

Report of the Head of Planning & Enforcement Services

Address RAF EASTCOTE LIME GROVE RUISLIP

Development: Erection of 8 one-bedroom and 2 two-bedroom flats, 14 three-bedroom, 3 four-bedroom and 5 five-bedroom houses with associated car parking and landscaping (modification of outline planning permission ref: 10189/APP/2007/3383 and reserved matters approval ref: 10189/APP/2007/3046 to provide a further 7 houses.)

LBH Ref Nos: 10189/APP/2010/1099

Drawing Nos: 6101/WIM-WL/300 Rev. A
6101/WIM-WL/301 Rev. B
6101/WIM-WL/AF01
6101/WIM.W.L/SSAA/PHASE 3
6101/WIM.WL/P/P1
6101/WIM.W.L/P/E1
6101/WIM.W.L/T/P1
6101/WIM.W.L/T/P2
6101/WIM.W.L/T/P3
6101/WIM.W.L/T/E1
6101/WIM.W.L/T/E2
6101/WIM.W.L/T/E3
6101/WIM.W.L/T/E4
6101/WIM.W.L/1359/P1
6101/WIM.W.L/1359/E1
6101/WIM.W.L/1359/E2
6101/WIM.W.L/3BH/P1
6101/WIM.W.L/3BH/E1
6101/WIM.W.L/3BH/E2
6101/WIM.W.L/2000 D/P1
6101/WIM.W.L/2000 D/E1
6101/WIM.W.L/1173/P1
6101/WIM.W.L/1173/E1
6101/WIM.W.L/1735D/P1
6101/WIM.W.L/1735D/E1
6101/WIM.W.L/1225SP/P1
6101/WIM.W.L/1347-1225SP/E1
6101/WIM.W.L/1392/P1 Rev. A
6101/WIM.W.L/1347/P1
6101/WIM.W.L/1347-1392/E1
6101/WIM.W.L/1310/P1
6101/WIM.WL/1310/E1
6101/WIM.WL/1310/E2
6101/WIM.WL/1310/E4
6101/WIM.W.L/GAR/P1
6101/WIM.W.L/GAR/P2
6101/WIM.W.L/GAR/P3
TWWL 17456 -12 Sheet 1 of 2
TWWL 17456 -12 Sheet 2 of 2
Design and Access Statement
RAF Eastcote - Uplift Phase 3 Schedule of Accommodation

Planning Statement
Statement of Community Involvement
Energy Statement
Technical Note
Addendum Flood Risk and Drainage Assessment

Date Plans Received: 10/05/2010

Date(s) of Amendment(s):

Date Application Valid: 13/09/2010

1. SUMMARY

This application is one of three applications, seeking to provide 15 additional units and various modifications to the approved Reserved Matters and Outline approvals at the Former RAF Eastcote site. This application seeks to uplift the approved scheme to allow for the conversion of 6 detached dwellings to 12 semi detached 2½ or 3 storey semi detached dwellings, the conversion of detached dwelling and a pair of semi detached dwellings to a terrace of four 3 storey dwellings and 5 detached dwellings to be converted to wheelchair units.

15 letters and 4 petitions have been received objecting primarily on the following grounds: increased density, out of keeping with the surrounding area, lack of amenity space and highway issues.

The proposed changes would result in a more cramped form of development, with spaces lost between buildings and ridge heights raised where 3 storey units have been proposed in place of 2 and a half storey buildings. The increase in accommodation would also require additional parking provision, which would result in a significant loss of soft landscaping to the detriment of the appearance of the scheme as a whole, adversely affect the cohesion of the scheme/layout and the quality of the landscaping of this part of the site. In addition, good environmental conditions have not been provided for future and surrounding occupiers.

The details for on-site renewable energy generation have not been incorporated into the design of the scheme. The design of the development as submitted cannot therefore meet the 20% renewables target without further modifications. In addition, the applicant has failed to provide contributions towards the improvements of services and facilities as a consequence of demands created by the proposed development (in respect of education, health, community facilities and libraries). The application is therefore recommended for refusal.

2. RECOMMENDATION

REFUSAL for the following reasons:

1 NON2 Non Standard reason for refusal

The proposed development, by reason of its overall scale, site coverage, design, layout and scale, represents an over-development of the site that would result in a cramped, unduly intrusive, visually prominent and inappropriate form of development, out of

keeping with the character and appearance of the surrounding area. The proposed changes will be detrimental to the cohesion of the scheme/layout, the quality of the landscaping of this part of the site and the setting of the buildings. The proposal is therefore contrary to Policies BE13, BE19 and BE38 of the adopted Hillingdon Unitary Development Plan Saved Policies (September 2007) and the Council's adopted Supplementary Planning Document HDAS: Residential Layouts.

2 NON2 Non Standard reason for refusal

The proposed development by reason of its design, form, spacing and layout would fail to provide adequate outlook to plots 396 and 296 and would result in overlooking and lack of privacy to the private amenity area of plot 398. As such, the development would provide an inadequate living environment for future occupiers, contrary to Policies BE21 and BE24 of the Hillingdon Unitary Development Plan Saved Policies (September 2007), Policies 4B.1 and 4B.5 of the London Plan (February 2008) and the Council's adopted Supplementary Planning Documents HDAS: Residential Layouts and Accessible Hillingdon.

3 NON2 Non Standard reason for refusal

The details for on-site renewable energy generation have not been incorporated into the detailed design of the scheme. The design of the development as submitted cannot meet the 20% renewables target without further modifications. Accordingly, the proposal would be contrary to Policy 4A.7 of the London Plan (February 2008).

4 NON2 Non Standard reason for refusal

The development fails to provide an adequate level of private amenity space for plots 287, 296, 297, 298, 327, 394,, 395, 396, 397, 398, 399 and 400, contrary to Policy BE23 of the Hillingdon Unitary Development Plan Saved Policies (September 2007) and the Council's adopted Supplementary Planning Document HDAS: Residential Layouts.

5 NON2 Non Standard reason for refusal

The applicant has failed to provide contributions towards the improvements of services and facilities as a consequence of demands created by the proposed development (in respect of education, health improvements, community facilities and libraries). The scheme therefore conflicts with Policy R17 of the London Borough of Hillingdon Unitary Development Plan Saved Policies September 2007, Supplementary Planning Document on Planning Obligations.

6 NON2 Non Standard reason for refusal

The applicant has failed to provide, through an appropriate legal agreement, an appropriate provision of on site affordable housing. The proposal is therefore contrary to policy Pt1.17 of the London Borough of Hillingdon Saved Policies (September 2007), the London Borough of Hillingdon's Supplementary Planning Document on Planning Obligations and policies 3A.10 and 3A.11 of the London Plan Consolidation (2008).

INFORMATIVES

1 I52 Compulsory Informative (1)

The decision to REFUSE planning permission has been taken having regard to all relevant planning legislation, regulations, guidance, circulars and Council policies, including The Human Rights Act (1998) (HRA 1998) which makes it unlawful for the Council to act incompatibly with Convention rights, specifically Article 6 (right to a fair hearing); Article 8 (right to respect for private and family life); Article 1 of the First Protocol (protection of property) and Article 14 (prohibition of discrimination).

2 I53 Compulsory Informative (2)

The decision to REFUSE planning permission has been taken having regard to the policies and proposals in the Hillingdon Unitary Development Plan Saved Policies (September 2007) set out below, including Supplementary Planning Guidance, and to all relevant material considerations, including the London Plan (February 2008) and national guidance.

AM14	New development and car parking standards.
AM15	Provision of reserved parking spaces for disabled persons
AM2	Development proposals - assessment of traffic generation, impact on congestion and public transport availability and capacity
AM7	Consideration of traffic generated by proposed developments.
AM9	Provision of cycle routes, consideration of cyclists' needs in design of highway improvement schemes, provision of cycle parking facilities
BE10	Proposals detrimental to the setting of a listed building
BE20	Daylight and sunlight considerations.
BE21	Siting, bulk and proximity of new buildings/extensions.
BE22	Residential extensions/buildings of two or more storeys.
BE23	Requires the provision of adequate amenity space.
BE24	Requires new development to ensure adequate levels of privacy to neighbours.
BE38	Retention of topographical and landscape features and provision of new planting and landscaping in development proposals.
BE4	New development within or on the fringes of conservation areas
OE1	Protection of the character and amenities of surrounding properties and the local area
OE5	Siting of noise-sensitive developments
PPG13	Transport
PPG24	Planning and Noise
PPS1	Delivering Sustainable Development
PPS3	Housing
R17	Use of planning obligations to supplement the provision of recreation, leisure and community facilities
HDAS	Residential Layouts Accessible Hillingdon

3

You are advised that all residential units within the development should be built in accordance with all 16 Lifetime Home standards (as relevant). Further, 10% of the units should be designed to be fully wheelchair accessible, or easily adaptable for residents who are wheelchair users, which should be evenly distributed throughout the whole development and across all housing types. Guidance is provided in the Council's Supplementary Planning Document Hillingdon Design and Accessibility Statement: Accessible Hillingdon, relevant policies and legislation. The following specific guidance is provided for this application:

1. Details of level access into all housing types should be submitted to achieve inclusive design across the whole development.
2. House type 1392, 1225, 1173, 3BH, 1310 2000D and 1347 should be designed in accordance with Lifetime Home standards. At least 700mm should be provided to one

side of the WC, with 1100mm provided between the front edge of the toilet pan and a door or wall opposite.

