

EOPRE-APP1/P21-176PL

08 July 2021

London Borough of Hillingdon  
Environmental and Community Services  
3 North  
Civic Centre  
High Street  
Uxbridge  
Middlesex  
UB8 1YW

Sent by email: [applicationsprocessingteam@hillingsdon.gov.uk](mailto:applicationsprocessingteam@hillingsdon.gov.uk)

Dear Madam/Sir,

Re: **EOPRE-APP1/P21-176PL**

Please find attached and below the pre-application submission made by Pegasus Group on behalf of the client 'Graftongate', relating to the site edged red on the site layout plan known as Bridge Retail Park, Uxbridge Road, Hayes UB4 0RH.

The following documents are included within this submission: -

- Pre-application request form
- Pre-application letter (this letter)
- Site Layout Plan Drg. No 21048 F0003 Rev. D
- Elevations Plan Drg. No 21048 P0005 Rev. A
- CGI imagery – 'Aerial 1' and 'View 1'

The guidance relating to pre-application submissions as provided on the Councils website has been considered and whilst it is acknowledged that the current submission does not include the comprehensive suite of documents referenced, we respectfully ask that you accept and register this application on the basis of the information provided.

This project is subject to significant time constraints and thus your speedy response would be greatly appreciated on this matter.

Should you wish to discuss the proposal further or have any specific queries, please do not hesitate to contact me on the details at the foot of this letter.

In the meantime, I look forward to hearing from you.

## **Key Questions**

In the interest of ensuring development efficiency, this pre-application submission seeks to obtain a comprehensive understanding and clarity on the following matters: -

## **Pegasus Group**

Birmingham | Bracknell | Bristol | Cambridge | Cirencester | Dublin | East Midlands | Leeds | Liverpool | London | Manchester | Newcastle | Peterborough

 **DESIGN**  **ENVIRONMENT**  **PLANNING**  **ECONOMICS**  **HERITAGE**

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- The in-principle acceptability of the proposal
- Highway matters
- Technical issues (design, character, appearance, drainage and flood risk, amenity, biodiversity and ecology, pollution) and any other material planning considerations
- Environmental sustainability
- Weight to be attached to the fallback position (existing use of the site) in respect of the technical matters, planning obligations and conditions.
- Details of any planning obligations (CIL/s.106) on account of the current use of the site
- Planning conditions
- Planning application submission requirements
- Planning application fee

## **Proposal**

Pre application advice is sought for the erection of a single building to accommodate use classes E(g), B2 and B8 as illustrated on the accompanying plans. The building would have a gross internal floor area of 15,995 m<sup>2</sup> and a gross external area of 16,359 m<sup>2</sup>. The site area is 3.17 hectares.

The proposal would result in approximately 241 additional jobs (not including construction related employment).

As illustrated on the accompanying CGI and elevations, the building would have a maximum height of approximately 19 metres and a shallow, ridged roof design. The proposed colour palette would comprise of varying shades of grey and the elevations would be broken, and interest added through the incorporation of glazing and the alternating use of colour, texture and finish.

A large surface carpark would be provided adjacent to the site frontage, buffered by existing soft landscaping. The existing access off Uxbridge Road would be used (and upgraded if necessary) to serve the proposal. The site access would lead to a secure service yard providing HGV docking, loading and parking bays, along with a turntable to allow vehicles to exit the site in a forward gear. Soft landscaping would be retained along the eastern site boundary.

Vehicle parking provision would include spaces for cars, disabled visitors, cycles and HGV's. The breakdown is as follows: -

- Cars: 122 bays
- Disabled spaces: 6 bays
- Lorries: 17 bays
- Cycles: 30 bays

## **Site and Surrounding Area**

The site is currently host to a range of large buildings occupied by various retail uses. These include: -

- Currys PC World
- Halfords
- Harveys and Bensons for Beds
- Dreams
- Office Outlet
- Argos
- AHF
- Tapi Carpets

As a consequence of the pandemic and the changing nature of retail, resulting in a significant shift to online sales, four of the referenced units have expressed an immediate interest in terminating their leases and vacating with immediate effect, two of the companies have recently gone into administration and one company will be consolidating its existing interests in a nearby store.

