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# Planning Statement

Ainscough Crane Hire Site, 84 Swallowfield Way, Hayes, London, UB3 1DQ

The demolition of existing structures and redevelopment for Use Classes E(g)(iii), B2 and B8 (applied flexibly) including hard and soft landscaping, servicing and associated works.

May 2023

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## **CONTENTS**

- 1.0 Introduction
- 2.0 The Application Site and Surroundings
- 3.0 Planning History
- 4.0 Application Proposals
- 5.0 Planning Policy Context
- 6.0 Assessment of Application Proposals
- 7.0 Conclusions

## **APPENDICES**

Appendix 1: Site Location Plan

Appendix 2: Written Pre-application Formal Response

## **1.0 INTRODUCTION**

- 1.1 This Planning Statement has been prepared by Barton Willmore, now Stantec, in support of a planning application made by Wrenbridge (FRELD Hayes) LLP (the 'Applicant') to redevelop 'the Site' known as the Ainscough Crane Hire Site, 84 Swallowfield Way, Hayes, London, UB3 1DQ (Appendix 1) to provide flexible E(g)(iii), B2 and B8 uses with ancillary offices. The development included car parking, landscaping, means of enclosure, access and servicing arrangements.
- 1.2 The Site was acquired by Wrenbridge (FRELD Hayes) LLP in April 2023 and this Planning Statements forms a suite of documents in support of a full planning application on the Site.
- 1.3 The Site has been previously developed and currently comprises of predominantly hard standing outdoor storage. Existing built form on the Site is limited to 1,108sq m (GIA) including a modular office block, detached store and vehicle maintenance unit. The existing accommodation on Site supports the ongoing operations of the crane hire and maintenance facility. The proposal provides an opportunity to intensify the Site for employment uses in accordance with National, Regional and Local Planning Policy, creating new jobs and boosting economic productivity.
- 1.4 The proposal comprises one building which is split into four units of varying sizes ranging from 1,379sq m to 2,272sq m. A total of 7,439 sq. m (GIA) is proposed with 5,720sq. m at ground floor level and an ancillary office provision totalling 861sq. m at first floor level, representing over 15% of the total floorspace. A further 858sq. m is provided across the units through first floor mezzanines. The increased provision of office floorspace has been combined with extensive glazing along the western elevation. This glazing wraps around the north and southern elevations and provides an active, high-quality frontage across the service yards and Swallowfield Way.
- 1.5 Full details of the proposed development can be seen in Section 6.0 of the accompanying Design and Access Statement prepared by CMP Architects.
- 1.6 Vehicular access to the Site is taken from an existing access from Swallowfield Way which serves a private internal road. Each unit is accessed from the spine road which has been fully tracked as part of the submitted documentation. Each unit benefits from an independent service yard including security features such as gates and fences. Refuse and recycling areas, accessible parking spaces, car parking spaces and cycle parking is

all provided within each of the associated yards. Loading doors are also provided into each unit as part of the proposal.

- 1.7 Further details are set out later in this Planning Statement however in total the scheme provides 61 car parking spaces and 24 cycle parking spaces. 20% of the parking spaces have active EV provision with a further 80% passive provision for future demand. Landscaping is significantly enhanced across the Site with a large biodiversity net gain of 53.96% in habitat units and 66.54% in hedgerow units. The proposal creates an active and improved street scene along Swallowfield Way.
- 1.8 The proposed scheme encourages a shift towards more sustainable modes of transport. Cycle shelters with green roofs, shower facilities and changing rooms have all been included in the design to encourage more sustainable modes of transport. A separate pedestrian access is taken adjacent to the existing vehicular access with footpaths provided across the Site to ensure a safe and suitable separation between pedestrians and vehicular movements.
- 1.9 The buildings will be high-quality; designed and constructed to a modern standard with glazing to the office space along the active frontage with Swallowfield Way and the yards to the west. A mixture of cladding treatments breaks up the massing of the buildings and add visual interest.
- 1.10 A comprehensive, high quality landscaping scheme has been prepared, this includes the strengthening of existing soft landscaping, introducing new amenity planting and enhanced understorey woodland planting; the landscaping scheme has been prepared in conjunction with the ecology consultant to ensure that opportunities to maximise biodiversity gains will be achieved. The proposed landscaping significantly enhances the Site along Swallowfield Way.
- 1.11 The proposal has also been shaped following a pre-application discussion with officers and a written response (please refer to **Appendix 2**). The scheme has taken onboard comments received from officers.
- 1.12 The applicant has excellent market knowledge and has carried out a number of similar schemes across the country. The applicant has a very strong track record of delivering high quality, flexible commercial floorspace to meet the needs of the market and the modern occupier. This includes a recent development at Stonefield Close, Ruislip which is fully occupied.

