

# PLANNING DESIGN AND ACCESS STATEMENT

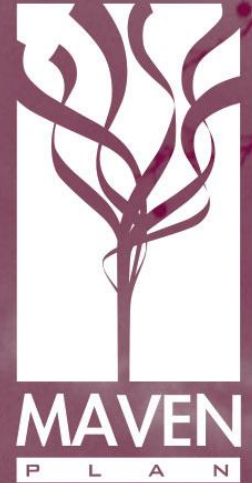
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PROPOSED CHANGE OF USE OF FIRST FLOOR FROM CLASS E (FINANCIAL SERVICES) TO CLASS C3 (RESIDENTIAL) TO CREATE 6 RESIDENTIAL UNITS, SUBDIVIDING THE COMMERCIAL SPACE ON GROUND FLOOR INTO TWO SMALLER UNITS AND ALTERATIONS TO ACCESS, FENESTRATION, CYCLE AND WASTE STORAGE.

BARCLAYS BANK PLC, 62 STATION ROAD HAYES, UB3 4DF

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AUGUST 2025



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## 1.0 INTRODUCTION

- 1.1. This planning statement has been prepared in support of a planning application for the change of use of the first floor from Class E (Financial Services) to Class C3 (Residential) to create 6 residential units and subdividing the ground floor commercial floorspace into two smaller commercial units (Class E), together with alterations to access, fenestration, cycle and waste storage.
- 1.2. This application follows a previous refusal for a change of use application reference: 1128/APP/2024/2368 on the first floor from commercial to residential use with an upward extension for an additional storey to generate 8 flats. The reasons of refusal were the design of the extended building and its impacts on the setting of the locally listed public house opposite. To address both the design and listed building concerns, the application no longer proposes an upward extension and simply seeks approval for a change of use on the first floor and subdivision of the ground floor in 2 units along with fenestration changes.
- 1.3. The proposals should be read in conjunction with the following drawings and reports:
- Architectural Plans by ABA Chartered Surveyors:
 

2525 OS 01	Location Plan
2505 EX 01	Existing Floor Plans
2505 EX 02	Existing Elevations
2505 EX 03	Existing Roof Plan
2505 PL 01	Proposed Floor Plans
2505 PL 02	Proposed Elevations
2505 PL 03	Proposed Roof Plan
2505 PL 04	Existing and Proposed Site Plan
2505 PL 05	Street Views
  - Heritage Statement by Heritage Unlimited;
  - Daylight and Sunlight Assessment by T16 Design;
  - Air Quality Assessment by Rappor;
  - Arboricultural Impact Assessment and Method Statement by All Arboriculture;
  - Contamination Land Risk Assessment Phase 1 Desk Study Report by STM Environmental;
  - Preliminary Ecological Appraisal and Roost Assessment by Arbtech;
  - Drainage Strategy by RIDA; and
  - This Planning Design and Access Statement.

## 2.0 SITE DESCRIPTION

- 2.1. The site is in a prominent position at the junction of Station Road and the Grand Union Canal, Hayes. It comprises a two-storey building with basement which was last occupied by Barclays bank in March 2024.
- 2.2. The building includes a ground floor commercial frontage with ancillary office space at first floor level. Part of the basement was formerly used as a bank vault with the remainder providing staff parking, accessed via a vehicular access ramp along the northern side of the building.
- 2.3. The area is characterised by buildings of varying scale, design, and character. The site lies between the more modest scale of development on the northern side of the canal and the much taller and more recent development to the south of the canal surrounding Hayes and Harlington Station. The site is surrounded by:
- The Grand Union Canal and the towpath to the south;
  - Station Road to the east on the other side of which is the locally listed Old Crown Public House;
  - Nos 56-60 Station Road, a three-storey building with ground floor commercial and flats above to the north; further north is the Grade II listed St Anselm's Church; and
  - Nos 1-15 Walters Close, a three-storey residential block of flats to the west.