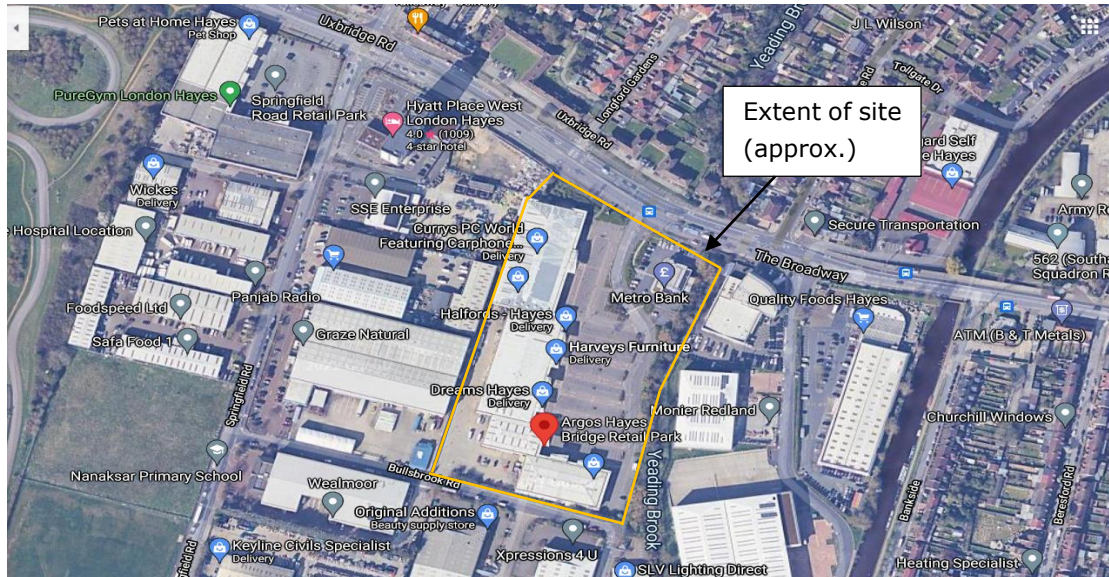
Within the southern corner of the site is a Metro Bank, which is to be retained.

The existing units have a combined footprint of approximately 9738 m2.

The buildings are situated in proximity to the western site boundary and there is a large surface car park to their frontage. There is a service yard to the rear of the buildings, accessed via Bullsbrook Road. The retail units are served by an existing access off Uxbridge Road. There is a landscape belt to the eastern site boundary and further soft landscaping to the rear (southern) boundary and along the site frontage. The western site boundary is secured by a perimeter wall.

The site occupies a plot on a large industrial estate. Immediately adjacent to the sites southern, eastern and western boundaries are existing industrial buildings. To the site frontage is Uxbridge Road. On the opposite side of this main route is a large residential area.

## Images of the Site



View of site frontage from Uxbridge Road. Hotel to west.





View of site entrance, looking east.



View into Bridge Retail Park from site entrance.



View of service access and rear site boundary.



View north west from Uxbridge Road.

## **Planning Policy**

The site is situated in a designated 'Strategic Industrial Location' (Local Plan part 1) and is a Proposed Locally Significant Industrial Site (Local Plan part 2). Within the Local Plan part 2, the site is identified as a 'Preferred Industrial Location' and as a 'Locally Significant Industrial Site'. As set out in the Plan, such sites are intended to be suitable for industrial and warehouse activities (Use Classes B1 (c), B2 and B8).

