



PROGRESS PLANNING

Prior Approval Statement (including Flooding, Transport, Noise, Contamination and Daylighting considerations)

Salamander Quay, Park Lane, Harefield, Uxbridge, UB9 6NZ

'Prior Approval application for the change of use from offices to residential use to provide 22 residential units with associated cycle parking, refuse storage and car parking'.

Prepared by Progress Planning

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Introduction

This planning, transport, design and access statement has been prepared to support a prior approval application for the part residential conversion and retention of an existing office space within the Quay Side West building of Salamander Quay, Park Lane, Harefield, Uxbridge, UB9 6NZ.

This application follows a previously rejected prior approval application under reference 42228/APP/2021/2268 which sought the redevelopment of offices into 45 residential units across both Quay West and Quay South.

The site itself is located within the established settlement of Harefield. Albeit on the periphery of the settlement, the village centre remains accessible and is located 1km from the application site. The buildings flank onto the Grand Union Canal to the west with Park Lane to the east with residential properties beyond. The Coy Carp Public House is situated on the opposite side of the canal.

The site currently consists of an office (Class E) use with the associated car park. The site is predominantly 2 storey (ground plus one), and the majority of the units benefit from direct access either from ground level or via deck access located at first floor. The buildings also benefits from a small third floor projection on each building which provide interest and articulation fronting the canal.

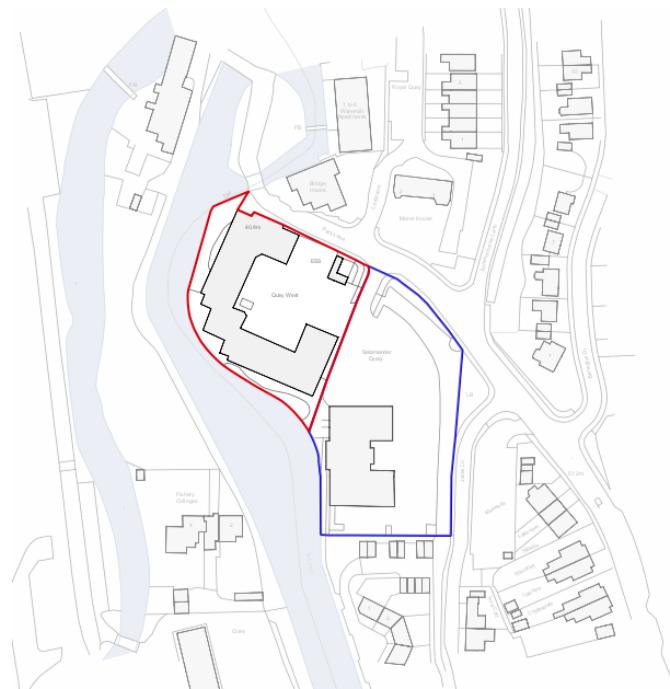


Image: Location plan (site indicated in red)

The existing premises are purpose built commercial offices which allow the flexible use of space to facilitate interchangeable spaces/units, depending on the requirements of the occupier and available space within the building at the time. Regrettably, due to the pandemic (Covid-19) a vast amount of Quay West has become vacant and the existing use rendering the site redundant and commercially unviable.

Along the Western boundary of the site runs the canal, the site benefits from vehicular access via Park Lane which runs along the Northern boundary with the benefit of 36 existing car parking spaces.

Planning History

This application relates to Quay West located within Salamander Quay. The building is a modern purpose built multi-let office building which was completed in 1988. The site has

recently been refused planning permission (42228/APP/2021/2268) for the 'Prior Notification under Class O of Part 3, Schedule 2 of the Town and Country Planning (General Permitted Development) (England) Order 2015 - Change of Use from office to 45 residential units'.

This application seeks to address the reasons for refusal which is set out as the following: 'The proposal fails to demonstrate that the development would be acceptable in terms of transport and highways, flood risk, and provision of adequate natural light and minimum floorspace standards. Prior approval of the matters set out at Class O.2.(1) (a), (c) and (e) and paragraph W of Part 3 of Schedule 2 of the Order is therefore refused'.

The Development Proposal

We have been instructed by our client London & Scottish Property to submit the enclosed prior approval application for the part conversion of an office building known as Salamander Quay, and situated at Quay West, Park Lane, Harefield, UB9 6NZ - specifically, Prior Approval is sought for the following development:

'Change of use from offices to residential use to provide 22 residential units with associated cycle parking, refuse storage and car parking'.

