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Our Ref: 51509/PRC/2021/159

Dear Eleanor Overton

RE: Erection of a building for use classes E(g), B2 and B8 along with ancillary development

SITE: Unit 1 Hayes Bridge Retail Park, 1-3 Uxbridge Road Hayes

I refer to your request for pre-application planning advice dated 8 July 2021 and our subsequent meeting on 20 August 2021 relating to the above development. The advice provided is based on the following drawings and documents issued to the Local Planning Authority for consideration:

Plan Numbers: Covering letter dated 8 July 2021 - received 26 Jul 2021
 21048 F0003 Rev D Site layout - received 26 Jul 2021
 21048 P0005 Rev A Proposed elevations - received 26 Jul 2021
 21048 F0001 Rev A Site constraints - received 26 Jul 2021

Outlined below is a preliminary assessment of the proposal, including an indication of the main issues that should be addressed should you choose to submit a formal planning application. Please note that the views expressed in this letter represent officer opinion only and cannot be taken to prejudice the formal decision of the Council in respect of any subsequent planning application, on which consultation would be carried out which may raise additional issues. In addition, the depth of analysis provided corresponds with the scope of information made available to Council officers.

The Site and Surrounds

The site is located on the south side of Uxbridge Road and comprises some 3.17ha. It is currently occupied as a retail park (with a combined footprint of approximately 9738 m²) and falls within a designated area of Strategic Industrial Land (SIL). It is within the Hillingdon Air Quality Management Area (AQMA), is Potentially Contaminated Land and is within Flood Zone 2.

The Proposal

The proposal is to demolish the existing buildings on the site and erect a single building with associated parking and landscaping for uses within the B2, B8 and E(g) Use Classes. The E(g) (formerly B1(a)) office use would be ancillary to the B2 and B8 uses.

The building would have a footprint of approximately 185m long by 80m deep and a height of some 19m. The building would have a gross internal floor area of about 15,995 m2 and a gross external area of some 16,359 m2.

Elevations and CGI images were submitted.

A large area of parking would be provided for HGVs and cars on the east side of the site and between the building and the Uxbridge Road frontage to the north. The existing site access would remain unchanged (although it would be upgraded as necessary). Vehicle parking provision would include spaces for cars, disabled visitors, cycles and HGVs.

Planning Policy

The proposed development would be assessed against the policies and proposals in the Hillingdon Local Plan Part 1 (2012) and Part 2 (2020) set out below, including Supplementary Planning Guidance, and to all relevant material considerations, including The London Plan (2021) and national guidance:

Part 1

Policy E1 - Managing the supply of employment land

Policy E2 - Location of employment growth

Policy E7 - Raising skills

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

Other Policies:

DME 1	Employment Uses in Designated Sites
DME 2	Employment Uses Outside of Designated Sites
DMEI 1	Living Walls and Roofs and Onsite Vegetation
DMEI 10	Water Management, Efficiency and Quality
DMEI 14	Air Quality
DMEI 2	Reducing Carbon Emissions
DMEI 3	Decentralised Energy
DMEI 7	Biodiversity Protection and Enhancement
DMEI 12	Development of Land Affected by Contamination
DMHB 10	High Buildings and Structures
DMHB 11	Design of New Development
DMHB 12	Streets and Public Realm
DMHB 13	Shopfronts
DMHB 14	Trees and Landscaping
DMHB 15	Planning for Safer Places
DMT 1	Managing Transport Impacts
DMT 2	Highways Impacts
DMT 4	Public Transport
DMT 5	Pedestrians and Cyclists
DMT 6	Vehicle Parking
DMT 7	Freight

LPP D9	(2021) Tall buildings
LPP E4	(2021) Land for industry, logistics and services to support London's economic function
LPP E5	(2021) Strategic Industrial Locations (SIL)
LPP G1	(2021) Green infrastructure
LPP G5	(2021) Urban greening
LPP G6	(2021) Biodiversity and access to nature
LPP G7	(2021) Trees and woodlands
LPP SI1	(2021) Improving air quality
LPP SI12	(2021) Flood risk management
LPP SI13	(2021) Sustainable drainage
LPP SI2	(2021) Minimising greenhouse gas emissions
LPP SI3	(2021) Energy infrastructure
LPP T1	(2021) Strategic approach to transport
LPP T2	(2021) Healthy Streets
LPP T5	(2021) Cycling
LPP T6	(2021) Car parking
LPP T7	(2021) Deliveries, servicing and construction

Main Planning Issues

1. Principle of development

Principle of Development

The site is currently an out of town centre retail park known as the Hayes Bridge Retail Park. The site is not a sequentially preferable location for main town centres uses and there are no policies in the Development Plan which requires the site to be retained as an out of town centre retail park.

