

PROLOGIS UK LIMITED

**MOD DOCUMENT RECORD OFFICE, BOURNE
AVENUE, HAYES**

PLANNING STATEMENT

APRIL 2013

CONTENTS

1.	Introduction	1
2.	Planning Background and History	2
3.	Site and Surroundings	5
4.	Proposed Development	6
5.	Planning Policy	7
6.	Key Planning Considerations	11
7.	Conclusions	15

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1. Introduction

- 1.1 This Planning Statement has been prepared on behalf of Prologis UK Ltd. It sets out an assessment for the application for full planning permission for a distribution warehouse (Use Class B8) with ancillary offices, associated car parking, access and landscape works, located within the existing Prologis development at the former MOD Records offices at Stockley Road, Hayes.
- 1.2 The site, including the newly developed Prologis Park, originally benefitted from outline planning permission (ref: 18399/APP/2004/2284, dated 19th August 2005) for the phased redevelopment for mixed use development comprising Use Classes B1(a), B1 (c), B2 and B8, employment uses and C3 residential, with associated access, parking and landscaping. The first phases have now been built, however planning permission for the remaining phase, the current site, has expired, and as such a new application is submitted. This new application seeks a planning permission for a scheme that is effectively the same as that already approved under previous applications for the site, with current minor amendments being made to the service yard size, size of Unit C and the subdivision of Unit D, to provide new Unit G. The next chapter sets out a full planning history for the site. The planning statement will assess the merits of the proposal against national and local planning policy and also considers the site context and a review of the key issues.
- 1.3 In order to seek to limit the requirement for pre-commencement conditions, the information enclosed within this application is comprehensive and addresses items that might otherwise have been conditioned. This follows the pre-application advice from planning officers. A full list of the information submitted with this application is set out within the covering letter.
- 1.4 The remainder of the report is structured as follows:
- Planning background and history
 - Site and surroundings
 - Proposed development
 - Planning policy context
 - Key planning considerations

2. Planning Background and History

- 2.1 The site has been subject to a number of planning applications; applications for variations of conditions; and reserved matters in order to redevelop the site for a mix of uses.
- 2.2 The original outline application (reference: 18399/APP/2004/2284) was approved on 19th August 2005 for the following description of development:

Redevelopment of the site for a mixed- use comprising (classes B1(a) & (c), B2 and B8) employment uses and (class C3) residential (up to a maximum of 101 units) with associated access, parking and landscaping (outline application)

- 2.3 A second application (reference: 18399/APP/2005/3415) was approved on 27th January 2006 that varied the above application to allow for a phased development. The description of development for this is as follows:

Variation of conditions 2,3,7,8,10,11,13,20, 21,22,26,29 & 30 (to allow separate phased submissions of details relating to residential and employment components of the development) of outline planning permission ref.18399/ APP/2004/2284 dated 19/08/2005: redevelopment of the site for a mixed-use development comprising use classes B1(a) & (c), B2 and B8 employment uses and C3 residential use (up to a maximum of 101 units) with associated access, parking and landscaping.

- 2.4 An application for approval of reserved matters (reference: 18399/APP/2007/2725) was approved on 17th December 2007 for details of siting, design, external appearance and landscaping. As part of this application, a plan was approved to split Unit D to create Unit G; as well as the relocation of the existing gate to the service yard of Unit D to provide two gates. The description of development is as follows:

Reserved matters (details of siting, design, external appearance and landscaping) of units C, D and G (employment component) in compliance with condition 3 of planning permission ref.18399/APP/2005/3415 dated 27/01/2006: variation of conditions (to allow separate phased submissions of details relating to residential and employment components of the development) of outline planning permission ref. 18399/app/2004/2284 dated 19/08/2005: redevelopment of the site for a mixed-use development comprising

use classes B1(a) & (c), B2 and B8 employment uses and C3 residential use (up to a maximum of 101 units) with associated access, parking and landscaping.