- 2.4. The site has a PTAL rating of 5, representing a very good level of public transport accessibility (with 0 being the lowest and 6a the highest). It lies within 200m of Hayes and Harlington Station while the nearest bus stops are on the southern side of the canal serving routes 90, 140, 195, 278, 350, 696, 698, E6, H98 N140 and U4; which connect Greenford, Harrow Weald, Ruislip, Hayes End, Hillingdon Heath, Heathrow Airport, Uxbridge and Northolt.
- 2.5. The site falls within the Secondary Shopping Area of Hayes Town Centre; Hayes Housing Zone, a Hotel Growth Location, and an Air Quality Management Area.
- 2.6. The site is not within a conservation area. The existing building is not statutory listed, but the Church of St Anselm, approximately 25 metres to the north, is Grade II listed (entry no: 1464541). The Old Crown Public House, on the eastern side of Station Road, approximately 16 metres from site, is a locally listed non-designated heritage asset.
- 2.7. The site is located in Flood Zone 1 indicating a low probability (less than 1 in 1,000 annual probability) of flooding.

### 3.0 RELEVANT PLANNING HISTORY

- 3.1 Below is a summary of the relevant planning history of the site.

[1128/APP/2024/2368](#)

- 3.2 In December 2024, planning permission was refused for a change of use of the first floor from Class E (Financial Services) to Class C3 (Residential) to create 8 residential units including the erection of an additional storey and amendments to the fenestration. The application was refused for the following reasons:

1. *The scale, bulk, massing, architectural composition and design approach would result in a building that appears, heavy, bulky and generally unsympathetic in relation to the surrounding buildings and development within the street scene. The development therefore fails to represent the highest design standards and fails to respond positively to the character and context of the surrounding area contrary to Policies DMHB 11 and DMHB 12 of the Local Plan: Part 2- Development Management Policies (2020); Policy BE1 of the Hillingdon Local Plan: Part 1 - Strategic Policies (Adopted November 2012); Policies D3 and D4 of the London Plan; and the NPPF 2023 in particular Paragraphs 135 and 139.*
2. *The siting, scale, bulk, massing and architectural composition of the building would erode the setting of the Locally Listed Old Crown Public House resulting in a moderate to high level of less than substantial harm to the significance of the Locally Listed Building which would not be outweighed by the public benefits of the development, contrary to Policy DMHB 3 of the Local Plan Part 2 – Development Management Policies (2020); Policy HC1 of the London Plan; and Paragraph 209 of the NPPF.*

- 3.3 Notwithstanding that the application was refused, the Council made the following observations of relevance to this application.

#### *Principle of Use*

- 3.4 The site is within the settlement limits within an established residential area so the principle of residential is acceptable.
- 3.5 The proposal would result in the loss of commercial floor space at first floor level, but the ground floor and basement would be retained in commercial use. On this basis, it is considered that the loss of the first floor to residential would not affect the viability of the commercial unit.

#### *Impact on Neighboring Amenities*

3.6 The proposed rear window on first and second floor levels would be angled away from Walters Close which would mitigate any potential overlooking concerns.

3.7 There is no unacceptable loss of light to properties at No. 1-15 Walters Close.

*Impact on Street Scene*

3.8 The existing building does not make a positive contribution to the street scene or canal edge.

3.9 The proposal to clad the building in red brick is considered acceptable as this relates contextually to the surroundings.

*Traffic Impact/Pedestrian Safety*

3.10 The site falls within a very sustainable location in terms of access to public transport. The principle of car-free development is considered acceptable.

*Quality of Accommodation*

3.11 Two out of 8 flats would be single aspect; however, these are south facing studios which would allow ample natural light. The outlook and internal daylight would also be acceptable.

3.12 The scheme proposed a combined total of 53sqm of private amenity space which falls significantly short of the minimum private amenity space of 200sqm. However, the officer acknowledged that the site is constrained with other public open spaces nearby, so the level of private amenity space was, on balance, considered acceptable.

*Dwelling Mix*

3.13 The proposed mix of 2 x studios, 4 x 2 bed, and 2 x 3 bed flats was acceptable.

*Trees*

3.14 If the application was recommended for approval, a tree condition would have been applied to ensure appropriate measures would be in place to protect the trees adjacent to the site during and after construction.

*Impact on Canal*

3.15 The Canal and Rivers Trust raised concerns about the drainage strategy and potential for surface water discharge to the canal.