The site is designated as a Strategic Industrial Location (SIL) in the Development Plan. Policy E5 of the London Plan (2021) outlines that proposals in SILs should be supported where the uses proposed fall within the industrial-type activities set out in Part A of Policy E4. This includes use classes B8, B2 and E(g)(iii).

The principle of development is therefore accepted. Use class E(g) includes office use, which is a main town centre use and therefore would not be supported in this location. Any application would need to demonstrate that the office element would be ancillary only to the primary B2 and B8 uses, and any permission would be conditioned to restrict the operation to those uses.

2. Design

As discussed at our meeting, the existing site is a retail park and pursuant to a retail function the existing buildings are designed to be visible to the public realm. The proposed building is designed for industrial and storage uses and is commensurately larger, higher and more dominant than the existing structures. It is considered that the building and associated hard surfaces should be screened as far as possible to preserve the character and appearance of the street scene and locality.

Given the proposed building's footprint, height, scale and mass, it would be very prominent in the street scene particularly given the wide access and relatively exposed position. The introduction of significant HGV traffic entering and exiting the site onto Uxbridge Road would also be detrimental visually and create a more hostile environment for pedestrians and cyclists. At our meeting we discussed the potential for HGV access to the site to be from the

rear of the site via Springfield Road and Bullsbrook Road and any application should explain how this has been explored.

In terms of screening, the proposed layout shows the existing area of vegetation on the site frontage to be significantly reduced. Given the potential for some degree of flexibility on car parking provision (see Highways comments below) it is recommended that the existing landscaping be retained and where possible re-inforced/ enhanced. We also discussed the possibility that some landscaping could be introduced onto the adjacent Metrobank site to help screen the side and rear of the proposed development. If that is possible the Metrobank site would need to be included within the blue line on the site location plan.

The proposal is within the Hillingdon Air Quality Management Area (AQMA) and therefore must provide on-site provision of living roofs and/or walls, in line with Policy DME1 1 of the Local Plan: Part 2 (2020). The London Plan (Policy G5, Urban Greening) states in respect of the Urban Greening Factor (UGF) that:

Whilst the target score of 0.3 does not apply to B2 and B8 uses, these uses will still be expected to set out what measures they have taken to achieve urban greening on-site and quantify what their UGF score is.

The materials for the proposed development will need to be carefully selected with a particular emphasis on durable and robust options which will harmonise with the local context, weather attractively and maintain a good appearance in the long term. A Townscape and Visual Impact Assessment would be required to accompany any future application.

3. Amenity

Given the separation distance to the houses on the opposite side of Uxbridge Road it is not considered there would be unacceptable, direct impacts on residential amenity in terms of loss of light and outlook. Given the introduction of significant HGV traffic, however, there would be impacts in terms of noise and vibration, dust and air pollution. These would need to be effectively addressed in the design of the proposed development and supported by a Noise Impact Assessment and an Air Quality Assessment in any future application.

4. Highways

The London Plan (2021) sets the new maximum car parking standards on the London Boroughs and which came into immediate effect by further reductions in car parking provisions (with exceptions to very low PTAL areas/opportunity areas). Where no standard is provided, the level of parking should be determined on a case-by-case basis taking account of Policy T6 Car parking, current and future PTAL and wider measures of public transport, walking and cycling connectivity.

The PTAL rating of the site is 2, indicating a "poor" level of public transport accessibility.

Car parking provision at Use Classes Order B2 (general industrial) and B8 (storage or distribution) employment uses should have regard to these office parking standards and take account of the significantly lower employment density in such developments. A degree of flexibility may also be applied to reflect different trip-generating characteristics. In these cases, appropriate provision for electric or other Ultra-Low Emission vehicles should be made.

The TA will be required to demonstrate that there are no adverse highway implications arising from the proposed development at the site.