- 1.13 This proposal has been informed by a wide range of technical assessments including; transport, flood risk and drainage, landscaping, noise, air quality and ecology. The development constitutes sustainable development and a BREEAM score of 'Outstanding' and EPC A+ is achieved.
- 1.14 This document briefly describes the Site and its surroundings, the planning history and the proposed development. It then reviews the current planning policy situation and sets out how the scheme is considered to comply with relevant Development Plan Policy and other material considerations.

## **2.0 THE APPLICATION SITE AND SURROUNDINGS**

- 2.1 The Site is located within an area of Hayes characterised by predominantly industrial and logistics uses, recognised as being a vital sector in supporting London's economy at both a local and regional level.
- 2.2 The Site itself is positioned on the Hayes Industrial Estate, an existing well established industrial area of London. The Site is just 15 miles west of Central London and 3 miles north of Heathrow Airport. Swallowfield Way is accessed via the A437 which provides excellent connectivity to the M4 motorway via junction 3 and 4. Approximately 5 miles west along the M4 is junction 15 of the M25 and this provides access to the wider strategic road network.
- 2.3 The Site also benefits from good rail connectivity with the Hayes & Harlington Station located 1.1 miles to the east. The railway line offers excellent links towards Reading, Heathrow Airport and Central London. The station is served by Great Western Rail and the recently opened Elizabeth Line (June 2022) which has been a catalyst for sustainable development in the area including improvements to local amenities.
- 2.4 The Site is brownfield land and currently used as an established employment site for B8 Storage and Distribution uses. The Site is designated within the Hayes Industrial Area, a Strategic Industrial Location (SIL) in the adopted London Plan and Hillingdon Local Plan. The Hillingdon Local Plan divides SILs into Preferred Industrial Locations (PIL) and Industrial Business Parks (IBP). The Site is located within a PIL, which is defined as being suitable for general industrial, light industrial and warehousing uses in the Local Plan.
- 2.5 The Site extends to 1.18 hectares (ha) and is one distinct parcel of land. The Site is bound by existing Industrial units to the East, the multi-track railway to the south and areas of outdoor open storage to the west. Swallowfield Way runs along the northern boundary of the Site with an area of existing landscaping which will be retained and enhanced as part of this application. Swallowfield Way is a dead-end road to the west so any traffic along this road is predominantly limited to movements associated with the existing employment uses along the road.
- 2.6 Although industrial in nature a designated heritage asset is located to the north of the Site; Stockley Park: Business Park Phases I and II, and country park and golf course — Grade II Registered Park and Garden. A Heritage Statement has been prepared to accompany this application and ensures no impacts on this designated asset.

- 2.7 The Site falls within Flood Zone 1 (low probability of flooding) and the proposed uses are classified as 'less vulnerable'.
- 2.8 Moreover, the Site is not within an environmental designation area and it is therefore considered to be free of constraints which would prevent its redevelopment.



