height and form of neighbouring properties and the overall street scene, is well-designed (including complying with any local design policies and standards), and can maintain safe access and egress for occupiers.”

5.16 The revised NPPF at paragraph 123 also makes it clear that decisions should avoid homes being built at low densities, and ensure that developments make optimal use of the potential of each site, as is the case with these proposals located very close to a bus routes and local services.

5.17 Paragraph 183 makes a critical point that “*the focus of planning policies and decisions should be on whether the proposed development is an acceptable use of land.*” This is the reason why there is a system of development control. It is incredibly difficult to understand how, taking all matters into account, the Proposed Development could not be considered an acceptable use of land.

5.18 This requirement to facilitate additional land for housing on brownfield previously developed sites such as this site is further re-emphasized by the need to boost

housing supply set out in the relevant parts of the NPPF and these proposals should therefore be considered entirely acceptable.

- 5.19 The pre-application response confirmed that the Council does not have an 'in principle' objection to the proposed redevelopment to provide additional flats concluding;

".....the Council does not have an 'in principle' objection to the erection of the building to provide 2 x 1 bed flats and 6 x 2 bed flats, subject to the application demonstrating compliance with all of the above criteria and relevant Development Plan policies." (Ref: pre-application response, 3rd December 2019, P4, Para.4)

Layout & Design

- 5.20 Policy DMHB 11 of the Hillingdon Local Plan Part 2 advises that all development will be required to be designed to the highest standards and incorporate principles of good design. The policy also goes on to state that development should take into account aspects including the scale of the development considering the height, mass and bulk of adjacent structures; building plot sizes and established street patterns; building lines and streetscape rhythm and landscaping.
- 5.21 The accompanying Design and Access Statement by RDT Design demonstrates the proposed scheme and the design considerations and evolution of the proposals indicating clearly the scheme is of an appropriate scale for this site and will be constructed of high-quality materials to reflect the local character of the area.
- 5.22 The layout of the proposals has been designed to comply with the Council's residential standards in terms of minimum distances between habitable residential windows.
- 5.23 The development will harmonise with the materials, design features, architectural style and building heights in the area with the layout, building line and appearance complementing the existing street scene.
- 5.24 At pre-application stage, in relation to the character of the area and the design and massing of the proposals, the Council stated;

"The street scene is comprised of a variety of properties ranging from single storey garage site adjacent to the north and the three storey office blocks to the south and east. Opposite is a three storey flatted development and a pair

of two storey semi detached dwellings.....the building would maintain the existing front building line and not exceed the height of the adjacent building Cardinal House, it is considered that the proposal would not be of a scale that is out of keeping with the character of the streetscene in the vicinity of the site." [Applicant's emphasis] (Ref: pre-application response, 3rd December 2019, P4, Para.8 - 9)

- 5.25 The development would therefore comply with policy DMHB11 of the development plan will also bring about the re-development and regeneration of the site and prevent any further deterioration.

Mix of units

- 5.26 Policy DMH2 of the development plan states the Council will require the provision of a mix of housing units of different sizes in schemes of residential development to reflect the Council's latest information on housing need.
- 5.27 The scheme would deliver a mix of units consisting of 1 and 2 bed flats (2 x 1 bed and 6 x 2 bed flats), which is considered wholly appropriate for this location and for the proposed scale of development.

Unit Size

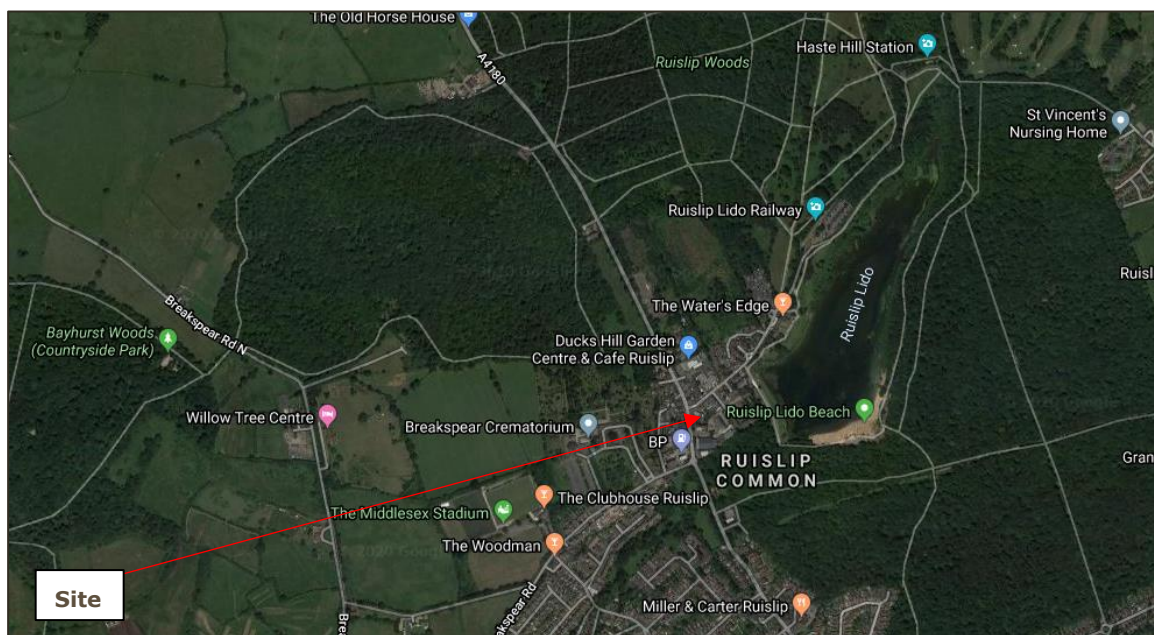
- 5.28 London Plan Policy 3.5 and development plan policy DMHB 16 endorses a range of minimum sizes for new residential development in London, with details set out at Table 3.3 of the policy.
- 5.29 The proposed flats have been designed to meet and exceed the relevant standards set out in the London Plan ensuring the development will provide a good standard of accommodation for future occupiers.

