

# **Hyde Park Hayes Business Park, Hayes - Building 3 Planning Statement**

Threadneedle UKPEC6 Hayes Jersey LP

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## 1.0 Introduction

- 1.1 This Planning Statement has been prepared by Lichfields on behalf of the applicant, Threadneedle UKPEC6 Hayes Jersey LP, to accompany an application for prior approval for the conversion of Building 3 at Hyde Park Hayes Business Park, Hayes from Class (B1(a)) office use to Use Class (C3) residential. The application is submitted pursuant to Schedule 2, Part 3 Class O of the Town and Country Planning (General Permitted Development) Order 2015 (as amended) ('the legislation').
- 1.2 The provisions of paragraph W (prior approval) of the relevant Part of the above legislation apply. As such, in order to determine if prior approval is required a developer must submit an application to the local authority which should also be accompanied by:
- 1 A written description of the proposed development;
  - 2 A plan indicating the site and showing the proposed development;
  - 3 The developer's contact address; and
  - 4 The developer's email address if the developer is content to receive communications electronically, together with any fee required to be paid.
- 1.3 A completed application form is enclosed, alongside a site location plan, the existing and proposed floorplans and sections. The elevations remain as existing. A description of development is included within this Planning Statement.
- 1.4 In addition, the following documents are submitted to respond to the relevant criteria identified under Class O of the legislation:
- 1 Transport Statement, prepared by Transport Planning Associates;
  - 2 Noise Report, prepared by Sandy Brown;
  - 3 Flood Risk Assessment, prepared by Ramboll Environ;
  - 4 Phase 1 Environmental Assessment, prepared by Ramboll Environ; and
  - 5 Daylight and Sunlight Assessment, prepared by Lichfields.
- 1.5 The structure of this report is as follows:
- **Section 2.0** briefly describes the site and its context and history;
  - **Section 3.0** provides a description of the proposed permitted development;
  - **Section 4.0** provides a comprehensive assessment of the proposed permitted development against the legislative tests; and
  - **Section 5.0** sets out the conclusions.

## **2.0 Site Description**

- 2.1 The application site comprises Building 3 and its car park situated within the Hyde Park Hayes Business Park, located to the south-west of Hayes.
- 2.2 Hyde Park Hayes Business Park is bound to the north by North Hyde Road and to the west by Dawley Road. Millington Road runs through the centre of the business park. The business park comprises a total site area of 4.82 hectares and includes a number of distinct plots.
- 2.3 This prior approval application relates to Building 3, located toward the northwest corner of the Business Park as illustrated on drawing GA.1201. The application site extends to approximately 0.46ha. The southern portion of the site is occupied by a seven-storey inverted L-shaped building, originally constructed in the mid-1970s. Post completion, the building has been refurbished, with internal/external alterations taking place in 1996 and 2006 respectively. The application site includes the rear car park.
- 2.4 The building is arranged over ground and six upper floors and is predominantly used as serviced office floorspace occupied by a number of tenants on a multi-let basis, comprising a total of 6,454sqm (GIA) floorspace.

### **Site History**

- 2.5 An application for prior approval for the conversion of the existing office building to residential comprising 157 residential units, was submitted in late 2016. This application was refused on 5 January 2017 (application ref. 2016/4122).
- 2.6 Following this, a new application for prior approval for the same quantum of residential units was submitted in March 2018. This application was approved on 10 July 2018 (application ref. 67702/APP/2018/920). A Unilateral Undertaking was also agreed with the Council to provide financial contributions towards pedestrian improvements, as well as provision of a travel plan and a restriction on resident parking permits.
- 2.7 The existing building will remain occupied until early 2021. As such, the approved scheme will not be completed before the approval expires in July 2021 (as required by paragraph O.2(2) of the legislation). A new application for prior approval is therefore being submitted so that the building can be converted to residential use once the remaining tenancies expire and the building is vacated.

### **Surrounding Area and Accessibility**

- 2.8 The surrounding area is typified by a mix of uses, including employment as well as commercial, retail and leisure facilities. The Business Park itself is diversifying, with one of the vacant plots (HPH 6) being granted permission for a four-storey hotel building comprising approximately 150 bed spaces (application ref. 22632/APP/2016/2369) in September 2016 – this development has now been completed.
- 2.9 In addition, an application to demolish an existing warehouse and provide 150 residential dwellings and flexible commercial floorspace at Keith House (to the north-west of the site) was submitted in July 2020 and is currently awaiting determination (application ref. 27189/APP/2020/2181).
- 2.10 The site is located in an area with good accessibility to public transportation (PTAL rating 4), with the site being served by a number of bus routes and located within 12 minutes walking distances of Hayes and Harlington railway station which will benefit from Crossrail services in the future.

