

## Report of the Head of Planning & Enforcement Services

**Address** RAF EASTCOTE LIME GROVE RUISLIP

**Development:** Erection of a pair of semi-detached three storey townhouses, 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 1 house.)

**LBH Ref Nos:** 10189/APP/2010/1100

**Drawing Nos:** 6101/WIM-WL/400  
6101/WIM-WL/401  
6101/WIM.W.L/1310/P1  
6101/WIM.W.L/1310/E4  
Design and Access Statement  
Planning Statement  
Statement of Community Involvement  
Energy Statement  
Odyssey Consulting Engineers Technical Note  
Addendum Flood Risk and Drainage Assessment  
6101/WIM.W.L/SSAA/PHASE 4

**Date Plans Received:** 10/05/2010 **Date(s) of Amendment(s):**

**Date Application Valid:** 21/07/2010

### 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 by one unit, replacing a 5 bedroom detached dwelling with a semi-detached pair of 3 bedroom town houses, fronting Kent Gardens.

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

The proposed changes would result in a more cramped form of development, with ridge heights raised where 3 storey units are now proposed in place of a 2 and a half storey building. 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 affecting 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 design of the scheme. The design of the development as submitted cannot therefore meet the 20% renewables target without further modifications. 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 proposal is therefore contrary to Policies BE13, BE19 and BE38 of the adopted Hillingdon Unitary Development Plan and the Council's adopted Supplementary Planning Document HDAS: Residential Layouts.

**2            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).

**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.
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
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.
H4	Mix of housing units
H5	Dwellings suitable for large families
OE1	Protection of the character and amenities of surrounding properties and the local area
OE7	Development in areas likely to flooding - requirement for flood protection measures
OE8	Development likely to result in increased flood risk due to additional surface water run-off - requirement for attenuation measures

PPG13	Transport
PPS1	Delivering Sustainable Development
HDAS	Residential Layouts

### 3

You are advised that all residential units within the development should be built in accordance with all 16 Lifetime Home standards (as relevant). Guidance is provided in the Council's

Supplementary Planning Document Hillingdon Design and Accessibility Statement: Accessible Hillingdon, relevant policies and legislation. The Council has a dedicated Access Officer, who would be able to assist with any specific queries. Mr. Ali Kashmeri can be contacted via [akashmeri@hillingdon.gov.uk](mailto:akashmeri@hillingdon.gov.uk).

## 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 22,500m<sup>2</sup> was administration space and 5,500m<sup>2</sup> 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 southern edge of the larger site which is accessed directly off Kent Gardens. The consented scheme for this part of the site contains a 3 storey pair of semi detached town houses and two detached 2 1/2 storey dwellings fronting Kent Gardens.

### 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 relates to plot 2, fronting Kent Gardens. It is proposed to replace a single 2 1/2 storey detached house (type 1735) with a semi-detached pair of 3 storey houses (type 1310), creating a new plot 393. The design of the proposed 1310 type dwellings was consented as part of the previous approval and features elsewhere within the larger site. Each new dwelling incorporates it's own curtilage parking, in the form of a driveway and integral garage.

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 exceedances 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. None of the approved

dwelling fronting Kent Gardens have been erected. The application site currently comprises the sales office and a landscaped area.

#### **4. Planning Policies and Standards**

##### **UDP / LDF Designation and London Plan**

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

Part 1 Policies:

Part 2 Policies:

AM14	New development and car parking standards.
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
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.
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PPG13	Transport
PPS1	Delivering Sustainable Development
HDAS	Residential Layouts

#### **5. Advertisement and Site Notice**

**5.1** Advertisement Expiry Date:- **8th September 2010**

**5.2** Site Notice Expiry Date:- Not applicable

#### **6. Consultations**

##### **External Consultees**

29 surrounding property owners/occupiers consulted on this application. A site notice was posted at the site. 4 letters have been received objecting to the proposals on the following grounds:

1. All other dwellings on Lime Grove and Kent Gardens are 2 storey without exception. This proposed three storey town house is out of keeping with other properties in the street.
2. It will dominate rather than blend in with existing properties.
3. Should be 2 storey like all other properties in Kent Gardens.
4. This proposal is distinct from similar properties currently being developed within the former RAF site, as this development will be on an existing and established residential street.
5. The three storey height is excessive and not in keeping with the remainder of Kent Gardens.
6. The expected cars associated with these houses will very likely cause obstruction and possibly danger due to the proximity to the junction used by traffic accessing Kent Gardens.
7. The pattern of build may not have altered, but the no. of people and cars entering and leaving the site will.
8. The density of the site should not be increased based upon a specious argument concerning the financial viability (for which read profitability) of the development.
9. When the current development was approved, there were strong objections at the time regarding the obvious overdevelopment of the site. Taylor Woodrow must be made to live with what they have. These applications should be dismissed.