The existing building is purpose-built offices and has been used as such since its erection. The same can be confirmed by the VOA website stating both buildings within the wider site were in use as 'offices and premises'.

The building is currently partially vacant and the remaining tenants for Quay West are Blaze Commercial Ltd, Ebit Fire Protection Ltd and JB London Builders Ltd. These business occupy their own separate offices within the building.

Please find below consideration of the relevant criteria that demonstrates that the proposal meets the requirements for Class MA, Part 3, Schedule 2 of The Town and Country Planning (General Permitted Development etc.) (England) (Amendment) Order 2021.

We have also set out how we have addressed the reasons for refusal referred to in the previous refusal.

Policy and Legislation Context

Class MA, Part 3, Schedule 2 of The Town and Country Planning (General Permitted Development etc.) (England) (Amendment) Order 2021 permits 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 the Schedule to the Use Classes Order, to a use falling within Class C3 (dwelling houses) of that Schedule.

Development is not permitted by Class MA if:

- (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;
- (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;
- (c) if the cumulative floor space of the existing building changing use under Class MA exceeds 1,500 square metres;
- (d) if land covered by, or within the curtilage of, the building—
 - (i) is or forms part of a site of special scientific interest;
 - (ii) is or forms part of a listed building or land within its curtilage;
 - (iii) is or forms part of a scheduled monument or land within its curtilage;
 - (iv) is or forms part of a safety hazard area; or
 - (v) is or forms part of a military explosives storage area;
- (e) if the building is within—
 - (i) an area of outstanding natural beauty;
 - (ii) an area specified by the Secretary of State for the purposes of section 41(3) of the Wildlife and Countryside Act 1981(a);
 - (iii) the Broads;
 - (iv) a National Park; or (v) a World Heritage Site;

(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

(g) before 1 August 2022, if—

(i) the proposed development is of a description falling within Class O of this Part as that Class had effect immediately before 1st August 2021; and

(ii) the development would not have been permitted under Class O immediately before 1st 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.

(2) The classes mentioned in sub-paragraph (1)(b) are the following classes of the Use Classes Order— (a) the following classes of the Schedule as it had effect before 1st September 2020— (i) Class A1 (shops); (ii) Class A2 (financial and professional services); (iii) Class A3 (food and drink); (iv) Class B1 (business); (v) Class D1(a) (non-residential institutions – medical or health services); (vi) Class D1(b) (non-residential institutions – crèche, day nursery or day centre); (vii) Class D2(e) (assembly and leisure – indoor and outdoor sports), other than use as an indoor swimming pool or skating rink; (b) on or after 1st September 2020, Class E (commercial, business and service) of Schedule 2.

The proposed scheme like the previous scheme submitted complies with all of the above requirements as stated in the Class MA, Part 3, Schedule 2 of The Town and Country Planning (General Permitted Development etc.) (England) (Amendment) Order 2021.

For further consideration of the criteria above and to determine the application acceptability in this location and how it addressed the reasons for refusal referred to in the previous decision, please see the corresponding sections below:

Site assessment

Transport and highways impact of the development

In July 2021, planning permission (42228/APP/2021/2268) was refused for the 'Prior Notification under Class O of Part 3, Schedule 2 of the Town and Country Planning (General Permitted Development) (England) Order 2015 - Change of Use from office to 45 residential units'. The officer report for the original application identified the following overarching matters relating to highways:

- The parking allocation of the site exceeds the maximum number allowed by the London Plan and would be contrary to Policy T6 Car Parking.
- Breakdown of the number trips associated with the change of use.
- The London Plan, Policy T1 requires development proposals should facilitate '*the delivery of the Mayor's strategic target of 80 per cent of all trips in London to be made by foot, cycle or public transport by 2041*'.
- Policy T2 Healthy Streets requires that development proposals '*should deliver patterns of land use that facilitate residents making shorter, regular trips by walking or cycling*'.

The proposal lies within the PTAL zone of 1b and the Councils' highways consultant recognises the relatively isolated and rural aspect of the location. Therefore, in line with the London Plan 2021, an appropriate amount of parking would consist of up to 1.5 spaces per dwelling. The proposal seeks planning consent for 22 units with provision of 27 car parking spaces designated for residential use. This would comply with the maximum parking and which would ensure each unit has access to an appropriate number of spaces. This equates to a parking ration of 1.23 spaces per unit, which does not exceed the maximum standard of 1.5 set out in the London Plan and the Council's Local Plan: Part 2.