## 3.0 The Proposed Development

- 3.1 The following sections provide an overview of the proposed scheme, with comparisons drawn against the extant prior approval where relevant.

### Land Use

- 3.2 The change of use from office (Use Class B1(a)) to residential (Use Class C3) will provide 114 new residential dwellings. The unit mix comprises studio and 1-bedroom apartments, as per Table 3.1 below.

Table 3.1 Unit Mix

| Building | 1b1p | 1b2p | Total |
|----------|------|------|-------|
| HPH3     | 110  | 4    | 114   |

- 3.3 Access to the units will be via relocated staircases and lift core locations within the building, as illustrated on the drawings included with this application.

### Space Standards

- 3.4 Although not currently forming part of the legislation, the Government announced on 30 September 2020 that homes converted via permitted development will be required to meet national space standards. As such, this has been provided for, with the studio units meeting the minimum requirements of 37sqm (with shower rooms), and one-bed units being at least 50sqm.

### Design

- 3.5 The proposed floor plans prepared by Spratley and Partners show the layout of each floor. This includes the relocation of the existing stair and lift access to each floor with apartments set off a central corridor. No external changes are proposed to the building on the basis that the prior approval application is limited to the use of the building for residential purposes only.

### Car Parking

- 3.6 The proposals include the retention of a total of 69 car parking spaces. 61 of these spaces are located within the existing surface level car park towards the rear of the building fronting onto North Hyde Road (including eight visitor spaces) and eight of these spaces are at the front of the building onto Millington Road (including six disabled spaces and two visitor spaces), which fall within the same ownership. This is a reduction of 66 spaces from the previous scheme, reflective of the reduction in units proposed. The proposed vehicle parking provision accords with the LB Hillingdon standards.
- 3.7 As set out in the Transport Statement, at present parking facilities are provided across the entire Hyde Park Hayes Business Park to accommodate 1,055 vehicles, of which 743 are allocated and 312 are unallocated. With the redevelopment of Building 3 for residential use, there will still be availability of 242 spaces across the Business Park should any of the office buildings require additional parking to meet demand. As such the proposals will not impact on the needs of the Business Park.
- 3.8 The proposal includes 14 active charging points and 14 passive spaces for electric vehicles in accordance with the London Plan.

## **Cycle Parking**

- 3.9 In total, 117 cycle parking spaces are proposed on the site. As illustrated on the proposed site plan, it is intended that the existing single storey building in the north-west corner of the site would be utilised as a covered and secure cycle store. It is also proposed that this cycle store accommodates space for three motorcycle spaces in accordance with LBH's parking standards. The proposed cycle parking provision accords with the LB Hillingdon standards. No change in hard surfacing is proposed as part of the refurbishment. Based on the surveyed levels, the site is relatively flat, with no noticeable variance in the site topography which will assist ease of cycling.

## **Servicing**

- 3.10 Whilst the nature of the waste collection will change to reflect the new residential use of the building, refuse collection will remain the same as existing arrangements for the site in terms of highways and access. Refuse and recycling storage bins will be located within the existing bin store located to the rear of the building. Swept path analysis drawings have been included in the appendices of the Transport Statement, which illustrates that safe ingress/egress can be achieved for all vehicles accessing the site (including 11 rigid refuse lorries).

## **The Legislative Tests**

- 3.11 The legislation states that prior to commencement of development the developer must apply to the local planning authority to establish whether prior approval will be required in relation to:
- a transport and highways impacts of the development;
  - b contamination risks on the site;
  - c flooding risks on the site;
  - d impacts of noise from commercial premises on the intended occupiers of the development; and,
  - e the provision of adequate natural light in all habitable rooms of the dwellinghouses.
- 3.12 Each of these matters has been assessed, the conclusions of which are summarised in the next section.

## 4.0 **Assessment Summary**

- 4.1 This section provides a summary of the conclusions reached in each of the accompanying technical reports i.e. addressing the relevant considerations of transport and highways, contamination, flood risk, noise and daylight.

