



ZONGWISE LTD

Unit 1, Caxton Trading Estate, Hayes

Planning Statement





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Contents

1	INTRODUCTION	1
1.2	PURPOSE AND SCOPE OF THE PLANNING APPLICATION	1
1.3	SUBMISSION DOCUMENTS	1
2	SITE CONTEXT	2
2.1	THE SITE AND SURROUNDING AREA	2
2.2	PLANNING HISTORY	3
3	THE PROPOSED DEVELOPMENT	4
3.2	PARKING, SERVICING AND ACCESS	4
4	PLANNING POLICY	5
4.2	NATIONAL PLANNING POLICY FRAMEWORK	5
4.3	STATUTORY DEVELOPMENT PLAN	5
5	PLANNING CONSIDERATIONS	8
5.2	PRINCIPLE OF DEVELOPMENT	8
5.3	HIGH QUALITY DESIGN	9
5.4	SUSTAINABILITY AND ENERGY	10
5.5	CONTAMINATION	10
5.6	ECOLOGY AND TREES	10
5.7	AMENITY	11
5.8	TRANSPORT	11
5.9	FLOODING AND DRAINAGE	12
6	CONCLUSIONS	13

1 INTRODUCTION

- 1.1.1. This planning statement has been prepared by WSP on behalf of our client, Zongwise LTD, in connection with the proposed scheme for the refurbishment and subdivision of the existing trade counter warehouse with ancillary office accommodation to provide 6 no. trade counter units, together with the creation of 2 no. B2/B8 warehouse units (8 units in total). The development includes the reconfiguration and upward extension of the existing office accommodation by one additional storey to form trade counter units over three floors, a vertical extension to part of the existing warehouse to create a separate warehouse unit with internal mezzanine and increase in overall height, and the erection of an additional warehouse building with internal mezzanine within the existing service yard, together with associated car parking, cycle parking, and ancillary refuse and recycling storage.
- 1.1.2. This planning statement assesses the proposed scheme against the adopted development plan and other material planning considerations.

1.2 PURPOSE AND SCOPE OF THE PLANNING APPLICATION

- 1.2.1. The purpose of this planning statement is to explain and assess the proposed development in the context of policies in the adopted development plan and other material considerations.
- 1.2.2. Section 2 and 3 of this statement describe the existing site, its context and the proposed development. Section 4 identifies the key planning policies and the most relevant material considerations, which should form the basis for the determination of the planning application.
- 1.2.3. Section 5 contains an assessment of the proposed development against the policies and relevant material considerations identified in Section 4. Following the assessment in Section 5, we conclude that the proposed development is in compliance with the development plan and other guidance and constitutes sustainable development which should be supported by the Council.

1.3 SUBMISSION DOCUMENTS

- 1.3.1. This Planning Statement forms part of the submission of the application for planning permission and should be read in conjunction with the following supporting documents:
- Signed and completed planning application form, ownership certificate and CIL form
 - Existing and Proposed plans and elevations
 - Design and Access Statement
 - Flood Risk Assessment and Drainage Strategy
 - Energy Strategy
 - Transport Statement
 - Arboricultural Survey and Impact Assessment
 - Phase 1 Desktop Land Contamination Report

2 SITE CONTEXT

2.1 THE SITE AND SURROUNDING AREA

- 2.1.1. The site is approximately 0.35ha in size and is located within the Caxton Trading Estate on Printing House Lane, within the London Borough of Hillingdon. The site is located adjacent to industrial units to the north, east and south.
- 2.1.2. The Caxton Trading Estate is accessed from Printing House Land but sits approximately 2.5m lower than the adjoining highway. The accesses into the estate are therefore ramped down from the road.
- 2.1.3. The application site is comprised of a two-storey, brick warehouse building. Access to the site is via Printing House Lane.
- 2.1.4. The site is located within the following designations within the adopted Local Plan:
 - Strategic Industrial Location (SIL)
 - Tree Preservation Order Area (576 and 134)
 - Flood Zone 1
- 2.1.5. The existing building is two-storeys in height with facing brickwork and comprises two distinct sections. The front section of the building is two-storeys with a flat roof with the first floor hosting office accommodation. The rear section is one and half storeys tall with a dual-pitched roof comprising the main warehouse at ground floor level and a partial mezzanine store above.
- 2.1.6. To the front and side elevation of the existing building lies areas of hard surfacing to allow for car parking for both employees and customers at the site. The service yard and loading access are located to the rear (east) of the building. The site has a PTAL rating of 2, the area is served by several bus routes, and the closest rail station is Hayes & Harlington (located 0.6 miles away).
- 2.1.7. The site is not listed and there are no listed buildings in the immediate surrounding area nor is the site located within area. The site is located within Flood Zone 1 which has the lowest probability of flooding.
- 2.1.8. In the surrounding area, land to the east of the site is designated as Green Belt. To the south of the site, an area is allocated as a Nature Conservation Site of Metropolitan or Borough Grade I Importance as part of the adopted local plan.