External Amenity Areas

- 5.30 The majority of units would have access to its own private terrace / balcony with useable private and communal amenity space for the units proposed as part of the scheme, as set out on the accompanying block plan.
- 5.31 This will ensure the new residential properties are provided with a good standard of accommodation and will provide significantly more than the required amenity space set out within the Mayor's Housing SPG. This requires 5sqm for 1 – 2 bed units (total requirement here 40sqm and 119sqm is proposed via balconies and the communal

garden). In addition, all of the flats are in excess of the London Plan internal space standards by a total of 32sqm which if added to the external amenity space calculation totals 151sqm.

- 5.32 This is a small amount under the space requirements set out in Hillingdon's residential design guide (which are much more onerous than the London Plan) and development plan policy DMHB 18, which would require a total of 190sqm. This is made up of 119sqm of communal and private amenity space. However, the Site is also within easy walking distance of a number of open spaces and recreational facilities including Ruislip Woods, Ruislip Common, Ruislip Lido, Bathurst Woods and the Middlesex Stadium, which will further enhance the living conditions for new residents of the flats.



Open space within the vicinity of the site

Flood Risk

- 5.33 The application Site, according to the Environment Agency Flood Map is located in Flood Zone 1 (low risk) and consequently it is not necessary to undertake a Flood Risk Assessment, to support the Proposals, given the Site is not at risk of flooding.

Sustainability

- 5.34 Sustainability and sustainable design, through the efficient use of land and construction resources are central objectives of NPPF and the adopted London Plan.

- 5.35 Environmental considerations and sustainability have been central to the design process and accordingly the development seeks to maximise environmental performance of the new building in the future through CO2 savings to be achieved as a result of the energy efficiency measures and as well as increasing biodiversity through the provision of the enhanced landscaped areas around the new building.

Parking, Highways and Access

- 5.36 Paragraph 109 of the revised NPPF once again makes it clear development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.
- 5.37 In addition, paragraph 127 sets out planning policies and decisions should ensure that developments optimise the potential of sites to accommodate and sustain an appropriate amount and mix of development and support local facilities and transport networks (such as the adjacent underground station and numerous bus routes).

Within the pre-app response given the PTAL of 1b it was stated that the proposed parking provision (7 spaces for 8 flats) was acceptable in this case. Cycling and parking is provided on site and the proposed development conforms with Policy 5.17 of the London Plan.

- 5.38 A full Transport Assessment has been provided to accompany the application in this regard which provides further justification for the proposals.

6.0 Conclusion

- 6.1 In conclusion, it is considered that the application scheme fully accords with the latest national planning policy objectives within the NPPF, as well as those at a local level.
- 6.2 This proposed redevelopment will make efficient and positive use of an underutilised site, which has proven to be no longer required, in an area which has good accessibility to local services and public transport options.
- 6.3 The development will harmonise with the materials, design features, architectural style and building heights in the area with the layout, building line and appearance complementing the existing street scene and will therefore comply with relevant policies within the development plan.
- 6.4 The scheme will also bring about the re-development and regeneration of the site and prevent any further deterioration, which has now been vacant for some time.
- 6.5 The new residential units will help deliver an important part of Hillingdon's required increased housing land supply of 765 dwellings per annum as detailed in the - consolidated changes version July 2019 and Hillingdon's Strategic level policies, which recognise the importance of underutilised sites in contributing to housing land supply and which reduces pressure for Greenbelt development.
- 6.6 The proposed residential units create an efficient use of the land, in support of the national strategic objective of achieving sustainable forms of development and will meet the identified demand for a wide choice of high-quality homes in accessible locations.
- 6.7 Based upon the detailed technical design and planning assessment justification case presented in support of the scheme the Applicant contends that the case in support of the Proposals is compelling and that planning permission should be granted.



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