*Ecology and Biodiversity Net Gain*

3.16 The Council accepted the conclusions of the Preliminary Ecological Appraisal and Roost Assessment which indicated the site had no value for foraging and commuting bats, due to lack of optimal habitats.

3.17 The site consists of hard surfacing and an existing building and therefore the habitat value of the site is judged to be de-minimis and delivery of mandatory biodiversity net gain would not be required.

*Contamination*

3.18 The Council accepted the Phase 1 Desk Study Report which identified no significant likelihood of contamination.

1128/PRC/2025/18 (Pre-Application)

3.19 In February 2025, a pre-application proposal for the change of use of the first floor from Class E (Commercial) to Class C3 (Residential) including the erection of 2 additional storeys and amendments to the fenestration to create 9 flats was submitted.

3.20 The main differences between the pre-application scheme and the refused scheme was the introduction of 2 additional storeys (instead of a 1 storey extension); an increase in number of residential units from 8 to 9, and the fenestration changes.

3.21 A meeting was held with the Council in March 2025 and a formal written response was provided in May 2025. The key feedback from the pre-application advice was:

- The principle of commercial use on the ground floor and basement levels with a residential use above is acceptable;
- The amended design with the addition of two additional floors remains bulky and heavy in appearance;
- The design requires a responsive design approach to the character of the surrounding 20th century buildings rather than the distinctly modern developments on the opposite side of the canal;
- The roof form fails to make a positive contribution to the skyline and transition to adjacent buildings to the north;
- An updated daylight and sunlight assessment would be required given the provision of an additional storey which may have a potential impact on the neighbouring properties at Walters Close;
- The housing mix should be reconsidered to focus on 1- and 2-bedroom units given it is a constrained town centre site.
- A car-free development would be appropriate, and a Unilateral Undertaking would be required to secure a permit free development;
- A management plan would be required for any basement parking allocated to the commercial units;
- The majority of cycle parking should be in the form of Sheffield-type stands which are accessible by all;
- An updated Arboricultural Impact Assessment and Method Statement would be required;
- A Drainage Strategy would be required to address the Canal & River Trust concerns about the proposed surface water strategy. A Structural report would be required to demonstrate the additional building load from adding an extra storey would not adversely affect the stability of the cutting;
- The site consists of an existing building and hard surfacing and therefore the habitat value of the site is judged to be de-minimis and the mandatory biodiversity net gain would not be required.

**4.0 DESCRIPTION OF PROPOSED DEVELOPMENT**

4.1 The proposal seeks a change of use of the commercial space to residential use on the first floor to create 6 residential units. The ground floor commercial space will also be sub-divided into two smaller units.

4.2 The exterior of the building is to be refaced in Ibstock Audley Red Mixture Brickwork, including recessed brick detail to the front (east), north, and south side elevations. Stone window heads are proposed to all elevations except the rear (west), plus a stone string course to the east side elevation. A new grey aluminum shopfront is also proposed including two new entrances.

4.3 Car parking for the commercial units and waste storage are proposed in the basement level. The cycle storage will be provided at basement level to the rear of the building. The residential units will be car free.

4.4 The building will provide the following accommodation:

Floor	Unit	Type	GIA (sqm)
Ground	Commercial		126.0
Ground	Commercial		190.0
First	1	2b3p	62.7
First	2	1b2p	61.4
First	3	2b3p	72.0
First	4	1b2p	52.8
First	5	Studio	38.0
First	6	Studio	39.2

**Table 1 – Accommodation Schedule**

## 5.0 RELEVANT PLANNING POLICIES

5.1 The Development Plan for Hillingdon comprises the London Plan (2021), the Hillingdon Local Plan Part 1 adopted in 2012 and the Hillingdon Local Plan Part 2 adopted in 2020.

