

Date
10 April 2025

London Borough of Hillingdon
Hillingdon Council
Civic Centre
High Street
Uxbridge
UB8 1UW

Submitted via Planning Portal (PP-13908347)

Dear Sir / Madam,

**HEATHROW 360, 2 MILLINGTON ROAD, HILLINGDON, UB3 4AZ
APPLICATION FOR FULL PLANNING PERMISSION FOR ALTERATIONS**

On behalf of our client, Indurent Propco A2 Ltd, please find enclosed an application for Full Planning Permission for alterations at Heathrow 360, 2 Millington Road, Hillingdon, UB3 4AZ. The Applicant is the freehold owner of the site.

The application consists of the following:

- Application form including ownership certificates;
- Cover letter (this document);
- Community Infrastructure Levy Form 1;
- Site Location Plan (ref. 24005-UMC-XXXX-SI-DR-A 0521 Rev P03);
- Existing Site Plan (ref. 24005-UMC-XXXX-SI-DR-A 0524 Rev P02);
- Proposed Site Plan (ref. 24005-UMC-XXXX-SI-DR-A 0621 Rev P03);
- Landscape Concept: BNG & Refurbishment (ref. 2431 BCA ELS OO DR L 2431-25-02 S5);
- Landscape Strategy prepared by BCA Design;
- Biodiversity Impact Assessment prepared by Environmental Solutions Ltd; and,
- Statutory Biodiversity Metric Calculation Tool prepared by Environmental Solutions Ltd.

1. Site and Background

The site is located 15 miles from central London and is well connected by road and public transport. It is approximately 0.5 mile from Hayes and Harlington Railway Station, which provides direct access to overground trains and the Elizabeth line. There are multiple bus stops close to the site, including one directly adjacent to its eastern boundary, on the A473, providing good local public transport connections.

The site area within the red line boundary is 0.33 ha. The application site is located within a wider existing industrial/storage site with ancillary offices, car parking and service yards. The application site boundary consists of existing car parking, pedestrian pavements and

landscaping. The industrial unit has recently been vacated. Full planning permission for alterations was recently granted in February 2025 under ref. 62644/APP/2024/3310.

2. Relevant Planning History

The following planning permissions have been granted previously for alterations:

- Advertisement consent (ref: 62644/ADV/2007/11) was granted in 2007 for '*Siting of 2 Non-illuminated external surface fixed signs on the premises of Nippon Express*'.
- Planning permission (ref: 62644/APP/2009/309) was granted in 2009 for '*Extension of lorry yard, involving alterations to parking at front and rear, including cycle spaces and disabled person spaces and alterations to fencing at rear*'.
- Recently, planning permission (ref: 62644/APP/2024/3310) was granted on 12 February 2025 for '*Refurbishment of existing unit including amendments to fenestration, landscaping works, installation of photovoltaic panels on roof, installation of electric car charging columns, external lighting and replacement plant equipment within the existing roof compound (amended description)*'.

The planning history reflects that multiple external works that have altered the elevations of the building have previously been granted planning permission. These alterations were needed to enhance the overall condition of the site and accommodate operational requirements.

3. Development

This application proposes alterations to the site as part of the refurbishment scheme to improve the site condition and accommodate operational requirements aimed at a new occupier.

The proposed works are as follows:

- Improvement of soft landscaping;
- Area of soft landscaping removed to allow for longer disabled car parking spaces;
- Repositioning of 8 disabled parking spaces closer to new office entrance;
- Additional pedestrian crossing to pedestrian route from site entrance;
- Area of new paving extending along the office to pedestrian entrance;
- Area of new paving leading from car park to repositioned entrance; and,
- Repositioning of 10 standard car parking spaces.

The proposal does not have any impact on the total numbers of standard and disabled parking spaces. For full details of the proposed works, please refer to the Proposed Site Plan (ref. 24005-UMC-XXXX-SI-DR-A 0621 Rev P03) and Concept Landscape Plan (ref. 2431BCA ELS OO DR L 2431-25-02 S5) submitted in support of this application.

4. Planning Policy Context

The application should be determined in accordance with the Development Plan unless material considerations indicate otherwise. The Development Plan comprises the London Plan (2021) and the Hillingdon Local Plan Part 1 (2012) and Part 2 (2020). Material considerations include the recently published National Planning Policy Framework (2024).

Designations

The site is not allocated in the Hillingdon Local Plan Part 2: Site Allocations and Designations (2020). It is not located in any policy designations.

