

Unit 1, Argent Centre
Country | September 2026

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Planning Statement

Schroder Investment Management Limited

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1. Introduction

Introduction

- 1.1. This Planning Statement has been prepared to accompany an application seeking permission on behalf of Schroder Investment Management Limited (the 'Applicant') to change the use of the existing building at Unit 1, The Argent Centre, Middlesex UB3 3BS.
- 1.2. The application also seeks to utilise Class V of the General Permitted Development Order (GPDO) to secure a flexible permission at the site. Flexible permission is sought to allow change of use between Use Class E(a) and/or E(g) and/or Use Class B2 and/or Use Class B8.
- 1.3. The proposed development is described as follows:

'Full Flexible Planning Permission (Under Class V of the General Permitted Development Order 2015) for Change of use from Use Class E(a) (formerly A1) to Use Class E(a) and/or E(g) and/or Use Class B2 and/or Use Class B8'

- 1.4. The existing unit was last used by B&M Bargains and therefore it is considered that the principle for retail use at this location is established.
- 1.5. The planning application is accompanied by the following supporting documents:
 - Planning application form and certificates duly signed and completed (prepared by JLL)
 - Statutory planning fee
 - Planning drawings (Prepared by JLL):
 - Location Plan (ref: U1.ARGENT.LOCATION.01)
 - Ground Floor Existing GA (ref: UNIT1.ARGENT.EX.01)
 - First Floor Existing (ref: UNIT1.ARGENT.EX.02)
 - External Elevations Existing (ref: UNIT1.ARGENT.EX.03)
 - Site Plan Existing (ref: UNIT1.ARGENT.EX.04)
 - Ground Floor Proposed GA (ref: UNIT1.ARGENT.PRO.05)
 - First Floor Proposed (ref: UNIT1.ARGENT.PRO.06)
 - External Elevations Proposed (ref: UNIT1.ARGENT.PRO.07)
 - Site Plan Proposed (ref: UNIT1.ARGENT.PRO.08)
 - Noise Impact Assessment (Prepared by Cass Allen)
 - Transport Statement (Prepared by Velocity)
 - including swept path drawings

Structure

1.6. This Planning Statement identifies and addresses the issues relevant to the consideration of the application submission as follows:

- Description of Site and Surrounding Area – describes the physical characteristics of the planning application site and its immediate surroundings.
- Planning History of the Site – sets out the planning history for the site.
- Proposed Development – provides a description of the proposed development.
- Relevant Planning Policy – describes the planning policies which are relevant to the proposed development.
- Planning Considerations – provides an assessment of the planning application proposals against the relevant planning policies.
- Conclusions – sets out the conclusions of this Statement.

2. Site Location and Description

The Site

- 2.1. The application site is located within the London Borough of Hillingdon, approximately 300m from the primary shopping area in Hayes Town Centre. Please see Figure 1.



Figure 1 - Aerial View of Site

- 2.2. The application site (the 'site') measures 0.24ha and comprises an existing unit which measures 1,636sqm. The unit is currently occupied by B&M Bargains. A car park accessed via Pump Lane is located to the north of the building and a larger car park and servicing area is located to the rear of the unit and is accessed via Silverdale Road.
- 2.3. The unit dates from the 1980's and its exterior comprises of red brick, dark coloured window frames and a wide span shallow pitched roof.
- 2.4. The site is situated within the Argent Centre, an industrial estate which comprises of ten units which are occupied by a mixture of retail, industrial and light industrial operators.

- 2.5. A Matalan retail unit abuts the site to the west and Unit 2 abuts the site to the east. Pump Lane abuts the site to the north and further industrial units and their associated service yards and car parks abut the site to the south.

Surrounding Area

- 2.6. To the east and south, the surrounding uses predominantly comprise commercial, industrial and retail uses. To the northwest of the site, the area is predominantly characterised by residential dwellings.
- 2.7. The site is highly accessible by various means of transport, including pedestrian footways, bus services (via Hayes town centre), rail services (via Hayes & Harlington Station) and highway links (Pump Lane, leading to the A312 and M4).

Other Matters

Flood Risk and Drainage

- 2.8. According to the Environment Agency (EA) indicative flood maps for planning, the development holds a Flood Zone 1 classification. As such, the site has a low probability of flooding.

Trees

- 2.9. Trees are present to the north of the site, adjacent to Pump Lane; however, these trees fall outside of the red line boundary and are not covered by Tree Preservation Orders.

3. Planning History

- 3.1. A planning history search has been undertaken via a desktop search of Hillingdon Council public access. A summary of the most relevant applications is provided in table 1.