5.2 The relevant policies are listed below:

### The London Plan (2021)

Policy GG2	Making the Best Use of Land
Policy D1	London’s Form, Character and Capacity for Growth
Policy D3	Optimising Site Capacity through the Design-led Approach
Policy D4	Delivering Good Design
Policy D5	Inclusive Design
Policy D6	Housing Quality and Standards
Policy D7	Accessible Housing
Policy H1	Increasing Housing Supply
Policy H2	Small Sites
Policy H10	Housing Size and Mix
Policy E2	Providing Sustainable Business Space
Policy SI1	Improving Air Quality
Policy SI13	Sustainable Drainage
Policy T4	Assessing and Mitigating Transport Impacts
Policy T5	Cycling
Policy T6	Car Parking
Policy T6.1	Residential Parking
Policy T7	Deliveries, Servicing and Construction

### Hillingdon Local Plan Part 1 – Strategic Policies (2012)

Policy E2	Location of Employment Growth
Policy E5	Town and Local Centres
Policy H1	Housing Growth
Policy HE1	Heritage
Policy BE1	Built Environment
Policy EM1	Climate Change Adaption and Mitigation
Policy EM6	Flood Risk Management
Policy EM7	Biodiversity and Geological Conservation
Policy EM 8	Land, Water, Air and Noise
Policy EM11	Sustainable Waste Management

### Hillingdon Local Plan Part 2 – Development Management Policies (2020)

Policy DMTC1	Town Centre Development
Policy DMTC2	Primary and Secondary Shopping Areas
Policy DMTC4	Amenity and Town Centre Uses
Policy DME2	Employment Uses Outside of Designated Sites
Policy DMH2	Housing Mix
Policy DKMB1	Heritage Assets
Policy DMHB3	Locally Listed Buildings
Policy DMHB 11	Design of New Development
Policy DMHB12	Streets and Public Realm
Policy DMHB 14	Trees and Landscaping
Policy DHMB 15	Planning for Safer Places
Policy DMHB 16	Housing Standards
Policy DMHB 17	Residential Density
Policy DMHB 18	Private Outdoor Amenity Space
Policy DMEI 2	Reducing Carbon Emissions
Policy DMEI 7	Biodiversity Protection and Enhancement
Policy DMEI 9	Management of Flood Risk
Policy DMEI 10	Water Management, Efficiency and Quality
Policy DMEI 14	Air Quality

Policy DMT 1	Managing Transport Impacts
Policy DMT 2	Highways Impacts
Policy DMT 5	Pedestrians and Cyclists
Policy DMT 6	Vehicle Parking

## 6.0 PLANNING CONSIDERATIONS

### 6.1 Principle of the Development

#### Principle of Residential

- 6.1.1 Policy H1 of the Local Plan indicates that the Council will meet and exceed its minimum strategic dwelling requirement in accordance with other Local Plan policies.
- 6.1.2 Policy H2 of the London Plan states that boroughs should pro-actively support well-designed new homes on small sites (below 0.25 ha). Hillingdon has a 10-year target of 2,950 units, i.e. an annual target of 295 units.
- 6.1.3 The site is within Hayes Town Centre and the Hayes Housing Zone. The proposal represents an efficient use of land to provide additional housing within a highly sustainable town centre location. The proposed residential use on the first-floor level would contribute to housing delivery on small sites which is supported by policy, subject to consideration of other factors.
- 6.1.4 In determining the previous application, the Council raised no objection to the principle of residential use on the first floor, subject to all other material planning considerations being acceptable.
- 6.1.5 The planning statement demonstrates in the following sections how the proposal meets all other material planning considerations.

#### Principle of Change of Use of Commercial Space to Residential Use

- 6.1.6 Policy SD6 c) of the London Plan states that the potential for new housing within and on the edges of town centres should be realised through mixed-use or residential development that makes best use of land, capitalising on the availability of services within walking and cycling distance, and their current and future accessibility by public transport.
- 6.1.7 Policy DTMC 1 A) of the London Plan states that the Council will support “main town centre uses” where the development proposal is consistent with the scale and function of the centre. Town centre development will need to demonstrate that: i) adequate width and depth of floorspace has been provided for the town centre uses; and ii) appropriate servicing arrangements have been provided while DTMC 1 B) states that residential use of ground floor premises in primary and secondary shopping areas and in designated parades will not be supported.
- 6.1.8 The site lies within the Secondary Shopping Area of Hayes Town centre, which is classed as a District Centre within the Local Plan.
- 6.1.9 Policy DTMC 2 B) states that in secondary shopping areas, the Council will support the ground floor use of premises for retail; financial and professional activities; restaurants, cafes, pubs and bars; launderettes and other coin operated dry cleaners; community service offices, including doctor’s surgeries provided that: i) a minimum of 50% of the frontage is retained in retail use; and ii) the uses specified in policy DMTC4 are limited to a maximum of 15% of the frontage; iii) the proposed use does not result in a concentration of non-retail uses which could be considered to cause harm to the vitality and viability of the town centre.
- 6.1.10 The proposal would retain commercial use on the ground floor and seek a change of use to residential on the first floor. The existing commercial space on ground floor will be sub-divided into two commercial units with two entrances onto Station Road to provide an attractive and active frontage. The loss of first floor commercial space would not affect the function of the ground floor units.