- 2.5 A similar reserved matters application (reference: 18399/APP/2010/545) was approved on 25th June 2010 which included details of access, appearance, landscaping, layout and scale for two units with ancillary offices and associated car parking including an overflow car park. The description of development is as follows:

Reserved matters (details of access, appearance, landscaping, layout and scale for two units with ancillary offices and associated car parking including an overflow car park) in compliance with condition 3 of planning permission ref:18399/APP/2005/3415 dated 02/03/2006 (variation of conditions 2, 3, 7, 8, 10, 11, 13, 20, 21, 22, 26, 29 and 30 (to allow separate phased submissions of details relating to residential and employment components of the development) of outline planning permission ref:18399/app/2004/2284 dated 19/08/2005: redevelopment of the site for a mixed-use development.)

- 2.6 An application (reference: 18399/APP/2010/2814) to then vary the above reserved matters application was approved on 24th February 2011, to allow for phased development. The description of development is as follows:

Variation of conditions 2, 4, 5, 6, 7, 9, 12, 13, 14, 15, 16, 17, 18 and 19 (to allow the phased development of the overflow car park and units C and D) of planning permission ref: 18399/APP/2010/545 dated 25/06/2010: reserved matters (details of access, appearance, landscaping, layout and scale for two units with ancillary offices and associated car parking including an overflow car park) in compliance with condition 3 of planning permission ref: 18399/APP/2005/3415 dated 02/03/2006 (variation of conditions 2, 3, 7, 8, 10, 11, 13, 20, 21, 22, 26, 29 and 30 (to allow separate phased submissions of details relating to residential and employment components of the development) of outline planning permission ref: 18399/APP/2004/2284 dated 19/08/2005: redevelopment of the site for a mixed-use development.)

- 2.7 A recent Section 96a application for non-material amendments was submitted to the council seeking the relocation of the estate road to the east by 3 metres, enlarging the service yard and reducing the footprint of Unit C. This application was

rejected on 7th January 2013 on the basis that the proposed changes were not non-material and, as such, a planning application would be required.

- 2.8 Finally, two further reserved matters applications were submitted on 25th January 2013. However, after correspondence with the council, these were subsequently withdrawn as condition 2 of outline planning permission 18399/APP/2005/3415 required that all reserved matters be submitted to the Local Planning Authority by the 27th January 2009. As such, a new application for planning permission was required.

3. Site and Surroundings

- 3.1 The site is within a Locally Significant Industrial Site (LSIS) as designated through the Local Plan; given it is a major employment area, where industrial and warehousing activities can operate.
- 3.2 The Hayes / West Drayton Corridor in which the site is located is a key sub area of the Heathrow Opportunity Area, and is described as an area where traditional manufacturing has left, and the logistics and distribution activities have increased. Three Crossrail stations are proposed to be located at Heathrow, West Drayton and Hayes, helping to establish the Corridor as a key transportation node in West London.
- 3.3 The site is currently previously used to store materials to build the other phases of the Prologis development. The site sits at the northern end of the Prologis Park, and comprises approximately a third of the total development area. To the south of Prologis Park lies a recreation park and open space. To the south east of the site, the new residential dwellings are located, approved as part of the original outline application in 2005. Existing residential dwellings also lie to the east of the site, bordered by an existing landscaped bund which was established as part of the original outline application. Railway tracks lie to the north and west of the site, along with further shrubbery and hedges, with large areas of industrial land beyond. Finally, to the south west of the site is a lake.
- 3.4 Junction 4 of the M4 is located approximately 500m south of the site, offering easy access to the motorway network. Stockley Road, to the west of the site, is a main arterial route leading to Heathrow Airport and also services Stockley Park to the north. Access to the site will be via the Estate Road, off the Stockley Road roundabout, which currently provides access to all existing units in the Prologis Park, and is maintained by the applicant.

4. Proposed Development

- 4.1 This application seeks to provide 14, 383 sq m (GEA) of commercial floorspace (B8 Use Classes) with ancillary offices, service yard areas, access landscaping and car parking over three units to complete the Prologis Park estate.
- 4.2 As previously mentioned, this scheme is effectively the same as that already approved under previous applications for the site, with current minor amendments comprising the following:
- moving a stretch of estate road to the east by 3 metres, to facilitate an enlarged service yard for Unit D of 50 m in depth and to reduce the footprint of Unit C slightly;
 - relocation of the existing gate to the service yard of Unit D to provide two gates;
 - the sub-division of Unit D into two units forming Unit G;
 - amendments to the offices within the south west corner of the now Unit G; and
 - the provision of further disabled car parking spaces.
- 4.3 Generally, the design, layout, scale and appearance of the proposed units follow the principles of the existing units to be in keeping with the look and feel of the Prologis estate as a whole.
- 4.4 Further details of the design principles can be found within the Design and Access Statement enclosed as part of this application.

