

Planning Department
London Borough of Hillingdon Council
Civic Centre
High Street
Uxbridge
UB8 1UW

Our ref: 1322259.2.BM

26th September 2024

Dear Planning,

THE TOWN AND COUNTRY PLANNING ACT 1990 (AS AMENDED)

Planning Application for the Change of Use of MOT Centre to a 1-bed apartment with associated alterations; provision of plant and store rooms associated with entirety of ground floor residential units

At Units 14-16 Ryefield Crescent, Pinner, Northwood, HA6 1LT

Introduction

1. This Planning Statement has been prepared on behalf of Bankway Properties Ltd ("the Applicant") to accompany a Change of Use application at Units 14-16 Ryefield Crescent, Pinner, Northwood, HA6 1LT ("the Site"). The proposed development comprises the following elements:
 - Change of use of MOT Centre to 1-bed apartment (Class C3) with associated external alterations; *and*
 - Change of use of residual Class E floorspace to plant room and store room associated with all ground floor residential units within Hawthorne Court (approved under 77316/APP/2022/1726 and 20331/APP/2023/564).
2. The following drawings and documents, prepared by rg+p Architects unless otherwise stated, have been submitted electronically via the Planning Portal as part of this application and should be read in conjunction with this Planning Statement:
 - Site Location Plan, drawing no. 101-173/(P)018 rev B
 - Existing Block Plan, drawing no. 101-173/(P)026
 - Existing Layout Plan, drawing no. 101-173/(P)010 rev B
 - Proposed Block Plan, drawing no. 101-173/(P)027
 - Proposed Ground Floor Plan, drawing no. 101-173/(P)019 rev D
 - Existing and Proposed Elevations, drawing no. 101-173/(P)020 rev C



- Existing and Proposed Sections, drawing no. 101-173/(P)023
 - Existing and Proposed Roof Plan, drawing no. 101-173/(P)028
 - Refuse Strategy Plan, drawing no. 101-173/(P)025
 - Design and Access Statement
 - Green Space Review, prepared by Marrons
 - Construction Management Plan, prepared by Marrons
 - Transport Note, prepared by Magna Transport Planning Ltd
 - Phase 1 Contaminated Land Report, prepared by Castledine Environmental
3. A BACS payment for the sum of £578.00, the correct fee for an application of this type, has been sent to the Planning Portal alongside the £70.00 administration fee.

Background and Site Description

4. The application site is located in Northwood, a suburb of North West London identified by the Local Development Plan as a 'Minor Town Centre'. The unit is part of a larger, 3-storey mixed use building, with existing residential units on the upper 2 floors. The majority of the ground floor has extant permission for conversion from Class E to residential use (Class C3), under prior approval application refs: 77316/APP/2022/1726 and 20331/APP/2023/564. Unit 14-16, as outlined on the Existing Layout Plan, is the last remaining section of the building with a permitted commercial use (as an MOT centre, sui generis).
5. The site is located within a primarily residential area and is surrounded by existing built-form to all aspects. Adjoining Ryefield Crescent to the south are semi-detached residential units, and to the east is a block of flats known as 'Rail Lodge'. To the west there is a small high-street with commercial uses backing on to the site, and to the north of the site lies a railway line servicing Northwood Hills Station.
6. Ryefield Crescent is a cul-de-sac with minimal through traffic (due to it being a no-through road) and limited parking on the street. The site is within a sustainable location with public transport links in close proximity to the site. Northwood Hills Underground Station is less than a 2-minute walk, providing access to the Metropolitan Line with links to Watford and Baker Street. In addition, there are convenient bus links to Harrow, Southall and Ruislip.
7. The site is also conveniently located for easy access to greenspace and playing fields, including Northwood recreation ground. A Green Space Review is submitted alongside this application which identifies all public open space within 800m of the site (e.g. easy walking distance).
8. The site falls within Flood Zone 1 where there is a low probability of flooding and there are no Listed Buildings or other Heritage Assets in close proximity to the application site. There are no trees or vegetation of any kind on the application site, nor is there anything of significant ecological value.



