



## **PLANNING STATEMENT - 73, High Street, Ruislip, HA4 8JB**

Proposed change of use from vacant bank to Bingo Hall and alteration to ground floor front elevation

### 1. The Site

This is located near to the junction of the High Street and Midcrott on the east side of the street. It is a terraced property on three floors with banking premises on the ground, first and second floor totalling some 220 m<sup>2</sup>. In addition on the second floor is a staff flat of some 41 sq m. The site forms part of a continuous parade of shops on the ground floor from Midcrott southwards to the junction with Brickwall Lane. The site has the use of the rear access road for waste collection and servicing needs. The bank closed in July 2025

### 2. The Surroundings

The site is located within Ruislip town centre with a mixture of Class E and 'sui generis' uses at street level. The upper floors are used for both residential accommodation and ancillary uses to the ground floor uses. The location is within the Ruislip Conservation Area and in terms of form, as opposed to function, the parade is three storeys high with some two storey elements. The post code has a PTAL of 4. with a 320 m walk to Ruislip station.

### 3. The Proposal

To change the use of the ground floor, some 99 sq m to a Bingo Hall and alter the front elevation by adding an additional door to give direct access to the upper floors.

### 4. The Development Plan

The London Plan 2021. Policy SD6 applies in part namely sections A1, A3, A5, F and H. As does Policy SD8, Section E which states: *District centres should focus on the consolidation of a viable range of functions, particularly convenience retailing, leisure, social infrastructure, local employment and workspace, whilst addressing the challenges of new forms of retailing and securing opportunities to realise their potential for higher density mixed-use residential development and improvements to their environment.*



Hillingdon Local Plan Part 2, adopted January 2020

*Policy DMTC 1: Town Centre Developments*

- A) *The Council will support 'main town centre uses' where the development proposal is consistent with the scale and function of the centre. Town centre development will need to demonstrate that:*
- i) adequate width and depth of floor space has been provided for the town centre uses; and*
  - ii) appropriate servicing arrangements have been provided.*
- B) *Residential use of ground floor premises in primary and secondary shopping areas and in designated parades will not be supported.*
- C) *Proposals for 'main town centre uses' in out of centre locations will only be permitted where there is no harm to residential amenity.*
- D) *The Council will:*
- i) expect proposals for 'main town centre uses' to demonstrate that there are no available or suitable sites in a town centre where an edge of centre or out of centre location is proposed, using a sequential approach; and*
  - ii) consider the effect of the proposal, either individually or cumulatively on the vitality and viability of existing town centres. Development proposals in out of centre and edge of centre locations, which exceed 200 sqm of gross retail floorspace, or 1,000 sqm of combined main town centres uses, will require an impact assessment.*

Before moving on it is noted that the National Planning Policy Framework (the Framework) has been updated since the adoption of Part 2. Annex 2 to the Framework 2024 lists appropriate main town centre uses and this includes a Bingo Hall

With parts B, C and D being not applicable in this case, I turn to part A. As shown in the submitted plans there is adequate floor space and the premises may be serviced using the rear service road.

*Next Policy DMTC 2: Primary and Secondary Shopping Areas*

- A) *In primary shopping areas, the Council will support the ground floor use of premises for retail, financial and professional activities and restaurants, cafes, pubs and bars provided that:*
- i) a minimum of 70% of the frontage is retained in Use Class A1;*
  - ii) Use Class A5 hot food takeaways are limited to a maximum of 15% of the frontage;*
  - iii) the proposed use will not result a separation of more than 12 metres between A1 retail uses; and*
  - iv) the proposed use does not result in a concentration of non retail uses which could be considered to cause harm to the vitality and viability of the town centre.*
- B) *In secondary shopping areas, the Council will support the ground*



With the changes in secondary legislation, namely the introduction of Class E of the Use Classes Order this policy has been rendered out of date. And this is underlined by the Annex to the Framework already noted.

### *Next Policy DMTC 4: Amenity and Town Centre Uses*

*Proposals for restaurants and hot food takeaways, drinking establishments, betting shops, night clubs, casinos, amusement centres, minicab offices and other similar uses will only be supported provided that they:*

- i) would not result in adverse cumulative impacts due to an unacceptable concentration of such uses in one area;*
- ii) would not cause unacceptable disturbance or loss of amenity to nearby properties by reason of noise, odour, emissions, safety and security, refuse, parking or traffic congestion; and*
- iii) would not detrimentally affect the character or function of an area by virtue of the proposed use or visual impact.*

Taking the sub sections in the same order;

- i) There is no existing Bingo Hall on the High Street
- ii) The matter of noise within the building may be addressed by a pre commencement condition and for the avoidance of doubt the applicant will accept such a condition.
- iii) If proposed use may cause an odour emission it will but less than one Standard 5. Material Considerations European Odour Unit which means it would not be detectable.
- iv) Safety and security are to be ensured by the layout physically controlling access and the use of door supervisors.
- v) The proposed use generates little waste which can be collected from the rear of the site via the rear service road as occurs at present.
- vi) There is a yard to the rear on which parking may be provided. Customers are to be encouraged to arrive by public and active transport. A number of Sheffield bike stands stand in the footway adjacent to the site. Cycle and car parking for staff will be made to the rear of the site.
- vii) It is HMGs view, as set out in the Framework, that a Bingo Hall is an appropriate use for a town centre. Since the site is within a Conservation Area the matter of visual impact is considered below.