Figure 2-1 - Site Location



- 2.1.9. From a planning perspective, the site is located within a Strategic Industrial Location (SIL), there are four SILs within Hillingdon covering 270 hectares.

2.2 PLANNING HISTORY

- 2.2.1. The site planning history comprises of two applications, both of which are historic. The details for these applications are the following:
- LPA ref. 50369/95/1597 – Description: Change of use of first floor from office to gymnasium and fitness studio – No Further Action – 1995.
 - LPA ref. 50369/A/97/0087 – Description: Changes to external appearance of the building resulting from demolition of adjoining unit and formation of new service yard – Approval – 1997.

3 THE PROPOSED DEVELOPMENT

3.1.1. Planning permission is sought for:

“Refurbishment and subdivision of the existing trade counter warehouse with ancillary office accommodation to provide 6 no. trade counter units (Class E(g) / B8), together with the creation of 2 no. B2/B8 warehouse units (8 units in total), including the reconfiguration and upward extension of the existing office accommodation by one additional storey, an upward extension to part of the existing warehouse to create a separate warehouse unit with internal mezzanine, and the erection of an additional warehouse building with internal mezzanine within the existing service yard, together with associated car parking, cycle parking, and ancillary refuse and recycling storage.”

3.1.2. As set out above, the works comprise alterations and extensions to the existing property to enhance the employment space provided.

3.1.3. The existing flat-roofed building frontage will be extended by one-storey and sub-divided into six individual trade-counter units over the three-levels. Five of the six units will face on to the western elevation fronting Printing House Lane, with the southern-most unit fronting onto the estate road to the south.

3.1.4. The existing warehouse is also proposed to be extended upward, retaining the existing dual-pitched roof design with eaves to match the extended front part of the building. The double-height warehouse would then be extended to the rear over the existing service yard. The two-rear warehouses are designed to be either a single larger unit or sub-divided to form two smaller buildings and both would include a Mezzanine area for ancillary office accommodation.

3.1.5. An area of servicing is proposed to the south of the warehouse buildings with the rear extended building set-back from the existing building line to accommodate a loading area in front of the building.

3.2 PARKING, SERVICING AND ACCESS

3.2.1. As noted above, servicing for the larger warehouse units is proposed from the southern elevation, accessed via the existing estate driveway. The proposed layout plans demonstrate with tracking how this arrangement would work.

3.2.2. Dedicated trade-counter parking is proposed to the front of the new units to the west and south of the buildings. This will formalise the existing arrangement were cars park informally immediately adjacent to the western elevation of the building.

3.2.3. The existing car parking spaces that run across the southern boundary of the site will be retained. Additional dedicated disabled, motorbike and cycle parking is proposed.

4 PLANNING POLICY

- 4.1.1. In this section we identify the planning policies that are most relevant to the determination of this planning application and that form the basis for assessment in Section 6.

4.2 NATIONAL PLANNING POLICY FRAMEWORK

- 4.2.1. The revised National Planning Policy Framework (NPPF) was published in December 2024. The NPPF sets out the government's planning policies for England and how these are expected to be applied. The NPPF provides guidance on how the policies should be applied.
- 4.2.2. Both the NPPF and NPPG are important material considerations in the determination of planning applications. Central to the NPPF is the presumption in favour of sustainable development in paragraph 11. It advises that, for decision-taking, this means approving development proposals that accord with the development plan without delay.
- 4.2.3. With reference to the proposed development, key chapters from the NPPF (2024) include:
- Chapter 2: Achieving sustainable development;
 - Chapter 6: Building a strong, competitive economy;
 - Chapter 9: Promoting sustainable transport;
 - Chapter 11: Making effective use of land;
 - Chapter 12: Achieving well-designed-places; and
 - Chapter 15: Conserving and enhance the natural environment.

4.3 STATUTORY DEVELOPMENT PLAN

- 4.3.1. Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the Development Plan unless material considerations indicate otherwise.
- 4.3.2. The proposals are designed to accord with all relevant national, regional and local planning policy and guidance. Broadly speaking, policy and guidance at the national and regional level seeks to protect employment and industrial land and promote employment uses in areas designated for employment and industrial use.
- 4.3.3. The relevant Development Plan for the site comprises:
- London Plan (2021);
 - Local Plan: Part 1 – Strategic Policies (November 2012); and
 - Local Plan: Part 2 – Development Management Policies (January 2020).