The development should attempt to encourage improved pedestrian links and the use of public transport, as well as bicycle to minimise vehicular movements. It will also ensure car parking provision does not exceed the London Plan or the minimum set in DMT6. A full transport study will be required to ensure the junction of the access road with Uxbridge Road is capable of handling the traffic implications of the scheme.

For industrial sites, the role of parking - both for workers and operational vehicles - varies considerably depending on location and the type of development proposed. Provision should therefore be determined on a case-by-case basis, with the starting point for commuter parking being the standards in Table 10.4 with differences in employment densities taken into account. Flexibility may then be applied in light of site-specific circumstances as above. Operational parking should be considered and justified separately.

A Parking Design and Management Plan should be submitted, indicating how the parking will be designed and managed, with reference to Transport for London guidance on parking management and parking design.

Swept path track drawings will need to be submitted to support the proposed parking layout and arrangement both inside and outside of the site.

Cycle parking should be at least in accordance with the minimum standards set out in the London Plan/ Policy DMT6 for all uses proposed on site. Cycle parking should be designed and laid out in accordance with the guidance contained in the London Cycling Design Standards. Development proposals should demonstrate how cycle parking facilities will cater for larger cycles, including adapted cycles for disabled people.

In line with The Hillingdon Local Plan: Part 2 Development Management Policies (2020) Policy DMT 6: there is also a requirement for Electric Vehicle Charging Point (EVCP) provision.

In the London Plan there is a requirement for the provision of rapid electric vehicle charging points for freight vehicles. Also to support carbon-free travel from 2050, the provision of hydrogen refuelling stations and rapid electric vehicle charging points at logistics and industrial locations is supported.

Disabled persons' parking provision should be provided in compliance with London Plan Policy T6.5. Such parking should be located close to building entrances.

5. Other Energy

London Plan Policy SI 2, Minimising greenhouse gas emissions, requires that major developments be net zero-carbon. This means reducing greenhouse gas emissions in operation and minimising both annual and peak energy demand in accordance with the Mayor's energy hierarchy. A minimum on-site reduction of at least 35 per cent beyond Building Regulations is required for major development. Residential development should achieve 10 per cent, and non-residential development should achieve 15 per cent through energy efficiency measures. Where it is clearly demonstrated that the zero-carbon target cannot be fully achieved on-site, any shortfall should be provided, in agreement with the borough, either through a cash in lieu contribution to the borough's carbon offset fund, or off-site provided that an alternative proposal is identified and delivery is certain.

An Energy Statement should accompany any future application.

Flooding

The site falls within Flood Risk Zone 2. A Flood Risk Assessment and Sustainable Drainage Statement would need to accompany any future application to demonstrate that the development is resilient to all sources of flooding and to restrict runoff rates to a 'greenfield rate'.

Access

1. Where the building is open to members of the public, it should be fully accessible to everyone, including wheelchair users.
2. A proportion of car parking for staff and visitors should be fully accessible. The required number of bays remains to be determined according to the exact use of the building(s).
3. Step free access would be required to all parts of the building, with appropriate toilet facilities for use by disabled people on all levels.

Contamination:

The site has a long history of significantly contaminative uses, including a tyre factory, vinyl production and other electronic equipment manufacturing operations conducted by EMI, HMV and Thorn EMI. Records indicate that a significant number and types of chemicals were stored and used at the site. There is likely to be a mantle of more recent made ground materials present, which would also require further investigation, because there is a possibility that those materials may have also introduced currently unacceptable contamination to land at the location. Furthermore, development of the earlier building/s likely involved introduction of asbestos materials, these too would, if detected, require to be addressed in accordance with the Control of Asbestos Regulations and HSE guidance.

Therefore, if a detailed application is received, the LPA shall require appropriate details to demonstrate the site has undergone and shall undergo further appropriate risk assessment in terms of land affected by contamination and in accordance with the proposed uses.

Depending upon future submitted information concerning assessed land conditions at the site, it is likely the LPA shall require standard conditions to be imposed to any award of planning permission.

OTHER MATTERS

The application should be screened pursuant to the Town and Country Planning (Environmental Impact Assessment) Regulations 2017.