6.1.11 In determining the previous application, the Council accepted that the loss of the first-floor space commercial floorspace would not affect the viability of the commercial space on the ground floor given the units prominence in the shopping area in Hayes Town Centre. The provision of residential space above the commercial unit is considered acceptable as this will contribute towards the overall vitality of the Town Centre.

## 6.2 Design and Impact on the Conservation Area

6.2.1 Policies D1, D3 and D4 of the London Plan require development proposals to be of high quality and to enhance the local context by delivering buildings and space that positively respond to local distinctiveness.

6.2.2 Hillingdon Local Plan Part 1: Strategic Policies (2012) Policy BE1 states *'The Council will require all new development to improve and maintain the quality of the built environment in order to create successful and sustainable neighborhoods, where people enjoy living and working and that serve the long-term needs of all residents. All new developments should achieve a high quality of design in all new buildings, alterations, extensions and the public realm which enhances the local distinctiveness of the area, contributes to community cohesion and a sense of place.'*

6.2.3 Policy DMHB 11 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020) states: *'All development, including extensions, alterations and new buildings will be required to be designed to the highest standards and, incorporate principles of good design including: i) harmonizing with the local context by taking into account the surrounding scale of development, height, mass and bulk of adjacent structures; building plot sizes and widths, plot coverage and established street patterns; building lines and setbacks, rooflines, streetscape rhythm, for example, gaps between structures and other streetscape elements, such as degree of enclosure; architectural composition and quality of detailing; local topography, views both from and to the site; and impact on neighbouring open spaces and their environment.'*

6.2.4 Policy DMHB 12 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020) re-emphasizes the need for new development to be well integrated with the surrounding area and provides design criteria as to how this would be achieved.

6.2.5 Policy DMHB 1 of the Local Plan states that the Council will expect development proposals to avoid harm to the historic environment. Development would be expected to make a positive contribution to the local character and distinctiveness of the area. Buildings in close proximity to heritage assets should not compromise their setting.

6.2.6 Policy DMHB 11 of the Local Plan requires all new developments to be of high-quality design, which takes account of its local context and is appropriate in terms of its siting, scale, mass and impact on neighbouring properties.

6.2.7 Policy DMHB 12 of the Local Plan re-emphasizes the need for new development to be well integrated with the surrounding area and provides design criteria as to how this should be achieved.

6.2.8 The existing building is 2-storeys with a basement. The Old Crown Public House, a locally listed pub, to the east, is part 1, part 2-storeys; while the terraced housing to the north and the apartment block to the west are both 3-storeys.

6.2.9 The proposal seeks a change of use on the first floor and to sub-divide the internal floorspace on the ground floor into two units. There will be no extensions of the footprint or height of the building. The exterior of the building is to be refaced in Ibstock Audley Red Mixture Brickwork, including recessed brick detail to the front (east), north and south side elevations. Stone window heads are also proposed to all elevations except the rear (west), plus a stone string course to the east side elevation. A new grey aluminum shopfront is also proposed including two new entrances.

6.2.10 The proposed property is not a heritage asset in its own right, instead being within the setting of listed and locally listed buildings. The proposed exterior finish of mixed red brick will harmonious with the surrounding area, where brick of various colours is commonly found, notably including red brick on the adjacent bridge and canal. The proposed use of red brick is considered to have a positive impact on the nearby heritage assets and their setting. Similarly, the other proposed features, such as the replacement windows, detailing and shopfront

match or complement the style of other properties in the area, are an improvement upon the existing character of the site.