## **Applicable Planning Policies**

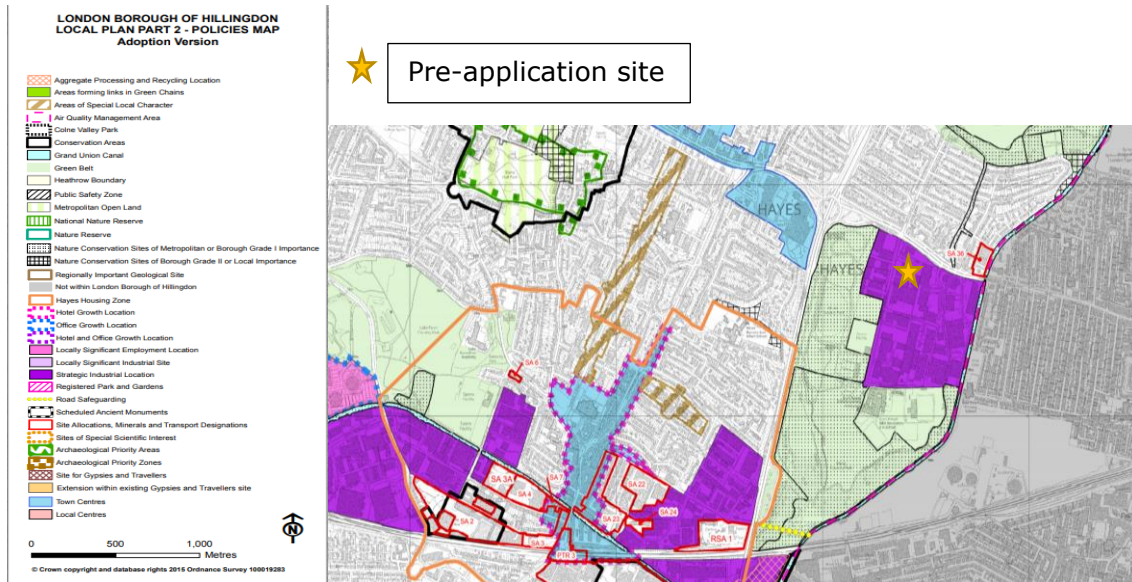
### **Local Policy**

The site is situated within the Borough of Hillingdon, London. The Local Plan comprises of two documents: the Part 1 and Part 2 Local Plans. The two sections of the Local Plan form the council's future development strategy for the borough. It sets out a framework and detailed policies to guide planning decisions and is the starting point for considering whether planning applications should be approved.

The Local Plan Part 1 comprises the strategic document. It sets out the overall level and broad locations of growth up to 2026 and was adopted in November 2012. It comprises a spatial vision and strategy, strategic objectives, core policies and a monitoring and implementation framework. These strategic policies are supported by more detailed policies and allocations set out in the Local Plan Part 2.

The Local Plan Part 2 comprises Development Management Policies, Site Allocations and Designations, and the Policies Map. This Plan was adopted in January 2020.

An extract from the Policies Map is below. This illustrates the pre-application sites designation as a 'Strategic Industrial Location'.