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 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.

## Letter 2

The above applications are for 15 extra dwellings at former RAF Eastcote site. We ask that these applications are determined together so that the full impact upon the density of the site can be realised.

The description of applications 1094 & 1099, modification of outline planning permission ref 10189/APP/2007/3383 & 10189/APP/2007/3046 is puzzling. As far as we were aware in 2007 full planning permission was granted, with some reserve matters. The outline permission ref. 10189/APP/2004/1781 was granted 09/03/06. Please could these descriptions be amended to avoid confusion?

The Planning Permission granted in February 2008, gave permission for 50 dwellings per hectare, which was the maximum for this site with a PTAL of 1a. Since the granting of this permission there have been changes to Planning Laws, both from Central Government and from the Mayor of London. A requirement for a minimum density has been removed and the importance of gardens and amenity space recognised.

It is not acceptable for the density of this site to be increased, it is currently at maximum.

With the introduction of more dwellings, there comes a need for more parking places, which will lead to a reduced garden size and loss of both public and private amenity space, which will not comply with current rulings.

During the original negotiations with Wimpey, it was agreed that the area overlooking the Eastcote Village Conservation Area, would not have rooms in the roofs, they would be two storey only, so as not to be detrimental to the Conservation Area. These applications are in direct contravention of the earlier agreement.

LDF Accessible Hillingdon SPD adopted Jan 2010, requires that all new homes should be lifetime homes. Will these proposals comply with this SPD?

We ask for these applications to be refused.

However, should the Council decide to approve these applications, we ask that Permitted Development Rights be removed from these dwellings, in line with the earlier planning permission.

Letter 3

EVCAAP has already made representations regarding the increase of density for RAF Eastcote, Applications numbers, 10189/APP/2010/1094, 10189/APP/2010/1099, 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/2010/1100.

This is the only change for the South side of the site, an increase of 1 dwelling. This just adds to the overall total of increase in density level.

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.

#### 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 application 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.

## **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.

### **Internal Consultees**

#### **TREE & LANDSCAPE OFFICER**

There are no existing trees on this part of site, but the approved landscaping scheme (ACD - Sheet 8 of 9) includes soft landscaping at the front of plots 1, 2, 3 and 4. The landscaped, open frontages of plots 1 and 2 (2 houses approved) fit with the pattern of houses and front gardens in this part of Kent Gardens and Lime Grove, with potential for the planting of trees at the front of the two houses, whilst the pair of town houses and the block opposite form a gateway feature to this part of the site in views from Lime Grove.

The proposed development of two town houses (with driveways/parking spaces and small front gardens similar to plots 3 and 4) will be inconsistent with the pattern of two-storey houses and gardens on the Kent Gardens frontage; significantly reduce the space and opportunity for tree planting on the frontage, which might otherwise be achieved as part of the amendment of the approved landscaping scheme and/or carried out by future owners/occupiers of the two houses, and the two pairs of town houses (plots 3 and 4 approved, and plots 2 and 393 proposed) will in effect present a large 3-storey block rather than a gateway feature. As such the proposed development will be out of character with the surrounding area and landscape.

For the landscape-related reasons outlined above, the application is unacceptable in terms of Saved Policy BE38 of the UDP.

#### **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 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.

#### 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.

The following access observations are provided:

1. Level access is required into the proposed dwelling houses via the front door.
2. The bathrooms/ensuite facilities, including the entrance level WC, should be designed in accordance with Lifetime Home standards. At least 700mm should be provided to one side of the WC, with 1100 mm provided between the front edge of the toilet pan and a door or wall opposite.
3. To allow bathrooms, including the entrance level WC, to be used as wet rooms in future, plans should indicate floor gulley drainage.