- 6.2.11 The submitted Heritage Statement concludes that the proposed design is high quality and enhances the setting of the Grade II listed Church of St Anselm and locally listed The Old Crown Public House.

**6.3 Quality of Accommodation**

**Internal Space**

- 6.3.1 Policy DMHB 16 of the Local Plan requires all new developments to meet the internal space standards set out under Table 5.1 which are summarized below:

**Table 5.1: Minimum Floorspace Standards (National Space Standards)**

Number of bedrooms	Number of bed spaces	Minimum Gross Internal Area (m <sup>2</sup> )			Built-in storage (m <sup>2</sup> )
		1 storey dwellings	2 storey dwellings	3 storey dwellings	
1b	1p	39 (37)*			1.0
	2p	50	58		1.5
2b	3p	61	70		2.0
	4p	70	79		
3b	4p	74	84	90	2.5
	5p	86	93	99	
	6p	95	102	108	
4b	5p	90	97	103	3.0
	6p	99	106	112	
	7p	108	115	121	
	8p	117	124	130	
5b	6p	103	110	116	3.5
	7p	112	119	125	
	8p	121	128	134	
6b	7p	116	123	129	4.0

- 6.3.2 As shown in Table 1, all 6 units comply with the above standards.
- 6.3.3 Units 1,3 and 4 are dual aspects and Units 2, 5 and 6 are single aspect. Nevertheless, Studios 5 and 6 are south facing and would receive good natural light and provide excellent outlook onto the canal. Whilst Unit 2 and studios 5 and 6 are single aspect, they benefit from existing large roof lights which provide adequate ventilation and daylight into the units. The submitted Internal Daylight Assessment concludes that the Target Daylight Factor (DFT) measurements for all internal living spaces would comply with BRE and BS EN 17037:2018 guidance targets.

**Outdoor Space**

- 6.3.4 Policy DMHB 18 and the associated Table 5.3 sets out the residential outdoor private space standards. For flats, it requires a minimum of 20 sqm for studio and 1 bedroom, 25 sqm for 2 bedrooms, and 30 sqm for 3 bedrooms or more. Balconies should have a depth of not less than 1.5m and a width of not less than 2m.
- 6.3.5 The site is significantly constrained given its location in Hayes Town Centre and opportunities to provide a private amenity space are limited given the size of the site and potential overlooking, which limits the ability to provide upper floor roof gardens or substantial shared communal amenity space. The site is surrounded by areas of public open space including Lake Farm Country Park (800m to the northwest) and Minet Country Park (1.1km to the east) which provide accessible public amenity space to the occupants.
- 6.3.6 In determining the previous application, the Council considered that given the location, site constraints, and the nearby public open space, the lack of private amenity space was considered acceptable on balance. The applicant would be willing to pay a S106 contribution towards off-site local open space improvements if deemed necessary.

**6.4 Unit Mix**

- 6.4.1 Policy H10 of the London Plan (2021) states that schemes should generally consist of a range of unit sizes.

- 6.4.2 Policy DMH 2 of the Council’s Local Plan encourages a mix of housing sizes to meet local housing need. Paragraph 4.6 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020) states that the Council's current information on housing need indicates a substantial borough-wide requirement for larger affordable and private market units, particularly three-bedroom properties and applicants proposing residential schemes will be required to demonstrate that this need has been taken into account.
- 6.4.3 Whilst a commitment to providing three-bedroom units would typically be encouraged by the policy, the site is notably constrained and there would be limited opportunity within the proposed layout to provide large areas of amenity space for the three bedroom units which would generally be expected. The housing mix issue was discussed at the pre-application meeting with the Council. The Council considered that typically larger three-bedroom units should be provided with larger terraces and this could present amenity issues for surrounding residents. The site constraints also do not allow for the provision of high quality amenity space. Based on the reasons above, the pre-application feedback was to focus on the provision of 1 and 2 bedroom units which would be a more realistic option on this constrained town centre site.
- 6.4.4 The scheme follows the pre-app advice and provides 2 x studios, 2 x 1 bed, and 2 x 2 bed flats. It is considered the scheme would provide a balanced mix of units to meet the local housing need and maximize the site’s potential.