3. House type 1359, 1753D, 2000D, 3BH, P, 1392, 1225, 1310 and 1347 should feature an entrance level WC that has transfer space of at least 700mm to one side, excluding chamfered corners that encroach on the transfer space (as per House Type P), and 1100mm of clear space in front of the WC. In addition, floor gully drainage should be provided to allow the facility to be used as a shower room in future.

4. House type House type 1310: The area identified for the level access shower within the entrance level WC should be repositioned within the transfer space adjacent to the toilet pan.

5. House type 2000D should provide no less than 450mm of space, clear of door openings and swings, from top step on the landing.

6. All blocks of flats should feature at least one Part M compliant passenger lift.

7. The bathrooms/ensuite facilities proposed for all non-wheelchair standard flats within Apartment Block T, should be designed in accordance with Lifetime Home standards. At least 700mm should be provided to one side of the WC, with 1100mm provided between the front edge of the toilet pan and a door or wall opposite.

8. To allow bathrooms to be used as wet rooms in future, plans should indicate floor gully drainage.

9. The lobby areas within the various blocks do not take account of those who are unable to evacuate by stairs in the event of a fire emergency. Reference to BS 9999:2008 is advised. Details, which demonstrate that the evacuation needs of disabled people have been inclusively designed, should be submitted.

10. Although a number of references have been made to 10% of the proposed units being designed and built to Wheelchair Home Standards, no details are shown on plan. Particular attention should be paid to the following areas:

a. From the internal face of the front door, the wheelchair standard dwellings should feature an obstruction free area not less than 1500mm wide and 1800mm to any door or wall opposite.

b. Wheelchair accessible bathrooms should be positioned, sized and fitted to ensure that the accommodation provided is usable by wheelchair users.

c. Hallways should be designed in accordance with the published Supplementary Planning Document detailed above.

d. A space identified for a through floor lift within a wheelchair standard home, should be located in an area that leads directly from the hallway and landings (e.g. not from a living room into an upstairs bedroom).

e. Accessibility to gardens/amenity areas should be provided via any rear doors and details of level access at secondary entrance should be provided.

f. Design provisions should ensure that disabled people can evacuate from their homes

independently and safely.

The Design & Access Statement should be revised to demonstrate how all 16 Lifetime Home and Wheelchair Housing standards have been successfully incorporated.

3. CONSIDERATIONS

3.1 Site and Locality

The former RAF Eastcote site is 7.7 hectares in area and is dissected into a northern and southern area by an existing public footpath. An internal private road links the northern and southern areas. The northern portion is 4.2 hectares and was last used as a US Navy facility. The land in this area is undulating, and becomes lower towards the north western boundaries. The southern portion of the site is 3.5 hectares, is generally flat and formally comprised a number of vacant buildings, previously used by the Ministry of Defence, which have now been demolished. Prior to demolition, the total floor space for the entire site was approximately 28,000sqm of which 22,500m² was administration space and 5,500m² barracks (for 200 personnel). These buildings were generally of poor quality and added little in terms of architectural value to the local vernacular.

The site formally had three vehicular access points, two from Eastcote Road and one leading from Lime Grove. The MoD closed the two accesses from Eastcote Road some years ago due to safety concerns. The site formerly had 246 marked parking spaces and 169 unmarked parking spaces.

The site has an average PTAL score of 1b, which is a low score within a possible range of 1 to 6. A number of trees and hedges of varying size and value surround the site boundary and the edge of the public footpath. The site is bounded to the west by Eastcote Road and on all remaining sides by residential properties. To the north the residential character is predominantly 1960/70s in style, with a large number of three storey town houses and flats, many of which have communal garage courts. To the southeast, the area has a larger number of semi-detached two storey dwellings dating to the 1930s.

Highgrove Nature Reserve which is of Borough Grade II importance is situated to the south of the site, adjacent to which is Highgrove House which is at present disused, but previously provided hostel accommodation in two and three storey buildings set within enclosed grounds. The northwest corner of the site lies adjacent to Eastcote Village Conservation Area, which includes a number of listed buildings.

This application relates to the north western portion of the site, accessed from Eastcote Road. The consented scheme for this part of the site contains mainly detached 4/5 bedroom dwellings and a 3 storey apartment block T, just north of the existing public footpath which bisects the larger site.

3.2 Proposed Scheme

The three separate planning applications, which are accompanied by a single Design and Access Statement have been submitted, seeking a net increase of dwelling numbers by 15, from 385 to 400 dwelling units.

The additional dwelling numbers are generally incorporated within the existing building footprints. This has been accomplished by incorporating smaller apartments within the roofspace of consented apartment blocks and providing additional townhouses within the

consented footprints of larger townhouse terraces and detached houses. Although the pattern of built form and road pattern remains largely unaltered from the consented scheme, there are some re-siting changes and building heights have been increased as part of the applications.

Parking is provided for the additional dwelling numbers, mainly at the expense of the soft landscaping which formed part of the approved scheme. Affordable housing is provided as part of the increased number of dwellings. 7 units are provided as the affordable housing, out of the uplift of 15 dwellings.

The applicants state that all dwellings are designed to meet Lifetime Homes standards, both spatially, and in layout and specification. A number of dwellings have also been modified in order to ensure that the resultant 400 dwellings proposed provide the 10% requirement of full disabled units.

The applicants have submitted that the provision of additional dwellings, generally of smaller size, is to assist viability and marketability, due to extraordinary market conditions resulting from the severe downturn in the global economy and domestic housing market. The consented and proposed dwelling mixes are shown below.

Overall Dwelling Mix

1 bedroom dwellings	Consented 112	Proposed 112
2 bedroom dwellings	Consented 101	Proposed 106
3 bedroom dwellings	Consented 56	Proposed 78
4 bedroom dwellings	Consented 75	Proposed 69
5 bedroom dwellings	Consented 41	Proposed 35

TOTAL NO. OF DWELLINGS: Consented 385 Proposed 400

Affordable Dwelling Mix

1 bedroom dwellings	Consented 58	Proposed 58
2 bedroom dwellings	Consented 32	Proposed 36
3 bedroom dwellings	Consented 24	Proposed 27
4 bedroom dwellings	Consented 12	Proposed 12
5 bedroom dwellings	Consented 10	Proposed 10

TOTAL NO. OF DWELLINGS: Consented 136 Proposed 143

This application site covers an area encompassing 36 dwellings. This has been necessary, in order to achieve the net increase of seven dwellings, change the tenure of 3 units to affordable dwellings, maintain the site's overall requirement of 10% disabled dwellings and include unaltered units within the affected apartment block T. There are therefore 17 amended dwellings and 12 unchanged units within the application boundary, totalling 36 units.

The changes are summarised below:

Block T

Plot 328: Existing 2 bed apartment amended to a 2 bed wheelchair unit

Plot 334: Existing 2 bed apartment amended from private to affordable.

All other apartments within block T remain unchanged.

The other changes comprise the replacement of a number of large detached houses with smaller terraced and semi detached houses.

Plots 285 & 395: Single detached 2½ storey house replaced by a semi-detached pair of 2½ storey affordable houses.

Plots 286 & 394: Single detached 2½ storey house replaced by a semi-detached pair of 3 storey houses.

Plots 400 & 287: Single detached 2½ storey house replaced by a semi-detached pair of 3 storey houses.

Plots 288,292,306 & 305: Amended to disabled dwellings.

Plots 302: Amended to a smaller P type detached design.

Plots 301 & 397: Single detached 2½ storey house replaced by a semi-detached pair of 3 storey houses(type 1392)

Plots 324: Amended to a disabled dwelling design

Plots 327 & 399: Single detached house replaced by a semi-detached pair of 3 storey townhouses

plot 296: Will change from a detached type 1225 dwelling to form part of a terrace of 4 type 1310 dwellings

plot 297 and plot 298: Will convert from a pair of semi detached type 1359 dwellings to form part of a terrace of 4 type 1310, 3 storey dwellings

Plot 396: New 1310 3 storey terraced house.

plot 398: New 1173 terraced house

All the above changes occur within the main body of the site.

In summary the main changes are:

6 detached dwellings will convert to 12 semi detached 2½ or 3 storey dwellings;

A detached dwelling and a pair of semi detached dwellings will convert to a terrace of four, 3 storey dwellings;

5 detached dwellings will be converted to wheelchair units.