Reference no.	Description	Decision & Date
2625AH/85/86	Erection of a Building for the Sale of Electrical Goods, Gas Appliances and Other Ancillary Products with Ancillary Storage, Car Parking and Unloading Facilities	Approved 10 January 1986
36616/APP/2002/2208	Removal of Condition 8 (Personal Permission) of Planning Permission Ref. 2625/Ah/85/86 Dated 10/01/1986; Erection of a Building for the Sale of Electrical Goods, Gas Appliances and other Ancillary Products with Ancillary Storage, Car Parking and Unloading Facilities	Approved 08 November 2002
36616/APP/2002/2206	Variation Of Condition 7 (To Allow Sale of a Wider Range of Bulky Goods) of Planning Permission Ref.2625/Ah/85/86 Dated 10/01/1986; Erection of Building for Sale of Electrical Goods and Gas Appliances	Approved 22 January 2003
36616/APP/2012/570	Variation of Condition 1 of planning permission Ref: 36616/APP/2002/2206 dated 22/01/2003 (Variation of condition 7 (to allow sale of a wider range of bulky goods) of planning permission ref: 2625/AH/85/86 dated 10/01/1986) to allow a wider range of retail goods to be sold.	Approved 31 August 2012

Neighbouring Permission

- 3.2. An application was approved at the neighbouring unit (Unit 2) on 3 October 2017. The application (ref: 36726/APP/2017/2655) was for the '*Change of use from Cellular Telephone Exchange (Use Class B1) to a flexible use within Use Classes B1(c) and/or B2 and/or B8*'.

- 3.3. Within the Officer's Report, it sets out that *'there is no objection in principle to the scheme assessed against the Council's adopted policies in Part Two of the Local Plan. The principle of the proposed industrial and warehousing uses is long established on the site and the proposal represents a clear strategy to secure the long term future of the site, which in turn contributes to the local economy. As such, no objection is raised in principle to the use of the existing premises within Classes B1(c) and/or B2 and/or B8'*.
- 3.4. As such, it is considered that there is principle in the area to change the use of existing premises in order to secure the long term future of the units. It is considered that a consistent approach should be taken with Unit 1 (the application site).

4. Proposed Development

Background

- 4.1. In 1986 planning permission (ref. 2625AH/85/86) was granted for the erection of a building for the sale of electrical goods, gas appliances and other ancillary products with ancillary storage, car parking and unloading facilities at the site.
- 4.2. Condition no. 7 restricted the use of the premises to the sale of electrical goods, gas appliances and other ancillary uses. Condition no. 8 made the permission personal to Bridgers Discount Ltd. In 2002 planning permission (ref. 36616/APP/2002/2208) was granted for the removal of condition no. 8. In 2003 planning permission (ref. 36616/APP/2002/2206) was granted to vary condition no. 7 of ref. 2625AH/85/86 to allow the sale of a wider range of comparison goods.
- 4.3. In 2012 permission was granted to vary condition no. 1 of planning permission ref. 36616/APP/2002/2206, increasing the range of comparison (i.e. non-food) goods that could be sold from the site and a modest proportion (no greater than 20%) of convenience (i.e. food and drink) goods were to be introduced.
- 4.4. The 2012 decision notice (ref: 36616/APP/2012/570) comprises the following condition which restricts the use at the site:

'The development hereby approved shall be used for the sale of the following non-food goods; DIY articles, garden materials and goods, building and decorating equipment and related goods, furniture and furnishings, self-assembly furniture, carpets, floor coverings, white goods and other electrical goods and accessories, computers, office stationery and equipment, pets and pet products, health and beauty, toys and gifts, cleaning, household and homeware products, as well as the following food goods; packaged and canned food and drink excluding fresh food and hot food and non pre-packaged items (with food sales covering no more than 20% of the total retail area (ie. not only sales floorspace). The premises shall be used for no other purposes, including any other use within Class A1 of the Town and Country Planning (Use Classes) Order 1987 (as amended) unless prior written consent is obtained from the Local Planning Authority' (our emphasis).

Proposed Development

- 4.5. The proposed development is described in the application as follows:

'Full Flexible Planning Permission (Under Class V of the General Permitted Development Order 2015) for Change of use from Use Class E(a) (formerly A1) to Use Class E(a) and/or E(g) and/or Use Class B2 and/or Use Class B8'
- 4.6. The proposal is sought to change the use of the existing building from a restricted A1 use (now Use Class E(a)) to a flexible use comprising Use Class E(a) and/or E(g) and/or Use Class B2 and/or Use Class B8.
- 4.7. The application would seek to utilise Class V of the General Permitted Development Order (GPDO) to secure a flexible permission at the site. Flexible permission would allow change of use between Use Class E(a) and/or E(g) and/or Use Class B2 and/or Use Class B8 over a period of

10 years. This would allow the site to respond to market changes and provides increased flexibility for the applicant and landlord.

- 4.8. As shown on drawing ref: UNIT1.ARGENT.EX.04 (Site Plane Existing) and drawing ref: UNIT1.ARGENT.PRO.08 (Site Plan Proposed), the site comprises an existing unit which measures 1,636sqm. Elevations are shown on drawing ref: UNIT1.ARGENT.EX.03 (External Elevations Existing) and ref: UNIT1.ARGENT.PRO.07 (External Elevations Proposed).
- 4.9. As this application is for a change of use, no external works are proposed as part of this application.

Access

- 4.10. All access arrangements will be retained, including the primary access from Pump Lane, the secondary access from within the Argent Centre to the rear and the goods entrance to the southeast of the site.
- 4.11. The Proposed Development will retain the existing car parking provision of 30 spaces, including two blue badge bays. This level of provision sits within the relevant maximum parking standards for the proposed flexible uses and safeguards against overspill parking during peak periods.