5. Planning Policy

5.1 This section sets out the planning policy framework in relation to the application site and proposed development. The policy context comprises the following documents:

- National Planning Policy Framework (adopted April 2012)
- The London Plan (adopted July 2011)
- Hillingdon Local Plan (adopted November 2012)
- Hillingdon UDP Saved Policies (saved 2007)

5.2 Since the previous outline application in 2005, PPS's and PPG's have been abolished with the introduction of the NPPF. The revised London Plan has also come into effect from 2011. With regards to local policy, the LDF Local Plan has been adopted containing strategic policies, whilst policies within the UDP have been saved. These are the policies, in which the application has been assessed against, with the most relevant policies set out below.

NPPF

5.3 The 'golden thread' running through the NPPF is the '*presumption in favour of sustainable development*' thus this requires the approval of development proposals that accord with the development plan without delay.

5.4 A core planning principle of the NPPF seeks to proactively drive and support sustainable economic development, delivering industrial units and infrastructure.

5.5 Paragraph 9 states sustainable development involves seeking positive improvements in the quality of the built environment as well as people lives, including making it easier for jobs to be created.

5.6 Paragraph 19 states planning should support sustainable economic growth; as such significant weight should be placed on the need to support economic growth through the planning system.

The London Plan

5.7 The London Plan intends to promote London's position as a World City. The plan encourages sustainable growth in locations that are well served by public transport (page 5).

- 5.8 Policy 2.7 seeks to address opportunities for economic growth within outer London so that it can rise above its long term economic trends by enabling existing sources of growth to perform more effectively; enhancing competitive advantages and synergies for clusters of related activities for business locations within development corridors; and managing and improving the stock of industrial capacity to meet both strategic and local needs.
- 5.9 Policy 4.1 seeks to develop London's economy, through promoting and enabling the continued development of a strong, sustainable and increasingly diverse economy across all parts of London, ensuring the availability of sufficient and suitable workspaces in terms of type, size and cost.
- 5.10 Policies 5.1 to 5.15 relate to climate change mitigation, and the use of sustainable design. In accordance with policy 5.2, development proposals should make the fullest contribution to minimising carbon dioxide emissions, seeking a 40% reduction between 2013 and 2016 (zero carbon thereafter). Major development proposals should include a detailed energy assessment demonstrating how these targets will be met. Where it can be clearly demonstrating the reduction targets cannot be fully achieved on site, any shortfall may be provided off site or through a payment in lieu. Policy 5.3 states proposals should demonstrate that sustainable design standards are integral to the proposal.

Local Plan

- 5.11 Policy E1 relates to managing the supply of employment land, which seeks to designate LSIS. The Local Plan seeks to include the site within the Locally Significant Industrial Site (LSIS) designation, given it is a major employment area, where industrial and warehousing activities can operate.
- 5.12 Policy E2 relates to the location of employment growth, seeking this to be directed towards suitable sites within LSIS (amongst other areas). The council also seeks to promote development in highly accessible locations and contributes to the improvement of existing networks to reduce emissions and impacts to air quality.
- 5.13 Policy E3 relates to the Heathrow Opportunity Area. The Hayes / West Drayton Corridor is a key sub area of this, and is described as an area where traditional manufacturing has left, and the logistics and distribution activities have increased. Three Crossrail stations are proposed to be located at Heathrow, West Drayton and Hayes, helping to establish the Corridor as a key transportation node in West London. This will also maximise regeneration and future growth opportunities. This

policy seeks to achieve the future growth set out for the Hayes / West Drayton Corridor through preparing a Local Development Document.

- 5.14 Policy BE1 requires all new development to improve and maintain the quality of the built environment, therefore new developments should achieve a high quality of design in all new buildings; and seek to protect the amenity of surrounding land and buildings, particularly residential properties. The council will also require all new development to achieve reductions in carbon dioxide emissions in line with the London Plan. BREEAM targets will be set out within the Development management Policies Local Development Document for which preparation will commence in 2013.