The replacement of 2½ storey houses with 3 storey houses involves an increase in ridge heights of approximately 1½-2 metres. Each dwelling supports its own on site parking provision. All the additional dwellings proposed comprise designs which were all consented as part of the original approval.

The applicant has submitted a series of detailed technical papers that assess the impact of the proposal. These are summarised below:

Planning Statement

The Statement assesses the proposal against the terms of the outline permission, reserved matters approval and relevant policy and the appropriateness of the development to the surrounding area in terms of townscape, open spaces and residential amenity. The statement also addresses highway and access issues, affordable housing and planning obligations.

Design and Access Statement

The statement details the development design principles, setting out the strategy for urban design, landscape design and the architectural approach. This statement includes the philosophy and approach to inclusive design, how the principles of inclusive design will be implemented and subsequently maintained and managed.

Junction Assessment

The statement considers the implication in capacity terms of the amended proposal at the junction between Eastcote Road and the new Highgrove access. The report concludes that the junction will operate satisfactorily in terms of capacity.

Addendum to Flood Risk and Drainage Assessment

The addendum is limited to phase 2 (north of the public footpath) and notes that the changes are limited to a small area and that the impact on the impermeable area is minimal. The levels strategy remains unchanged. The provision of overland flow routes for exceedences remain as previously defined in the originally approved Flood Risk Assessment. The approved drainage design has been amended to incorporate the required changes. The design principles approved under the original Flood risk assessment have been maintained.

Statement of Community Involvement

This statement provides an explanation of the consultation exercise carried out as part of the preparation of the planning application and how this complies with the Council's adopted Statement of Community Involvement. It also provides a summary of the comments made by local stakeholders and the means by which the scheme has responded to these.

3.3 Relevant Planning History

Comment on Relevant Planning History

The North Planning Committee resolved on 31 March 2005 to grant planning permission for residential development, subject to the application being referred to the Secretary of State, the signing of a S299 legal Agreement and appropriate conditions. (ref 10189/APP/2004/1781). The outline planning permission was issued on 9th March 2006, subject to the conditions imposed by the Planning Committee.

On February 21st 2008 four separate applications pertaining to the former RAF Eastcote site were considered by the North Planning Committee.

The location and specific details of an alternative access were the subject of a full planning approval for the necessary works to provide a priority junction and an access link road to the development site utilising the access currently serving the Highgrove House site. (Ref: 10189/APP/2007/2954). This was approved on 3rd March 2008.

Application ref: 10189/APP/2007/3383 (A) was a section 73 application which varied condition 40 of the outline planning permission, to remove the requirement for traffic signals on Eastcote Road and on the intersection of Eastcote Road and Fore Street, as the signals will no longer be necessary, if the alternative access (Highgrove) referred to above goes ahead. This new outline planning permission was approved on 21st February 2008.

The varied condition requires the developers to provide a traffic light controlled access, as per the Outline Planning Permission, or such alternative access as the LPA shall approve in writing. The condition allows them to commence construction on site whilst they resolve the technical issues concerning the alternative access. The developers have elected to proceed with the alternative access.

Reserved matters applications 10189/APP/2007/2463 (approved access) and 10189/APP/2007/3046 (alternative access) relate to alternative schemes and cover details of siting, design, external appearance and landscaping pursuant to discharge of condition 3 of outline planning permission 10189/APP/2007/3383 dated 21/2/2008.

Both reserved matters schemes were approved on 31 March 2008 for or 385 residential units, including 12 live work units and 134 affordable dwellings, along with a Community Hall and associated parking, landscaping and open space. Whereas application 10189/APP/2007/2463 incorporates the access points approved at outline stage from Eastcote Road and Lime Grove, application 10189/APP/2007/3046 will utilise an alternative access from Eastcote Road which will also service Highgrove House (implemented scheme).

In addition to the reserved matters details, details pursuant to the discharge of various outline planning conditions; namely residential density, community facility, sustainability and energy assessment, refuse and recycling storage, site survey plan, landscaping, and access statements were approved by Committee on 21st February 2008 and have been discharged.

Various applications to vary the layout, design and landscaping of the alternative access scheme approved under reserved matters consent ref:10189/APP/2007/3046, to allow for the provision of conservatories to various plots have subsequently been approved.

Details pursuant to the discharge of various outline and reserved matters conditions have also been approved.

An application to amend the layout to various plots to address breaches in planning control was granted on 24/6/2009 (Reserved matters Approval 10189/APP/2009/621 (Amendments to reserved matters approval refs: 10189/APP/2007/3046 and 10189/APP/2007/2463 dated 31/03/2008 involving: rearrangement of plots 100-116, removal of access path between plots 102 and 103, provision of rear access to plots 101 and 102 and substitution between plots 103 and 258 of a 4 bed wheel chair unit and 4 bed life time home unit).

Phase 1 development comprising the southern parcel of land and the vehicular link to Lime Grove is presently under construction and well advanced.

4. Planning Policies and Standards

UDP / LDF Designation and London Plan

The following UDP Policies are considered relevant to the application:-

Part 1 Policies:

- | | |
|--------|---|
| PT1.10 | To seek to ensure that development does not adversely affect the amenity and the character of the area. |
| PT1.16 | To seek to ensure enough of new residential units are designed to wheelchair and mobility standards. |
| PT1.17 | To seek to ensure the highest acceptable number of new dwellings are provided |

in the form of affordable housing.

- PT1.21 To seek publicly accessible recreational open space in association with proposals for development where appropriate to help reduce deficiencies in recreational open space or to ensure that provision does not fall below accepted standards.
- PT1.37 To facilitate the development and transport interchange facilities and rail and road improvements at Hayes Hub, which promote competitiveness, economic regeneration and environmental quality of the Hayes/West Drayton Corridor.

Part 2 Policies:

- AM14 New development and car parking standards.
- AM15 Provision of reserved parking spaces for disabled persons
- AM2 Development proposals - assessment of traffic generation, impact on congestion and public transport availability and capacity
- AM7 Consideration of traffic generated by proposed developments.
- AM9 Provision of cycle routes, consideration of cyclists' needs in design of highway improvement schemes, provision of cycle parking facilities
- BE10 Proposals detrimental to the setting of a listed building
- BE20 Daylight and sunlight considerations.
- BE21 Siting, bulk and proximity of new buildings/extensions.
- BE22 Residential extensions/buildings of two or more storeys.
- BE23 Requires the provision of adequate amenity space.
- BE24 Requires new development to ensure adequate levels of privacy to neighbours.
- BE38 Retention of topographical and landscape features and provision of new planting and landscaping in development proposals.
- BE4 New development within or on the fringes of conservation areas
- OE1 Protection of the character and amenities of surrounding properties and the local area
- OE5 Siting of noise-sensitive developments
- PPG13 Transport
- PPG24 Planning and Noise
- PPS1 Delivering Sustainable Development
- PPS3 Housing
- R17 Use of planning obligations to supplement the provision of recreation, leisure and community facilities
- HDAS Residential Layouts
Accessible Hillingdon

5. Advertisement and Site Notice

5.1 Advertisement Expiry Date:- 1st November 2010

5.2 Site Notice Expiry Date:- Not applicable

6. Consultations

External Consultees

The application has been advertised under Article 8 of the Town and Country Planning General Development Procedure Order 1995 as a Major Development. Site notices were posted and 558 surrounding property owners/occupiers, ward Councillors and local amenity groups have been consulted on this application. 15 letters have been received objecting on the following grounds:

1. Concern over increase in density.
2. The surrounding development is 2 storey 1930's housing and the proposed 2/3 storey blocks would be out of keeping with the area.
3. Object to developers cramming more units into the development.
4. Insufficient amenity space has been provided.
5. Floor space below Council's standards.
6. The proposals will increase the amount of vehicular traffic, resulting in traffic congestion and impact on highway safety.
7. The proposals will overload medical and educational services.
8. Proposals will lead to an increase in anti social behaviour.
9. Impact on drainage
10. Damage to adjoining property as a result of tree planting.

In addition, the following petitions have been received, covering all 3 applications, objecting to the additional units:

A petition bearing 21 signatures from residents in Azalia Walk and Farthings Close, objecting on the following grounds:

The residents believe that any increase in the number of units will create huge traffic congestion and parking even outside their own houses, which is already difficult, will become impossible due to the number of vehicles unable to be parked on the Pembroke Park Estate.

A petition bearing 22 signatures from residents in Flag Walk/Spring Drive, objecting on the following grounds:

This application will increase the impact of the development on the community beyond a reasonable level and adversely change the character of the neighbourhood. It will further add to the pressure of traffic management and have a detrimental impact on the access to adjacent homes.

A petition bearing 66 signatures organised by Eastcote Residents Association. The principle planning reasons for formally objecting are:

- Excessive density of living units, beyond allowable standards
- Insufficient parking spaces to meet modern requirements
- Insufficient amenity space to meet allowable standards
- Some of the units do not meet the standards for LDF Lifetime Homes
- Overlooking of existing properties and the Eastcote Conservation Area, Pretty Cottages and Eastcote Road.