5. Planning Policy Context

Introduction

- 5.1. The Local Planning Authority, London Borough of Hillingdon, will be obligated under Section 38(6) of the Planning Authority and Compulsory Purchase Act 2004 to make their determination according to the Development Plan when determining a planning application on the site unless material considerations indicate otherwise.
- 5.2. Planning Policy, development plan documents and guidance applicable to the development proposals are contained in the following:
- Local Planning Policy, comprised of:
 - The Hillingdon Local Plan: Part 1- Strategic Policies
 - The Local Plan Part 2 Development Management Policies and Site Allocations and Designations
 - National Planning Policy Guidance, comprising of:
 - National Planning Policy Framework
 - National Planning Practice Guidance
 - Other material considerations include:
 - The London Plan

Local Planning Policy

- 5.3. As set out in the below extract, the site is allocated as a Strategic Industrial Location within London Borough of Hillingdon's Local Plan Part 2 Policies Map.

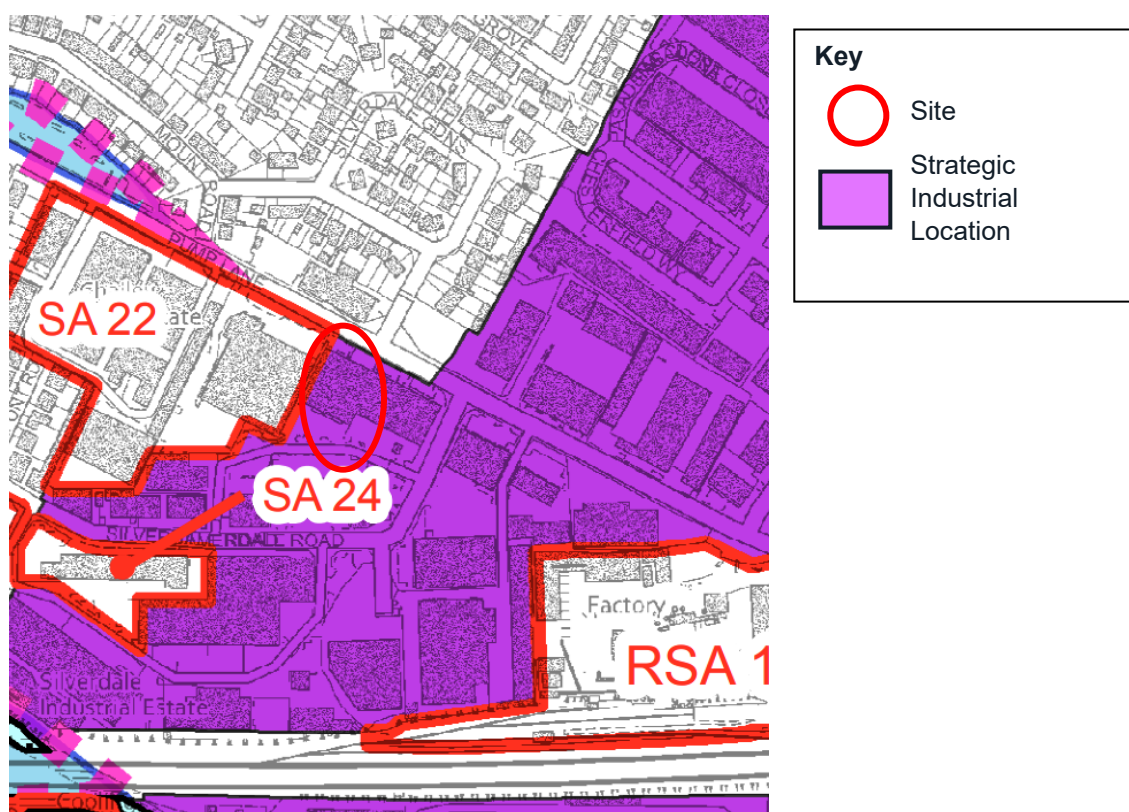


Figure 2 - Local Plan Part 2 Policies Map

- 5.4. Strategic Industrial Locations – Part 2 sets out that 'Strategic Industrial Locations' (SILs) are identified in the London Plan as London's main reservoir of industrial land. These sites are categorised as either 'Preferred Industrial Locations' (PILs) which are suitable for general industrial, wholesale distribution, waste management and recycling or 'Industrial Business Parks' (IBPs), which are more suited to specialist industrial and office development.

Local Plan Part 1

- 5.5. The Hillingdon Local Plan: Part 1- Strategic Policies was adopted in November 2012 and is the key strategic planning document for Hillingdon and will support the delivery of the spatial elements of the Sustainable Community Strategy.
- 5.6. **Policy E1: Managing the Supply of Employment Land** sets out that *'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'*.
- 5.7. **Policy E2: Location of Employment Growth** sets out that *'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'*. Moreover, *'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’.

- 5.8. **Policy EM8: Land, Water, Air and Noise** sets out that *‘the Council will investigate Hillingdon’s target areas identified in the Defra Noise Action Plans, promote the maximum possible reduction in noise levels and will minimise the number of people potentially affected. The Council will seek to identify and protect Quiet Areas in accordance with Government Policy on sustainable development and other Local Plan policies. The Council will seek to ensure that noise sensitive development and noise generating development are only permitted if noise impacts can be adequately controlled and mitigated’.*

Local Plan Part 2

- 5.9. The Local Plan Part 2 Development Management Policies and Site Allocations and Designations were adopted as part of the borough's development plan on 16 January 2020. The Local Plan Part 2 comprises Development Management Policies, Site Allocations and Designations and the Policies Map.

