

Planning Statement

on behalf of

MHA Heathrow Ltd

Prior Approval Application for the conversion of office space (B1 Use) to residential (C3 Use)

at

Building 3, Status Park, Nobel Drive, Heathrow, Middlesex UB3 5EY

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1.0 Introduction

This document accompanies an application for a determination as to whether prior approval is required for the proposed conversion of Building 3, Status Park, Nobel Drive, Heathrow, Middlesex UB3 5EY from Use Class B1a (Offices) to use Class C3.

The report is prepared by Richard Oaten BA BSc RIBA of Oaten Architects Ltd, a qualified architect of 20 years who also has an MSc (Dist) in Advanced Environmental and Energy Studies.

This application is for the conversion of Building 3 to 36 flats.

The building has already been granted approval for 30 flats 69183/APP/2016/4299 28th November 2016. Following a review of the approved layouts, a rationalisation of the achievable flats within the constraints of the windows, as well as correct compartment wall widths and a review of Building Regulations requirements, the layouts have been slightly amended, requiring a re-submission.

The application contains the relevant architectural and survey layouts, this statement and the technical reports, which are contained in the indexes.

The application also contains further information regarding aspects which were conditioned on the existing approval. It is hoped that this information will satisfy the requirements and that they will not need to be conditioned as they can be listed in the new approval decision.

These aspects are:

- Refuse and recycling storage proposals
- Landfill gas survey
- Ventilation Scheme for the building

Under Class O (Formerly Class J) of The Town and Country Planning (General Permitted Development) (England) (Amendment) Order 2016, development consisting of the change of use of a building and any land within its curtilage to a use falling within Class C3 (dwelling houses) from a use falling within Class B1(a) (offices) constitutes 'permitted development', subject to a number of criteria.

Namely permitted development rights do not apply if any of the below criteria apply:

- Building is on article 2(5) land;
- Building was not used for a use falling within Class B1(a) on 29th May 2013, or in the case of a building which was in use before that date but was not in use on that date, when it was last in use.
- Use of the building falling within Class C3 (dwelling houses) was begun after 30 May 2016;
- Site is or forms part of a safety hazard area;
- Site is or forms part of a military explosives storage area;
- Building is a listed building or is within the curtilage of a listed building
- The site is, or contains, a scheduled monument.

Permitted development is also subject to the condition that prior to commencement, the developer shall apply for a determination as to whether the prior approval of the local planning authority will be required with regards to:

- Transport and highway impacts of the development;
- Contamination risks on the site
- Flooding risks on the site.
- Impacts of noise from commercial premises on the intended occupiers of the Development

Since November 2016, the date of the existing approval for the conversion of this building, these requirements have not changed. This statement and the accompanying reports update the information where required and provide further technical information where indicated in the previous technical reports.

The application documents address these four aspects and are summarised later in the report in Sections 3.0 to 6.0.

Building 3 is in the centre of Status Park, which is a well-established office development situated on the north side of Bath Road (A4) accessed via Nobel Drive. The property is within close proximity to Heathrow Airport which is located approximately 0.25 miles to the south.

The application site comprises a three-storey building (ground, first and second floors) of which the current and lawful use is as offices (Use Class B1(a).

The site is not, nor forms part of, either a military hazard area or a military explosives storage area and the building is neither a listed building nor a scheduled monument, and nor does it fall within article 2(5) land, which are defined areas exempt from the above permitted development rights.

Accordingly, the development satisfies all of the criteria set out in Class O of The Town and Country Planning (General Permitted Development) (England) (Amendment) Order 2016.

2.0 Proposed works

Our client proposes to convert the existing office space into (36 no) residential units, comprising 4 x studio flats, 29 x 1 bed flats, and 3 x 2 bed flats. Communal cycle storage facilities will be provided within the existing parking courtyard and refuse storage will be provided within existing external stores in line with the Council's guidance.

The building has been surveyed and the existing plans are shown on NGM Survey Drawing Nos.:

3167/13 Rev A	Existing GF Plan
3167/14 Rev A	Existing 1F Plan
3167/15 Rev A	Existing 2F Plan

The proposed layouts are shown on Oaten Architects Drawing Nos.:

17.1131/301	Proposed Ground Floor Plan
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17.1131/302
17.1131/303

Proposed First Floor Plan
Proposed Second Floor Plan

3.0 Transport and Highway Impacts of the Development

As stated in the previous application, the park benefits from a comprehensive road network with the M4 (junction 4) 2 miles north of the park also providing excellent access to the M25 and surrounding motorway links.

The Bath Road is well serviced by local buses which provide free access into the Heathrow Terminals. Heathrow Connect services from the terminals provide access to London Paddington in approximately 15 minutes, along with regular underground services to Central London via the Piccadilly Line.