i. Planning History

9. The planning history of the site is summarised in Table 1 below, as available on the Council's public access page.

Application Ref.	Description	Date of Decision	Decision
77316/APP/2022/1726	Conversion of commercial (Class E) space to 5 no. residential units comprising 4 one-bed units and 1 two-bed unit (class C3) (Application for Prior Approval under Schedule 2, Part 3, Class MA of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended)).	11 th August 2022	Approved
20331/APP/2023/564	Change of use of the building from Class B1a (Class E) to 15 residential units (1 x studio, 10 x 1-bedroom and 4 x 2-bedroom units) (Class C3) (Application for Prior Approval under Schedule 2, Part 3, Class MA of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended)).	17 th July 2023	Approved

Table 1 – The planning history of the application site, as available on the Council's public access page.

ii. Pre-Application Enquiry

10. A pre-application advice request was submitted to the Council in February 2024, with a Teams meeting held with the allocated Case Officer on 12th June. The subsequent written advice was received on 28th June. The response received can be summarised as follows:
- The current MOT use is classed as Sui Generis and will need a full planning application to be submitted to change its use to residential;
 - No issues with the loss of an employment unit as fits in line with policy guidance, nor was there any objection to the addition of one further residential unit within the existing building;



- No issues raised with regard to the proposals impact on the character and appearance of the area, nor on the amenity of existing and future residents;
- The proposals were in compliance with the nationally described space standard;
- Located in a highly accessible location;
- Green Space Review undertaken would suggest that the provision of private outdoor space would not be a requirement in this instance, despite being contrary to policy; *and*
- Suggested provision of a legal agreement, preventing future residents from joining the resident parking scheme.

The Proposal

11. The proposed development seeks to convert 259.3m² of existing floorspace to residential (and ancillary residential) use. The proposals comprise the following elements:
 - 1-bed residential unit = 63.1m²
 - Plant Room = 33.8m²
 - Storage Room = 88.2m²
 - Internal corridor = 74.2m²
12. The proposed unit exceeds the National Space Standard requirement of 50m² for a 1B2P unit. The unit will be served by large windows as the external elevation already benefits from two full-height wide openings due to its previous use as a MOT centre – these will be replaced with glazed windows. This will ensure that all habitable rooms will receive adequate natural light.
13. The internal corridor proposed will create a central circulation core, from which all ground floor residential units (permitted and proposed) will be accessible from. This is communicated on the submitted 'Unit 14-16 Proposed Ground Floor Plan' (drawing no. 101-173/(P)019 rev D).
14. The proposed plant and store rooms are to be associated with all ground floor residential units (both permitted and proposed). A legal agreement will be provided in due course to secure this.

i. S106 Draft Heads of Terms

15. The Applicant will work with the Council towards delivery of a S106 agreement and proposes the following draft Head of Terms:
 - A restriction on the future residents of the proposed apartment from obtaining a resident parking permit for the local CPZ; *and*
 - The proposed store shall be available for use by all residents of the ground floor of Hawthorne Court (comprising the 20no. units previously approved under Class MA



permission refs: 77316/APP/2022/1726 and 20331/APP/2023/564), not just the 1no. unit proposed under this application.