This is considered to be an appropriate balance of car parking provision, particularly given the unit mix of the scheme. 13 of the 22 flats proposed would be either studio or 1 bedroom flats which are less likely to own 2 vehicles. In addition, there are only 2 x 3 bedroom family sized units within the scheme. So taking a holistic approach, there would be adequate car parking for future residents of the development without causing overspill parking onto surrounding streets. In addition, there are 9 retained office car parking spaces which could be utilised by visitors and residents during the evenings and weekend. Taken in combination, the proposal would provide an appropriate level of car parking.

The application would not involve any changes to the existing vehicular access and the access road of Park Lane is sufficiently wide enough to allow two cars to pass safely, however it is noted the constraint of the bridge leading towards Copper Mill Lane where traffic is restricted to a single lane. The proposed use is considered to not intensify the vehicle use of site as it does not add additional car parking spaces and the accompanying Transport Statement explains that there would not be an increase in the number of trips. Instead the proposal encourages alternative green modes of transport and it provides a significant number of cycle spaces. A total of 36 proposed residential cycle spaces and a further 8 visitor cycle spaces are to be provided. The commercial aspect also maintains 8 long stay cycle spaces and 4 short stay spaces. This level of cycle parking exceeds the London Plan 2021 minimum standards and goes to strengthen the suitable nature of the development. Furthermore, the development is positioned along the canal which runs towards Uxbridge to the south and Rickmansworth to the north and provides safe pedestrian access. The footpath located at the end of Jacks Lane also connects South Harefield to the site, which can also be reached via the canal. Notwithstanding this the site is within close distance to the U9 bus network which runs every 20 minutes to Uxbridge and Harefield Hospital.

It is recognised the site is located within an isolated location and therefore the site has access to limited local services. Harefield and its local shops are located some 18 minutes' walk and 7-minute cycle from Quay South and is accessible via a well-maintained pavement. Fundamentally the proposed use would lead to greater transport harm than the existing use of the office block. Please see accompanying Transport Statement for further details.

Overall, the proposal will have very limited to no discernible impact on the local highway network, and it will not raise any highway safety concerns, in accordance with local and national planning policy.

Contamination risks on the site

Quay West is a relevantly new building as it being constructed in 1988 when the site was comprehensively developed. The proposal doesn't involve any extraction or demolition, only internal alterations to the floor space to facilitate its conversion.

There haven't been any previous users who give cause for concern within the office building with respect to contaminates. The car park will perhaps have very small traces of hydrocarbons given its historic uses of parking private motor vehicles. Contamination isn't considered a concern, though if essential exploratory works can be conditioned. Furthermore, no objection was raised in the previous application relating to contamination and therefore it is considered not to raise any further concerns.

Flooding risks on the site

The site does immediately adjoin the canal which is identified as flood zone 3 however the building and the whole site is in flood zone 1. Based on the EA long term flood risk information, the majority of the site appears to be at very low risk of surface water flooding, with a small area at medium to high risk of flooding in the car park. This submission is accompanied by a flood risk assessment undertaken by Fernbrook consulting. Please refer to this assessment for greater detail which considers a number of elements including existing drainage infrastructure from the Thames Valley Water. In addition, as part of this permitted development application, the proposals are comprised primarily of internal modifications, with no significant groundworks. Therefore, the risk of groundwater flooding is assessed as low.

The assessment concludes the proposal is consistent with the aims of the NPPF and the Planning Practice Guidance to the NPPF along with the aims of the Local Flood Risk Management Strategy. Ultimately, the site will not be at significant risk of flooding or increase the flood risk to others.

