

7<sup>th</sup> November 2024

**Mr. Mike Kemp**  
Central Services – Planning and Regeneration  
London Borough of Hillingdon  
Hillingdon Council  
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Dear Mr. Kemp,

**MEAD HOUSE, MEAD HOUSE LANE, HAYES END, HAYES, HILLINGDON, UB4 8EW**

**APPLICATION SUBMITTED UNDER SCHEDULE 2, PART 3, CLASS MA OF THE TOWN AND COUNTRY PLANNING (GENERAL PERMITTED DEVELOPMENT) (ENGLAND) ORDER 2015 (AS AMENDED) TO DETERMINE IF PRIOR APPROVAL IS REQUIRED**

We write on behalf of our client, Reliant Care Limited ("the Applicant") following the recent submission on 27<sup>th</sup> September 2024 of application ref. 12298/APP/2024/2599, to determine if Prior Approval is required in respect of the proposed conversion of Mead House, Mead House Lane, Hayes, UB4 8EW ("the Site") from Class E (commercial, business and service) to Class C3 (residential).

This application, submitted under Schedule 2, Part 3, Class MA of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended) ('GPDO'), seeks to obtain a determination from the local planning authority as to whether Prior Approval is required for the proposed conversion of Mead House from a day centre (Class E) to residential (Class C3).

**Background**

The application pending consideration is for the conversion of all floors of the existing building (ground, first and second floors) to provide a total of 16 residential units. Following the application being submitted and the Officer site visit taking place a number of amendments to the proposals have been made, including:

- A decision has been made by the Applicant to remove the second floor from the proposals and therefore the Prior Approval application relates to the ground and first floors only.
- A corresponding reduction in the number of residential units is proposed, from 16 to 14 studio apartments.
- The proposed GP surgery shown on the ground floor of the building has been removed.
- An internal cycle store has been incorporated at ground floor level.

- An internal refuse and recycling store has been incorporated at ground floor level.
- Car parking provision is now included, comprising 10 parking spaces in total, of which 3 are to be accessible spaces.

## **Application Documentation**

Following the helpful feedback received from Officers, an amended package of planning drawings in addition to a full set of supporting documents are being submitted in support of the application, including:

- Updated Planning Application Form;
- This Covering Letter as Planning Statement (by JLL);
- Updated Site Location Plan (by Buckmaster Batcup Architects);
- Updated Existing and Proposed Drawings including Schedule of Accommodation (by Buckmaster Batcup Architects);
- Transport Statement (by EAS);
- Phase I Geo-Environmental Desk Report Study with Walkover (by Earth Environmental & Geotechnical);
- Flood Risk Assessment (by RIDA);
- Acoustic Assessment (by Nova Acoustics); and
- Daylight and Sunlight Assessment (by Ecolytik).

## **Description of the Site**

The Site is within the jurisdiction of the London Borough of Hillingdon (LBH) and extends to approximately 0.39 hectares (ha) in area. The Mead House building is three storeys in height (ground floor and two upper floors) and provides circa 1,035 sqm (GIA) of Class E floorspace.

Over the past four years, the building has had multiple uses. Its most recent use was as a day centre (operated by the LBH) until March 2024, and prior to that it was a GP surgery (operated by the NHS), and prior to that the building operated as a COVID-19 vaccination centre. The day centre catered for vulnerable adults, including those with physical disabilities. The building has been vacant since March 2024.

Within the site boundary, to the south of the Mead House building, is an area of hardstanding, including car parking, with green space to the north of the building.