Planning Policy Context

16. The Development Plan for the application site consists of the relevant policies of the adopted Local Plan Part 1 (adopted November 2012), the Local Plan Part 2 (adopted January 2020) and the London Plan (adopted March 2021). The National Planning Policy Framework (December 2023) will also be a material consideration in the determination of the application. It is noted that there is a new draft version of the NPPF (July 2024) which has just completed the consultation process. As the findings of the consultation have not yet been published however, no weight can be attributed to the changes proposed within.

i. Local Plan Part 1 (adopted 2012)

17. The following policies from the Local Plan Part 1 are considered to be relevant to this full planning application:

- Policy NPPF1: National Planning Policy Framework – Presumption in Favour of Sustainable Development
- Policy BE1: Built Environment
- Policy EM11: Sustainable Waste Management

ii. Local Plan Part 2 – Development Management Policies

18. The following policies from the Local Plan Part 2 are considered to be relevant to this full planning application:

- Policy DMEI 12: Development of Land Affected by Contamination
- Policy DMCI 2: New Community Infrastructure
- Policy DMCI 7: Planning Obligations and Community Infrastructure Levy
- Policy DMTC 1: Town Centre Development
- Policy DMTC 4: Amenity and Town Centre Uses
- Policy DMHB 14: Trees and Landscaping
- Policy DMHB 15: Planning for Safer Places
- Policy DMEI 14: Air Quality
- Policy DMHB 11: Design of New Development
- Policy DMHB 16: Housing Standards
- Policy DMHB 18: Private Outdoor Amenity Space
- Policy DMT 1: Managing Transport Impacts
- Policy DMT 2: Highways Impacts
- Policy DMT 5: Pedestrians and Cyclists
- Policy DMT 6: Vehicle Parking



iii. London Plan

19. The following policies from the London Plan are considered to be relevant to this full planning application:

- GG1 – Building strong inclusive communities
- GG2 – Making the best use of land
- SD6 – Town Centres and High Streets
- SD7 – Town centres: Development principles and Development Plan Documents
- D4 – Delivering Good Design
- D5 – Inclusive Design
- D6 – Housing Quality and Standards
- D12 – Fire safety
- H1 – Increasing housing supply
- SI13 – Sustainable drainage
- T4 – Assessing and mitigating transport impacts
- T5 – Cycling
- T6 – Car parking
- SI3 – Energy infrastructure

iv. National Planning Policy Framework (December 2023)

20. The following Sections of the Framework are considered to be relevant to this full planning application:

- Section 2: Achieving sustainable development
- Section 5: Delivering a sufficient supply of homes
- Section 7: Ensuring the vitality of town centres
- Section 8: Promoting healthy and safe communities
- Section 9: Promoting sustainable transport
- Section 11: Making effective use of land
- Section 12: Achieving well-designed and beautiful places

Planning Policy Assessment

i. Principle of Development

21. Policy NPPF1 of the Local Plan Part 1 and Section 2 of the Framework are both concerned with achieving sustainable development. Paragraph 8 of the Framework elaborates upon the definition of sustainable development, and states that the planning system has three overarching objectives:



- a) *“an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;*
 - b) *a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities’ health, social and cultural well-being; and*
 - c) *an environmental objective – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy”.*

22. Central to the Framework is a presumption in favour of sustainable development, which means that proposals which comply with an up to date Development Plan should be approved without delay, unless *“any adverse impacts of doing so would significantly and demonstrably outweigh the benefits”* when assessed against the policies within the Framework. Whilst Part 1 of the Local Plan is aged, Part 2 is considered up to date. Both Parts and the London Plan are consistent with the objectives of the Framework, and can be afforded due weight in the decision making process.

23. The current use of Unit 14-16 is a MOT Centre (Sui Generis). The site is not designated employment land however, and therefore the proposed change of use to residential does not conflict with the objectives of Policies E1 nor E6 of the Local Plan Part 1. With regards to Policy DME 2 of the Local Plan Part 2 – Development Management Policies, this states:

“Proposals which involve the loss of employment floorspace or land outside of designated employment areas will normally be permitted if:

 - i. the existing use negatively impacts on local amenity, through disturbance to neighbours, visual intrusion or has an adverse impact on the character of the area;*
 - or*
 - ii. the site is unsuitable for employment reuse or development because of its size, shape, location, or unsuitability of access; or*
 - iii. Sufficient evidence has been provided to demonstrate there is no realistic prospect of land being reused for employment purposes; or*
 - iv. The new use will not adversely affect the functioning of any adjoining employment land; or*
 - v. The proposed use relates to a specific land use allocation or designation identified elsewhere in the plan”*