### *Policy DMHB 4: Conservation Areas*

*New development, including alterations and extensions to existing buildings, within a Conservation Area or on its fringes, will be expected to preserve or enhance the character or appearance of the area. It should sustain and enhance its significance and make a positive contribution to local character and distinctiveness. In order to achieve this, the Council will:*



*A) Require proposals for new development, including any signage or advertisement, to be of a high quality contextual design. Proposals should exploit opportunities to restore any lost features and/or introduce new ones that would enhance the character and appearance of the Conservation Area.*

*B) Resist the loss of buildings, historic street patterns, important views, landscape and open spaces or other features that make a positive contribution to the character or appearance of the Conservation Area; any such loss will need to be supported with a robust justification.*

*C) Proposals will be required to support the implementation of improvement actions set out in relevant Conservation Area Appraisals and Management Plans.*

Again taking the three sub sections in turn:

- A There is no record of the ground floor frontage before the bank use was introduced prior to the designation of this Conservation Area. In anticipation of making a subsequent planning application for a change of use of the upper floors a second door has been introduced to the ground floor frontage in keeping with the present elevation. New signage will be made within the requirements of Class 5 of the Advertisements Regulations which makes specific provision of bingo halls.
- B The modest change of the street elevation will result in no loss to the Conservation Area (CA)
- C The appraisal of the CA places the site in Character Area 2; The High Street. planning application. Nevertheless it has been explained how signage will be addressed. In the matter the rear yard there is no 'ad hoc' storage structure and parking spaces and bin storage are to be regulated as shown in the submitted plans.

## 5. Material Considerations

The premises previously opened as follows:

Monday to Saturday 09:00 or 10:00 to 17:00, 16:00 on Saturdays. Closed on Sundays

The proposed opening hours are 24/7.

Currently Sainsbury's trades from 07:00 to 22:00 and Waitrose from 08:00 to 21:00 (Sundays 16:00). Tokyo Fizz is open to 23:59 and 111 High Street from 09:00 to 00:30 except Fridays and Saturdays 09:00 to 01:30.



The town centre enjoys some late night trading.

A recent study has been made of late night behaviour in another London Borough and the study is attached to this statement. In addition a third party made an earlier study of such establishments and the tabulated results are below:

| Venue   | Date & Time of Visit                        | Town or District Centre | Residential Directly Above (Y/N) | No. Customers In | No. Customers out | Analysis of Observation (Patron behaviour)  |
|---|---|-------------------------|----------------------------------|------------------|-------------------|---|
| 302-304 Hessle Road, Hull – 11th September 2020                     | 11 <sup>th</sup> September 2020 01:45-02:45 | District Centre         | No                               | 10               | 4                 | Patrons generated little sound from brief conversation. Barely discernible against noise from the road.       |
| 48-50 Camberwell Church Street, Camberwell, London – 15th July 2021 | 15 <sup>th</sup> July 2021 01:00-02:00      | District Centre         | Yes                              | 2                | 4                 | On three occasions patrons came outside for a cigarette. On one occasion patrons talked at low level briefly. |
| 45 West Street, Boston – 29th July 2021                             | 29 <sup>th</sup> July 2021 00:00-01:00      | Town Centre             | No                               | 2                | 0                 | No sound was generated by patrons. One patron came outside to smoke but made no sound.                        |
| 22 The Market, Wrythe Lane, Carshalton, SM5 1AG                     | 16 <sup>th</sup> March 2023 01:00-02:30     | District Centre         | Yes                              | 1                | 1                 | Staff came out at 02.29 but made no noise and one patron is heard talking briefly. No other sound.            |
| 122 Kingsland High Street, Hackney, London, E8 2NS                  | 15 <sup>th</sup> March 2023 01:00-02:30     | Town Centre             | Yes                              | 2                | 2                 | No sound from any of the patrons. Only sound is from cars on the road.  |
| 222-223 High Street, Dudley, DY1 1PD                                | 22 <sup>nd</sup> March 2023 01:00-02:00     | Town Centre             | No                               | 5                | 3                 | Two instances occurred where patrons came out to smoke but no sound was generated. No other patron noise.     |

We would also like to incorporate a distinct study titled 'A Comparative Survey of Adult Gaming Centres' (Appendix 1), which was developed in September 2025. While we recognise that our application pertains to a Bingo Hall, the study is intended solely for comparative analysis.

This survey was designed to collect data through field observations of current AGCs in Hammersmith & Fulham. Data was also collected via desktop research of existing published reports for example the Gambling Policy Area Profile 2024 available in the public domain.

The observational data collection included (i) a site assessment of existing AGC venues in King Street and North End Road to understand what if any effect AGC premises in these areas have on the immediate external areas (the macro environment) in relation to noise nuisance, crime and disorder and public safety matters by assessing the behaviour of customers that use AGC premises at each of the locations between the hours of 01.00 and 04.00.



### 6. The Planning Balance

With the Framework (2024) taken into account there is encouragement that the proposed use may be located in a main town centre. The site is of sufficient size to enable bin storage, cycle parking and independent access to the upper floors. As shown on the submitted drawings noise insulation can be installed to the ground floor soffit. In the matter of external noise studies show that this is limited and within ambient levels. Consequently planning permission may be given subject to conditions. For the avoidance of doubt Pre Commencement conditions may be accepted subject to the Regulations.

Roger Pidgeon

Chartered Town Planner

28<sup>th</sup> November 2025

APPENDIX 1 - 'A Comparative Survey of Adult Gaming Centres'