### **3.0 PLANNING HISTORY**

- 3.1 The Site is previously developed brownfield land and is currently utilised as a crane hire storage and maintenance facility. We believe this operates under a B8 Use Class.
- 3.2 We have reviewed the Councils Planning Application Search Portal and the planning history on the Site is limited. The most recent application which includes part of the Site relates to the Crossrail works (Ref: 1101/APP/2018/1724).
- 3.3 There are no previous applications on the Site which are considered to impact the ability to redevelop the Site for the proposed uses.

## 4.0 APPLICATION PROPOSALS

4.1 The proposal is to provide a single building which will be split into four units of varying floorspace. In total, the proposal will provide 7,439 sq. m (GIA) of accommodation. Full details can be seen on the accompanying Proposed Site Plan (H067-CMP-SI-ZZ-DR-A-00100\_p12) and this is summarised in the table below.

4.2 The proposal seeks approval for the following description of development:

**“The demolition of existing structures and redevelopment for Use Classes E(g)(iii), B2 and B8 (applied flexibly) including hard and soft landscaping, servicing and associated works.”**

Unit	Haunch Height (m)	Max Height (m)	GIA (sq. m)		Car Parking Spaces	Cycle Parking Spaces
<b>1</b>	12.5m	15.7m	Ground Floor	1,521	13	6
			First Floor Ancillary Office	226		
			First Floor Mezzanine	313		
			<b>Total</b>	<b>2,060</b>		
<b>2</b>	12.5m	15.7m	Ground Floor	1,078	12	6
			First Floor Ancillary Office	156		
			First Floor Mezzanine	145		
			<b>Total</b>	<b>1,379</b>		

<b>3</b>	12.5m	15.7m	Ground Floor	1,349	14	6
			First Floor Ancillary Office	202		
			First Floor Mezzanine	177		
			<b>Total</b>	<b>1,728</b>		
<b>4</b>	12.5m	15.7m	Ground Floor	1,772	22	6
			First Floor Ancillary Office	277		
			First Floor Mezzanine	223		
			<b>Total</b>	<b>2,272</b>		
<b>Total:</b>			<b>7,439sq m</b>		<b>61 (1:122)</b>	<b>24</b>

- 4.3 The principle of development for flexible E(g)(iii) Light Industrial, B2 Manufacturing and B8 Storage and Distribution Use Classes has been supported in the Councils written pre-application response (Appendix 2) dated 4<sup>th</sup> April 2022.
- 4.4 Each unit will be delivered as clear height, open shell space, providing a high level of flexibility for an end occupier. As a speculative scheme it is vital to ensure each unit remains attractive to a range of businesses and occupiers. Allowing the space to be fitted out in response to changes in economic conditions is a key factored and the importance of this has been emphasised further by the recent Covid-19 pandemic.
- 4.5 The proposal provides a higher percentage of office accommodation when compared to similar schemes of this nature. The increased ancillary office space allows for a wide range of jobs and skills including management operations. This demonstrates our client's intentions to target an occupier employing a higher number of employees with a varied skill base ensuring it responds positively to the local economy. Office-based roles are increasingly co-locating alongside production and logistics uses as it is convenient for these people to be closer to the operations they control and analyse. Research also

suggests that for every 10 new warehousing jobs created, another 7 to 12 jobs are created offsite across the wider supply chain.