24. The remainder of Ryefield Crescent and Hawthorne Court above is within residential use (either existing or permitted), and therefore the single residual commercial unit (a MOT



centre) sits uncomfortably amongst the surrounding residential uses. The presence of the MOT centre undermines the feasibility of investing in a wholesale refurbishment of the wider application site, as the commercial use negatively impacts upon local amenity through disturbance to neighbours, visual intrusion and has an adverse impact on the character of the area, which in light of the recently approved Class MA permissions, is now almost entirely characterised by prevailing residential development. The proposals will accord with sub-point i) of Policy DME 2, allowing for the principle of the change of use. It should also be noted that there is the potential for the MOT use to intensify, which would have an adverse impact upon residential amenity.

25. The application site is located just within the Town Centre boundary for Northwood Hills, as designated by the Local Plan Part 2 – Development Management Policies document. The Secondary Shopping Area is located immediately to the west of the application site, with the Primary Shopping Area located *circa* 100m to the north. This will ensure that future occupiers of the site have an abundance of day-to-day facilities available to them within walking distance.
26. The change of use will provide 1no. additional 1-bed unit, in a highly sustainable location. The unit will exceed National Space Standards and will benefit from 2no. south-facing windows, allowing for ample natural daylight within the habitable spaces. The change of use is therefore in accordance with the objectives of Policy DMHB 16 of the Local Plan Part 2 – Development Management Policies, H1, GG4 and D6 of the London Plan and Section 5 of the Framework.

ii. Design

27. Paragraph 135 of the Framework states that decisions should ensure that developments:
 - a) *“will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;*
 - b) *are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;*
 - c) *are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);*
 - d) *establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;*
 - e) *optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and*
 - f) *create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where*



crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience”.

28. This notion is supported within local policy, at Policy DMHB 11 of the Local Plan Part 2 – Development Management Policies and D4 of the London Plan. The proposed change of use makes the most effective use of the floorspace available. A large, 1B2P flat will be provided as part of the proposals, as well as a store room, plant room and internal corridor, the latter of which will allow for a central circulation core to the adjacent permitted residential units. This will facilitate ease of access to and from the units, as well as aid fire safety. The introduction of a residential use within this location will be beneficial to existing residents upon the upper floors of the building, by removing the MOT Centre which is a conflicting use in such close proximity.

29. Policy DMHB 18 of the Local Plan Part 2 states:

“A) All new residential development and conversions will be required to provide good quality and useable private outdoor amenity space. Amenity space should be provided in accordance with the standards set out in Table 5.3, which states that Studio and 1-bedroom flats should be provided with at least 20 square metres of private amenity space.

B) Balconies should have a depth of not less than 1.5 metres and a width of not less than 2 metres.

C) Any ground floor and/or basement floor unit that is non-street facing should have a defensible space of not less than 3 metres in depth in front of any window to a bedroom or habitable room. However, for new developments in Conservation Areas, Areas of Special Local Character or for developments, which include Listed Buildings, the provision of private open space will be required to enhance the streetscene and the character of the buildings on the site.

D) The design, materials and height of any front boundary must be in keeping with the character of the area to ensure harmonisation with the existing street scene.”

30. No outdoor amenity space is proposed as part of the development. The nature of the change of use application as conversion of an existing commercial unit entails that there is limited space on-site for amenity provision. The site is located within walking distance of an abundance of green spaces however, as outlined within the accompanying Green Space Review. In response to the Green Space Review within the written pre-application advice received, the following is stated at p.10:

“Private outdoor space should be provided and meet local standards wherever possible. As stated in Part A, an amenity space serving a proposed 1bed 2person flat would ordinarily be expected to be in the region of 20sq.m. It is acknowledged that this size of amenity space would significantly reduce the GIA of the unit in a negative way. At the meeting it was suggested that a small amenity space exceeding the London Plan



requirement, could be incorporated into the design without any conflict with the GIA requirement for the unit.