### **Transport and Highways**

- 4.2 A Transport Statement has been prepared by Transport Planning Associates. The assessment concludes in summary that the site is located in an area which is accessible to local services and facilities, including surrounding residential areas, local shops, schools and services through walking, cycling and public transport.
- 4.3 Notwithstanding the good PTAL rating, the site has good public transport connections to local services and facilities. The site is located approximately 0.7km walking distance to the south-west of Hayes and Harlington train station. This station provides regular national rail services to Heathrow Airport, London Paddington, Banbury, Oxford, Reading and Maidenhead. The introduction of Crossrail at the station (expected in 2022) will reduce travel times to places such as Central London, Heathrow and Reading. The shops and services of Hayes Town are located just beyond the train station and include a supermarket, a bank, pharmacy, shops and restaurants. The closest schools are located approximately 1km walking distance to the south-west of the site and include Harlington School and Pinkwell Primary School.
- 4.4 Car and cycle parking is located at grade to the rear and adjacent to the building. In terms of car parking spaces, a total of 69 car parking spaces are provided, including 61 in the rear adjoining car park (including eight visitor spaces) and eight spaces at the front of the building onto Millington Road (including two visitor spaces and six disabled spaces). As set out in the submitted Transport Statement, the proposed development will generate significantly less traffic than the existing office use and, as a result, will reduce the impact on the local highway network.
- 4.5 The proposals include the provision of 117 cycle spaces in accordance with LBH requirements. These will be located within the existing storage building located in the western part of the site which will be refurbished to allow for cycle parking. The submitted Transport Statement sets out that the scheme will result in a negligible increase in pedestrian movements in and around the site in peak hours and over the course of the day and a negligible reduction in cycling. It is therefore considered that there will be no detrimental impact on local pedestrian and cycle facilities.
- 4.6 The previously approved application for the site included the provision of 135 car parking spaces (including 65 car parking spaces in the adjacent car park) and 170 cycle parking spaces. The reduction in car parking spaces as part of this application is a reflection of the reduction in unit now proposed for the site. The provision of car and cycle parking accords with LBH standards.
- 4.7 Overall it is clear that no adverse transport or highway impacts arise, with vehicle and cycle parking compliant with policy. The legislative test is passed.

### **Contamination**

- 4.8 A Phase I Environmental Assessment has been undertaken by Ramboll. The conclusions of the assessment can be summarised as follows:
- 4.9 Based on the current information available, the potential for significant ground contamination to exist at the site due to the current and historic uses is considered to be low to moderate. No

ground works are proposed as this application solely relates to the change of use of the existing building.

- 4.10 Based on the topography and hydrology features, the predicted ground water flow is from north-west to south-east, and therefore the potential for significant ground contamination to exist at the site as a result of off-site activities is considered to be low to moderate.
- 4.11 Overall, the hydrogeological sensitivity in the vicinity of the site is considered to be moderate to high. The vulnerability of groundwater resources is considered to be moderate due to the extensive building and hardstanding coverage of the site, none of which is due to change as part of this proposal. The hydrological sensitivity of the site is considered to be low to moderate. The vulnerability is considered to be low (since the nearest identified surface watercourse is the Grand Union Canal, located 0.5km north-east of the site).
- 4.12 The current and former uses of the site indicate a low potential for significant widespread soil and groundwater contamination. Based on the available information, the site is not considered likely to be classified as Contaminated Land under Part 2A of the Environmental Protection Act 1990.
- 4.13 Overall, the contamination risk of the site is low. There are no contamination concerns arising from the proposed change of use from office to residential. The EHO officer did not raise concerns with the proposals during the determination of the previous scheme. On the basis of the above and the extant prior approval, the legislative test is passed.

## **Flood Risk**

- 4.14 A Flood Risk Assessment has been undertaken by Ramboll. The conclusions of the assessment are summarised below.
- 4.15 The proposed development will not result in any change to the existing drainage arrangements as the proposed works are change of use and internal refurbishments only.
- 4.16 Overall the site is considered to have a low probability of being affected by fluvial and tidal flooding, sewer flooding, groundwater flooding and reservoir flooding. Parts of the car park have medium potential for surface water flooding, although these areas are not considered likely to affect the occupation of the site and the mapping of surface water flood risk does not take account of existing surface water drainage assets.
- 4.17 Overall, the flood risk of the site is low and there are no flood risk concerns arising from the proposed change of use from office to residential. The flooding and drainage position has not changed since the previous application was approved and as such it is considered the proposals are acceptable in these terms. The legislative test is passed.