- 4.6 The Industrial and Logistics Sector can play an important role in providing a variety of jobs to suit different skill sets and bring people back into work who have previously lost jobs in other sectors of the economy as a result of the Covid-19 pandemic and economic uncertainty.
- 4.7 The application proposes 61 parking spaces, 20% of which will benefit from active EV charging provision with the remaining 80% having passive provision for future flexibility. One car parking space in each unit will also be marked up to accommodate two cargo bikes, providing flexibility should these be demanded by an end occupier. Each unit also has accessible parking bays. Parking is located within the service yard, to the west of the building. Secure cycle shelters are also incorporated into the car parking area and will benefit from green roofs for biodiversity benefits.
- 4.8 The single vehicular access point is taken from Swallowfield Way which is already an established access point into the Site, this is a fixed point as the access must remain open to serve adjacent developments. This provides direct vehicle access into an internal road which will then serve the four units independently. Units 1, 3 and 4 provide 2 HGV loading doors while the smaller unit 2 provides one loading door.
- 4.9 Pedestrians and cyclists access is taken from a separate access from Swallowfield's way.
- 4.10 The service yard has a 3.5m high acoustic fence wrapping around part of the service yard and parking to Unit 4. The location of the acoustic fence is defined on the submitted Proposed Site Plan H067-CMP-SI-ZZ-DR-A-00100\_P12. The fence will have climbers along the southern elevation, facing the proposed scheme. The proposed acoustic fence has been informed by an Acoustic Assessment submitted in support of the application.
- 4.11 We are seeking unrestricted 24/7 hours of operation across the Site.

## 5.0 PLANNING POLICY CONTEXT

5.1 Section 38 (6) of the Planning and Compulsory Purchase Act 2004 states that;

**"If regard is to be had to the development plan for the purpose of any determination to be made under the planning Acts the determination must be made in accordance with the plan unless material considerations indicate otherwise."**

5.2 The Statutory Development Plan for the London Borough of Hillingdon consists of:

- Part 1 Strategic Policies (November 2012);
- Part 2 Development Management Policies and Site Allocations and Designations (January 2020); and
- The London Plan 2021.

5.3 In addition to the above, there are a number of other material considerations which include:

- The National Planning Policy Framework (NPPF) (2021);
- National Planning Practice Guidance; and
- Relevant Local and London Supplementary Planning Documents.

### **Regional Policy – The London Plan**

5.4 The London Plan was adopted in March 2021 and provides the spatial planning framework for the Greater London Area, in which the Site is located. The proposal has given careful consideration to the plan and several key policies have been considered in putting together this proposal.

5.5 Policy E4: Land for industry. Logistics and services to support London's economic function requires a sufficient supply of land and premises across London to meet current and future demands. This includes making provision for uses including flexible E(g)(iii) (formally B1(c)), B2 and B8 hybrid space.

5.6 Policy E5: Strategic Industrial Locations (SIL) – The Site is identified as being within a SIL and therefore this policy applies. The policy seeks to protect sites covered by SIL

designations but also to intensify them through co-location and ensuring that surrounding developments do not compromise the businesses ability to operate on a 24-hour basis.

- 5.7 The intensification of such sites flows into Policy E7: Industrial Intensification, Co-location and Substitution – this requires proposals to be proactive and encourage the intensification of Use Classes E(g)(iii), B2 and B8 by doing the following:
- Introducing smaller units;
  - Multi-storey schemes;
  - Basements;
  - More efficient use of land through higher plot ratios, having regard for yard space requirements and transport network impacts.
- 5.8 Policy E2: Providing suitable business space – considers the size of units to be provided for B-Class units, and seeks to secure a range of different sizes to meet the demands of micro, small and medium-seized enterprises.
- 5.9 Policy SI 1: Improving Air Quality – requires developments to prevent a deterioration in air quality to create unacceptable air quality risks. Developments are therefore required to be air quality neutral as a minimum.
- 5.10 Policy SI 2: Minimising Greenhouse Gas Emissions – Major developments should be net-zero carbon, and will be required to submit a detailed energy strategy showing how the zero-carbon target will be met within the energy hierarchy. A minimum of 35% beyond building regulations in greenhouse gases is required as well as a 15% requirement of the 35% being through energy efficient measures. If it cannot meet these targets, then cash payments will be required. However, this will only be accepted with a strong and clear rationale as to why the targets cannot be achieved on the Site. Major developments will also be required to calculate and minimise carbon emissions from plant and machinery.
- 5.11 Policy SI 3: Energy Infrastructure – requires major development within Heat Network Priority Areas to have communal, low temperature heating systems. Any development of the Site would likely need to show how it could fit / plug into a wider heat network in the future.
- 5.12 Policy SI 5: Water Infrastructure – Commercial developments are required to achieve a minimum of BREEAM Excellent for Wat 01 category.