This matter has been addressed by way of a Green space Review submitted following the meeting. The review identifies other opportunities for residents to access nearby recreational space which would weigh into the balance and potentially offset any deficiency in amenity space provision. Taking a balanced view, the sustainable site location, nearby recreational facilities and the planning history weigh in favour of a policy departure in this instance.

(our added emphasis)

iii. Highways

31. Section 9 of the Framework states that decisions should ensure development proposals have taken the opportunities for sustainable transport modes, ensure safe and suitable access to the site can be achieved for all users and any significant impacts from the development on the transport network, or on highway safety, can be effectively mitigated to an acceptable degree. Paragraph 115 of the Framework states 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.
32. The location of the development, within Northwood Hills Town Centre, entails that there are an abundance of public transport options available to future residents in very close proximity. In addition, all essential day-to-day facilities and services are within walking distance. The site is in an extremely sustainable location with Northwood Hills Underground Station less than a 2-minute walk from the application site, providing access to the Metropolitan Line with links to Watford and Baker Street. There are convenient bus links extremely close by.
33. Due to the existing unrestricted 'sui generis' use of Unit 14-16, the proposed change of use would result in a net reduction in trips across all modes of transport, and would consequently result in a betterment to highway capacity, as well as the reduction in demand on nearby sustainable travel infrastructure. Table 5C within the accompanying Transport Note sets out the significant net reduction in vehicle trips as a result of the proposed change of use – there would also be a reduction in parking demand. There is no evidence to suggest that there is an existing road safety problem that requires mitigation. The conversion of the ground floor unit to residential use can therefore come forward with no highway safety implications.
34. Regarding on-site parking, there are 10 car parking spaces along the site's southern boundary. Should the residents of the new flat require on-site parking, Bankway Properties Ltd will lease the spaces to the occupiers on a monthly license, in the similar manner as the existing arrangements with the parking bays located along the western boundary of the site. Therefore, if the demand requires it, there is capability onsite for parking provision that would be in accordance with the maximum parking standards prescribed within the London Plan.



The Applicant would be willing to enter into a S106 agreement to prevent future residents of the proposed unit from obtaining a resident parking permit for the local CPZ.

35. Furthermore, as part of the previously approved Class MA applications that the remainder of the ground floor was subjected to, 36no. cycle parking spaces within an internal cycle store were proposed. This exceeds the minimum requirement for cycle parking prescribed within the London Plan. The excellent nearby public transport links should assist with discouraging residents from owning a car, and instead encourage residents to utilise more sustainable modes of transport, such as walking, cycling or public transport.
36. The proposed bin storage is located within 10 metres from the refuse vehicle access, in accordance with council guidelines. The accompanying Refuse Strategy Plan confirms that sufficient space is available for the storage of separate waste and recycling bins.
37. Overall, the development is not considered to cause any adverse impacts upon highway safety. Accordingly, the proposed change of use would not prejudice the safe or efficient use of the public highway and there are no issues with the existing access.

iv. Other Matters

38. Section 14 of the Framework seeks to ensure that development is not at risk from flooding, nor does it increase flood risk elsewhere. The application site falls within Flood Zone 1, as per the Environment Agency Flood Map for Planning, where there is a less than 1 in 1000 annual probability of flooding. It is acknowledged that the site is within a Critical Drainage Area, however, given the nature of the proposals as a change of use, there would be no increase in built form on the application site and therefore no exacerbation over and above the existing situation. Overall therefore, the development is not considered to incur unacceptable flood risk in accordance with Section 14 of the Framework.
39. Paragraph 124 (c) of the Framework states that planning decisions should give substantial weight to the value of using suitable brownfield land for homes, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land. A Phase 1 Contaminated Land Report accompanies this application, and confirms that the site represents a low level of risk with respect to the proposed development and no further works or investigation are required. Overall, the conversion of Unit 14-16 can come forward safely and the residential unit can be occupied as the site would be rendered free from risks to human health, in accordance with Section 11 of the Framework.
40. From an ecology perspective, there is nothing of ecological value on site as it comprises entirely of a building and hard surfacing.