Hillingdon Local Plan Part 2: Site Allocations and Designations

- 5.10. The ‘Rebalancing Employment Land’ chapter identifies the employment land to be retained over the period of the Local Plan, sites to be released for other uses and preferred locations for different types of employment and employment - generating uses. It is underpinned by Policy E1 and E2 in the Local Plan Part 1, as above.
- 5.11. **Policy SEA 1: Strategic Industrial Locations** sets out that *‘in accordance with Policy 2.17 of the London Plan the Council will promote, manage and where appropriate protect a network of Strategic Industrial Locations across the Borough. The following are designated as Preferred Industrial Locations (PILs).*
- *Hayes Industrial Area, defined by the areas shown on Map B located near Hayes town centre, on Map C located off Springfield Road to the east of the Minet Country Park.*
- 5.12. Moreover, the policy sets out that *‘development in these areas will be required to meet the provisions of Policy DME 1 in the Council’s Development Management Policies, and Policy 2.17 of The London Plan’.*
- 5.13. Section 4.8 of the Local Plan Part 2 sets out that *‘the Hayes Industrial Area comprises a cluster of sites straddling the London to Paddington railway line in the south of the Borough. Traditionally, this area has been a centre for general industry. Manufacturing still retains a foothold in the form of mechanical engineering and construction support services. Increasingly however, this area supports distribution and logistics uses associated with Heathrow. Paragraph 2.82 of the London Plan highlights the importance of making strategic provision for logistics near Heathrow. As such, the following sections of the Hayes Industrial Area will be designated as Strategic Industrial Locations (Preferred Industrial Locations):*
1. *Horton Road, Yiewsley*
 2. *Stockley Close, Heathrow*
 3. *Prologis Park, Hayes*
 4. *Rigby Lane, Swallowfield Way / Betham Road / Dawley Road West, Hayes*

5. Blyth Road / Clayton Road / Printinghouse Lane, Hayes

6. Bulls Bridge, North Hyde Gardens, Hayes

7. **Pump Lane, Hayes (our emphasis)**

8. Springfield Road, Hayes

- 5.14. Section 4.16 sets out that *'Pump Lane is a vibrant industrial location with a wide range of businesses. It is evident that the employment area could benefit from some more new development, in particular the redevelopment of some isolated bulky goods retail buildings into medium sized business units.'*

Hillingdon Local Plan Part 2: Development Management Policies

- 5.15. **Policy DME 1: Employment Uses on Designated Employment Sites** sets out the following:

- 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 occupiers and the workforce on designated employment sites, such as 'walk to' services including workplace crèches, cafes and small scale food outlets, will be supported.*

- 5.16. **Policy DMT 1: Managing Transport Impacts** sets out that *'development proposals will be required to meet the transport needs of the development and address its transport impacts in a sustainable manner'.*

- 5.17. **Policy DMT 2: Highways Impacts** sets out that *'development proposals must ensure that:*

- i. *safe and efficient vehicular access to the highway network is provided to the Council's standards;*
- ii. *they do not contribute to the deterioration of air quality, noise or local amenity or safety of all road users and residents;*

- iii. *safe, secure and convenient access and facilities for cyclists and pedestrians are satisfactorily accommodated in the design of highway and traffic management schemes;*
- iv. *impacts on local amenity and congestion are minimised by routing through traffic by the most direct means to the strategic road network, avoiding local distributor and access roads; and*
- v. *there are suitable mitigation measures to address any traffic impacts in terms of capacity and functions of existing and committed roads, including along roads or through junctions which are at capacity’.*

National Planning Policy

National Planning Policy Framework

- 5.18. The revised National Planning Policy Framework was Published in August 2026 and contains national planning policy for England.
- 5.19. The 2026 NPPF in paragraph 17 set out that *‘the planning system has three overarching objectives in providing for the homes, commercial development, facilities and infrastructure which society needs. These objectives are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across all three):*
- a. **An economic objective** – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;
 - b. **A social objective** – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible community facilities, public service infrastructure and open spaces that reflect current and future needs and support communities’ health, social and cultural well-being; and
 - c. **An environmental objective** – to support efforts to mitigate and adapt to climate change, including moving to a low carbon economy; and to protect and enhance our natural, built and historic environment, including making effective use of land, improving biodiversity, using natural resources prudently, and minimising waste and pollution.
- 5.20. NPPF Policy S3 states that Decisions on development proposals should apply a presumption in favour of sustainable development. In all locations, development proposals that accord with both an up-to-date development plan and the decision-making policies in this Framework should be approved without delay.
- 5.21. Further consideration of development on sites within settlements is set out within Policy S4, which states that:

“Development proposals within settlements should be approved unless the benefits of doing so would be substantially outweighed by any adverse effects, when assessed against the national decision-making policies in this Framework”