Mead House has a Public Transport Accessibility Level (PTAL) of 2 on a scale where 0 is the lowest level of accessibility and 6b is the highest. Hayes and Harlington Train Station is located circa 3.2km to the south of the Site and is served by Elizabeth Line and Great Western Railway (GWR) services into Central London. Uxbridge Underground Station is located circa 3.8km to the north-west of the Site and is served by Metropolitan and Piccadilly Line services into Central London. There are a number of existing bus stops located close to the Site. The westbound bus stop (stop XF) is to the south of Uxbridge Road, circa 300 metres to the south of the Site, and the eastbound stop (stop XC) is on the northern side of Uxbridge Road, around 350 metres south of the Site. From these a total of 7 bus services can be boarded, these being the 278, 427, 697, 698, H98, SL8, and N207.

Pedestrian access can be achieved via the same route. Vehicular access to the Site is part of a mini-roundabout junction, which forms the junction of Hayes End Road with Mead House Lane and the Site access. Uxbridge Road (A4020) is circa 230 metres to the south of the Site, linking Uxbridge in the west with Shepherd's Bush in the east.

The Site is not located within a Conservation Area nor does it contain any listed buildings.

According to the Environment Agency's (EA) Flood Map for Planning (2024), the Site is located within Flood Zone 1 and is therefore subject to the lowest probability of flooding. In terms of surface water flooding, the EA's maps show that the flood risk from surface water is low.

The Site is located on Green Belt land.

There are a number of mature trees to the south of the Site, within the site boundary. The Site is also located within a Tree Preservation Order (TPO) area (ref: TPO 24).

The Site is not subject to an Article 4 Direction restricting permitted development rights under Schedule 2, Part 3, Class MA of the GPDO.

### **The Surrounding Area**

The Site is bounded by Mead House Lane to the west, the access road to the south, a number of two-storey semi-detached houses to the east, and an area of mature vegetation to the north.

The surrounding area is predominantly residential, with a range of building sizes, although building heights are predominantly two storeys. The houses directly to the east are semi-detached two-storey houses, with further two-storey houses to the west and south-west of the Site, opposite Hayes End Road. There is one three-storey apartment building to the south of the Site (Springfield House). There is also a large area of open space to the north-west of the Site.

### **Planning History**

There have been a number of planning applications submitted in relation to the Site. The most relevant applications have been outlined in the table below:

<b>App Ref</b>	<b>Description of Development</b>	<b>Decision</b>
12298/APP/2010/2066	Substitute ramp/railings with new external landing/steps and consequential amendment to planting layout (Application for Non-material amendment following grant of planning permission ref: 12298/APP/2009/2297 dated 05/02/2010: Single storey side extension with new access ramp and railings.)	Granted (06 Sep 2010)
12298/APP/2009/2297	Single storey side extension with new access ramp and railings (Application includes samples/details of materials.)	Granted (22 Oct 2009)
12298/APP/2008/742	Provision of new pedestrian access gate in existing boundary fence off private access road leading to Hayes Park Road, provision of new access path between new gate and new reception, rearrangement of wheelchair car parking spaces and provision of new steps / ramp at reception in conjunction with new access including minor external alteration to the existing conservatory.	Granted (03 Mar 2008)
12298/E/98/2233	Erection of a side conservatory.	Granted (16 Nov 1998)
12298/D/98/1926	Erection of a detached garage.	Granted (30 Sep 1999)
12298/A/94/1513	Change of use from residential institutional to a client day centre including separate offices, erection of an external lift housing and provision of additional parking spaces	Granted (23 Sep 1994)

Of particular note is application 12298/A/94/1513 which was approved in September 1994 for a client day centre, which supports that the existing building has been in use as Class E for a continuous period of over 2 years, as per Clause MA.1(1)(b) of Schedule 2, Part 3, Class MA of the GDPO.

### **Description of the Proposed Development**

Prior Approval is sought for the proposed change of use of Mead House from Class E to residential (Class C3) to provide 14 apartments. The proposals only relate to the ground and first floors of the building – the second floor will remain as existing. For confirmation, this application makes no external alterations to the building.

Refuse and recycling storage and cycle parking will be located internally within the building at ground floor level, whilst the car parking (including Blue/Brown Badge Parking) will be external as per the existing. The proposed flats will be located at ground and first floors. There are no changes proposed to the second floor.