## **6.5 Impact on Neighbouring Residential Amenity**

- 6.5.1 Part B of Policy DMHB11 of the Local Plan states that development proposals should not adversely impact on the amenity, daylight and sunlight of adjacent properties and open space.
- 6.5.2 The proposal has been carefully designed to ensure there would be no unacceptable impact on outlook, daylight, sunlight or privacy on the neighboring properties.
- 6.5.3 The nearest residential properties are Nos. 56 to 60 Station Road to the north and Nos 1 to 15 Walters Close to the west.
- 6.5.4 The proposal will not extend the footprint or height of the building, hence there would be no daylight/sunlight or overbearing concerns.
- 6.5.5 The rear windows on the first floor facing Nos. 1-15 Walters Close will be ariel windows and would be angled away from Walters Close to avoid potential mutual overlooking. In determining the previous application, the Council accepted the angled windows as a mitigation measure to ensure the neighboring amenity is protected.
- 6.5.6 The proposal accords with part B of Policy DMHB11 of the Local Plan in protecting the residential amenity.

## **6.6 Parking and Cycle Parking**

- 6.6.1 Policy DMT 6 of the Council’s Local Plan sets out the car and cycle parking standards in Appendix C of Table 1. The Mayor of London adopted a new and revised London Plan in March 2021, consequently the car parking standards set out in the London Plan take precedence over those in the Local Development Plan, except where the Local Plan specifies lower local maximum standards.
- 6.6.2 The application site has a PTAL score of 5 and lies within 200 meters of Hayes and Harlington Station and bus links serving multiple routes covering West London. The site is therefore considered to fall within a very sustainable location in terms of access to public transport. Accordingly, the proposal would be a car-free development.
- 6.6.3 In determining the previous application, the Council accepted a car-free development is suitable at this sustainable location.
- 6.6.4 The basement would retain 7 parking spaces for the commercial units and the parking spaces would not be used by the occupiers of the residential dwellings.

6.6.5 Policy T5 Table 10.2 sets out the minimum cycle parking standard. For residential use, it requires 1 space per studio or 1b1b unit and 1.5 spaces per 1b2p or 2b3p units. In addition, 2 visitor spaces would be required. For commercial use, it requires a minimum of 1 long stay space per 175sqm of commercial space and 1 short stay space per 40sqm.

6.6.6 The proposal would generate a requirement of 10 cycle spaces and 2 visitor cycle spaces for residential use and 2 long stay and 8 short-stay cycle spaces for the commercial use. The proposal provides a policy compliant provision at the basement and ground levels as shown on the submitted floor plans.

## **6.7 Trees**

6.7.1 Policy DMHB 14 of Hillingdon Local Plan Part 2 requires the retention and enhancement of existing landscaping, trees, biodiversity or other natural features, landscaping that supports and enhances biodiversity and amenity and replanting of new trees.

6.7.2 The site contains no trees but there are two groups of trees adjoining the site to the south and west. The scheme proposes no work to the trees and all would be retained. An Arboricultural Impact Assessment and Method Statement is submitted with the application which sets out appropriate measures to protect the trees during the course of works and post development.

6.7.3 The proposal is considered to accord with Policy DMHB 14 of the Hillingdon Local Plan.

## **6.8 Air Quality**

6.8.1 The site lies within the Hillingdon borough-wide Air Quality Management Area (AQMA).

6.8.2 The Air Quality Assessment considered that the site is located in an area that experiences low traffic volumes with no other significant emission sources nearby. The site is located in an area of existing residential use and does not propose to locate new residential properties closer to the local road network than existing residential properties. Local air quality monitoring recorded concentrations below the current relevant air quality objectives in recent years. Based on the reasons above, it is therefore considered that the site is suitable for the proposed use with regard to air quality.

6.8.3 The report also considered that the scheme could be considered to be air quality neutral and no further mitigation would be required.

## **6.9 Contamination**

6.9.1 The submitted Phase 1 Desk Study report identified no significant risks of contamination and therefore no specific remedial action is considered necessary in respect of potential soil contamination at the proposed development. In determining the previous application, the Council accepted the findings and considered that a “watching brief” would be required during the development. The applicant is prepared to accept a suitably worded planning condition to adopt a watching brief and report to the local planning authority should any unexpected contamination encountered during the development.