A petition bearing 74 signatures raising the following matters of concern:

Our petition objects to the overall increase of density on this site with all the additional strains on the environment and infrastructure that this will cause, but especially the proposed increase within Blocks C, D, W, and V which will border the North Side edge of this site with Eastcote Road and High Road Eastcote. This will be intrusive, affect privacy and mar the street scene.

EASTCOTE RESIDENTS ASSOCIATION

This letter relates to the 3 recent planning applications listed above for the development site known as RAF Eastcote. Initially we must ask that, as these three applications are interdependent, that they are heard together at the same North Planning Committee Meeting. You will have noted that the Developer have themselves combined these 3 applications in the same Design and Access Statement, Planning Statement, Technical Note, Energy Statement, etc. Similarly many of our objections apply to all 3 applications. Please attach these comments, where applicable, to all three applications.

You will be aware that there are a number of petitions from different local actions groups all of which I believe relate to all three applications. Could you please confirm that the 3 applications will be held at the same meeting?

Much is made by the Developer of Consultation with Local Residents and this is emphasized in the Statement of Community Involvement which accompanies each application. Whilst we would agree that residents were made aware of these proposals, more especially at a public meeting in October 2009, we can't however agree that there has been any Community Involvement. Despite the fact that many residents strongly objected to the various aspects of the proposals, as can be seen from the printed feedback in the Statement of Community Involvement, the current proposals are almost the same as those shown at the public meeting thus no account was taken of the community's objections or comments. Community Involvement requires the Developer to take heed of Community concerns and opinions.

Much has changed with regard to planning legislation since the original planning application for this site. The target densities now set, within current legislation (PPS3), for a site which is PTAL of 1a, have been significantly reduced and thus if the planning application for this site was being considered now it would be firmly rejected as greatly exceeding the allowed site density. It could well be argued, by some, that the currently proposed changes, within these three applications, are so extensive as to constitute a new application for redevelopment of the site and thus due to its high density it should immediately be rejected, by delegated authority, without recourse to a planning meeting.

The developers argument that these applications are only a small increase is clearly inapplicable, as due to the already excessive density any increase by any amount, however small, must be rejected.

The only applicable reason why the Developer considers that he should be allowed to exceed the approved site density is for their own financial gain. Whilst the need for profits, in business, is appreciated it can never be to the detriment of the local community.

The London Borough of Hillingdon has exceeded its planned housing targets in recent years and with the current approved/planned developments is likely to significantly exceed its targets in the coming years. Therefore even if the currently approved density of development on this site were lower there would be no need to approve these applications to meet housing targets. It has to be said that with current planned/approved developments the pressure on the infrastructure of Hillingdon is probably well beyond breaking point already and any legitimate opportunity to limit further housing development should be taken.

In early consultations, prior to the original planning approval for this site, changes were made to blocks W, C & D to remove apartments with high level dormer windows overlooking properties on Eastcote Road. These have now been re-introduced which is completely unacceptable. It is very apparent that there is currently insufficient amenity space within the whole site and to try to bypass the approved standards we now note instances of where the developer is calling a bedroom, a study or bonus room, to allow lesser standards to apply i.e. 3 bedrooms not 4 bedrooms. Parts of this development are now occupied and due to the cramped conditions and lack of sufficient parking spaces (in most areas only one space per housing unit is provided which is completely unsatisfactory for modern living) residents of RAF Eastcote are already starting to park their cars in surrounding streets. We can only expect this situation to get worse as more units are occupied. It is hoped that the Planning Staff of Hillingdon Council and Councillors on the North Planning Committee will visit the site. The current entrance is from the northern end of Lime Grove, Eastcote. They will clearly see that the current excessive density of the site is highly unsatisfactory with insufficient amenity space, lack of privacy and many aspects which are highly detrimental to long term good living standards.

The principle planning reasons for formally objecting to these 3 planning applications are:-

- Excessive density of living units, beyond allowable standards
- Insufficient parking spaces to meet modern requirements
- Insufficient amenity space to meet allowable standards
- Some of the units do not meet the standards for LDF Lifetime Homes
- Overlooking of existing properties and the Eastcote Conservation Area, Pretty Cottages and Eastcote Road.

We firmly believe that these three applications should be firmly rejected. This letter will also be sent to you by mail together with a petition letter with over twenty signatures to allow a representative of Eastcote Residents Association to speak at the relevant meeting of the North Planning Committee.

EASTCOTE VILLAGE CONSERVATION AREA ADVISORY PANEL (EVCAAP)

The outline planning permission for this site was for a density of 30-50 DPH. During the process of determining the full planning permission 50 DPH was granted, which was very much against local opinion. Also, during the consultation period the possibility of dormer windows in the roofs of the apartments overlooking Eastcote Road and the Conservation Area was challenged, this was resolved and there were no dormer windows in the original planning permission at this position on the site.

Taylor Wimpey have now expressed a desire to increase the density beyond the maximum 50 DPH, resulting in dormer windows in the roofs of building overlooking the Conservation Area and Eastcote Road. There was a public consultation and the over whelming response from the residents was NO! It must be noted that the results of this consultation are not included in the current planning application.

The intention is to increase the density by a further 15 dwellings, most of which will be situated on the north side of the site, some impacting upon the Eastcote Village Conservation Area. At present there is one application 10189/APP/2010/1100 activated, to replace one detached house with 2 semi-detached dwellings fronting onto Lime Grove. The Design and Access statement for this application contains details of the other 14 proposed dwellings on the site. The further applications are, I have been given to understand, with Hillingdon but awaiting further details before they can be activated.

We do not consider it acceptable for these applications to be filtered through one by one, in fairness to the residents of Eastcote, the total amount of increase of density, and the effect upon the Conservation Area must be considered together.

The garden areas within this development are already very small to increase the density will make some below the required minimum. Parking for extra vehicles will also take away amenity land. The site has a PTAL rating of 1a.

The recent changes to PPS3 have taken away the necessity for a minimum density of 30 and does recognise the importance of gardens, these applications are against these changes.

It is also mentioned in the D&AS that further S106 payments will need to be negotiated, if Hillingdon are mindful to approve the applications, which we hope will not be the case, can we ask that S106 payments are requested towards the restoration of the Grade II listed buildings at Eastcote House Gardens.

EVCAAP has already made representations regarding the increase of density for RAF Eastcote, Applications numbers 10189/APP/2010/1094, 10189/APP/2010/1099 and 10189/APP/2010/1100. Further representations are set out below concerning amenity space, floor area of dwellings, street scene and the Eastcote Village Conservation Area. Please can these points be taken into consideration during the determination of these applications.

Application 10189/APP/2010/1094.

This proposed development fronts onto Eastcote Road, and part of the Eastcote Village Conservation Area. It is mainly blocks of flats, with some houses. During the negotiations in 2007, it was agreed that to maintain the street scene of Eastcote Road, there would not be any two and half or three storey blocks on the frontage. Nor would there be any dormer windows overlooking the Conservation Area. This proposal seeks to renege on that agreement.

- There will be 8 plots with houses, 7 x 3 bedroom + study and 1 x 3 bedroom. If the criteria, of the study being classed as a bedroom is implemented then 7 of the dwellings will have an amenity space below the required minimum.

- I cannot see a way of estimating the shared amenity space, but more dwellings equates to more people and more parking spaces, it follows that the shared amenity space will of necessity be reduced.

- Local Development Framework, Accessible Hillingdon, Supplementary Planning Document adopted January 2010. States that all new build homes should be Lifetime Homes and sets out the required minimum for floor space, which are as follows.

1. 1 bedroom dwelling for 1 or 2 persons: 50sqm.
2. 2 bedroom dwelling for 3 persons: 61sqm
3. 2 bedroom dwelling for 4 persons: 70sqm.
4. 3 bedroom dwelling for 4 persons: 74sqm
5. 3 bedroom dwelling for 5 persons: 86sqm.

The following is a breakdown of the blocks with the number of dwellings below the HDAS minimum.

1. Block A: No change.
2. Block C: 2 below min.
3. Block D: 5 below min
4. Block W: 6 below min.
5. Block V: 14 below min.

- Block C will have dormer windows overlooking Eastcote Road, thus being out of keeping with the street scene, which consists of 1930's semi-detached dwellings.

- Block D will have dormer windows overlooking New Cottages [Grade II listed buildings] and Pretty Corner, which are part of the Eastcote Village Conservation Area.

The Gazette of 26th October 2010 quotes a spokesperson for Taylor Wimpey saying the extra development is needed because of the global financial market. This means in understandable

parlance, Taylor Wimpey wish to make more money by overloading Eastcote with a substantial number of sub-standard dwellings, we trust that Hillingdon Council will not allow this to happen and refuse these applications.