- 5.13 Policy SI 6: Digital Connectivity Infrastructure – Developments are required to ensure they are future proofed for full fibre and mobile connectivity.
- 5.14 Policy SI7: Reducing Waste and Supporting the Circular Economy – Requires developments to conserve resource, reduce waste and increase material re-use.
- 5.15 Policy G1: Green Infrastructure – Requires development proposals to identify how they will integrate into London’s wider green infrastructure network. The post-amble to the policy outlines the role of street trees and green roofs in assisting with this.
- 5.16 The flows into policy G5: Urban greening – This requires major developments to contribute to the greening of London by including it as a fundamental element of Site and building design. Measures such as green walls and roofs are specifically mentioned in the policy. Urban Greening Factor calculations have been run to identify how much urban greening is achieved on the Site.
- 5.17 Policy G6: Biodiversity and Access to Nature – Requires a biodiversity net gain to be achieved.

### **Local Planning Policy**

#### ***Local Plan Part 1 - Strategic Policies (November 2012)***

- 5.18 Policy E1: Managing the Supply of Employment Land – identifies that the Council will accommodate growth by protecting Strategic Industrial Locations (SIL) with Policy E2 demonstrating the intention to accommodate 9,000 new jobs across the plan period, SILs are seen as a key contributor in meeting these targets.
- 5.19 Policy HE1: Heritage – requires proposals to conserve and enhance Hillingdon’s distinct and varied environment including registered parks and gardens.
- 5.20 Policy BE1: Built Environment – aims to ensure all new development improves and maintains the quality of the built environment. This includes achieving a high-quality design, improving environmental quality and maximising opportunities.
- 5.21 Policy EM1: Climate Change Adaption and Mitigation – ensures climate change mitigation is addressed at every stage of the development process by promoting a modal shift to more sustainable modes of transport, ensuring suitable development densities and maximising low carbon, sustainable initiatives.

- 5.22 Policy EM6: Flood Risk Management – focuses new development away from Flood Zone 2 and 3 in accordance with the National Planning Policy Framework. All Developments should utilise SUDs, unless it can be demonstrated this is not viable.
- 5.23 Policy EM8: Land, Water, Air and Noise – requires all major development within AQMAs to be Air Quality Neutral and financial contributions may be sought if necessary.
- 5.24 Policy T1: Accessible Local Destinations – demonstrates the Council will steer development to the most appropriate locations in order to reduce the impact on the transport network. Improved access to walking and cycling is encouraged.

***Local Plan Part 2 - Development Management Policies and Site Allocations and Designations***

- 5.25 Policy DME1 supports employment proposals in SILs and PILs for E(g)(iii), B2 and B8 Uses.
- 5.26 Chapter 5 of the Development Management Policies considers the Historic and Built Environment. This chapter includes Policies DMHB1, 2 and 8 which consider built heritage assets and registered park and gardens. The policies ensure development proposals do not cause detrimental harm to designated assets.
- 5.27 Policy DMHB10 requires proposals for high buildings to demonstrate how they respond to the local context and integrate with the surrounding area. DMHB 11 and 12 provide further guidance on the design of proposals to ensure the highest standards are met and follow the principles of good design. There is no specific definition of a 'high building'.
- 5.28 Chapter 6 seek to ensure environmental protection and enhancement. Policies DMEI 1 and 7 specifically relate to biodiversity enhancements and techniques to maximise the potential for BNG on Site. DMEI 14 requires proposals to be 'Air Quality Neutral' to ensure they contribute towards national air quality objectives for pollutants.
- 5.29 Chapter 8 considers Transport and Aviation with policy DMT 1 managing transport impacts. Accessibility to public transport, walking and cycling should all be considered. A Transport Assessment and Travel Plan is required to demonstrate compliance with this policy.