- 5.22. The policy goes on to provide guidance on the type of issues where the benefits of a development may be outweighed by adverse effects, which include, but are not limited to situations where development would:
- a. *Have a substantial adverse impact in relation to:*
 - i. *The allocation or safeguarding of land or buildings for particular uses in the development plan, unless there is no reasonable prospect of an application coming forward for the allocated use, or there is evidence that the safeguarding is no longer appropriate; or*
 - ii. *The application of the policies in this Framework for existing recreational land and facilities (HC7), Local Green Space (HC8), areas of particular importance for biodiversity and geodiversity (N6), Protected Landscapes (N4) and development within residential curtilages (L2(1)(d)).*
 - b. *Involve the whole or partial loss of undeveloped land which is used for a cemetery or burial ground; or for water storage and/or flood risk management (unless suitable compensatory provision is made that does not increase the risk of flooding either on or off-site); or*
 - c. *Fail to comply with one of the national decision-making policies which state that development proposals should be refused in specific circumstances.*
- 5.23. Chapter 7 of the NPPF is entitled 'Building a strong, effective economy and states that the objective of the policies in the chapter is to enable businesses to invest, expand and adapt in a way that reflects the opportunities, challenges and characteristics of different areas, and supports long-term economic growth both locally and nationally.
- 5.24. Policy E2 states that to support business growth, substantial weight should be given to:
- "The economic benefits of proposals for commercial development which allow businesses to invest, expand and/or adapt; especially where this would support the economic vision and strategy for the area, the implementation of the Industrial Strategy, support improvements in freight and logistics."*
- 5.25. Policy P4 of the NPPF addresses the potential impact of development on existing activities, stating that Existing businesses, community facilities, etc should not have unreasonable restrictions placed on their current or permitted operation as a result of development being approved after they were established.
- 5.26. The policy requires that new development should Identify the nature of the potential impacts and those existing uses which could be affected by the proposal to inform the scope for mitigation. The application should be able to demonstrate that suitable mitigation can be provided.
- 5.27. The Policy also states that both lawful current and permitted levels of operation of existing activities should be taken into account when applying Policy P4.
- 5.28. Chapter 12 of the NPPF is entitled 'Making effective use of land', which states that the objective of the policies in the chapter is to promote the effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions.
- 5.29. Policy L2 states that Substantial weight should be given to the benefits where a development proposal would make better use of vacant and underutilised land and buildings.

Other Material Considerations

The London Plan

- 5.30. The London Plan 2021 is the Spatial Development Strategy for Greater London. The Plan is part of the statutory development plan for London, meaning that the policies in the Plan should inform decisions on planning applications across the capital. Relevant policies are detailed below.
- 5.31. **Policy E4: Land for industry, logistics and services to support London's economic function** sets out that
- A. *A sufficient supply of land and premises in different parts of London to meet current and future demands for industrial and related functions should be provided and maintained, taking into account strategic and local employment land reviews, industrial land audits and the potential for intensification, colocation and substitution (see Policy E7 Industrial intensification, co-location and substitution). This should make provision for the varied operational requirements of:*
 - 1. *light and general industry (Use Classes B1c and B2)*
 - 2. *storage and logistics/distribution (Use Class B8) including 'last mile' distribution close to central London and the Northern Isle of Dogs, consolidation centres and collection points*
 - 3. *secondary materials, waste management and aggregates*
 - 4. *utilities infrastructure (such as energy and water)*
 - 5. *land for sustainable transport functions including intermodal freight interchanges, rail and bus infrastructure*
 - 6. *wholesale markets*
 - 7. *emerging industrial-related sectors*
 - 8. *flexible (B1c/B2/B8) hybrid space to accommodate services that support the wider London economy and population*
 - 9. *low-cost industrial and related space for micro, small and medium-sized enterprises (see also Policy E2 Providing suitable business space)*
 - 10. *research and development of industrial and related products or processes (falling within Use Class B1b).*
 - B. *London's land and premises for industry, logistics and services falls into three categories:*
 - 1. *Strategic Industrial Locations (SIL)*
 - 2. *Locally Significant Industrial Sites (LSIS)*
 - 3. *Non-Designated Industrial Sites*
 - C. *The retention, enhancement and provision of additional industrial capacity across the three categories of industrial land set out in Part B should be planned, monitored and managed. Any release of industrial land in order to manage issues of long-term vacancy and to achieve wider planning objectives, including the delivery of strategic infrastructure, should*

be facilitated through the processes of industrial intensification, co-location and substitution set out in Policy E7 Industrial intensification, co-location and substitution and supported by Policy E5 Strategic Industrial Locations (SIL).