The proposal includes 14 x studio apartments. The layouts of the dwellings have been carefully considered to ensure that they meet or exceed the Nationally Described Space Standards (NDSS) and provide adequate levels of daylight. All proposed apartments also have built in storage in accordance with the NDSS.

The Proposed Development will provide 10 parking spaces in total, in line with LBH policy requirements, located in front of the building, and accessed as per the existing arrangement. It is proposed to provide two Blue/Brown Badge parking spaces. Two of the proposed car parking spaces will have active EV charging facilities and the remaining eight spaces will have passive provision, in accordance with the London Plan.

The proposals will provide 24 cycle parking spaces, therefore exceeding London Plan and LBH policy requirements. The cycle parking provision will include 4 wider spaces for larger non-standard cycles. The cycle store is proposed within the western part of the existing ground floor, in a secure, covered storage area on the ground floor with access gained from both the front and rear of the building.

It is proposed that two dedicated areas for refuse and recycling storage will be provided, located within the small rooms at the western end of the existing building. Refuse will be stored on the ground floor within the interior of the building and accessed via a separate entry at the rear (east side) of the building.

### **Assessment of the Proposed Development**

Schedule 2, Part 3, Class MA of the GPDO makes provision for development consisting of a change of use of a building and any land within its curtilage from a use falling within Class E (commercial, business and service) of Schedule 2 to the Use Classes Order to a use falling within Class C3 (dwellinghouses) of Schedule 1 to that Order.

The proposed change of use of the ground and first floors from a day centre (Class E) to residential apartments (Class C3), constitutes the type of development referred to for the purpose of Class MA.

Development is not, however, permitted by Class MA in the circumstances outlined in Clause MA.1(1). As such, an assessment against Clause MA.1(1) is provided in the following table:

Clause	Assessment
MA.1(1) Development is not permitted by Class MA:	

<p>(a) unless the building has been vacant for a continuous period of at least 3 months immediately prior to the date of the application for prior approval;</p>	<p>N/A – This criterion has been removed in the amendment to Class MA which came into force on 6<sup>th</sup> March 2024.</p>
<p>(b) unless the use of the building fell within one or more of the classes specified in subparagraph (2) for a continuous period of at least 2 years prior to the date of the application for prior approval;</p>	<p>The building has fallen within Use Class E for a continuous period of over 2 years.</p>
<p>(c) if the cumulative floor space of the existing building changing use under Class MA exceeds 1,500 square metres;</p>	<p>N/A – This criterion has been removed in the amendment to Class MA which came into force on 6<sup>th</sup> March 2024.</p>
<p>(d) if land covered by, or within the curtilage of, the building—</p> <ul style="list-style-type: none"> <li>(i) is or forms part of a site of special scientific interest;</li> <li>(ii) is or forms part of a listed building or land within its curtilage;</li> <li>(iii) is or forms part of a scheduled monument or land within its curtilage;</li> <li>(iv) is or forms part of a safety hazard area; or</li> <li>(v) is or forms part of a military explosives storage area;</li> </ul>	<p>The Site does not include and is not within the curtilage of any Sites of Special Scientific Interest ('SSSIs'), listing buildings, scheduled monuments, safety hazard areas or military explosives storage areas.</p>
<p>(e) if the building is within—</p> <ul style="list-style-type: none"> <li>(i) an area of outstanding natural beauty;</li> <li>(ii) an area specified by the Secretary of State for the purposes of section 41(3) of the Wildlife and Countryside Act 1981;</li> <li>(iii) the Broads;</li> <li>(iv) a National Park; or</li> <li>(v) a World Heritage Site;</li> </ul>	<p>The Site is not within an Area of Outstanding Natural Beauty ('AONB'), an area specified for the purposes of the Wildlife and Countryside Act 1981, the Broads, a National Park or a World Heritage Site.</p>
<p>(f) if the site is occupied under an agricultural tenancy, unless the express consent of both the landlord and the tenant has been obtained; or</p>	<p>The Site is not occupied under an agricultural tenancy.</p>
<p>(g) before 1 August 2022, if—</p> <ul style="list-style-type: none"> <li>(i) the proposed development is of a description falling within Class O of this Part as that Class had effect immediately before 1<sup>st</sup> August 2021; and</li> <li>(ii) the development would not have been permitted under Class O immediately before</li> </ul>	<p>This application has not been made before 1<sup>st</sup> August 2022.</p> <p>There is no Article 4 Direction in place which removes permitted development rights.</p>