## ***Local Plan Part 2 – Site Allocations and Designations***

- 5.30 Chapter 4 of the Site Allocations and Designations Plan looks at Rebalancing Employment Land. Policy SEA 1: Strategic Industrial Locations – in accordance with the London Plan, will promote, manage and protect SILs across the Borough with the Hayes Industrial Area also designated as a Preferred Industrial Location (PIL).
- 5.31 The Site falls within cluster 4 of the Hayes PIL and has been designated following paragraph 2.82 of the London Plan which highlights the importance of making strategic provision for logistics near Heathrow.

## **National Planning Policy Framework (NPPF)**

- 5.32 The revised NPPF was published in July 2021 and sets out the Governments Planning Policy Framework for England and how the policies should be applied at a local level. The NPPF should be viewed as a material consideration in determining planning applications against Section 38(6) of the Planning and Compulsory Purchase Act 2004. When a development plan is considered out of date, planning applications must be assessed against the merits of 'sustainable development' as defined in the NPPF.
- 5.33 Paragraph 11 of the NPPF requires decision taking to accord with an up-to-date development plan so applications can be approved without delay. It would require significant and adverse impacts which would demonstrably outweigh the benefits to result in a planning refusal when assessed against the policies in the framework.
- 5.34 Chapter 4 encourages early engagement between public and private resources particularly through pre-application discussions.
- 5.35 Chapter 6: Building a strong, competitive economy – this chapter focus on applying significant weight to supporting economic growth and productivity considering both local needs and wider opportunities for development as discussed in paragraph 81.
- 5.36 Of particular relevance is paragraph 82 which states:

### **"Planning policies should:**

- a) set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, having regard to Local Industrial**

**Strategies and other local policies for economic development and regeneration;**

- b) set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period;**
- c) seek to address potential barriers to investment, such as inadequate infrastructure, services or housing, or a poor environment; and**
- d) be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices (such as live-work accommodation), and to enable a rapid response to changes in economic circumstances."**

5.37 Paragraph 83 states:

**"Planning policies and decisions should recognise and address the specific locational requirements of different sectors. This includes making provision for clusters or networks of knowledge and data-driven, creative or high technology industries; and for storage and distribution operations at a variety of scales and in suitably accessible locations."**

5.38 Chapter 8 of the revised NPPF promotes healthy and safe communities which requires decisions to ensure that they achieve healthy, inclusive and safe places.

5.39 Chapter 9 sets out the requirement to promote sustainable transport. Paragraph 104 states the following:

**"Transport issues should be considered from the earliest stages of plan-making and development proposals, so that:**

- a) the potential impacts of development on transport networks can be addressed;**
- b) opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised – for example in relation to the scale, location or density of development that can be accommodated;**

- c) **opportunities to promote walking, cycling and public transport use are identified and pursued;**
- d) **the environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account – including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains; and**
- e) **patterns of movement, streets, parking and other transport considerations are integral to the design of schemes, and contribute to making high quality places.”**

5.40 Paragraph 107 considers parking standards and requires policies and decision-making to consider a number of elements other than just the proposed use. This includes:

- Accessibility of the development;
- The type, mix and use of development;
- The availability of the opportunities and public transport;
- Local car ownership levels; and
- Ensure provision for ultra-low emission vehicles.

5.41 The emphasis on maximum parking standards are discouraged in paragraph 108 and should only be set or applied where there is clear and compelling justification that it is necessary for managing the local road network.

5.42 Paragraph 110 states that:

**“In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that:**

- a) **Appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location;**
- b) **safe and suitable access to the site can be achieved for all users;**
- c) **the design of streets, parking areas, other transport elements and the content of associated standards reflects**

**current national guidance, including the National Design Guide and the National Model Design Code 46; and**

- d) any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.”**

5.43 Paragraph 111 states that development should only be refused on highways grounds if there is an unacceptable risk to highways safety, or a cumulative impact would be severe.