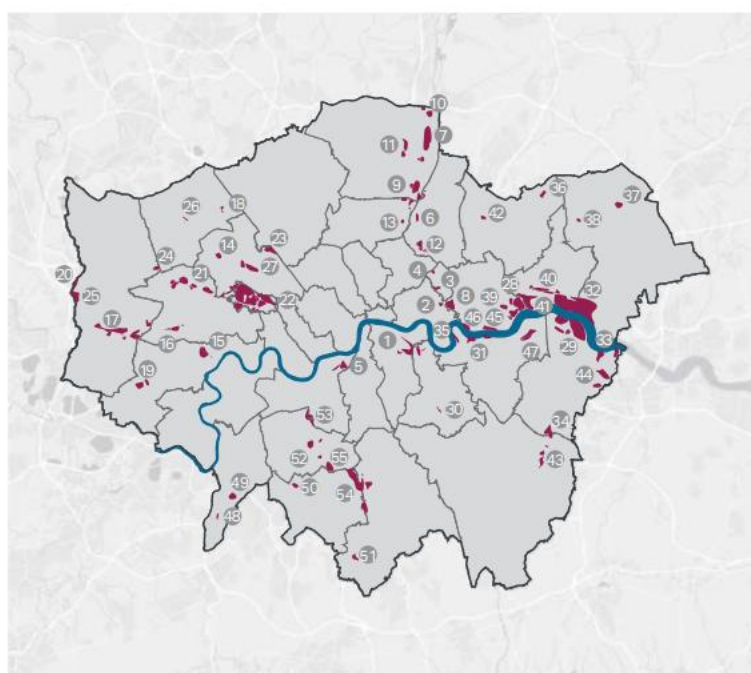
- D. The retention, enhancement and provision of additional industrial capacity should be prioritised in locations that:*
- 1. are accessible to the strategic road network and/or have potential for the transport of goods by rail and/or water transport*
 - 2. provide capacity for logistics, waste management, emerging industrial sectors or essential industrial-related services that support London's economy and population*
 - 3. provide capacity for micro, small and medium-sized enterprises*
 - 4. are suitable for 'last mile' distribution services to support large-scale residential or mixed-use developments subject to existing provision*
 - 5. support access to supply chains and local employment in industrial and related activities (..).'*

5.32. Policy E5: Strategic Industrial Locations (SIL) sets out that:

- A. 'Strategic Industrial Locations (identified in Figure 6.1 and Table 6.2 [below]) should be managed proactively through a plan-led process to sustain them as London's largest concentrations of industrial, logistics and related capacity for uses that support the functioning of London's economy.*
- B. Boroughs, in their Development Plans, should:*
- 1. define the detailed boundary of SILs in policies maps having regard to the scope for intensification, co-location and substitution (set out in Policy E7 Industrial intensification, co-location and substitution)*
 - 2. develop local policies to protect and intensify the function of SILs and enhance their attractiveness and competitiveness (including improvements to access, public transport, digital connectivity and other related infrastructure) for the functions set out in Part A of Policy E4 Land for industry, logistics and services to support London's economic function*
 - 3. explore opportunities to intensify and make more efficient use of land in SILs in Development Plan reviews and through Opportunity Area Planning Frameworks in collaboration with the GLA and other planning authorities within and outside London (Policy E7 Industrial intensification, colocation and substitution).*
 - 4. strategically coordinate Development Plans to identify opportunities to substitute industrial capacity and function of Strategic Industrial Locations where evidence that alternative, more suitable, locations exist. This release must be carried out through a planning framework or Development Plan Document review process and adopted as policy in a Development Plan. All Boroughs are encouraged to evaluate viable opportunities to provide additional industrial land in new locations to support this process. This policy should be applied in the context of Policy E7 Industrial intensification, co-location and substitution.*

- C. *Development proposals in SILs should be supported where the uses proposed fall within the industrial-type activities set out in Part A of Policy E4 Land for industry, logistics and services to support London's economic function*
- D. *Development proposals within or adjacent to SILs should not compromise the integrity or effectiveness of these locations in accommodating industrial type activities and their ability to operate on a 24-hour basis. Residential development adjacent to SILs should be designed to ensure that existing or potential industrial activities in SIL are not compromised or curtailed. Particular attention should be given to layouts, access, orientation, servicing, public realm, air quality, soundproofing and other design mitigation in the residential development*

Figure 6.1 - Strategic Industrial Locations



Strategic Industrial Locations

● Strategic Industrial Locations (SIL)

References refer to Table 6.2

Source: GLA Planning

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Table 6.2 - Strategic Industrial Locations

Ref.	Location	Industrial Property Market Area	Planning Authority
1	Bermondsey / Old Kent Road / Surrey Canal Area	Central Services Area	Southwark / Lewisham
2	Empson Street	Central Services Area	Tower Hamlets
3	Fish Island / Marshgate Lane	Central Services Area	LLDC (Newham/ Tower Hamlets)
4	Hackney Wick	Central Services Area	LLDC (Hackney)
5	Queenstown Road, Battersea	Central Services Area	Wandsworth
6	Blackhorse Lane	Lee Valley	Waltham Forest
7	Brimsdown	Lee Valley	Enfield
8	British Gas Site / Cody Road	Lee Valley	Newham
9	Central Leaside Business Area	Lee Valley	Enfield / Haringey / Waltham Forest
10	Freezywater / Innova Park	Lee Valley	Enfield
11	Great Cambridge Road	Lee Valley	Enfield
12	Lea Bridge Gateway	Lee Valley	Waltham Forest
13	Tottenham Hale	Lee Valley	Haringey
14	East Lane	Park Royal / Heathrow	Brent
15	Great West Road / Brentford – Transport Avenue	Park Royal / Heathrow	Hounslow
16	Great Western	Park Royal / Heathrow	Ealing
17	Hayes Industrial Area	Park Royal / Heathrow	Hillingdon
18	Honeypot Lane, Stanmore	Park Royal / Heathrow	Harrow

5.33. **Policy E7: Industrial intensification, co-location and substitution** sets out that:

- A. *‘Development Plans and development proposals should be proactive and encourage the intensification of business uses in Use Classes B1c, B2 and B8 occupying all categories of industrial land through:*
- 1. introduction of small units*
 - 2. development of multi-storey schemes*
 - 3. addition of basements*
 - 4. more efficient use of land through higher plot ratios having regard to operational yard space requirements (including servicing) and mitigating impacts on the transport network where necessary’.*

6. Planning Considerations

Introduction

- 6.1. This section assesses the proposed change of use against the relevant planning policies identified in Section 5. This assessment demonstrates that the proposal aligns with local and national planning policy and will contribute positively to the economic function of the Strategic Industrial Location.