RUISLIP RESIDENTS ASSOCIATION

Although this site is just outside the area covered by our Association the impact of its development will affect the whole district. For this reason we wish to express our concerns about these latest proposals.

We understand the current application proposes an increase in density above the maximum already approved, would reduce amenity space to certain properties below Council standards and alter the elevational treatment of properties facing onto Eastcote Road.

The current development, whilst no doubt meeting the policy requirements applying at the time of approval, is affecting the character of the area. If approved these latest approvals would:

- result in a further deterioration in local character;
- intensify demand on local services, particularly Health and Education;
- aggravate the already overloaded highways network;
- set a precedent for other developers to follow in the future.

THAMES WATER

Waste Comments: Surface Water Drainage: With regard to surface water drainage it is the responsibility of a developer to make proper provision for drainage to ground, water courses or a suitable sewer. In respect of surface water it is recommended that the applicant should ensure that storm flows are attenuated or regulated into the receiving public network through on or off site storage. When it is proposed to connect to a combined public sewer, the site drainage should be separate and combined at the final manhole nearest the boundary. Connections are not permitted for the removal of Ground Water. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required.

Thames Water would advise that with regard to sewerage infrastructure we would not have any objection to the above planning application.

Water Comments: With regard to water supply, this comes within the area covered by the Veolia Water Company.

METROPOLITAN POLICE CPDA: Members of the public should not have access to communal amenity space. Defensible space should be provided for the ground floor flats. Any changes which involve alleyways should be discussed with the CPDA.

SOUTH RUISLIP RESIDENTS' ASSOCIATION: No response.

HILLINGDON PRIMARY CARE TRUST: No response.

TRANSCO: No response.

LONDON FIRE BRIGADE: No response.

LONDON AMBULANCE SERVICE: No response.

THREE VALLEYS WATER: No response.

Internal Consultees

URBAN DESIGN AND CONSERVATION OFFICER

As approved, this area contained mainly well spaced, larger detached family houses. As proposed, block T becomes elongated to include a pair of three storey town houses and the individual houses opposite combine to form a large block of 3 storey town houses. These appear rather uncomfortable in terms of scale, design and spacing when seen against house types 3BH and 1173. Elsewhere, single houses are replaced with semis. Overall, this would create a less spacious appearance to this part of the site.

CONCLUSION: The proposed changes would result in a more cramped form of development, with spaces lost between buildings and ridge heights raised where 3 storey units have been proposed in place of 2 and 2 and a half storey buildings. The increase in accommodation would also require additional parking provision, which would result in a significant loss of soft landscaping to the detriment of the appearance of the scheme as a whole.

SUSTAINABILITY OFFICER

I object to all the proposed developments as the submitted information needs further clarity. In addition there is a disconnect between the energy assessment, the house designs and the description of development which also needs further work.

10189/APP/2010/1100 - 2 houses

The energy assessment is satisfactory and demonstrates in theory that the development can achieve the 20% renewables target. However the drawings showing the elevations do not show the use of solar hot water or PV panels. It is therefore not possible to condition the building to meet the drawings submitted and the energy statement. The elevations need to be redrawn to demonstrate the use of solar thermal panels and the PV panels.

In addition, the description in the energy assessment is for an additional 15 units, however the description of development only amounts to 14.

General Comments

The energy assessments for all three proposals appear to have been a separate technology based exercise that has not been linked to the design process. It is not possible to approve the proposals because the designs conflict with the energy assessment. The assessments appear adequate (subject to confirmation of whether they are for 14 or 15 units) as a separate technology exercise but the designs do not appropriately reflect them.

If the designs are approved the development cannot meet the 20% renewables target without further submissions and if the energy assessment is approved, the designs are not sufficient.

In addition, there is some debate as to whether solar thermal panels and PV panels should sit close to each other on a roof space as detailed in the energy assessment. Therefore, the applicant needs to provide information on the types of panels to be used and their effective relationship. There are hybrid panels on the market which provide both heat and electricity. These should be investigated for this development.

WASTE MANAGER

Flats: I would estimate the Total Weekly Waste Arising from the development to be 1,140 litres.

The above waste would therefore be accommodated in one 1,100 litre bulk bin, however I would recommend allowing space for up to a total of 2 bulk bins so as recycling can be included. Initially all bulk bins on site would be for residual waste, then some of these could be exchanged for recycling at a later date. The bin enclosures must be built to ensure there is at least 150mm clearance in between the bulk bins and the walls of storage area.

Arrangements should be made for the cleansing of the bin store with water and disinfectant. A hose union tap should be installed for the water supply. Drainage should be by means of trapped gully connected to the foul sewer. The floor of the bin store area should have a suitable fall (no greater than 1:20) towards the drainage points.

The material used for the floor should be 100mm thick to withstand the weight of the bulk bins. Ideally the walls of the bin storage area should be made of a material that has a fire resistance of one hour when tested in accordance with BS472-61.

If gate/door are added to the bin store these need to be made of either metal, hardwood, or metal clad softwood and ideally have fire resistance of 30 minutes when tested to BS476-22. The door frame should be rebated into the opening. Again the doorway should allow clearance of 150mm either side of the bin when it is being moved for collection. The door(s) should have a latch or other mechanism to hold them open when the bins are being moved in and out of the chamber.

Internal bin chambers should have appropriate passive ventilators to allow air flow and stop the build up of unpleasant odours. The ventilation needs to be fly proofed.

If the chambers are inside the building they should have a light. The lighting should be a sealed bulked fitting (housings rated to IP65 in BS EN 60529:1992).

The collectors should not have to cart a 1,100 litre bulk bin more than 10 metres from the point of storage to the collection vehicle (BS 5906 standard).

The gradient of any path that the bulk bins have to be moved on should ideally be no more than 1:20, with a width of at least 2 metres. The surface should be smooth. If the storage area is raised above the area where the collection vehicle parks, then a dropped kerb is needed to safely move the bin to level of the collection vehicle.

Houses: I would recommend that these properties keep their waste and recycling within the curtilage of their properties, at present it for collection on the allocated day(s). The current waste and recycling collection system for houses is:-

Weekly residual (refuse) waste using sacks purchased by the occupier;
Weekly dry recycling collection using specially marked sacks provided by the Council;
Fortnightly green garden waste collection using specially marked reusable bags provided by the Council.

General Points: The value of the construction project will be in excess of £300,000, so the Site Waste Management Plans Regulations 2008 apply. This requires a document to be produced which explains how waste arising from the building works will be reused, recycled or otherwise handled. This document needs to be prepared before the building work begins.

The client for the building work should ensure that the contractor complies with the Duty of Care requirements, created by Section 33 and 34 of the Environmental Protection Act.

TREE AND LANDSCAPE OFFICER

Note: These observations relate to the scheme shown on the 'Planning Layout' drawing (No. 6101/WIM-WL/301) and the associated 'Landscape Proposals' drawings (Nos. TWWL 17456 - 12, sheets 1 and 2 of 2 - sheet 2 seems to have the incorrect number, 11), although the landscaping, in particular the tree planting, on those drawings is not consistent with that shown on the 'Planning Layout' drawing and the 'Proposed Layout' in the Design and Access Statement.

There are no existing trees on this part of site (within the red line), and the two trees retained close to the site are not affected by the proposed development (modifications).

The landscape masterplan for the approved development includes roadside trees and decorative trees in rear gardens in this part of the site, which are detailed in the approved landscaping scheme (2007).

The detailed landscape proposals submitted as part of this application are similar to the approved landscaping scheme.

Subject to the relevant tree and landscape related conditions, this application is acceptable in terms of Saved Policy BE38.

ACCESS OFFICER

In assessing this application, reference has been made to London Plan Policy 3A.5 (Housing Choice) and the Council's Supplementary Planning Document "Accessible Hillingdon" adopted January 2010.

The scheme should be revised and compliance with all 16 Lifetime Home standards (as relevant) should be shown on plan. In addition, 10% of new housing should be built to wheelchair home standards and should accord with relevant policies, legislation and adopted guidance.

Wheelchair standard homes should be evenly distributed throughout the whole development and across all housing types.

The following access observations are provided:

1. Details of level access into all housing types should be submitted to satisfy the requirement (attached to the original planning applications detailed above) to achieve inclusive design across the whole development.
2. House type 1392, 1225, 1173, 3BH, 1310 2000D and 1347 should be designed in accordance with Lifetime Home standards. At least 700mm should be provided to one side of the WC, with 1100mm provided between the front edge of the toilet pan and a door or wall opposite.
3. House type 1359, 1753D, 2000D, 3BH, P, 1392, 1225, 1310 and 1347 should feature an entrance level WC that has transfer space of at least 700mm to one side, excluding chamfered corners that encroach on the transfer space (as per House Type P), and 1100mm of clear space in front of the WC. In addition, floor gully drainage should be provided to allow the facility to be used as a shower room in future.
4. House type House type 1310: The area identified for the level access shower within the entrance level WC should be repositioned within the transfer space adjacent to the toilet pan.
5. House type 2000D should provide no less than 450mm of space, clear of door openings and swings, from top step on the landing.