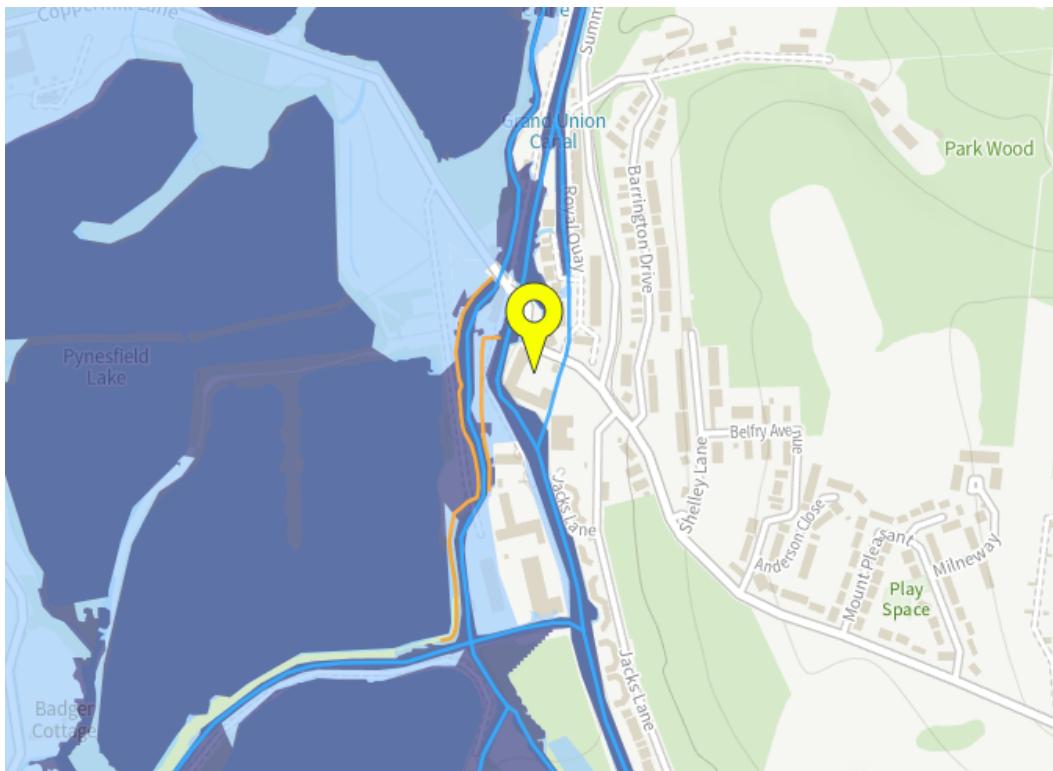


Image: EA flood risk map

Internal space and habitable rooms

The change of use secures the appropriate dimensions for each room and all dwellings will meet or exceed the minimum space standards as set out in the technical housing standards.

Please see below accommodation schedule which confirms all units meet the standard.

No.	Unit Name	Unit Type	GIA (sq.m)	GIA (sq. ft)	No of Beds	Habitable Rooms	Cycle	Part M
1	A-GF1	1b1p	40	430.6	1	1	1	M4(2)
2	A-GF2	1b2p	62	667.4	1	2	1.5	M4(2)
3	A-GF3	1b1p	40	430.6	1	1	1	M4(2)
4	A-GF4	2b4p	71	764.2	2	3	2	M4(2)
5	A-GF5	1b2p	78	839.6	1	2	1.5	M4(2)
6	A-GF6	1b2p	89	958.0	1	2	1.5	M4(2)
7	A-GF7	3b5p	127	1367.0	3	4	2	M4(2)
8	A-GF8	2b4p	74	796.5	2	3	2	M4(2)
9	A-GF9	1b1p	39	419.8	1	1	1	M4(2)
10	A-GF10	2b4p	76	818.1	2	3	2	M4(2)
11	A-GF11	1b2p	58	624.3	1	2	1.5	M4(2)
12	A-1F1	1b2p	59	635.0701	1	2	1.5	M4(2)
13	A-1F2	1b1p	40	430.556	1	1	1	M4(2)
14	A-1F3	2b4p	70	753.473	2	3	2	M4(2)
15	A-1F4	1b2p	71	764.2369	1	2	1.5	M4(2)
16	A-1F5	2b3p	89	957.9871	2	3	2	M4(2)
17	A-1F6	1b1p	38	409.0282	1	1	1	M4(2)
18	A-1F7	3b5p	127	1367.0153	3	4	2	M4(2)
19	A-1F8	2b4p	72	775.0008	2	3	2	M4(2)
20	A-1F9	1b1p	39	419.7921	1	1	1	M4(2)
21	A-1F10	2b4p	74	796.5286	2	3	2	M4(2)
22	A-1F11	1b2p	59	635.0701	1	2	1.5	M4(2)

Image: Accommodation schedule

The provision of adequate natural light in all habitable rooms of the dwelling houses

The existing buildings are in good condition and benefit from large openings (floor to ceiling windows and door) which flood the space with as much daylight as possible. The surrounding environment is very spacious, and all future residents will have a high-quality of outlook. The rear facing units will also have the benefit of the views over the canal as highlighted in the image below.