5. Assessment

The Principle

Policy E4 of the London Plan (2021) is supportive of providing and maintaining land and premises in different parts of London for industrial and related functions, including for light and general industry (former Use Class B1c and existing Use Class B2), storage and logistics/distribution (Use Class B8), and, flexible (former B1c/B2/B8) hybrid space to accommodate services that support the wider London economy and population. The retention, enhancement and provision of additional industrial capacity should be prioritised in locations that are accessible to the strategic road network, rail and water transport.

Policy GG5 of the London Plan (2021) requires planning and development to plan for sufficient employment and industrial space in the right locations to enhance London's economic development and competitiveness.

Policies E1 and E2 of the Hillingdon Local Plan Part 1 (2012) are supportive of economic and employment growth in highly accessible locations, including the provision of 9,000 jobs over the plan period.

Paragraph 87 of the NPPF (2024) states that planning decisions should recognise and address the specific locational requirements of different sectors, including making provision for storage and distribution operations at a variety of scales and in suitably accessible locations.

The proposed changes to the car park and landscaping are required to accommodate the operational requirements aimed at a new occupier. The proposal will improve the quality of the existing industrial, warehouse and distribution site. It will enable a new occupier to operate the site, which will support the industrial and logistics sector, and contribute positively to London's economic development and employment growth. Therefore, the principle of development is compliant with the London Plan (2021), the Hillingdon Local Plan Part 1 (2012) and the NPPF (2024).

Biodiversity Net Gain

Under the Environment Act 2021, as of the 12 February 2024, all planning permissions granted in England (with a few exemptions) except for small sites must deliver at least 10% biodiversity net gain. The net gain must be demonstrated using the Statutory Defra Metric.

While the site does not have a designation in relation to biodiversity. Strategic Objective SO8 of the Hillingdon Local Plan Part 1 (2012) sets out the borough aims to protect and enhance biodiversity to support the necessary changes to adapt to climate change.

Paragraph 8 (c) of the NPPF sets out the environmental objective for achieving sustainable development, which states '*to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.*'

The Biodiversity Impact Assessment supported by the Statutory Defra Metric submitted in support of this application confirms that the proposal will result in a biodiversity net gain of 0.07 habitat units (11.39%), which exceeds the minimum requirement of 10% by the Environment Act 2021. The improvement of biodiversity will enhance the built environment of the site and provide environmental benefits to help address climate change, which is compliant with the Hillingdon Local Plan Part 1 (2012) and the NPPF (2024).

Design

Policy DMHB 11 of the Hillingdon Local Plan Part 2 (2020) requires all development to be designed to the highest standards and incorporate principles of good design, including the use of high quality building materials and finishes, as well as landscaping and tree planting to protect and enhance amenity, biodiversity and green infrastructure.

The proposed alterations to the car park will deliver a high quality design to enhance the overall condition of the industrial/storage site. The proposed soft landscape improvement will contribute positively to the amenity and biodiversity, complementing the refurbishment for the wider site. Therefore, the proposed development is compliant with the design principles set out in the Hillingdon Local Plan Part 2 (2020).

Accessibility and Safety

Policy D5 of the London Plan requires all development to be inclusive, which should be '*convenient and welcoming with no disabling barriers, providing independent access without additional undue effort, separation or special treatment*'.

Paragraphs 96 (b) and 135 (f) of the NPPF encourage the creation of safe, inclusive and accessible places which promote health and well-being.

8 disabled car parking spaces will be repositioned close to the new office entrance, which will improve accessibility and inclusivity of the site, and improve safety for disabled parking users. The new pedestrian crossing from the pathway to the car park will also improve pedestrian and vehicle safety. Therefore, the proposal is compliant with the London Plan (2021) and the NPPF (2024).

6. Conclusion

The proposed alterations are required to enhance the quality of the existing industrial site and accommodate the operational requirements aimed at a new occupier, which will be advantageous to the industrial/logistics sector and the wider economy in London. The proposed scheme will provide enhancements to the site, including accessibility, safety and biodiversity net gain. The proposed alterations are supported by policy and, therefore, this planning application should be considered favourably.

This application has been submitted via Planning Portal (PP-13908347). An application fee of £1,277 has been paid electronically at the time of submission. We trust that you have sufficient information to validate and determine this application. Should any additional information be required and if you have any questions about this application, please do not hesitate to contact Nick Delaney or Christy Ng (email and phone number provided below) of this firm.

Yours faithfully,



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