LONDON PLAN (2021)

- 4.3.4. The London Plan supports delivery of industrial development on suitable brownfield sites. The following policies are relevant to the proposed development:
- Policy GGS Making the best use of land;

- Policy GG5 Growing a good economy;
- Policy D3 Optimising site capacity through the design-led approach;
- Policy D4 Delivering good design;
- Policy D5 Inclusive design;
- Policy D8 Public realm;
- Policy D11 Safety, security and resilience to emergency;
- Policy D12 Fire safety;
- Policy D13 Agent of Change;
- Policy D14 Noise;
- Policy E2 Providing suitable business space;
- Policy E4 Land for industry, logistics and services to support London's economic function;
- Policy E5 Strategic Industrial Locations (SIL);
- Policy E7 Industrial intensification, co-location and substitution;
- Policy G1 Green infrastructure;
- Policy SI 1 Improving air quality;
- Policy SI 2 Minimising greenhouse gas emissions;
- Policy SI 12 Flood risk management;
- Policy SI 13 Sustainable drainage;
- Policy T1 Strategic approach to transport;
- Policy T4 Assessing and mitigating transport impacts;
- Policy T5 Cycling;
- Policy T6 Car parking;
- Policy T6.5 Non-residential disabled persons parking; and
- Policy T7 Deliveries, servicing and construction.

LOCAL PLAN

4.3.5. The following policies from Part 1 of the Local Plan are of most relevance to this application:

- Policy E2: Location of Employment Growth;
- 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; and
- Policy T1: Accessible Local Destinations.

4.3.6. Part 2 of the Local Plan policies of relevance include:

- Policy DME 1: Employment Uses on Designate Sites;
- Policy DMHB 11: Design of New Development
- Policy DMHB 14: Trees and Landscaping;
- Policy DMEI 2: Reducing Carbon Emissions;
- Policy DMEI 7: Biodiversity Protection and Enhancement;

- Policy DMEI 10: Water Management, Efficiency and Quality;
- Policy DMEI 12: Development of Land Affected by Contamination;
- Policy DMT 1: Managing Transport Impacts;
- Policy DMT 2: Highways Impact;
- Policy DMT 5: Pedestrian and Cyclists; and
- Policy DMT 6: Vehicle Parking.

Other Material Planning Considerations

- 4.3.7. The following Supplementary Planning Document is of relevance to the site:
- Planning Obligations SPD (2013).
- 4.3.8. The development proposals have been prepared in accordance with the policies outlined above. This statement demonstrates compliance with all relevant aspects of the development plan.

5 PLANNING CONSIDERATIONS

- 5.1.1. This section identifies the key planning considerations relating to the scheme and assess the proposed development in the context of the relevant national and local planning policy and other material considerations.

5.2 PRINCIPLE OF DEVELOPMENT

- 5.2.1. The site is located within a Strategic Industrial Location (SIL), London's top tier of industrial sites for planning purposes, where intensification of new employment floorspace is encouraged, and existing employment floorspace is protected against any changes to non-business uses, as set out in London Policy E5 and Local Plan Policies E2 and DME 1.
- 5.2.2. Policies E5 of the London Plan states that proposals in SILs should be supported where the uses proposed fall within industrial-type activities, which are defined under Policy E4 as including light and general industrial (Class E and B2) and storage and logistics/distributions (Use Class B8). The proposals for the site involve the intensification of the existing industrial uses and in land use terms the principle of development is strongly supported by planning policy.
- 5.2.3. The London Plan goes further, promoting intensification and unlocking of additional capacity within London's existing industrial locations. Policy E4 of the London Plan states that the enhancement and provision of additional industrial capacity should be supported where the site is accessible to local road networks, can provide capacity for emerging sectors such as logistics and 'last mile' distribution services, as well as provide a range of unit sizes for different-sized businesses.
- 5.2.4. The proposed development is an excellent opportunity to achieve these policy objectives on an existing industrial site. The proposals would enable the site to be used by both industrial and logistics operators, including being appropriate for 'last mile' distribution services. London Plan Policy E7 gives explicit support for higher plot ratios, and the intensification of businesses uses within existing industrial areas to provide higher industrial capacity, which are being achieved through the proposed development on the site.
- 5.2.5. Strategic Local Plan Policy E2 outlines the Councils target to accommodate 9,000 new jobs during the plan period, outlining most of this employment growth will be directed to suitable sites in areas such as Strategic Industrial Locations. Development Management Local Plan Policy DME 1 sets out the Council will support employment proposals in SILs in accordance with relevant policies in the London Plan. This proposal seeks to improve the amount and quality of industrial floorspace through intensification.
- 5.2.6. The proposed development will bring 743 sqm of additional net employment floorspace within this site whilst refurbishing and enhancing the existing 2,094 sqm. The scheme has been carefully designed to rationalise and maximise the operational floorspace to ensure activity is enclosed within the units themselves. The additional units and subdivision of the

existing industrial units will allow for the intensification of the site as well as improving the appearance and function of operations on the site.