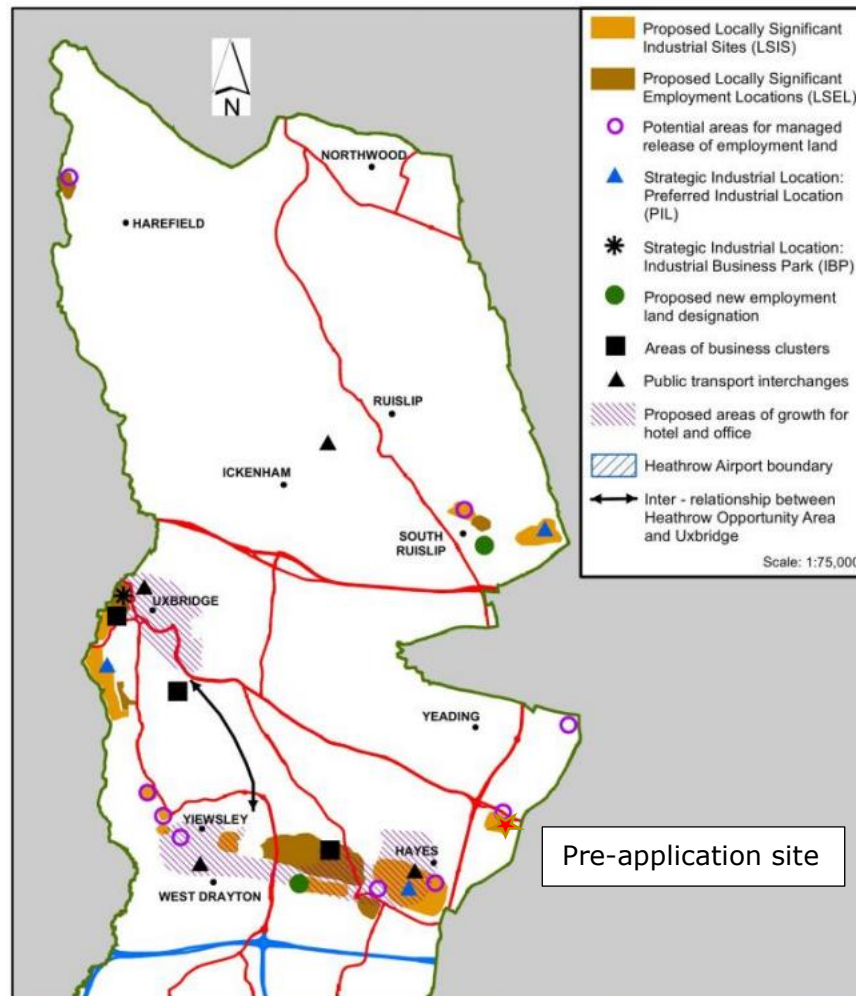


The site is situated on the perimeter of the Hayes and West Drayton Corridor. This is a key location for employment growth in the Heathrow Opportunity Area. The plan acknowledges that while traditional manufacturing in this area has declined, the logistics and distribution sector has strengthened.

The plan further acknowledges that some employment sites in the Hayes/West Drayton Corridor will be partially released for mixed use development. It is stated that cross rail will be a catalyst for growth and regeneration in the Corridor, particularly around Hayes town centre where the station will be modernised as a public transport interchange. Furthermore, the Grand Union Canal is recognised as a key open space and blue/ green corridor with improved public access, strong biodiversity habitats, and increased opportunities for recreation and leisure activities.



Map 5.1 Locations for Employment Growth



As illustrated by the extract above, the pre-application site is a 'Proposed Locally Significant Industrial Site' (LSIS) with the purple circle indicating a 'potential area for the release of employment land'.

## Part 1 Policies

The most applicable policies relating to the Principle of development are Policies E1 and E2. (extract below)



### **Policy E1: Managing the Supply of Employment Land**

The Council will accommodate growth by protecting Strategic Industrial Locations and the designation of Locally Significant Industrial Sites (LSIS) and Locally Significant Employment Locations (LSEL) including the designation of 13.63 hectares of new employment land.

Areas for managed release of employment land are shown on Map 5.1.

### **Policy E2: Location of Employment Growth**

The Council will accommodate 9,000 new jobs during the plan period. Most of this employment growth will be directed towards suitable sites in the Heathrow Opportunity Area, Strategic Industrial Locations (SILs), Locally Significant Employment Locations (LSEL), Locally Significant Industrial Sites (LSIS), Uxbridge Town Centre and Hayes Town Centre with a particular focus around transport nodes. The Council will promote development in highly accessible locations that delivers sustainable travel patterns and contributes to the improvement of existing networks to reduce emissions and impacts on air quality. The Council will accommodate a minimum of 3,800 additional hotel bedrooms, and new hotels and visitor facilities will be encouraged in Uxbridge, Hayes, on sites outside of designated employment land on the Heathrow perimeter and in other sustainable locations.