5.44 Chapter 11 relates to making effective use of land and requires decisions to promote an effective use of land in order to meet the needs for homes, industry and other uses, while safeguarding and improving the environment.

5.45 Paragraph 120 (d) is particularly relevant as it requires decisions to:

- d) “promote and support the development of underutilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively (for example converting space above shops, and building on or above service yards, car parks, lock-ups and railway infrastructure).”**

5.46 Paragraph 121 also requires Local Planning Authorities to take a proactive role in identifying and helping to bring forward land that may be suitable for meeting development needs. Furthermore paragraph 124 states that decisions should take into account the need for development and the availability of land suitable for accommodating it, local market conditions and viability, and the availability and capacity of infrastructure and services.

5.47 The revised NPPF (2021) had an increased emphasis on design and quality. Chapter 12 focuses on achieving well-designed places which is fundamental to what the planning and development process should achieve. There is also a theme throughout the chapter which emphasises the importance of early discussions between the applicant and council. Paragraph 127 sets out what good design is considered to be for decision-taking and includes: adding to the overall quality of the area, being visually attractive and optimising the potential of the Site to accommodate and sustain an appropriate amount and mix of development.

- 5.48 Chapter 14 outlines the requirement for plan-making and decision-taking to meet the challenges presented by climate change, flooding and coastal change. This outlines the requirements of the planning system to support a transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change.
- 5.49 Conserving and enhancing the natural environment is discussed in Chapter 15. This includes protecting valuable landscapes, biodiversity and preventing against new and unacceptable risks from pollution.

***S.106 and CIL***

- 5.50 Policy R17 of the Hillingdon Local Plan Part 2 requires development that generates the need for additional facilities to provide financial contributions. As set out in Policy DMCI7 of the Local Plan Part 2 Development Management Policies, the Council's Community Infrastructure Levy (CIL) will predominantly be used to address this.
- 5.51 CIL could be sought in addition to S.106 contributions.

## 6.0 ASSESSMENT OF APPLICATION PROPOSALS

### Principle of Development for Employment Uses

- 6.1 The Site is currently established as an employment use (assumed B8 – Storage and Distribution) and is designated within the wider Hayes Industrial Area, a Strategic Industrial Location (SIL) within the adopted London Plan and Hillingdon Local Plan. Local Plan Policy SEA1 seeks to protect SILs for employment uses. Local Plan Policy DME1 supports employment proposals in SILs and states that proposals for other uses will only be acceptable in certain specified circumstances.
- 6.2 The Hayes Industrial Area is also identified as a Preferred Industrial Location (PIL) in the adopted Local Plan; these areas are considered suitable for general industrial, light industrial, storage and distribution, waste management, recycling, some transport related functions and other industrial related uses (e.g. generally Use Classes E(g)(iii) (formerly B1(c)), B2 and B8). This is also consistent with London Plan Policies E4 and E5.
- 6.3 Following the updates to the Use Class Order since the adoption of the Hillingdon Local Plan, we are of the opinion that the redevelopment of the Site for a flexible Class E(g)(iii) Industrial Processes, B2 General Industrial and B8 Storage and Distribution use accords with adopted regional and local planning policy and therefore the proposed uses are acceptable.
- 6.4 In order to establish development principles on the Site, the Applicant submitted a pre-application request on 27<sup>th</sup> January 2023. A meeting was held with officers on 16<sup>th</sup> March 2023. The Written Pre-Application Response (Appendix 2) from the Council dated 4<sup>th</sup> April 2023 states in Section 8: Conclusion;

**The redevelopment of the Site for flexible Class E(g)(iii) Industrial Processes / B2 General Industrial / B8 Storage and Distribution use accords with adopted regional and local planning policy and therefore the proposed uses are acceptable.**

- 6.5 It is acknowledged that the Council has concerns regarding the range of uses permissible under Use Class E and therefore considers it may be necessary to restrict the Site to E(g)(iii). The Applicant is not adverse to this, should it be deemed necessary by the Council, this can be secured via an acceptably worded planning condition.