<p>1<sup>st</sup> August 2021 by virtue of the operation of a direction under article 4(1) of this Order which has not since been cancelled in accordance with the provisions of Schedule 3.</p>	
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As demonstrated in the above assessment table, the proposals satisfy all of the requirements for permitted development pursuant to Clause MA.1(1).

Conditions for Class MA development are provided in Clause MA.2. Before beginning the development under Class MA, the developer shall apply to the local planning authority for a determination as to whether the prior approval of the authority will be required as to:

a) Transport impacts for the development, particularly to ensure safe site access

The Site benefits from existing access for pedestrians, cyclists and vehicles, which will remain unaffected as a result of the Proposed Development. The site will retain its existing access arrangement for pedestrian and cyclists from the Hayes End Road and Mead House Lane mini-roundabout. Access for vehicles will also be made, as it is at present, via the mini-roundabout junction of this road with Hayes End Road with Mead House Lane.

The Proposed Development will provide 10 parking spaces in total, located in front of the building, and accessed as per the existing arrangement, in line with LBH policy requirements. It is proposed to provide two on-site Blue/Brown Badge parking spaces, equating to 21% of units benefitting from access to a Blue/Brown Badge space. This arrangement significantly exceeds the requirements set out in Policy T6.1 of the London Plan, which seeks to ensure that for 3% of dwellings, at least one designated disabled persons parking bay per dwelling is available from the outset. This also meets LBH requirements, which states that all new residential developments of ten or more units must have 10% of homes designed to include a Blue/Brown Badge parking space. The Blue/Brown Badge spaces will be provided by converting a number of existing standard-sized car parking spaces on the site.

Two of the proposed car parking spaces will be equipped with active EV charging facilities and the remaining eight spaces will have passive provision, in accordance with the London Plan.

With regard to cycle storage, the proposals will provide 24 cycle parking spaces of which there will be 4 wider spaces for larger non-standard cycles. The cycle parking is located in a secure, covered storage area on the ground floor with access gained from both the front and rear of the building. This level of cycle parking exceeds the LBH policy requirement and the minimum requirements set out in Policy T5 (Cycling) of the London Plan.

It is proposed that two dedicated areas for refuse and recycling storage will be used, located within the small rooms at ground floor level at the western end of the existing building. Refuse will be stored within the interior of the building and accessed via a separate entry at the rear (east side) of the building.

As the proposed refuse and recycling stores are located at a distance from the secondary access, it is proposed that the waste and recycling bins are moved out from the refuse and recycling store on collection day, by the site management to a holding area, from where these can be serviced by LBH's Waste

Collection personnel. The holding area is proposed to be around 10 metres from where the refuse collection vehicle will wait.

A managed delivery and servicing arrangement will be implemented, and it will be the responsibility of the building management to transfer the refuse to the refuse and recycling holding area on collection days. This will ensure the refuse is within the 10m walk distance for operatives in accordance with LBH policies.

In terms of trip generation, it would be expected that the Proposed Development would generate 1 trip (1 departure) in the AM peak hour, and 3 trips (2 arrivals and 1 departure) during the PM peak hour. The Transport Statement concludes that the level of vehicular traffic generation is likely to be imperceptible on the local highway network and is significantly lower than the trip generation of the former use of the Site.