The Proposal

- 6.2. The proposal is to change the use of the existing building from a restricted A1 use (now Use Class E(a)) to a flexible use comprising Use Class E(a) and/or E(g) and/or Use Class B2 and/or Use Class B8.
- 6.3. This would allow the site to respond to market changes and provides increased flexibility for the applicant and landlord.

Principle of Development

- 6.4. The existing unit is currently in use by B&M Bargains and therefore it is considered that the principle for retail use (Use Class E(a)) at this location is already established.
- 6.5. The application site is located within a designated Strategic Industrial Location (SIL), specifically the Pump Lane area of the Hayes Industrial Area, as identified in Policy SEA 1 of the Hillingdon Local Plan Part 2 and Policy E5 of the London Plan.
- 6.6. The proposed flexible use comprising Use Class E(a) and/or E(g) and/or Use Class B2 and/or Use Class B8 accords with national, regional and local planning policy for employment land within Strategic Industrial Locations. The industrial and logistics elements, Use Classes E(g), B2 and B8, fall squarely within the industrial-type activities set out in Policy E4 of the London Plan and are explicitly supported by Policy E5, which states that "*development proposals in SILs should be supported where the uses proposed fall within the industrial-type activities set out in Part A of Policy E4*". These uses are also supported by Policy DME 1 of the Local Plan Part 2.
- 6.7. The inclusion of Use Class E(a) (retail) within the flexible permission provides continuity for the existing use and strengthens employment use on site. The flexible permission ensures that the site can continue to operate as retail where there is market demand, whilst also enabling a transition to industrial and logistics uses where appropriate. This maximises the employment potential of the site in accordance with Policies E4 and E5 of the London Plan and Policies E1 and DME 1 of the Local Plan.
- 6.8. Paragraph 4.16 of the Local Plan Part 2 recognises that "*the employment area could benefit from some more new development, in particular the redevelopment of some isolated bulky goods retail buildings into medium sized business units*". The proposal directly responds to this policy objective.
- 6.9. The site's location within the Hayes Industrial Area, in close proximity to Heathrow Airport, makes it strategically important for logistics operations serving the capital. Policy E5 of the London Plan

emphasises the importance of securing and enhancing "*strategic provision in SILs in west London, especially at Park Royal and around Heathrow*". The proposal supports this strategic objective.

- 6.10. Planning permission was granted at the neighbouring Unit 2 (ref. 36726/APP/2017/2655) for a change of use to flexible use within Use Classes B1(c) and/or B2 and/or B8. The Officer's Report confirmed that "*the proposal represents a clear strategy to secure the long term future of the site, which in turn contributes to the local economy*". This establishes a clear precedent for supporting flexible industrial uses within the Argent Centre.
- 6.11. The flexible permission sought for a 10-year period is strongly supported by paragraph 86 of the NPPF, which requires planning policies to "*be flexible enough to accommodate needs not anticipated in the plan, and allow for new and flexible working practices and spaces to enable a rapid response to changes in economic circumstances*".
- 6.12. By permitting the site to switch between uses, the proposal ensures that the building can remain occupied and economically productive regardless of market conditions. This flexibility enhances the long-term viability of the site and protects employment within the SIL, in accordance with Policies E4, E5 and E7 of the London Plan and Policies E1, E2 and DME 1 of the Local Plan.

Noise

- 6.13. Cass Allen have prepared a Noise Impact Assessment to assess the suitability of extending the permitted uses at Unit 1, The Argent Centre in Hayes to include Class E(g), B2 and B8 use.
- 6.14. Whilst residential properties are located to the northwest of the site, it is important to note that the site is located within a Strategic Industrial Location where industrial and logistics operations are the predominant land use. Policy E5 of The London Plan specifically sets out that "*development proposals within or adjacent to SILs should not compromise the integrity or effectiveness of these locations in accommodating industrial type activities and their ability to operate on a 24-hour basis. Residential development adjacent to SILs should be designed to ensure that existing or potential industrial activities in SIL are not compromised or curtailed*".
- 6.15. Furthermore, Policy P4 of the NPPF states that Existing businesses, community facilities, etc should not have unreasonable restrictions placed on their current or permitted operation as a result of development being approved after they were established.
- 6.16. The Assessment highlights that class E(g)/B2/B8 uses encompass various industrial activities with different noise profiles. Since the end occupier is unknown, a worst-case assessment has been undertaken for B2/B8 use. The Assessment concludes that the site is suitable for B2 and B8 use in terms of noise. The assessment demonstrates that compliance with the Council's acoustic criteria can be achieved through a combination of internal noise management and operational best practices typical of commercial and industrial uses. Where specific occupiers would undertake operations that would exceed the guidelines, a site-specific acoustic assessment can confirm the appropriateness of proposed measures to ensure continued compliance with the Council's criteria.
- 6.17. It is considered that the proposal accords with Policy EM8 of the London Borough of Hillingdon's Local Plan and the NPPF.