The Design & Access Statement should be revised to confirm adherence to all 16 Lifetime Home standards.

Conclusion: Revised plans that incorporate the above observations should be requested prior to any grant of planning permission.

#### URBAN DESIGN AND CONSERVATION OFFICER

As approved the three houses in this group have a similar design approach, using yellow stock bricks, render and gable features. The proposed semi-detached pair of town houses in red brick would look out of place within the group and introduce additional hard surfacing to the frontage.

**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.

S106 OFFICER: As this application came in as red line plan around only 2 proposed houses (an increase of one) then this would not trigger a requirement for planning obligations.

## **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, the density would be 57 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 3.1-3.7 hr/unit, should be within the ranges of 150-200 hr/ha and 40-65 units/ha. The proposed density is therefore within the London Plan guidelines for this site and the RAF Eastcote site overall. However, for this red line application site, having regard to the locational constraints of the site, it is important to ensure that the proposed development harmonises with the character of the surrounding residential area and that good environmental conditions can be provided for futue and surrounding occupiers. 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 3 bedroom houses is considered acceptable, in compliance with these policies.

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

There are no archaeological or heritage issues associated with the changes sought to the approved scheme.

**7.04 Airport safeguarding**

There are no airport safeguarding implications associated with this application.

**7.05 Impact on the green belt**

The site does not fall within and is not adjacent to the Green Belt.

**7.06 Environmental Impact**

There are no environmental implications linked to this application.

**7.07 Impact on the character & appearance of the area**

Policies contained within the Hillingdon Unitary Development Plan Saved Policies (September 2007) seek to ensure that new development is compatible with surrounding developments in terms of appearance and layout. Of particular relevance are Policies BE13, BE19 and BE38, which cover the impact of development on the visual amenities of the street scene and character of the area.

There are no existing trees on this part of site, but the approved landscaping scheme includes soft landscaping at the front of plots 1, 2, 3 and 4. The landscaped, open frontages of plots 1 and 2 fit with the pattern of houses and front gardens in this part of Kent Gardens and Lime Grove, with potential for the planting of trees at the front of the two houses,

The pair of 3 storey town houses (plots 3 and 4) and the block opposite the Lime Grove entrance (Block U), form a gateway feature to this part of the site in views from Lime Grove. The house types approved for plots 1 (a 2 storey detached dwelling) and plot 2 (a 2 1/2 storey detached dwelling) were specifically designed to fit with the pattern of houses in Kent Gardens and Lime Grove, which are predominantly 2 storey semi detached and detached dwellings, interspersed with bungalows.

The proposed development of two, three storey town houses, with driveways/parking spaces and small front gardens similar to plots 3 and 4, will be inconsistent with the pattern of two-storey houses and gardens on the Kent Gardens frontage. The proposed changes would result in two pairs of town houses (approved plots 3 and 4 and proposed plots 2 and 393), which will in effect present two large 3-storey blocks on the Kent Road frontage, rather than a gateway feature. This view is shared by the Urban Design and Conservation Officer, who notes that as approved, the three houses in this group have a similar design approach, using yellow stock bricks, render and gable features. The proposed semi-detached pair of town houses, in red brick, would look out of place within the group and introduce additional hard surfacing to the frontage.

In addition, the proposed amendments would significantly reduce the space and opportunity for tree planting on the frontage, which might otherwise be achieved as part of the approved landscaping scheme and/or be carried out by future owners/occupiers of the two houses. As such the Tree and landscape Officer considers that the proposed development will be out of character with the surrounding area and landscape.

For the urban design and landscape-related reasons outlined above, the application is considered unacceptable in terms of Saved Policies BE13, BE19 and BE38 of the UDP.

#### **7.08 Impact on neighbours**

Policy BE24 states that developments should be designed to protect the privacy of future occupiers and their neighbours. The Council's SPD HDAS: Residential Layouts also provides further guidance in respect of privacy, stating in particular that the distance between habitable room windows should not be less than 21 metres. In relation to outlook, Policy BE21 requires new residential developments to be designed so as to ensure adequate outlook for occupants of the site and surrounding properties. In relation to sunlight, Policy BE20 of the Hillingdon Unitary Development Plan Saved Policies (September 2007) seeks to ensure that buildings are laid out to provide adequate sunlight and preserve the amenity of existing houses.