## **Noise**

- 4.18 A Noise Report has been undertaken by Sandy Brown. The conclusions of the assessment can be summarised as follows - due to the Covid-19 pandemic, it is considered that current noise data for the site would not necessarily be representative due to reduced activity. As such data used as part of the assessment for the Keith House application has been used (application ref. 27189/APP/2020/2181).
- 4.19 The noise survey around the site has indicated that the noise from Dawley Road / North Hyde Road and train movement along the railway to the north of the site dominate the soundscape, rather than noise from the surrounding commercial premises.

- 4.20 The minimum measured background sound levels were *LA*<sub>90</sub>, 5min 44dB in the day (7am-11pm), and *LA*<sub>90</sub>, 5min 39dB at night (11pm-7am).
- 4.21 As the surrounding buildings are commercial we have assumed the daytime noise limits would be relevant. These limits are cumulative and apply with all plant operating under normal conditions.
- 4.22 An indicative facade sound insulation assessment has been carried out on the worst affected facade of the building. To meet the requirements set out in BS 8233:1999, a glazing performance of *Rw*+*Ctr* 35 dB is required. This acoustic performance is achievable with double glazing. If enhancements to the existing glazing performance are required, this could be done by installation of secondary glazing. The acoustic requirements for the glazing will be less on the facades facing away from the road and railway. Ventilation by way of high performance acoustically attenuated passive ventilators, or mechanical means, is required to achieve the internal noise criteria.
- 4.23 It is clear that noise from surrounding commercial premises would not result in significant impacts on intended occupiers of the proposed residential units, which is the test in the relevant legislation. This is consistent with the findings of the extant 2018 approval.
- 4.24 Overall, the impacts of noise from commercial premises and transport on the intended occupiers of the development are negligible. There are no commercial premises related noise concerns arising from the proposed change of use from office to residential.
- 4.25 The previous approval included two conditions to maintain acceptable noise levels and provide suitable sound insulation – these are both accepted in principle again. Given the above, the legislative test is passed.

## **Daylight**

- 4.26 A Daylight Assessment has been prepared by Lichfields. An assessment of the proposed development was undertaken of all habitable rooms. Daylight analysis has been undertaken using the Average Daylight Factor (ADF) and Daylight Distribution (DD) tests. Sunlight amenity has been undertaken using the Annual Probable Sunlight Hours (APSH) test.
- 4.27 A total of 118 rooms were tested using indicative layouts for each of the residential units proposed. The ADF analysis shows that all rooms tested were full compliant with the BRE Report guidance for their room uses, resulting in 100% ADF compliance.
- 4.28 The DD analysis shows that all 118 rooms assessed will fully comply with the BRE Report guidance, with at least 80% of the room area in receipt of direct sky visibility. This results in 100% DD compliance.
- 4.29 APSH analysis shows that of the 118 rooms tested regardless of orientation, 66 (56%) will see full compliance with the BRE Report guidance. As noted in the assessment, windows facing within 90 degrees of due north are unlikely to receive good levels of sunlight and therefore a low compliance rate for these windows is expected. Therefore, when just looking at the 67 southerly facing rooms, 66 (99%) will fully comply with the BRE Report guidance.
- 4.30 As a result of the above, it is considered that the proposed development clearly provides adequate natural light to all habitable rooms in accordance with the legislation. The legislative test is passed.

5.0

## Conclusion

- 5.1 This Planning Statement has been prepared by Lichfields to accompany an application for change of use of Building 3 at Hyde Park Hayes from office (Use Class B1(a)) to residential (Use Class C3).
- 5.2 The submitted documents demonstrate that the site is suitable for residential occupation in terms of flood risk, contamination, noise and daylight requirements and that the proposed scheme would not have an adverse impact upon the highway network. Policy compliant car and cycle parking is provided.
- 5.3 In addition, the proposals represent an improvement on the previously approved scheme insofar as proposed units will now all meet current space standards.
- 5.4 Subject to appropriate planning conditions, as was the case for the July 2018 approval, this proposed change of use of the existing buildings from Class B1(a) to Class C3 is clearly acceptable and complies with the requirements of the legislation.



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