6. All blocks of flats should feature at least one Part M compliant passenger lift. To reduce waiting time, the disruption caused by inevitable lift breakdowns and the need to maintain wheelchair access in such situations, larger blocks containing 15 units or more should contain two lifts.

7. The bathrooms/ensuite facilities proposed for all non-wheelchair standard flats within Apartment Block T, should be designed in accordance with Lifetime Home standards. At least 700mm should be provided to one side of the WC, with 1100mm provided between the front edge of the toilet pan and a door or wall opposite.

8. To allow bathrooms to be used as wet rooms in future, plans should indicate floor gulley drainage.

9. The lobby areas within the various blocks do not take account of those who are unable to evacuate by stairs in the event of a fire emergency. Reference to BS 9999:2008 is advised. Details, which demonstrate that the evacuation needs of disabled people have been inclusively designed, should be submitted.

10. Although a number of references have been made to 10% of the proposed units being designed and built to Wheelchair Home Standards, no details are shown on plan. Particular attention should be paid to the following areas:

a. From the internal face of the front door, the wheelchair standard dwellings should feature an obstruction free area not less than 1500mm wide and 1800mm to any door or wall opposite.

b. Wheelchair accessible bathrooms should be positioned, sized and fitted to ensure that the accommodation provided is usable by wheelchair users.

c. Hallways should be designed in accordance with the published Supplementary Planning Document detailed above.

d. A space identified for a through floor lift within a wheelchair standard home, should be located in an area that leads directly from the hallway and landings (e.g. not from a living room into an upstairs bedroom).

e. Accessibility to gardens/amenity areas should be provided via any rear doors and details of level access at secondary entrance should be provided.

f. Design provisions should ensure that disabled people can evacuate from their homes independently and safely.

The Design & Access Statement should be revised to demonstrate how all 16 Lifetime Home and Wheelchair Housing standards have been successfully incorporated.

Conclusion: unacceptable

As detailed above, a number of improvements will be necessary to support any grant of permission.

Comment: Although the Design and Access Statement is sparse in its contents, in that it does not clearly explain how all lifetime home and wheelchair accessible housing standards are met, there are in fact 5 units which have been designed as wheelchair accessible, and these are of a sufficient size that they could be adapted to be fully wheelchair accessible.

S106 OFFICER

Please find below the planning obligations sought to address this uplift scheme.

NB: Assumed all market dwellings for the purpose of population calculation.

10189/APP/2010/1099

Proposed Additional Units:

5 x 4 bed houses (5hrms @3.01pop)

2 x 3 bed houses (4hrms @ 2.34pop)

total population:19.39

Heads of Terms sought:

1. Education: a contribution in the sum of £50,626
2. Health: a contribution in the sum of £216.67 x 19.39 = £4,201.23
3. Community Facilities: a contribution in the sum of £5,000
4. Libraries: a contribution in the sum of £23 x 19.39 = £445.97
5. PM&M fee: a contribution equal to 5% of the total cash contributions.

If this scheme is approved then a supplemental deed to the main S106 agreement to address this uplift would be required to address these planning obligations.

EDUCATION & CHILDRENS SERVICES

The requested contribution towards school places is £50,626.

Primary - £19,775

Secondary - £23,065

Post 16 - £7,767

HIGHWAY ENGINEER

The proposed additional 15 residential units to the previously approved are not considered to have a significant highways impact on the surrounding highway network.

A technical note has been submitted in support of the proposals, which concludes that the operation of the Eastcote High Road/Site Access Road junction in the context of the proposed provision of an additional 15 residential units at the RAF development would operate satisfactory in terms of capacity. Consequently, no objection is raised on the highways aspect of the proposals.

HOUSING SERVICES

The application offers 50% of the 15 extra units as affordable housing. Two of the units will be created in the roof space of an existing block with minor size reductions to existing flats in the block. Three flats are currently private and will change to shared ownership and we will also gain one extra 3 bedroom house for rent.

Whilst we would gain additional affordable housing units in a desirable area of the borough, there will be an impact in terms of density on the consented development. The affordable units may be hard to deliver as the RSL on this development is currently working with A2 Dominion, but the relationship is very fraught because of delays in handovers on the first phase of units. A2 Dominion have indicated they would not want to take on any further stock on this development and it would be difficult to have another RSL managing units in the same block as A2 Dominion. This could be further complicated by the lack of HCA funding in the immediate future.

However it is possible the units could be delivered as an alternative form of affordable housing such as discounted sale but this is not indicated in the application.

7. MAIN PLANNING ISSUES

7.01 The principle of the development

The principle of residential development on this site has already been established by virtue of the outline planning permission. The general layout, design and landscaping of the development has been established by virtue of the reserved matters approvals.

It is considered that this application to vary the outline and reserved matters approvals, would have only limited local impact on the immediate environment and would not raise fundamental issues in relation to flooding and contamination, ecology, waste disposal and archaeology. As such, no objections are raised in principle to the proposed amendments.

7.02 Density of the proposed development

From a strategic land use planning viewpoint, the Government's land use planning policy is outlined in National Planning Policy guidance. This is reflected in the Mayor's London Plan, which provides planning policy at the regional level. On matters of density of housing, the Mayor's London Plan superceded the Adopted Unitary Development Plan for Hillingdon at the time the outline application was considered. The Mayor's London Plan seeks to accommodate demand for housing growth through maximising the density of development on previously developd land. This is done with reference to density guidance to guide the extent of development that might be acceptable on individual sites.

In this case, an outline planning permission has already been granted. That application considered the matter of the acceptable density of development for the site and defined this as up to 50 units per hectare. This was stipulated by way of a planning condition on the outline permission. This is a material consideration, which guided the determination of the subsequent reserved matters applications. Both reserved matters applications for the approved and alternative access schemes were approved for the development of 385 residential units, at an average density of 50 dwellings per hectare (dph). This was in excess of the national indicative minimum target of 30dph set by PPS3 at that time and was in accordance with the maximum density of 50dph approved by the outline consent.

Cummulatively, all three applications to uplift the approved scheme by 15 units would result in a density of 51.9 dwellings per hectare. In terms of this application site, the density would be 53 dwellings per hectare. Table 3A.2 of the London Plan recommends that developments within suburban residential setting with a PTAL score of 1 and with 3.8-4.6 hr/unit, should be within the ranges of 150-200 hr/ha and 35-55 units/ha. The proposed density is therefore within the London Plan guidelines, having regard to the site's Public Transport Accessibility Level.

Notwithstanding the above, given the locational constraints of the site in terms of proximity to Highgrove Nature Reserve, Eastcote Conservation Area and the character of the surrounding residential areas, it is important to ensure that this level of development would not adversely impact upon the amenity of the surrounding area and future residents. These issues are dealt with elsewhere in this report.

In terms of the mix of units, Saved Policy H4 states that wherever practicable, new residential developments should have a mix of housing units of different sizes, including units of one or two bedrooms. Policy H5 states that the Council will encourage the provision of dwellings suitable for large families. The proposed mix of 2 bedroom flats and 3 and 4 bedroom houses is considered acceptable, in compliance with these policies.

7.03 Impact on archaeology/CAs/LBs or Areas of Special Character

Saved Policy BE4 requires any new development within or on the fringes of a Conservation Area to preserve or enhance those features that contribute to its special

architectural and visual qualities, and to make a positive contribution to the character or appearance of the conservation area. Saved Policy BE10 seeks to protect the setting of listed buildings.

There are no archaeological or historic issues associated with this application. Given the distance between this site and the Eastcote Village Conservation Area and tree screening on the boundaries of the larger site, it is not considered that the proposed changes would have a direct impact on the character of the Conservation Area, in compliance with Saved Policy BE4 of the Hillingdon Unitary Development Plan.

7.04 Airport safeguarding

There are no airport safeguarding issues related to this development.

7.05 Impact on the green belt

There are no Green Belt issues associated with this site.

7.06 Environmental Impact

Issues relating to land contamination have already been dealt with for the former RAF Eastcote site as a whole. It is not considered that the uplift for 7 additional units would raise any further issues in this regard.

7.07 Impact on the character & appearance of the area

Saved Policy BE13 of the UDP states that development will not be permitted if the layout and appearance fail to harmonise with the existing street scene or other features of the area which the local planning authority considers it desirable to retain or enhance. Saved Policy BE19 seeks to ensure that new development within residential areas complements or improves the amenity and character of the area. Saved Policy BE4 requires any new development within or on the fringes of a Conservation Area to preserve or enhance those features that contribute to its special architectural and visual qualities and to make a positive contribution to the character or appearance of the conservation area. Saved Policy BE38 stresses the need to retain and enhance landscape features and provide for appropriate (hard and soft) landscaping in new developments.