Transport

- 6.18. A Transport Statement has been prepared by Velocity in support of the planning application.

- 6.19. The Statement sets out that all access arrangements will be retained, including the primary access from Pump Lane, the secondary access from within the Argent Centre to the rear, and the goods entrance to the southeast of the site.
- 6.20. The Proposed Development will retain the existing car parking provision of 30 spaces, including two blue badge bays. This level of provision sits within the relevant maximum parking standards for the proposed flexible uses and safeguards against overspill parking during peak periods.
- 6.21. Delivery, servicing and refuse collection will continue to be accommodated off-street using the existing servicing arrangements within the Argent Centre. The existing site can accommodate vehicles up to a 16.5m articulated lorry and the on-site arrangement allows delivery and servicing vehicles to access and egress the public highway in forward gear.
- 6.22. The transport impact assessment has forecast the person and vehicle trip generation for the range of proposed flexible uses using TRICS data. The assessment demonstrates that, across the range of uses, the Proposed Development would generate comparable or lower total person and total vehicle trips within the peak hours, when compared with the existing use. On this basis, the Proposed Development would have a negligible impact on the surrounding highway network.
- 6.23. Overall, the Transport Statement, including swept path drawings, demonstrates that the site can operate safely and efficiently under all proposed uses, in accordance with Policies DMT 1 and DMT 2 of the Local Plan Part 2.
- 6.24. The site is highly accessible by pedestrian footways, bus services, rail services (via Hayes & Harlington Station) and highway links. The site has good access to the strategic road network via Pump Lane, the A312 and M4, making it highly suitable for all proposed uses. This accords with paragraph 87 of the NPPF and Policy E2 of the Local Plan.

Other Material Considerations

- 6.25. The site is located in Flood Zone 1 and has a low probability of flooding. The proposal comprises no external works or changes to drainage arrangements, and there are no flood risk implications.
- 6.26. Trees are present along the frontage adjacent to Pump Lane; however, these fall outside the application site boundary and are not covered by Tree Preservation Orders. The proposal involves no external works and will have no impact on existing trees.
- 6.27. The proposal involves no external alterations to the existing building. As the proposal is for a change of use only, there are no design or heritage implications.

7. Conclusions

- 7.1. The proposed development is described in the application as follows:
- 'Full Flexible Planning Permission (Under Class V of the General Permitted Development Order 2015) for Change of use from Use Class E(a) (formerly A1) to Use Class E(a) and/or E(g) and/or Use Class B2 and/or Use Class B8'*
- 7.2. The application seeks to utilise Class V of the General Permitted Development Order (GPDO) to secure a flexible permission at the site. Flexible permission would allow change of use between Use Class E(a) and/or E(g) and/or Use Class B2 and/or Use Class B8 over a period of 10 years. This would allow the site to respond to market changes and provides increased flexibility for the applicant and landlord.
- 7.3. The application site is located within a designated Strategic Industrial Location (SIL), specifically the Pump Lane area of the Hayes Industrial Area, as identified in Policy SEA 1 of the Hillingdon Local Plan Part 2 and Policy E5 of the London Plan. As such, it is considered that the proposed uses are wholly appropriate for the location, in keeping with the local character and compatible with the surrounding use.
- 7.4. The proposal aligns with the strategic designation of the site as a Strategic Industrial Location, in accordance with Policies E4 and E5 of the London Plan and Policies SEA 1, E1 and DME 1 of the Local Plan;
- 7.5. The proposal responds to paragraph 4.16 of the Local Plan Part 2 regarding employment uses within the employment area. Moreover, the proposal supports the retention and enhancement of employment capacity in west London, particularly around Heathrow;
- 7.6. The proposal contributes to the Council's employment growth objectives set out in Policy E2 and the proposal makes effective use of an existing building on previously developed land in a highly accessible location, in accordance with Policy E2 of the NPPF.
- 7.7. The proposal follows the precedent established by the approval of flexible uses at the neighbouring Unit 2 and the proposal provides flexibility to respond to changing market conditions, in accordance with Policy E7 of the London Plan.
- 7.8. The proposal complies with Policies DMT 1 and DMT 2 and will ensure no unacceptable impacts on the highway network or residential amenity. Moreover, it is considered that the proposal accords with Policy EM8 of the London Borough of Hillingdon's Local Plan.
- 7.9. The proposal represents sustainable economic development that will secure the long-term viability of the site and maximise its contribution to London's employment capacity. It accords with the development plan and should be supported in accordance with the presumption in favour of sustainable development set out in Policies S3 and S4 of the NPPF.
- 7.10. We trust the information submitted with the application is sufficient to consider the proposals, which we consider to be acceptable in the location and in accordance with adopted local and national planning policy.

Planning Statement

**We can support you with expert advice that
reflects your business needs and priorities**

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