The application would be referable to the GLA under the Town and Country Planning (Mayor of London) Order 2008 as a development of potential strategic importance due to its floorspace exceeding 15,000sqm GEA.

6. Planning Obligation and CIL (Mayor and LBH) S106 PLANNING OBLIGATIONS

The proposed development is likely to generate requirements for planning obligations in respect of:

Travel Plan and contribution
Air Quality mitigation financial contribution
Skills, training and employment agreement
Carbon offset contribution

COMMUNITY INFRASTRUCTURE LEVY (CIL)

Please be advised that from 1 April 2012, all planning approvals for schemes with a net additional internal floor area of 100m² or more will be liable for the Mayoral Community Infrastructure Levy (Mayoral CIL), as legislated by the Community Infrastructure Levy Regulations 2010 and The Community Infrastructure Levy (Amendment) Regulations 2011. The liability payable will be equal to £60 per square metre. The London Borough of Hillingdon is a collecting authority for the Mayor of London and this liability shall be paid to LBH in the first instance.

In addition the development represents Chargeable Development under the Hillingdon Community Infrastructure Levy, which came into effect on 1st August 2014. The liability payable will be £5 per square metre.

Should you require further information please refer to the Council's Website www.hillingdon.gov.uk/index.jsp?articleid=24738

7. Application Submission

The Councils adopted Local Planning Validation Checklist (June 2020) is available on the Council website and sets out a full list of the information required to validate a full planning application. As a future planning application would be considered a major scale development, it is advised that the proposal should be accompanied by, but is not limited to, the following documentation:

- Location Plan at scale 1:1250 or 1:2500 showing the application site outlined in red and all other land in the applicants ownership outlined in blue.
- Existing and Proposed Plans;
- Planning Statement;
- CIL Additional Information Form;
- Design and Access Statement;
- Townscape and Visual Impact Assessment with verified viewpoints;
- Landscape Strategy;
- Urban Greening Factor Assessment;
- Tree Report to BS5837:2012;
- Ecology Desktop Study;
- Drainage Assessment and Statement;
- Transport Assessment;
- Draft Travel Plan;
- Draft Construction Logistics Plan;
- Draft Service and Delivery Plan;
- Air Quality Assessment;
- Energy Assessment;
- Flood Risk Assessment;
- Contaminated Land Assessment;
- Daylight and Sunlight Assessment;
- Noise Impact Assessment;
- Fire Statement;
- Statement of Community Involvement;
- Wind assessment.

8. Conclusion

The proposed development is accepted in principle given the location of the site within a Strategic Industrial Location.

There are significant concerns, however, around the potential visual impact of the proposal and the highways, noise and air quality impacts arising from HGV traffic on Uxbridge Road that are of concern to the Council.

As set out in the above report, careful consideration needs to be given to the mitigation of these impacts including the potential for HGV access to the site to be from the rear of the site via Springfield Road and Bullsbrook Road, the selection of materials for the proposed development that will be durable, robust and will harmonise with the local context; retaining and reinforcing / enhancing existing landscaping and urban greening. There appears to be potential for extensive use of living roofs and/or walls and sustainable drainage measures.

Please be advised that the Council require confirmation that you wish to enter into a PPA as soon as possible, in order to ensure the necessary resource are in place to meet the terms of the PPA.

Thank you for entering into the Councils pre-application advice service and I trust you have found this service of assistance.

Michael Gavin
Planning Officer
Major Applications Team
London Borough of Hillingdon

Planning Guarantee

For complex applications which are likely to exceed the statutory timeframes, the applicant is encouraged to enter into a Planning Performance Agreement (PPA) to allow for the negotiation of complex cases. Central Government encourages the use of PPAs for larger and more complex planning proposals to bring together the developer, the Local Planning Authority and key stakeholders to work in partnership throughout the planning process.

Providing a PPA helps ensure that major proposals progress through the application process in a timely fashion and result in high quality development but the service is both time consuming and costly. The charge for all Planning Performance Agreements will ensure that adequate resources and expertise can be provided to advise on major development proposals, the charges are determined on a site by site basis.

Hillingdon are committed to ensure the best possible service provision to all of our applicants. In order to ensure this, we will not be able to facilitate negotiation which would result in an application being determined outside of statutory timeframes, unless the applicant has entered into a Planning Performance Agreement.