Further details are provided in the submitted Transport Assessment, prepared by Waterman.

Overall, the net addition of 14 apartments is considered to have an acceptable impact on transport and highway safety. On this basis the proposal will not give rise to any major transport issues in accordance with Paragraph 111 of the NPPF which states that:

*“Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.”*

b) Contamination risks in relation to the building

This application is supported by a Phase I Geo-Environmental Desk Report Study with Walkover, prepared by Earth Environmental & Geotechnical.

A review of historical and current day information has highlighted a lack of significant contamination sources present at the assessment site. A review of surrounding site uses has identified several potential off-site contamination sources, however given the cohesive nature of the underlying geology, and the distance of the potential sources from the assessment site, it has been recommended that a maximum of a low risk is present. Given the low level of risk, it is suggested that no instructive works are currently required at the assessment site.

As such, the Phase I Geo-Environmental Desk Report Study with Walkover concludes that further intrusive ground investigation is not required.

In summary, there are no contamination factors that would prevent the grant of prior approval.

c) Flooding risks in relation to the building

As detailed in the Flood Risk Assessment, prepared by RIDA, the Site is wholly within Flood Zone 1, indicating a low probability (0.1%) of flooding from rivers or the sea. Other flooding sources (such as groundwater and reservoirs) have also been assessed and deemed as low risk to the development. In terms of surface water flooding, the EA's maps show that the flood risk from surface water is low.

The development is not increasing the surface water run-off as this is a change of use and no extensions or changes to the external areas are proposed. The Flood Risk Assessment concludes that the Proposed Development does not increase the off-site impact.

As such, it is considered that there are no flooding risks that would detract from the suitability of the Site for the proposed residential change of use.

d) Impacts of noise from commercial premises on the intended occupiers of the development

The impacts of noise from commercial premises on the intended occupiers of the development has been robustly assessed within the Acoustic Assessment prepared by Nova Acoustics, which has reviewed the acoustic performance of external building fabric elements with reference to internal noise level targets in BS8233:2014.

Prior Approval applications under Class MA of the GDPO need to consider the effects of commercial noise only.

The Acoustic Assessment concluded that there would be minimal to no impact from commercial noise.

Consequently, the internal noise levels are considered to be within acceptable limits for residential development.

e) Impact on the character and sustainability of a Conservation Area

The Site is not within a Conservation Area and, therefore, subclause (e) is not applicable.

f) The provision of adequate natural light in all habitable rooms of the dwellinghouses

This application is supported by a Daylight and Sunlight Assessment, prepared by Ecolytik. Ecolytik's analysis has been carried out in accordance with the methodologies contained in the BRE Guidelines, which is used by the Local Authority to determine the acceptability of a proposal in terms of its natural light amenity.

In terms of daylight, the report assessment concludes that all habitable spaces exceed BRE recommendations for daylight, using the illuminance method and climate-based modelling.

In terms of sunlight, all assessed spaces with windows within 90 degrees due south exceeded BRE's recommendations for sunlight.

Overall, the Proposed Development complies with BRE's guidelines for daylight and sunlight access to the proposed dwellings within the conversion. As such, the Proposed Development is considered to provide good daylight and sunlight amenity for the future residents.

g) The impact on intended occupiers of the development of the introduction of residential use in an area the authority considers to be important for general or heavy industry, waste management, storage and distribution, or a mix of such uses

There are no planning designations specifically for general or heavy industry, waste management, storage and distribution, or a mix of such uses in this area.

h) The impact on the local provision of the types of services lost

The site does not comprise a registered nursery.