It is considered that the change in house type to plot 2 would not have an adverse impact on the amenities of surrounding residents. The garden depths to plot 5 to the rear and separating distances from plots 1 and 3 remain unchanged. As such, it is considered that the proposed revisions would not result in unacceptable impacts on surrounding residents in terms of loss of light, overlooking or overdominance, in compliance with Policies BE20, BE21, and BE24 of the Hillingdon Unitary Development Plan Saved Policies (September 2007).

#### **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.

Both units will benefit from a reasonable level of privacy, outlook and light. Also, all units would comply with the minimum overall space standards for residential properties as set out in the Supplementary Planning Document.

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,

Amenity space is provided in the form of individual gardens at 75sq.m and 85sq. m for plots 2 and new plot 393 respectively and will therefore continue to meet the Council's amenity space standards as set out in the SPD HDAS: Residential Layouts.

Overall, it is considered that the proposed development would provide good living conditions for both of the proposed units in accordance with Policies BE20, BE23, BE24, OE1 and O5 of the Hillingdon Unitary Development Plan Saved Policies (September 2007), HDAS: Residential Layouts and the provisions of the London Plan.

#### **7.10 Traffic impact, car/cycle parking, pedestrian safety**

With regard to parking, the proposed town houses will have integral garages. 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 application 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. As a guide, the recommended minimum standard for 3 bedroom houses is 81sq. m. The floor plans indicate that the development at 121sq.m for house type 1310 achieves HDAS recommended floor space standards and that Lifetime Home Standards could be met for these houses in terms of size.

The Access Officer has commented that the scheme should comply with all 16 Lifetime Home standards (as relevant) and should be shown on plan. It is considered that had the application been recommended for approval, further amendments to the internal layout of the units to comply with life time homes standards could have been addressed by condition.

#### **7.13 Provision of affordable & special needs housing**

There will be no net loss in the provision of fully wheelchair accessible units or affordable housing.

#### **7.14 Trees, Landscaping and Ecology**

These issues have been dealt with elsewhere in the report.

#### **7.15 Sustainable waste management**

There are no sustainable waste management issues associated with the proposed modifications to the approved scheme.

#### **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 the assessment demonstrates that 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 drainage or flooding issues relating to this application.

#### **7.18 Noise or Air Quality Issues**

There are no noise or air quality issues related to this application.

#### **7.19 Comments on Public Consultations**

The primary concerns relating to the increase in density, impact of the development on the character of the area, parking and the impact on residential amenity (loss of privacy, and outlook), have been dealt with in the report.

#### **7.20 Planning Obligations**

As this application is for only an increase of one unit, this would not trigger a requirement for planning obligations.

#### **7.21 Expediency of enforcement action**

There are no enforcement issues associated with this site.

#### **7.22 Other Issues**

There are no other planning issues relating to 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 introduction of a pair of 3 storey town houses, in place of a 2 1/2 storey detached dwelling would result in an unduly intrusive, visually prominent and inappropriate form of development, out of keeping with the the properties in Kent gardens and Lime Grove. 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. The increase in accommodation would also require additional parking provision, which would result in 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. The application is therefore recommended for refusal.

## **11. Reference Documents**

Planning Policy Statement 1 (Delivering Sustainable Development)  
Planning Policy Statement 3 Housing  
Planning Policy Guidance Note 13 Transport  
Planning Policy Guidance Note 24 Planning and Noise  
Hillingdon Unitary Development Plan Saved Policies (September 2007)  
Supplementary Planning Document: Accessible Hillingdon  
Supplementary Planning Document: Residential Layouts  
Supplementary Planning Guidance: Community Safety by Design  
Supplementary Planning Guidance: Community Safety by Design  
Supplementary Planning Document: Affordable Housing  
Supplementary Planning Guidance: Planning Obligations Strategy  
Letters of objection and petitions against the development

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## Notes



Site boundary

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Site Address

**RAF Eastcote  
Lime Grove  
Ruislip**

Planning Application Ref:

**10189/APP/2010/1100**

Planning Committee

**North**

Scale

**1:1,250**

Date

**November  
2010**

**LONDON BOROUGH  
OF HILLINGDON**

**Planning, Environment  
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