Heathrow Airport, one of the world's key transport hubs is situated opposite Status Park and provides a wealth of domestic and international connections. Gatwick Airport, just 43 miles away, provides further options.

Regular trains from the nearby Hayes & Harlington station provide direct access to London Paddington in 20 minutes. Reading station is 40 minutes away and Gatwick Airport can be reached in just over an hour. Heathrow Airport terminals provide direct links to London via the Heathrow Express (20 minutes, trains per hour) and London Underground. Hounslow West underground station (Piccadilly Line) is 2 miles away.

The proposed development therefore has good infrastructure links with the road and public transport network, as demonstrated above.

Impact upon these is considered to be acceptable, with a significant reduction in the number of trips associated with a residential use, as opposed to that of an intensive office use.

The site has an extensive parking courtyard as existing which is to be utilised for the proposed residential units and will provide more than adequate allocated parking and visitor parking provision.

Servicing and deliveries can be accommodated within the site without impediment to the highway, and the proposed change of use would incorporate an adequately sized refuse and recycling store.

A separate updated accompanying transport note has been provided as part of the application and can be found in Appendix E.

This report should be read fully in conjunction with this statement.

The report from RPS concludes;

"Taking into consideration the foregoing assessment, it can be concluded that based on the anticipated reduction of person movements, vehicle movements and potential for non-car mode trips, the proposed conversion would not result in a material increase or change in the character of traffic in the vicinity of the site. "

"It is therefore considered that there is no Highways related reason as to why prior approval consent should not be granted, for a change of use of Building 3 for residential purposes."

4.0 Contamination

A Groundsure desktop contamination and flood report was commissioned for the site and formed part of the previous application. This is contained in Appendix C.

The report stated the following;

"The study site has been identified as being located in close proximity to a landfill site which could potentially impact on the site. Additionally, the client has informed Siteguard's Consultant that the site is to change use for residential purposes. As such the study site has been identified as being of very high risk due to the potential for contamination to be encountered during the refurbishment works."

As a result of this initial broad report, a Phase I Geo-Environmental Desk Study was prepared by EPS Ltd to look at contamination in more detail.

The Non-technical summary states;

- *The site currently includes three commercial properties which are proposed to be converted to residential accommodation under permitted development. The proposals would not involve any external alteration, only conversion of internal space.*
- *The site is located within an area of low environmental sensitivity, primarily due to anticipated underlying clay based ground conditions. The vast majority of the site is currently building or hardstanding other than soft landscaping around the boundaries and within car parking areas.*
- *Historic mapping and Environment Agency (EA) records indicate that the agricultural fields immediately to the north and east of the site were used for gravel abstraction in the 1980s and subsequently backfilled under an EA Permit in the 80s and 90s with Inert waste materials.*
- *Although the areas to the east and north are reported to have been backfilled with inert waste, it has not been possible to fully discount potential risks from associated ground gases; a risk which could increase based on the proposed alteration of the buildings from commercial to residential use. Therefore, a landfill gas investigation has been recommended to assess risks posed to future residents and ensure the site is suitable for its proposed end use.*

Further to the approval of the earlier scheme, the requirement for a landfill gas investigation was listed in Condition 4:

'Prior to occupation of the development, a landfill gas survey shall be submitted to and approved in writing by the Local Planning Authority. If, landfill gas is found to be a risk, a remediation scheme to prevent gas ingress to the newly converted residential building shall be submitted to and approved in writing by the Local Planning Authority. Thereafter, the remediation scheme shall be implemented and completed in full accordance with these approved details prior to occupation.'

Two surveys have now been instructed, carried out and the reports separately prepared by EPS and Enzygo Geo Environmental. The latter is attached, the former is currently being finalised and will be issued next week. This is based on longer term testing (as per Mick Brough's requirements, Contaminated Land Officer, LB Hillingdon).

Both reports indicate whilst carrying out tests on a series on boreholes, both near the boundary and near the building, with the EPS carrying out the report over a long time-frame, to record the measurements during different pressures (high and low), that there was no evidence of landfill gas. The Enzygo report concludes, in the Executive Summary that:

'Gas monitoring recorded characteristic situation 1 conditions and no gas precaution measures are required. No radon risk has been identified.'

This report also contains a further updated GroundSure desktop study.

In conclusion therefore, previous studies stated that the only risk of contamination was landfill gas. This has been investigated and it has been demonstrated that there is no evidence of landfill gas.

5.0 Flood Risk

As stated in the previous application, the site is not located within a Flood Risk Zone and therefore we consider that the proposal will not affect the flood risk of this or neighbouring properties.

Nevertheless, a desktop Flood Risk Report as part of the Groundsure report (Part 7) was submitted in support of the application, confirming that the site is not considered to be at significant risk of flooding from any sources.