As approved, this part of the former RAF Eastcote site contained mainly well spaced, larger detached family houses. As proposed, block T becomes elongated to include a pair of three storey town houses and the individual houses opposite combine to form a large block of 3 storey town houses. The Urban Design and Conservation Officer raises concerns in terms of scale, design and spacing when seen against house types 3BH and 1173. Elsewhere, 6 detached houses are replaced with 12 semi detached dwellings and a detached dwelling and a pair of semi detached dwellings will convert to a terrace of four, 3 storey dwellings. It is considered that this would create a less spacious appearance to this part of the site and would result in a more cramped form of development, with spaces lost between buildings and ridge heights raised, where 3 storey units have been proposed in place of 2 and 2 and a half storey buildings. The increase in accommodation would also require additional parking provision, which would result in a loss of soft landscaping to the detriment of the appearance of the scheme as a whole.

Overall, it is considered that the proposed development, including changes to the layout and the design of the buildings would result in a more cramped form of development, with spaces lost between buildings and ridge heights raised. The increase in accommodation would require additional parking provision, which would result in the loss of soft landscaping to the detriment of the appearance of the scheme as a whole, contrary to Saved Policies BE13, BE19 and BE38 of the UDP.

7.08 Impact on neighbours

Policy BE20 of the Unitary Development Plan Saved Policies September 2007 states that

the Local Planning Authority will seek to ensure that buildings are laid out so that adequate daylight, sunlight and amenities of existing houses are safeguarded. Policy BE21 of the Unitary Development Plan Saved Policies September 2007 states that planning permission will not be granted for new development, which by reason of its siting, bulk and proximity, would result in a significant loss of residential amenity of established residential areas.

The supporting text to Policies BE20 and BE21 of the UDP Saved Policies September 2007 states 'that while some proposals of substantial width, height and depth, may not cause loss of amenity by reason of daylight or sunlight, these may nonetheless still be over-dominant in relation to the adjoining property and/or its private amenity space. This in turn can result in a depressing outlook detracting from residential amenity.' Policy BE24 of the UDP Saved Policies September 2007 seeks to ensure that the design of new buildings protects the privacy of the occupiers and their neighbours. The supporting text to this policy states that 'the protection of privacy, particularly of habitable rooms (including kitchens) and external private amenity space is an important feature of residential amenity'.

The Council's Supplementary Planning Document HDAS: Residential Layouts states that where a two or more storey building abuts a property or its garden, adequate distance should be maintained to overcome possible over domination. The distance provided will be dependent on the bulk and size of the building but generally 15m would be the minimum acceptable separation distance. The Council's HDAS also provides further guidance in respect of privacy, stating in particular that the distance between habitable room windows should not be less than 21m.

The Council's HDAS at paragraph 4.12 states that 'new residential development should be designed so as to ensure adequate privacy for its occupants and that of the adjoining residential property from windows above ground floor, an angle of 45 degrees each side of the normal is assumed in determining facing, overlooking distances'. This requirement has been adhered to so as to respect the residential amenity of existing residents.

The site is centrally located within the larger development and it is considered that the proposed changes to these plots would not have an adverse impact on the amenities of surrounding residents in terms of loss of privacy, outlook, daylight or sunlight.

7.09 Living conditions for future occupiers

In relation to outlook and privacy, Policies BE21 and BE24 require new residential developments to be designed so as to ensure adequate outlook and privacy for occupants of the site. In relation to sunlight access, Policy BE20 of the UDP seeks to ensure that buildings are laid out to provide adequate sunlight and preserve the amenity of existing houses.

The Council's Supplementary Planning Document HDAS: Residential Layouts states that where a two or more storey building abuts a property or its garden, adequate distance should be maintained to overcome possible over domination. The distance provided will be dependent on the bulk and size of the building but generally 15m would be the minimum acceptable separation distance. Only 11.5 metres would be provided between the flank wall of plot 339 and the rear of the terrace comprising plots 396, 296, 297 and 298. In term of privacy, it is considered that the proximity, height and number of windows in the rear elevations of the proposed terrace (plots 396, 296, 297 and 298), at a distance of only 11.5 metres from the adjoining plot's (398) private amenity space, would impinge upon the privacy of future occupiers of that plot to the north and engender a sense of

being under surveillance. This scheme would impair the privacy neighbouring residents might reasonably expect to enjoy in a spacious suburban area such as this, resulting in an unacceptable impact on the amenities of the occupiers of that plot, contrary to Saved Policy BE24 of the UDP and the Supplementary Planning Document HDAS: Residential Layouts.

Policy BE23 of the UDP requires the provision of external amenity space, sufficient to promote the amenity of the occupants of the proposed and surrounding buildings and which is usable in terms of its shape and siting. The Council's Supplementary Planning Document, specifies amenity space standards for dwellings. As a guide 60sq. m should be provided for 2 and 3 bedroom houses, 100sq. m for 4 + bedroom houses, 20sq. m for 1 bedroom flats and 25sq. m for 2 bedroom flats.

Private amenity space is provided in the form of individual gardens for the houses. None of the additional dwellings have adequate garden sizes. Of the 3 bed + study and 4 bedroom units, amenity space provision varies from 31.9sq.m to 32.4sq.m, 36.1sq.m, 51.8sq.m, 63.8sq.m and 82.2sq m., which is below the Council's minimum private amenity space standards of 100sq. m for this size of property. In addition the 3 bed unit at plot 395 only has a private amenity area of 36.1sq.m. which falls well below the Council's minimum standard of 60sq. In terms of the replaced units plots 285, 286, 288, 295, 301, 302, 305, 306 and 324 all have adequate amenity space provision. However, plots 287, 296, 297, 298 and 327 have sub standard private amenity space provision.

Furthermore, although an area of public open space has been provided, none of the flats in block T have been allocated any private amenity space. The amenity space provision therefore fails to meet the Council's amenity space standards given in Supplementary Planning Document HDAS: Residential Layouts, contrary to Policy BE23 of the UDP.

London Plan policy 3D.13 'Children and young people's play and informal recreation strategies' states that "The Mayor will and boroughs should ensure that developments that include housing should make provision for play and informal recreation, based on the expected child population generated by the scheme and an assessment of future needs." The overall child population, in accordance with the Mayor's 'Providing for children and young people's play and informal recreation' Supplementary Planning Guidance is estimated to be 25.12, which when using a benchmark figure of 10sq.m. for each child, equates to a figure of 250sq.m. children's play space as part of this development.

Although the majority of the units have private gardens, dedicated provision for children's play space, particularly for the residents of the flat element would be required to ensure compliance with the London Plan policy 3D.13. This has been provided elsewhere on the larger site and had the development been acceptable in other respects, a condition or legal agreement could have ensured that occupants of this development would be allowed to enjoy this provision.

7.10 Traffic impact, car/cycle parking, pedestrian safety

All vehicular access will utilise the newly constructed propriety junction and access road leading from High Road Eastcote. A Junction Assessment Report has been submitted as part of the application. The report considers the implication in capacity terms of the amended proposal at the junction between Eastcote Road and the new Highgrove access. The report concludes that the junction will operate satisfactorily in terms of capacity. The Council's Highways Engineer raises no objection to the development in terms of the impact of the traffic generated on the highway network.

With regard to parking, the proposed town houses will have integral garages and additional parking has been provided for the additional appartments. Although adequate parking has been provided in accordance with the Council's adopted standards, this is at the expense of soft landscaping and amenity areas, which formed part of the approved scheme. Nevertheless, had the appication been acceptable in other respects,it is considered that adequate parking could be provided and highway and pedestrian safety would not be prejudiced, in compliance with Policies AM14 and AM7 of the UDP Saved Policies September 2007.

Although secure cycle parking has not been identified in the application submission, it is considered that had the application been recommended for approval this issue could be dealt with by condition and is therefore not a sustainable reason to refuse the application.

7.11 Urban design, access and security

These issues have been dealt with elsewhere in the report.

7.12 Disabled access

HDAS was adopted on the 20th December 2005 and requires all new residential units to be built to lifetime home standards and 10% of units designed to wheelchair accessible standards. Further guidance is also provided on floor space standards for new residential development to ensure sound environmental conditions are provided on site. The minimum standard for 1 bedroom flats is 50sq. m and 63sq. m for 2 bedroom flats. The minimum standards for 2 bedroom houses are 63sq. m, 81sq. m for 3 bedroom houses and 92sq m. for 4 bedroom houses. Additional floorspace would be required for wheelchair units. The floor plans indicate that the development generally achieves HDAS recommended floor space standards and that Lifetime Home Standards could be met for these flats in terms of size.

The Access Officer has commented that the scheme should be revised and compliance with all 16 Lifetime Home standards (as relevant) should be shown on plan. In addition, 10% of new housing should be built to wheelchair home standards and should accord with relevant policies, legislation and adopted guidance.