Whilst the building previously operated as GP surgery, its most recent use was as a day centre (operated by the LBH until March 2024). The building is currently vacant. On this basis the proposed conversion will not result in the loss of an existing health centre.

i) Where the development meets the fire risk condition, the fire safety impacts on the intended occupants of the building

The top storey measured from the ground level on the lowest side of the building to the top storey upper floor surface does not exceed 18 metres, nor would the building be over 7 storeys. On this basis, the development does not meet the fire risk condition and there is no requirement for a Fire Statement to be submitted.

Paragraph W

Paragraph W sets out the requirements for applications for Prior Approval under Part 3, and the following table clarifies how the requirements pursuant to Clause W(2) have been satisfied.

Clause	Assessment
(a) a written description of the proposed development, which, in relation to development proposed under Class C, M, N or Q of this Part, must in the same application include any building or other operations;	A written description of the proposed development is provided within this Covering Letter.
(b) a plan indicating the site and showing the proposed development;	The Site is shown within the submitted Site Location Plan and the proposed development is shown in the submitted drawings.
(ba) in relation to development proposed under Classes G, M, MA, N, O, P, PA and Q of this Part, a statement specifying the net increase in dwellinghouses proposed by the development (for the purposes of this sub-paragraph, “net increase in dwellinghouses” is the number of dwellinghouses proposed by the development that is additional to the number of dwellinghouses on the site immediately prior to the development);	The proposals include a net increase of 14 dwellinghouses, as stated in this Covering Letter and shown in the submitted drawings.
(bb) in relation to development proposed under Class Q of this Part, a statement specifying— (i) the number of smaller dwellinghouses proposed; (ii) the number of larger dwellinghouses proposed; (iii) whether previous development has taken place under Class Q within the established agricultural unit and, if so, the number of smaller and larger dwellinghouses developed under Class Q;	N/A, this application does not propose development under Class Q.

(bc) in relation to development proposed under Class G, M, MA, N, O, PA or Q of this Part, a floor plan indicating the total floor space in square metres of each dwellinghouse, the dimensions and proposed use of each room, the position and dimensions of windows, doors and walls, and the elevations of the dwellinghouses;	The submitted floor plans identify the floorspace of each proposed new dwellinghouse, the dimensions and use of each room, and the position of windows, doors and walls and can be scaled accordingly. Elevations have also been submitted, and it is clarified that no external works are proposed.
(c) the developer's contact address;	The contact address of the Agent, acting on behalf of the Applicant (developer), is included on the application form.
(d) the developer's email address if the developer is content to receive communications electronically; and	The email address of the Agent, acting on behalf of the Applicant, is included on the application form.
(e) where sub-paragraph (6) requires the Environment Agency to be consulted, a site-specific flood risk assessment,	The Environment Agency ('EA') is not required to be consulted on this application. Notwithstanding, a Flood Risk Assessment has been submitted.
together with any fee required to be paid.	The statutory application fee of £1,750.00 (+ £70 service charge) has been paid via the Planning Portal.

As such, it is considered that all requirements of the relevant conditions pursuant to Clause MA.2 and Paragraph W have been addressed as part of this application. It is understood that the balance of the conditions will be satisfied by the local planning authority's processing, assessment and determination of this application.

## Conclusion

This application has been prepared in accordance with Schedule 2, Part 3, Class MA of the GPDO, in order to obtain a determination from the local planning authority as to whether Prior Approval is required for the proposed change of use of the ground and first floors of Mead House from a day centre (Class E) to 14 residential apartments (Class C3).

It has been demonstrated that all of the relevant requirements for Permitted Development have been satisfied and, therefore, it is considered that Prior Approval should be granted for the proposals.

If you have any queries, please do not hesitate to contact Kerry Royston (+44 7872 107555 / [Kerry.Royston@jll.com](mailto:Kerry.Royston@jll.com)) or Dominique Mirepoix (+44 7729 074271 / [Dominique.Mirepoix@jll.com](mailto:Dominique.Mirepoix@jll.com)) of this office.

Yours sincerely,

*Jones Lang LaSalle Limited*

**JLL PLANNING AND DEVELOPMENT**