The report states:

"RoFRaS data for the study site indicates the property has a Very Low (less than 1 in 1000) chance of flooding in any given year"

6.0 Noise

A detailed environmental noise report was prepared as part of the previous application by Hann Tucker, to assess the impact of environmental noise on the proposed residential development, in accordance with the Permitted Development requirements.

In particular, the report assessed any impact from surrounding commercial premises (ie. the airport) which could adversely affect any residential premises.

The conclusion states;

"The environmental noise impact upon the proposed dwellings has been assessed in the context of Permitted Development.

A detailed environmental noise survey has been undertaken in order to establish the currently prevailing environmental noise climate around the site and also inside the building.

Appropriate internal noise criteria have been proposed for environmental noise intrusion, based on BS 8233: 2014. The results of our environmental noise survey show these should be achievable whilst retaining the existing facade elements.

We have assessed the impact from surrounding commercial premises which could adversely affect any residential premises. Having reviewed the internal noise levels in the unoccupied building, there is no evidence of any adverse commercial uses in the vicinity and should therefore be deemed to satisfy the

requirements of Part 3, Class O of Schedule 2 of the Town and Country Planning (General Permitted Development) (England) (Amendment) Order 2016.”

The full report can be found in Appendix should be read in conjunction with this statement and can be found in Appendix D.

7.0 Conditions attached to the existing Approval 46616/APP/2016/4299

The items below are Conditions listed in the existing approval.

It is proposed to address these issues within this Prior Approval Application for the revised scheme so that these items can be considered addressed and not requiring further Conditions.

7.1 Refuse and recycling storage proposals

Condition 3 of the existing approval states:

'Prior to occupation of the development, details of refuse and recycling storage shall be submitted to and approved in writing by the Local Planning Authority. Thereafter, the storage shall be carried out as agreed and remain in perpetuity, unless otherwise agreed in writing by the Local Planning Authority.'

There are no specific waste storage guidelines for Harlington and standards vary greatly across even the London Boroughs. For example, for flat developments with over 8 units;

Brent Housing Standards	60l domestic per bedroom/60l recycling per bedroom
LB Newham	250l per flats (regardless of size) (split 50%)
LB Southwark	30l/unit + 70l/bedroom with 50% total to be recycling (NB. This is based on BS 5906:2005)

1100 litre bins are the preferred size for bins with 1280 litre bins seen as being too unwieldy.

Current flat make up = 4 x studio flats (count as 1 bed flats), 29 x 1-bed + 3 x 2-bed. Using the above standards would give the following results:

Brent Housing Standards	$60 \times (33 + 3 \times 2) = 2340\text{l domestic} + 2340\text{l recycling}$ → 3x1100l bins domestic waste and 3 x1100l bins recycling (6 total)
LB Newham	$250 \times 36 = 9000\text{l split equally (4500l waste/4500l recycling)}$ → 4x1100l bins domestic waste and 4 x1100l bins recycling (8 total)
LB Southwark	$30 \times 36 \text{ flats plus } 70\text{l} \times (33 + 3 \times 2) = 1080 + 2730 = 3810\text{l}$ (1905l domestic waste /1905l recycling waste) → 2x1100l bins domestic waste and 2 x1100l bins recycling (6 total)

It is proposed to provide the more generous of the three, so 8 nos 1100l bins will be provided for Building 3 consisting of 4 x 1100l bins for domestic waste and 4 x 1100l bins for recycled waste.

Within the flats, guidelines indicate 30l provision for waste and 30l provision for recycled waste. These shall be provided within double base units in each of the kitchens within the flats.

The proposed location and layout of the bins is shown on site plan 17.1131/310 which forms part of this application. The bin store is located adjacent to the exit (though set back to avoid queuing). The bin store is to have a 1500mm hit and miss fence to physically and visually contain the bins. The

fencing will be open to the front to allow ease of movement for both people using the bin store area, but also for the waste collection company.

Access to the bin store for the waste collection company will be via the access gate and there is adequate turning circles within the site.

It may be preferred for the waste collection company to park adjacent to the exist gate and drag the bins to the road, which is a viable option as the bin store is located close to this access point.

The waste collection company would be given the code for the vehicle gate to allow access.

7.2 Landfill Gas Survey

Condition 4 of the existing approval states:

‘Prior to occupation of the development, a landfill gas survey shall be submitted to and approved in writing by the Local Planning Authority. If, landfill gas is found to be a risk, a remediation scheme to prevent gas ingress to the newly converted residential building shall be submitted to and approved in writing by the Local Planning Authority. Thereafter, the remediation scheme shall be implemented and completed in full accordance with these approved details prior to occupation of the development.’

Attached to this are two reports.

The EPS report indicates that testing was carried out in a series of 9 boreholes adjacent to the boundary over a period of many months. This was to allow for variations in atmospheric pressure which can greatly influence results as the gas is released during low pressure.