Stroma Built Environment have been commissioned to undertake a daylighting assessment. The report considers whether all living, kitchen and dining rooms receive enough daylight. It finds that all the living/kitchen/dining rooms achieve the target ADF% values (2% for kitchens) and all bedrooms achieve the ADF% target for their room type.

In addition, all of the windows serving rooms with a sunlight requirement (according to BRE 209) achieve the recommended APSH (annual probable sunlight hours). Please refer to the accompanying Daylight Report for full results and how the proposed dwellings would receive adequate levels of daylight to all habitable rooms.

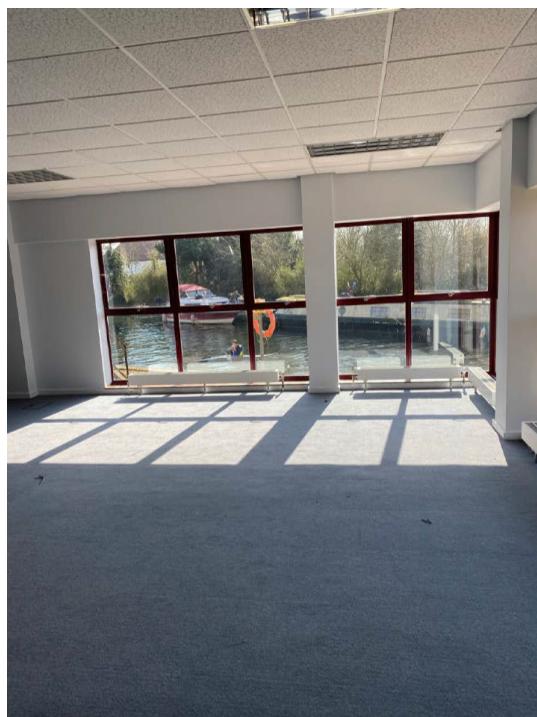


Image: West facing accommodation with views over the canal

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

The site is surrounded by residential properties with the only commercial premises being a public house located on the opposite side of the canal. The pub garden is mainly located on the opposite side away from Salamander Quay. Given the sites setting and residential context the comings and goings of the public house is not considered to cause concern for the occupiers of the development. If anything, it is considered to be an attractive amenity to the benefit of future occupiers.

The client, RR Falcon Ltd has instructed KP Acoustics to undertake a noise impact assessment of the development site. The assessment considers a number of elevations to meet the suitable threshold for noise, it is therefore considered no additional mitigation measures will be required for these elevations.

Nonetheless, other elevations do not meet the recommended internal noise levels stipulated in BS8233:2014. Therefore, existing windows would need to be upgraded internally to meet

the recommended internal noise levels, this will be undertaken via a secondary glazing system which can be conditioned to ensure this aspect is secured. Additionally, the development would need to comply with Approved Document E 'Resistance to the passage of sound' of Building Regulations which would safeguard future occupiers from adverse levels of noise in any case. There are no immediate unneighbourly noise contributors which would create cause for concern for this building to be converted into residential use. Please refer to the KP Acoustics report for additional information and calculations.

Finally, it is noted in the officer's report that the council's internal consultant noted that there would be acceptable levels of noise from commercial sources, and that it is unlikely additional residential units would affect the future use of the remaining/local employment land. It is therefore considered that this scheme would be acceptable in relation to noise.

Other considerations

The building has been vacant for at least 3 months prior to the submission of this application. The building does not exceed the cumulative floor space of 1,500 square meters nor is it situated within any of the listed designations which would prevent the conversion of the property under class MA.

Conclusion

The supporting evidence of this proposal sets out how the applicants have overcome the issues for refusal. This proposal goes to justify the conversion of its existing use of Office (Class E) to Residential C3 under Class MA of the GPDO. This scheme is compliant in terms of both local and national policy and through this report it has been examined that the proposal would appropriately address any concerns relating to the future occupants of the property. It is considered that all the evidence provided justifies the change of use and therefore prior approval should be given.