UDP Saved Policies (Adopted 1998, Saved 2007)

- 5.15 Policy Pt 1.23 encourages industry and warehousing uses to be located within existing industrial and business areas, whilst policy Pt 1.24 reserves designated industrial and business areas as the preferred locations for industry and warehousing.
- 5.16 Policy BE 25 relates to industrial and business uses, and states the LPA will *'seek to ensure modernisation and improvement of industrial and business areas through careful attention to the design and landscaping of buildings and external spaces. Where it is appropriate it will seek improved vehicular and pedestrian access and circulation routes through the area, and environmental improvements.'*
- 5.17 Policy LE1 states all proposals for industry (B2), warehousing (B8) and business (B1) development will be assessed by taking into account where appropriate the following considerations:
- i) Outstanding unimplemented planning permissions, development under construction and vacant floorspace elsewhere in the plan area;*
 - ii) The availability and capacity of public transport facilities to serve proposals for employment intensive uses;*
 - iii) The ability of the road system, as existing or taking due account of committed improvements, to accommodate at normal peak hours the additional traffic generated;*
 - iv) The provision for access by people with disabilities and other accessible facilities both to and within buildings*

- 5.18 Policy LE3 states new development in designated industrial and business areas should, where appropriate and practical, include the provision of small units, particularly when existing small units are proposed to be demolished.

6. Key Planning Considerations

Principle of Development

- 6.1 This application proposes the erection of commercial floorspace within a designated Locally Significant Industrial Site where industrial and warehousing activities can operate; therefore it is considered the principle of the development is acceptable, in accordance with adopted policy.
- 6.2 Furthermore, this application seeks planning permission for a scheme that is effectively the same as that already approved under previous applications for the site, therefore the principle of this development has already been accepted by the council.

Design and Layout

- 6.3 The design and layout of the proposed units follow a similar design and layout to the rest of the existing Prologis Estate.
- 6.4 The proposed units will be constructed from similar materials as the existing units, enabling them to be of a similar design and in keeping with the estate whilst the location of the offices within the units provides key frontages to the estate. The heights of the units meet the operational purposes of future occupiers, with mature landscaping, provided through the original application, providing suitable screening and buffering to.
- 6.5 Finally, this application proposes three units for the site, as opposed to the two units which were approved under the previous application, thus creating smaller units within a designated industrial and business area, which is in accordance with saved UDP policy LE3.

Transportation and Access

- 6.6 It was agreed through correspondence with the Planning Officer at the Council, that a Transport Statement will be included within the application and that a full Transport Assessment would not be required. This is due to the application proposing a very similar scheme to that already approved, and it is considered the transportation implications will not adversely differ from this. Therefore a Transport Statement is sufficient to cover any transport implications.

- 6.7 The Transport Statement concludes that the impact resulting from the application site would be no worse than that from the previous scheme. In comparing the original outline planning application for the whole park, the application site will generate significantly fewer vehicle trips than the original outline planning application.
- 6.8 A Framework Travel Plan has also been included as part of the application.

Sustainability

- 6.9 As one of the Global 100 most sustainable corporations in the world, the sustainability strategy proposed will protect and where possible enhance the local environment, implement sustainable transportation measures and make a strong positive contribution to the implementation of national and local sustainability policy.
- 6.10 The London Plan does not set any specific requirements with regards to BREEAM certification, and at present no adopted local policy stipulates the use of BREEAM or specific standards of achievement for non-domestic development in Hillingdon. However, the scheme will achieve the BREEAM Very Good standard, which is considered to be in accordance with the national objectives of delivering sustainable development and the objectives of Policy BE1 of the adopted Local Plan.
- 6.11 Further sustainability features of the proposed development include minimising carbon emissions through the construction of energy efficient buildings; an on-site generation of renewable heat; reduced water consumption; maximising resource efficient; and green infrastructure. Further details of these and other sustainability features are expanded upon within the enclosed Sustainability Statement.
- 6.12 Overall, it is considered the proposals will have a beneficial impact on the local economy, will conserve and where possible enhance the natural environment as well as meeting the long term challenge of future climate change.