The applicable criteria based policies are as follow:-

Policy BE1 – Built Environment

Policy EM1 – Climate Change Adaptation and Mitigation

Policy EM6 – Flood Risk Management

Policy EM7 - Biodiversity and Geological Conservation

Policy EM8 - Land, Water, Air and Noise

Policy EM11 – Sustainable Waste Management

Policy T1 – Accessible Local Destinations

Policy T3 – North-South Sustainable Transport Links

## **Part 2 Policies**

The pre-application site is situated within a Strategic Industrial Location and specifically a preferred Industrial location. The plan sets out that such areas are suitable for general industrial, light industrial, storage and distribution, waste management, recycling, some transport related functions and other industrial related uses. (i.e. generally Use Classes

B1 (c), B2 and B8. The Plan continues that Locally Significant Industrial sites (the pre-app site) are primarily for industrial activities.

The most applicable Policy concerning the Principle of development is DME1 (extract further). This is supportive industrial and warehousing uses on locally significant industrial sites.

**Policy DME 1: Employment Uses on Designated Employment Sites**

**A) The Council will support employment proposals in Strategic Industrial Locations (SILs) - Preferred Industrial Locations (PIL) or Industrial Business Parks (IBP) - in accordance with relevant policies in the London Plan.**

**B) The Council will support industrial and warehousing uses (Use Classes B1 (c), B2 and B8) and Sui Generis uses that are appropriate in an industrial area within Locally Significant Industrial Sites (LSIS).**

**C) The Council will support light industrial, office and research & development activities (B1 (a) (b) (c) Use Classes) within Locally Significant Employment Locations (LSELs).**

**D) Proposals for other uses will be acceptable in SILs, LSELs and on LSIS only where:**

- i) There is no realistic prospect of the land being developed in accordance with criterion A, B or C; or**
- ii) Sites have been vacant and consistently marketed for a period of 2 years; and**
- iii) The proposed alternative use does not conflict with the policies and objectives of this Plan.**

**E) Development adjacent to SILs, LSIS and LSELs must be located and/or designed so as to not to compromise the integrity or operation of these employment areas.**

**F) Proposals for small scale ancillary development which supports**

The applicable criteria-based Policies are as follow: -

Policy DMHB 11: Design of New Development

Policy DMHB 12: Streets and Public Realm

Policy DMHB 15: Planning for Safer Places

Policy DMEI 1: Living Walls and Roofs and on-site Vegetation

Policy DMEI 2: Reducing Carbon Emissions

Policy DMEI 3: Decentralised Energy

Policy DMEI 7: Biodiversity and Enhancement

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 4: Public Transport

Policy DMT 5: Pedestrians and Cyclists

Policy DMT 6: Vehicle Parking

Policy DMT 7: Freight

In terms of the specific site allocations, the extract below identifies the pre-application site:-

## REBALANCING EMPLOYMENT LAND

### Map C: Springfield Road, part of the Hayes Industrial Area SIL

#### 8) Springfield Road, to the east of Minet Country Park, Hayes

4.19 Springfield Road, Hayes is a vibrant employment site with a wide range of businesses. It has benefited from recent investment from the private sector. Vacancy rates are only slightly above the normal accepted churn rate. The Council is of the view that most of the existing Industrial Business Area should be regarded as forming part of the Hayes Industrial Area – Preferred Industrial Location.



Rebalancing Employment Land  
Sites located off Springfield Road to the east of  
Minet Country Park, near Hayes town centre

## **National Planning Policy Framework (the Framework) (2019)**

The Framework was published on the 27th March 2012 and replaced previous national planning guidance set out in Planning Policy Guidance and Planning Policy Statements. The Ministry of Housing, Communities and Local Government published the revised Framework on 24th July 2018. This was the first revision of the Framework since 2012. It implements reforms announced through the Housing White Paper, the Planning for the Right Homes in the Right Places consultation and the draft Revised Framework consultation. The Framework was again updated in February 2019.

There are three dimensions to sustainable development: economic, social and environmental. The presumption in favour of sustainable development remains at the 'heart' of the Framework.

Paragraph 11 states that, for decision-taking, this means approving development proposals that accord with the development plan without delay.