- 5.2.7. The site is well located both strategically in London and locally within the Caxton Trading Estate SIL. The scheme will deliver significant new employment opportunities and will deliver modern, fit for purpose industrial units that would positively contribute to the London Borough of Hillingdon achieving its vision for maintaining and enhancing the industrial capacity in its SIL areas.
- 5.2.8. The proposed development will ultimately deliver new industrial units on the existing site and will reinforce the areas status as an important location for business, aligning with the objectives of the local and regional planning policy. The principle of intensifying the industrial uses on the site is in line with the employment policies in the London Plan, as well as being in full compliance with the employment policies in the adopted Local Plan.

5.3 HIGH QUALITY DESIGN

- 5.3.1. Paragraph 131 of the NPPF (2024) outlines the fundamental importance of the creation of high quality, beautiful and sustainable buildings and places and what the planning and development process should achieve. Good design is considered a key aspect of sustainable development and creating better places in which to work and live.
- 5.3.2. London Plan Policy D3 sets out the importance of responding to site context, providing developments that demarcate public and private environments and facilitating efficient servicing and maintenance of buildings, whilst minimising negative impacts on the environment.
- 5.3.3. London Plan Policy D5 states that proposals should achieve the highest standards of accessible and inclusive design as well as Policy BE1 and DMHB 11 of the Hillingdon Local Plan emphasising all development should achieve high quality design.
- 5.3.4. The sites context is relatively utilitarian, built for purpose, industrial type buildings. The immediate surrounding area is a highly industrial and urban location. The overall nature of the immediate surrounding area and the sites location as a SIL provides opportunity for a well purposed industrial development that can support the economic prosperity of the employment area.
- 5.3.5. The proposed development will facilitate the enhancement of the existing employment floorspace, including a proportionate uplift in the total floorspace, with a modern and well-designed unit that remains fit for purpose and flexible.
- 5.3.6. The proposed materials have been carefully selected to be complimentary and sympathetic to the style of neighbouring buildings. The proposed development will utilise a neutral colour palette, providing differentiating coated profile metal cladding panels on the roof and elevations. This provides the effect of breaking up the building to integrate it into the surrounding townscape and provide visual interest in immediate views. The proposed

development embodies the high-quality business aesthetic sought by both the applicant and prospective occupiers.

- 5.3.7. The package of drawings include a contextual elevation that shows how comfortably the additional height within proposed scheme sits alongside the other buildings fronting Printing House Lane to the north and south, as well as the larger existing warehouse buildings to the east of the site.
- 5.3.8. The new building represents a fit-for-purpose, flexible unit that would be sympathetically designed and an attractive addition to the industrial location. This is in line with Policy BE1 and DMHB 11 of the Hillingdon Local Plan by delivering a development of high architectural and urban design quality.
- 5.3.9. The proposals to extend and provide additional units that are sympathetically designed and of increased size and height responds to both the policy aspirates of intensification of SIL and making efficient use of sites. The site responds positively in its scale and character to the surrounding area. The proposed high-quality design enables the site to contribute further to the vitality and operation of its industrial cluster.

5.4 SUSTAINABILITY AND ENERGY

- 5.4.1. The application is accompanied by an Energy Statement produced by Focus360 Energy. The Statement demonstrates how the development will achieve high levels of energy reductions on the site of approximately 50-60% compared with Part L Building Regulations. The on-site carbon reductions accord with the requirements of London Plan Policy SI2.

5.5 CONTAMINATION

- 5.5.1. A Phase 1 Contaminated Land Risk Assessment Desk Study Report has been provided with the application which identifies some historic uses on the site that could have potentially resulted in ground contamination on the site with a Low-Moderate risk identified. The report recommends that further intrusive site investigations are undertaken to determine this risk and establish an appropriate remediation strategy for the development. It is anticipated that any planning permission would be granted subject to a condition requiring this further work.