The EPS report states that there was no evidence of landfill or radon gas.

The Enzygo report indicates that testing was carried out in 5 boreholes closer to the building and again there was no evidence of landfill or radon gas.

Both reports indicate that specialist measures within the building to prevent gas infiltration are not required.

7.3 Ventilation scheme for the building

Condition 5 of the existing approval states:

‘Prior to commencement of development, a ventilation scheme for the proposed development shall have been submitted to and approved in writing by the Local Planning Authority. Thereafter, the scheme shall be implemented and maintained in full compliance with the approved measures.’

The ventilation scheme is shown on MCA (M+E Consulting Engineers) layouts:

2655/M100	GF Layout
2655/M101	1F Layout
2655/M102	2F Layout

As indicated in the notes on the drawings each flat is to be provided with a fully independent Sentinel MVHR Unit (located within the hall of each flat and concealed by a lowered ceiling (height 2350) above the ceiling in the which will have an inlet and extract direct to outside.

These will be fitted with attenuators to prevent spread of any noise outside into the flat. The ducts shall also be boxed out in 2x15mm Soundbloc plasterboard.

The external glazing is not to be changed as part of the works, so a full ventilation system is required and is as proposed. This will ensure that the flat is safely within the dB levels (as described in the Hann Tucker report) whilst receiving sufficient ventilation and temperature treated fresh air supply and warm moist stale air extract.

Each of the systems is to be fully tested upon completion and the Test Certificates issued to Building Control as part of the signing-off works.

7.4 Sustainable Water Management

This is not conditioned for Building 3, but may be considered relevant. Condition 6 of the existing approval for Building 4 stated:

'Prior to commencement, a scheme for the provision of sustainable water management shall be submitted to, and approved in writing by the Local Planning Authority. The scheme shall clearly demonstrate how it incorporates sustainable urban drainage (SUDs) in accordance with the hierarchy set out in Policy 5.15 of the London Plan and will:

- i. provide information on all SuDs features including the method employed to delay and control the surface water discharged from the site and:*
- ii. provide a management and maintenance plan for the lifetime of the development of arrangements to secure the operation of the scheme throughout its lifetime. Including appropriate details of Inspection regimes, appropriate performance specification. The scheme shall also demonstrate the use of methods to minimise the use of potable water through water collection, reuse and recycling and will:*
- iii. provide details of water collection facilities to capture excess rainwater; and how rain and grey water will be recycled and reused in the development. Thereafter the development shall be implemented and retained/maintained in accordance with these details for as long as the development remains in existence.'*

In the event that this is seen as relevant for Building 3 (not a Condition on the existing Consent for Building 3), we can comment as follows:

i) SuDS features

The development is an interior fit-out & conversion with no extensions or alterations proposed to the buildings or external hard-standings.

The drainage survey for Building 3 shows that the existing surface water drains to soakaways located under the carparking areas, which we understand are operating effectively.

As these will be no change to the existing surface water drainage regime, and therefore no increase in peak flows or annual volumes of surface water run-off to the existing soakaways, no additional SuDS measures are proposed.

We consider the existing SuDS system that serve the buildings currently to be adequate to serve the proposed development, and there will be no discharge of surface water to public sewers, and no increased risk of flooding as a result of the conversion works.

ii) Management/Maintenance Plan for the SUDS system

It is not proposed to install any new SUDs features therefore there is no required maintenance other than the usual good practice of 6 monthly checks of all guttering and pipes to ensure clear for the rw systems on the building and an annual checking of the drains to ensure that none are blocked.

A CCTV drain survey shall be carried out at the start of the works to ensure that the drains are in good condition. In the event of any blockages or cracking, appropriate remediations will be carried out in line with the CCTV report's recommendations.

The building will be served by mains water and therefore all water usage and distribution will be potable. It is suggested that grey water recycling for flushing WCs is not viable for this development which will consist of regular high-quality short-term lets where low maintenance is a design requirement. We would suggest this system would be more suitable to owner occupation units or longer term lettings where the maintenance systems would be more understood by the residents.

In terms of the landlord's water supply, this will partly be used for the watering of the soft landscaping and it is proposed to install a water butt which will be fed by one of the existing external rwps. This will be fitted with an overflow return which will direct it back to the drains once the butt is full. The water butt will provide a large % of the required water usage for the soft landscaping and will therefore reduce the use of potable water.

iii) Water collection facilities

There is no proposed rain and grey water recycling proposed other than the water butt previously described.

Appendix A EPS Phase 1 Environmental Desk Study

Appendix B Enzygo Landfill Gas Survey
EPS Landfill Gas Survey

Appendix C Groundsure Desk Study report

Appendix D Hann Tucker Environmental Noise Survey and Noise Impact Assessment

Appendix E RPS Transport Note and Parking Provision Statement