Of specific reference to this proposal is Chapter 6, Building a strong, competitive economy. Paragraph 80 states *'Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development..'*

Furthermore, although in reference to plan making, paragraph 81 is also relevant in that it provides clarity on the government's intentions in regard to economic development.

Criterion a) states that *the Plan should set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, having regard to Local Industrial Strategies and other local policies for economic development and regeneration and criterion seeks to:- b) set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period;*

Both criterions have been achieved by the Council, as set out within its Local Plan.



## Planning Obligations

The Planning Obligations Supplementary Planning Document has been considered, and the extract below provided in terms of CIL requirements. As the pre-application site is currently occupied by retail units however, details are requested of the applicable obligations and CIL requirements.

**TABLE 1: PLANNING OBLIGATIONS GRID**

Local Plan Policy	Type of Obligation	Residential (Units)			Non Residential (sqm)		
		0-9	10-14	15+	<100	100-1000	>1000
H2	Affordable housing	x	√	√	x	x	x
T1	Travel plans	x	x	x	x	√	√
T1	Site specific transport works	√ calculated on site by site basis and may include travel plans for larger residential schemes					
EM8	Air quality improvements	√ but only where there is a net increase in traffic based trips					
EM8	Noise and vibration improvements	x	x	x	Dependant on nature of scheme		
E7	Employment and training provision	x	x	x	√	√	√
BE1	Community safety in the public realm	Dependant on nature of scheme					
EM7	Environmental impacts	Dependant on nature of scheme					
EM4	Open space and recreation	x	x	√	√	√	√
CI1	Community Infrastructure Provision	Dependant on the nature of the scheme. Only large projects generating on site requirements should fund provision of community facilities through Planning Obligations					

## Appraisal

The principle of the proposed commercial development on this site is considered to be acceptable. Within the Local Plan Part 1, the site is designated as a 'Proposed Locally Significant Industrial Site' with Policy E1 seeking to accommodate growth by protecting designated sites (such as this) and allocating 13.63 hectares of new employment sites. Furthermore, Policy E2 states that the Council will accommodate 9000 new jobs. Policy DME1 of the Local Plan Part 2 seeks to support employment proposals on allocated employment sites, and specifically states that B1 (c) B2, B8 and Sui Generis uses will be appropriate on Locally Significant Industrial Sites.

In terms of design, the proposed commercial building will be of a scale and appearance commensurate with existing industrial buildings and so will be in keeping the character of the area and its setting. The selected pallet of materials and colour finishes will further assimilate the building within its setting and add interest to the elevations. The perimeter landscaping, where possible will be retained and will be enhanced in specified locations to ensure no loss in terms of biodiversity and to soften the edges of the development site.

The more detailed design elements and specification will be included within the full application submission.

Any highway infrastructure improvements, sustainable transport measures and further details of vehicle movements/trips will be detailed in the Transport Statement and Travel Plan which will accompany the detailed application. However, as the site is host to an existing retail park, it is not considered that the proposed use will result in any further adverse highway considerations that could not be overcome by way of obligation, if necessary.

In terms of drainage, it is considered that the existing drainage infrastructure would be capitalised on, however further investigation will be undertaken to inform the overall drainage strategy, for submission with the detailed application.

Whilst it is acknowledged that the site is currently host to a number of retail units, as set out above, the longevity and future viability of the majority of these are uncertain, with only one currently operating in a viable manner. The tenancy of this unit would be respected, and any consent received would exceed the length of the remaining agreement, however it is considered prudent to plan for the future of this site, to maintain its economic productivity and to reduce any potential periods of vacancy.

Notwithstanding the above, the site is allocated for employment uses within the Local Plan (Part 1 and 2) and the proposal would be in full conformity with this. On this basis, the principle of development is considered acceptable. In terms of the technical details, it is clear that the proposal is already, or could be designed in a way to accommodate the various requirements.

Overall the development is considered to comprise of sustainable development, which will result in significant economic benefits and should be supported.

Yours sincerely

*E Overton*

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