5.6 ECOLOGY AND TREES

- 5.6.1. The planning application is accompanied by a Preliminary Ecological Appraisal (PEA) and Preliminary Roost Assessment (PRA) to consider the biodiversity value of the site. Overall, the site has limited biodiversity value, however, the PRA does note that the existing buildings' may have a low potential for bat roosting and, therefore, recommends that one x emergence survey is undertaken prior to the works taking place.
- 5.6.2. The development site is located adjacent to several trees that front Printing House Lane, these are all outside of the site boundary and all of the trees are proposed for retention. The supporting Tree Survey and Arboriculture Impact Assessment (AIA)

5.7 AMENITY

- 5.7.1. The site is located on an existing trading estate and some distance from any sensitive residential receptors. Accordingly, the development is not likely to generate any material impacts on residential amenities.

5.8 TRANSPORT

- 5.8.1. The application is accompanied with a Transport Statement (TS), prepared by Capital Transport Planning. The existing access points to the site are to be retained providing vehicle and pedestrian access as per the existing arrangements.

Accessibility and Trips

- 5.8.2. The site achieves a PTAL rating of 2 using TfL's WebCAT tool which indicates a relatively poor level of public transport accessibility. The site is, however, within 0.5 miles (approximately a six minute walk) from Hayes and Harlington rail station and 0.2 miles from the Printing House Lane bus stops located on Botwell Lane. The site, therefore, benefits from public transport options for staff and visitors and should be regarded as a sustainable location.
- 5.8.3. The TS includes a breakdown of the anticipated trips likely to be generated by the development across the day, with the increase in vehicle trips associated with the development as likely to have a negligible impact on the public highway. The development would not, therefore, have a material impact on the local transport network in accordance with London Plan policies T1 and T4 and Local Plan Policies T1, DMT1 and DMT1.

Car Parking

- 5.8.4. Local Plan Policy DMT6 requires development proposals to comply with the parking standards provided in Appendix C of the Local Plan unless any variance would not lead to a deleterious impact on street parking provision, congestion or local amenity.
- 5.8.5. The local car parking standards indicate that a maximum of 26 parking spaces should be provided for the amount of development proposed. According with this, a total of 26 parking spaces are provided within the proposed layouts. There are 17 existing car parking spaces within the site which are proposed to be retained with one additional space provided for blue-badge holders. An additional 8 spaces are proposed for van parking outside the smaller servicing units to the front of the site.

Cycle Parking

- 5.8.6. 12 secure cycle parking spaces are proposed within the site which would exceed the Local Plan cycle parking standards which require a total of 7 cycle parking spaces.

Servicing

- 5.8.7. The TS includes vehicle tracking that demonstrates how all of the units can be accessed and serviced from the existing Estate Road, avoiding any servicing on the public highway in accordance with London Plan T7.

5.9 FLOODING AND DRAINAGE

- 5.9.1. The accompanying Flood Risk Assessment (FRA) and Drainage Strategy identifies that the site is at low risk of flooding from fluvial sources and, therefore, is in Flood Zone 1. There are areas of surface water flood risk within the site boundary at the existing service yard and driveway to the front of the building. Surface water flood risk is addressed through a sustainable urban drainage strategy within the report.
- 5.9.2. The drainage strategy demonstrates how surface water will be managed within the site to reduce run-off rates to the equivalent of a greenfield site. The Strategy incorporates a geo-cellular storage tank beneath the shared driveway to attenuate surface water prior to either it being infiltrated into the ground or discharged to the existing sewer. Given the existing site is almost 100% covered in hard-surfaces with no drainage attenuation, these measures will provide significant betterment in this regard.
- 5.9.3. The proposed development will not be at risk of flooding, nor cause flood risk to increase elsewhere. The proposed development includes a drainage strategy that will significantly reduce the amount of surface water flooding compared with the existing site. The development will, therefore accord with London Plan Policies SI12 and SI13, and Local Plan Policies EM1, EM6, EM8 and DMEI10.

6 CONCLUSIONS

- 6.1.1. This planning application seeks permission to extend and improve an existing employment site within an identified Strategic Industrial Location (SIL), in full compliance with the site's designation and the objectives of Policy E5 of the London Plan.
- 6.1.2. The development will generate additional employment and economic opportunities from the site, providing socio-economic benefits for the local and wider area.
- 6.1.3. The technical impacts of the development have been assessed within this Planning Statement and the other supporting reports which demonstrate that there are no policy conflict or material considerations that indicate the planning permission should be withheld. In fact, the redevelopment will provide betterment in regards to the drainage and energy performance of the building.
- 6.1.4. Accordingly, the proposed development is wholly compliant with the adopted Development Plan and should be recommended for approval.



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