Other Planning Considerations

Noise

- 6.13 A Noise Summary Report has been prepared as part of this application, following on from the Acoustic Report (dated 14 December 2009) prepared as part of the previous application. A 4.5 m timber acoustic fence will border the southern

boundary associated with the Unit D and G. This is considered to be sufficient to provide full screening of the activities, including any façade reflections, to the upper floors of the nearest dwellings. The Report concludes that with these measures in place, and given the current proposals are very similar to the previously permitted proposals, it is anticipated there will be no significant noise effects on the neighbouring dwellings.

- 6.14 Besides the acoustic fencing, the existing landscaping approved as part of the previous application has now matured so to further provide suitable screening for nearby residential dwellings from the proposed units.

Flood Risk

- 6.15 A flood risk assessment has been carried out for the site, taking into account flood risk from overland flows, groundwater flooding, sewer flooding, and flooding from reservoirs and canals. It was then considered that the likelihood of flooding from these were negligible, therefore flood mitigation is not required. The FRA also confirms that the site is location in an area with low annual probability of flooding and has a low risk of flooding from all sources. Therefore the site proposals are considered to be robust and in accordance with the requirements set out in the NPPF.

Contamination

- 6.16 Land contamination assessments on the site have been undertaken since 1997, with a recent assessment identifying localised elevated concentrations of hydrocarbon and asbestos contamination. It is therefore indicated that localised asbestos contaminated soils should be reused beneath hard standing only during redevelopment with appropriate safety management procedures adopted. The hydrocarbon impacted soils are deemed low risk and the concentrations suitable for a commercial/industrial end use with a hard surface cover
- 6.17 It is considered that further contaminated land assessment work is not necessary for this application, with the installation of hard standing sufficient mitigation for any residual contamination. However recommendations for the development include a completion of a watching brief with method statement to address contamination in the event that it is encountered during excavations. Health and safety assessments are also recommended, as well as the installation of a capping layer of soft landscaped areas to break the direct contact and inhalation pathways of any residual contamination.

Ecology

- 6.18 An Ecology Report has been included as part of this application, which concludes that no negative effects on statutory or non-statutory wildlife on the site are anticipated as a consequence of the development. Through site investigations, there was evidence of badgers and foxes from mammal holes dug, with a recommendation that these holes are monitored prior to site clearance. Although the size of the site is relatively small, it is unlikely to be of high value for ground nesting birds; however a further recommendation was made to check for breeding birds to be completed in advance of site clearance.

7. Conclusions

- 7.1 This application is submitted for the full planning permission for a distribution warehouse and offices as part of Phase 3 within the existing Prologis Park development. The site originally benefitted from outline planning permission, with the first two phases of the Park built. However as planning permission for the remaining phase had expired, a new application is submitted. This new application seeks a planning permission for a scheme that is effectively the same as that already approved under previous applications for the site, with some very minor amendments.
- 7.2 The development proposals are well based in that they are within an existing industrial estate within a designated Locally Significant Industrial Site. The proposals are also designed and laid out so that they are in keeping with the look and feel of the Prologis Park.
- 7.3 As part of this application, summary comments have been provided for the assessments and reports submitted as part of the original application. This was considered acceptable by the Council.
- 7.4 The application site is located in an area which is highly accessible by public transport and other non-vehicular modes, whilst the Transport Statement also considers the number of trips generated by the proposals will be significantly fewer than that of the previous lapsed application. Therefore, it is concluded the impact resulting from this application would be no worse than the outline permission and have no significant transportation impacts.
- 7.5 Besides from the existing extensive landscaping treatments to the boundaries of the application site, as approved within the original outline planning permission, acoustic timber fencing will also be erected to the boundaries bordering the residential dwellings. This ensures there will be no adverse effect to the amenity of neighbouring residents.
- 7.6 It is also considered the application will not have any adverse or increased noise, air quality or ecology impacts, over the previously approved application.
- 7.7 In order to remove the requirement for any pre-commencement conditions, the information enclosed within this application is comprehensive and addresses items that would have been conditioned following advice from the council.

- 7.8 It is therefore considered this is a suitable proposal for the site, there is no policy basis against which to resist the application and that planning permission should be granted.