## **6.10 Drainage**

6.10.1 Policy DMEI 10 of the Local Plan also states that developments are required to include a drainage assessment demonstrating that appropriate sustainable drainage systems (SuDS) have been incorporated in accordance with Policy 5.13 of the London Plan.

6.10.2 The submitted Drainage Strategy considered that the impermeable area and the roof layout remains unchanged from the existing condition. The development will not incur a worsening of the current drainage regime. The proposed drainage system is to re-use existing down pipes and associated below ground networks identified in the CCTV survey. Downstream connection and discharge rates to remain as existing, into the Grand Union Canal with no alterations to the existing outfall, as approved by the license to discharge. A copy of the license is appended to the Drainage Strategy.

## **6.11 Ecology and Biodiversity**

- 6.11.1 The Preliminary Ecological Appraisal and Roost Assessment concluded that the site offered low suitability for protected species, except for bats. With regard to bats, the survey identified that the site had no value for foraging and commuting bats due to the lack of optimal habitats. However, the presence of the canal to the south means that foraging and commuting bats onsite cannot be ruled out. The site itself has low habitat value to foraging and commuting bats. The appraisal identified that there are no internal or external features on the building that would allow roosting bats and therefore the development is unlikely to impact directly on bats.
- 6.11.2 In determining the previous application, the Council accepted the ecology findings and concurred with the recommendation that a lighting strategy should be implemented to retain the canal to the south as a dark corridor. The applicant is prepared to accept a suitably worded planning condition to submit a lighting strategy prior to site commencement.
- 6.11.3 The government has confirmed that Biodiversity Net Gain Assessment is mandatory for small sites from 2nd April 2024 except where specific exemptions apply as set out in the NPPG. This includes development subject to the de minimis exemption, where development that does not impact a priority habitat and impacts less than 25 square metres of onsite habitat.
- 6.11.4 The site consists of hard surfacing and an existing building. The habitat value of the site is judged to be de-minimis and delivery of mandatory biodiversity net gain would not be required.
- 6.11.5 In considering the previous application, the Council accepted that a BNG assessment would not be required.

## 7.0 CONCLUSION

- 7.1 The application seeks planning approval for the change of use of the first floor from Class E (Financial Services ) to Class C3 (Residential) to create 6 residential units and subdivision of the ground floor commercial floorspace into two smaller commercial units (Class E), together with alterations to access, fenestration, cycle and waste storage.
- 7.2 This application follows a previous refusal for a change of use application reference: 1128/APP/2024/2368 on the first floor from commercial to residential use with an upward extension for an additional storey to generate 8 flats. The key reasons of refusal were the design of the extended building and its impacts on the setting of the locally listed public house opposite. To address the design concerns, the application no longer proposes an upward extension and simply seeks approval for the change of use on the first floor and subdivision of the existing floorspace on the ground floor together with fenestration changes.
- 7.3 The principle of the loss of commercial floorspace and the proposed residential use on the first floor were previously considered acceptable.
- 7.4 The proposal includes refacing the exterior of the building with a new shopfront which would enhance the appearance of the site. The proposed design is high quality and will enhance the setting of the Grade II listed Church of St Anselm and locally listed The Old Crown Public House.
- 7.5 The proposed 6 residential units would have high quality internal living space. Given the site constraints, it would not be possible to provide on-site amenity space but there are alternative accessible public open spaces nearby which on balance, overcome the lack of amenity space on the site. The applicant would also be willing to provide a financial contribution towards local open space improvements in lieu of any on-site provision.
- 7.6 The proposal has been carefully designed to ensure there would be no unacceptable impact on outlook, daylight, sunlight, or privacy on the neighboring properties.
- 7.7 The development would be car-free and the applicant is prepared to enter into a S106 agreement so to prevent occupants from obtaining parking permits.
- 7.8 The submission demonstrated there would be no unacceptable impacts on trees, air quality, contamination, drainage or ecology.
- 7.9 As such, the proposal is deemed to retain all aspects that were deemed acceptable in the previous scheme and fully overcome all concerns raised in the cited reasons for refusal. The proposal is in accordance with the relevant national, regional, and local planning policies and it is therefore respectfully requested that the application be approved with appropriate conditions.