Water Efficiency

41. Policy DMEI 10 Part G) of the Local Plan Part 2 states that all new development proposals (including refurbishments and conversions) will be required to include water efficiency



measures, including the collection and reuse of rain water and grey water. Part H) also states that new residential development should demonstrate water usage rates of no more than 105 litres per person per day.

42. A fittings-based approach will be taken to reduce water usage in accordance with Policy DMEI 10 (parts G and H). Measures will include:
- Installation of low flow taps in the bathroom and kitchen;
 - Installation of a low water use dishwasher;
 - Installation of a dual-flush WC; *and*
 - Installation of a reduced volume bath (volume of less than 150 litres to the overflow), with a low flow shower over it.
43. In this instance, a rainwater harvesting system is not possible to install due to the units ground floor location within a three-storey building.

Energy Efficiency

44. At p.11 of the pre-application response, it is stated that *“an Energy Assessment incorporating carbon reduction and energy efficiency measures is encouraged as part of the wider scheme in accordance with Policy SI 2 Part C) of the London Plan (2021) and Policy DMEI 2 Part A) of the Hillingdon Local Plan: Part 2 (2020)”*. A separate planning application is in the process of being prepared for fenestration changes to the wider building. Of relevance to this application is the installation of 100mm stone wool insulation and silicone render to all external walls of the building. The provision of additional insulation will reduce energy consumption, by retaining heat more effectively. A reduction in energy use will have an associated reduction in harmful emissions.
45. All windows will be double-glazed, with trickle vents to allow for air flow whilst minimising heat loss.

Fire Safety

46. In terms of fire safety measures, the proposed residential unit will be fitted with a smoke and carbon monoxide detector, as well as a sprinkler system. These will also be present in the communal areas, to include the plant room, store room and internal corridors. Fire extinguishers will be available at all times, located within the internal circulation corridor. All communal internal doors and ‘front doors’ to the units (both those apartments already permitted via Class MA and the apartment proposed under this application) will be fire doors, at a grade of FD30 in accordance with BS EN 1634.
47. There are several external exits available for residents to utilise in the event of a fire. All external exits will have an illuminated fire exit sign, similar to the one in Figure 1 below, above them.



Figure 1 – Illuminated Fire Safety Sign

48. Upon occupation of the apartment, the residents will be furnished with a copy of the below map (Figure 2), illustrating the evacuation assembly point in the event of an emergency.



Figure 2 – Fire evacuation assembly point.

Conclusions

49. It has been demonstrated throughout this Planning Statement that the proposed development is compliant with the Development Plan when read as a whole, and can be accommodated on the application site without unacceptable impacts arising.
50. The National Planning Policy Framework sets out a clear presumption in favour of sustainable development in section 2. The proposed development, for the 'Change of Use of MOT Centre to a 1-bed apartment with associated alterations; provision of plant and store rooms



associated with entirety of ground floor residential units', will serve to repurpose an existing unit into a use that is in keeping with the prevailing residential use of the surrounding area.

51. The proposed conversion has been meticulously designed, to ensure that the development would have no adverse impact upon the character or appearance of the surrounding area. In fact, the proposed change of use would result in a betterment in the residential amenity of existing and future occupiers, by removing a conflicting use in such close proximity.
52. If you require any clarification or additional information, please do not hesitate to contact Brian Mullin or Megan Simpson using the details below.

Yours sincerely

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