The Access Officer has expressed concerns regarding the internal layout of some of the units and that the application should be amended to reflect the required changes. Officers consider that on closer examination, the units are of a sufficient size that they could be adapted to meet the relevant standards. It is not therefore considered that the application could be refused on accessibility. An informative is nonetheless recommended, to give guidance to the applicant on this matter.

7.13 Provision of affordable & special needs housing

The London Borough of Hillingdon Affordable Housing SPD (May 2006) seeks to secure a minimum of 50% affordable housing on new build schemes that contain 15 units or more. This should then be split in 70% social rented and 30% shared ownership/intermediate housing. The Council's Planning Obligations SPD (July 2008), together with the London Plan Consolidation (2008) supersedes these requirements and schemes with 10 units or more shall secure 50% affordable housing.

Affordable housing is provided as part of the increased number of dwellings. 7 units are provided as the affordable housing, out of the total uplift of 15 dwellings. For this application, on plots 285 & 395 a single detached 2½ storey house would be replaced by a semi-detached pair of 2½ storey affordable houses, while in Block T, (plot 334) an approved 2 bedroom apartment would be amended from private to affordable. Thisis would ensure that this application for an uplift of 7 dwellings provides 3 affordable dwellings. The amendment to achieve this requirement involves an internal re-design of

the apartment in Block T. This level of provision is considered acceptable, as it exceeds the 35% achieved over the larger site. However, the applicants have not offered a legal agreement to address this issue and it is recommended the planning application should also be refused on this basis.

7.14 Trees, Landscaping and Ecology

The Tree and Landscape Officer notes that there are no existing trees on this part of site and the two trees retained close to the site are not affected by the proposed development. The landscape masterplan for the approved development includes roadside trees and decorative trees in rear gardens in this part of the site, which are detailed in the approved landscaping scheme (2007).

The detailed landscape proposals submitted as part of this application are similar to the approved landscaping scheme. Therefore, subject to the relevant tree and landscape related conditions, this application is considered acceptable in terms of Saved Policy BE38.

7.15 Sustainable waste management

The requirement for the scheme to provide for appropriate covered and secure refuse and recycling bin storage facilities could be secured by a condition in the event that this scheme is approved.

7.16 Renewable energy / Sustainability

London Plan (February 2008) policies 4A.4 and 4A.7 require the submission of an energy demand assessment based on sustainable design and construction, a demonstration of how heating and cooling systems have been selected in accordance with the Mayor's energy hierarchy and how the development would minimise carbon dioxide emissions, maximize energy efficiencies, prioritise decentralised energy supply and incorporate renewable energy technologies, with a target of 20% carbon reductions from on-site renewable energy.

An energy assessment has been submitted with the application and this is considered satisfactory. The assessment demonstrates that in theory, the development can achieve the 20% renewables target using solar hot water or PV panels. However the detailed elevational drawings do not show the use of these renewable energy technologies. There is therefore a disconnect between the energy assessment, the house designs and the description of development. The energy assessments appears to have been a separate technology based exercise that has not been linked to the design process.

It is therefore not possible to approve the proposals, because the designs conflict with the energy assessment. It is not considered that conditions could address this issue, because the scheme would

require a redesign, in order to accommodate the suggested renewable technologies, comprising solar thermal panels and the PV panels. Given that no details for on-site renewable energy generation can be incorporated into the scheme, the proposal would fail to meet the requirements set out in the London Plan contrary to Policy 4A.7 of the London Plan (February 2008).

7.17 Flooding or Drainage Issues

There are no specific flooding or drainage issues associated with this application. However, should the application be approved, a condition is recommended requiring sustainable Urban Drainage (SUDS) measures for areas of hard surfacing.

7.18 Noise or Air Quality Issues

With respect to the noise impact the development may have upon surrounding residents, traffic to the proposed development would utilise the existing access and it is not considered that the additional vehicle movements associated with the proposed

development would result in the occupiers of surrounding properties suffering any significant additional noise and disturbance or visual intrusion, in compliance with Saved Policy OE1 of the UDP.

7.19 Comments on Public Consultations

The primary concerns relating to the principle of the development, parking and the impact on residential amenity (loss of privacy, and outlook), have been dealt with in other sections of the report. Similarly, the effect of the scheme on the character of the area and intensification of use, have also been addressed.

7.20 Planning Obligations

Policy R17 of the Hillingdon UDP is concerned with securing planning obligations to supplement the provision recreation open space, facilities to support arts, cultural and entertainment activities, and other community, social and education facilities through planning obligations in conjunction with other development proposals. These UDP policies are supported by more specific supplementary planning guidance. As the application is being recommended for refusal, no negotiations have been entered into with the developer in respect of these contributions. However, if the application were to be considered for approval, the following broad Section 106 Heads of Terms would be pursued by the Council at that time:

Education contributions: In connection with this proposal and following an assessment by Education Services, a contribution of £50,626 is considered appropriate in order to cater for the increased demand placed on existing school places by the proposed development. No legal agreement to address this issue has been offered and it is recommended the application should be refused on this basis.

Affordable and Key Worker Housing: The application proposes 50% affordable housing of which 100% will be social rented. This level of provision is considered acceptable. However, the applicants have not offered a legal agreement to address this issue and it is recommended the planning application should also be refused on this basis.

Community Facilities: In line with the supplementary planning document for community facilities it is likely that a community facilities contribution equal in nature and scale to the proposal could be sought if a need is demonstrated. A libraries contribution should be sought, this is equal to £23 for each person equating to $£23 \times 19.39 = £445.97$.

Health: In line with the supplementary planning document for Health a contribution in the realm of $£216.67 \times 19.39 = £4,201.23$ is likely to be sought if a bid is received demonstrating need by the local Primary Health Care Trust.

Project Management and Monitoring: In line with the supplementary planning document a contribution towards project management and monitoring is sought equal to 5% of the total cash contributions secured from this proposal.

7.21 Expediency of enforcement action

There are no enforcement issues associated with this site.

7.22 Other Issues

There are no other issues arising from this application.

8. Observations of the Borough Solicitor

When making their decision, Members must have regard to all relevant planning legislation, regulations, guidance, circulars and Council policies. This will enable them to

make an informed decision in respect of an application.

In addition Members should note that the Human Rights Act 1998 (HRA 1998) makes it unlawful for the Council to act incompatibly with Convention rights. Decisions by the Committee must take account of the HRA 1998. Therefore, Members need to be aware of the fact that the HRA 1998 makes the European Convention on Human Rights (the Convention) directly applicable to the actions of public bodies in England and Wales. The specific parts of the Convention relevant to planning matters are Article 6 (right to a fair hearing); Article 8 (right to respect for private and family life); Article 1 of the First Protocol (protection of property) and Article 14 (prohibition of discrimination).

Article 6 deals with procedural fairness. If normal committee procedures are followed, it is unlikely that this article will be breached.

Article 1 of the First Protocol and Article 8 are not absolute rights and infringements of these rights protected under these are allowed in certain defined circumstances, for example where required by law. However any infringement must be proportionate, which means it must achieve a fair balance between the public interest and the private interest infringed and must not go beyond what is needed to achieve its objective.

Article 14 states that the rights under the Convention shall be secured without discrimination on grounds of 'sex, race, colour, language, religion, political or other opinion, national or social origin, association with a national minority, property, birth or other status'.

9. Observations of the Director of Finance

Not Applicable to this application

10. CONCLUSION

The proposed changes would result in a cramped form of development. The bulk and massing of the proposed development would fail to respect and would be out of scale with the established character of the area, while the scheme as a whole would fail to produce good environmental conditions for future and neighbouring occupiers, in terms of adequate amenity space provision, and loss of outlook. The increase in accommodation would also require additional parking provision, which would result in a significant loss of soft landscaping to the detriment of the appearance of the scheme as a whole, adversely affect the cohesion of the scheme/layout and the quality of the landscaping of this part of the site. The details for on-site renewable energy generation have not been incorporated into the detailed design of the scheme. In addition, the applicant has failed to provide contributions towards the improvements of services and facilities as a consequence of demands created by the proposed development (in respect of education, health improvements, community facilities and libraries. The application is therefore recommended for refusal.

11. Reference Documents

Planning Policy Statement 1 (Delivering Sustainable Development)
Planning Policy Statement 3 (Housing)
Planning Policy Statement 25 (Development and Flood Risk)
Planning Policy Guidance Note 13 (Transport)
Planning Policy Guidance Note 15 (Planning and the Historic Environment)
Planning Policy Guidance Note 24 (Planning and Noise)
London Plan Consolidation (February 2008)

Hillingdon Unitary Development Plan Saved Policies (September 2007)
HDAS: Residential Layouts
Supplementary Planning Guidance Community Safety by Design
Supplementary Planning Guidance Planning Obligations Strategy
Letters making representations.
Petitions

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Notes



Site boundary

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Ruislip**

Planning Application Ref:

10189/APP/2010/1099

Planning Committee

North

Scale

1:2,000

Date

November
2010

**LONDON BOROUGH
OF HILLINGDON**

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