### Intensification of Floorspace and Building Height

- 6.6 The intensification of industrial floorspace within SILs is supported in the Local Plan Part 2 Policy DME 1. The Policy also states employment proposals on designated employment sites will be supported in accordance with relevant London Plan Policies.
- 6.7 The adopted Local Plan and London Plan applies a great emphasis on the need to intensify floorspace with Policy E7 of the London Plan encouraging development proposals to be proactive and resulting in an intensification of business uses in Use Classes E(g)(iii), B2 and B8. Introducing smaller units, taller units and higher plot ratios to utilise land in a more efficient manner is seen as a key way to meet this need.
- 6.8 The need for intensification and densification of commercial schemes within London was highlighted in a recent Report (January 2022) titled; 'Making Space: Accommodating London's Industrial Future' by the Industrial Land Commission. It states: "*London will inevitably face pressures to use scarce land more intelligently and intensively. One solution is to build upwards to create additional floorspace*". With suitable land in tight supply and demand pushing towards smaller industrial sites with enhanced connectivity to local residents; intensification of land is becoming a potential solution to the situation. Increasing floorspace capacity on existing industrial sites is key to securing London's long-term economic prosperity.
- 6.9 The Proposal results in a significant intensification of GIA floorspace of 571%. The existing floorspace on Site comprises:

Building	Area (Sq. m) GIA
Modular Office Building	300
Detached Store	119
Vehicle Maintenance Unit	378
Side Store	44
Ground Floor Offices & Stores	136
First Floor Offices & Canteen	131
<b>Total</b>	<b>1,108</b>

- 6.10 The existing floor area on the Site totals 1,108 sq. m with the proposal providing 7,439 sq. m of floorspace across four units of varying size.
- 6.11 As stated in the report 'Making Space: Accommodating London's Industrial Future', intensification is seen as a potential solution by 'bypassing the need to secure new sites

by increasing the floorspace capacity of existing developments'. This report further strengthens the importance of redeveloping this Site in line with the proposal by providing an increase in floorspace with the additional benefits of being multiple units of varying sizes to appeal to a wide range of occupiers.

- 6.12 This stance to intensification has also been echoed in a more recent research paper published by New London Architecture (NLA) titled 'Industrial & Logistics: Can London Deliver?'. The report looks at the latest trends, challenges and opportunities in the industrial and logistics sector with intensification considered as a key way to address the shortfall of suitable industrial and logistics floorspace in Greater London.
- 6.13 The proposal results in intensification through higher plot ratio and an increased building height. While it is acknowledged the proposal is higher than the immediate surroundings, many of these existing buildings predate adopted planning policy and do not reflect the growing and identified need for intensification of Industrial and Logistics floorspace in Greater London. They also reflect different market requirements from occupiers at the time.
- 6.14 During the pre-application meeting, the proposal presented a building with a maximum height of 18.8m, allowing for a building with 15m to underside of haunch to be achieved. Following officer feedback, the Applicant has responded by reducing the overall building height to a maximum of 15.7m. this allows for a building of 12.5m to underside of haunch to be achieved.
- 6.15 We trust this reduction in height is viewed positively by officers as requested in the pre-application written response.
- 6.16 Given the current industrial and logistic market, occupiers require flexibility within buildings and 12.5m to underside haunch is deemed necessary to attract a strong market demand and flexibility for this proposal. We are aware of a number of nearby schemes in Hayes which have been approved for taller buildings including:
- SEGRO Park Hayes – permitted industrial buildings of up to 18m (REF: 1331/APP/2017/1883)
  - Prologis Park West London – permitted industrial buildings of up to 16.2m (REF: 37977/APP/2015/1004)
  - North Hyde Gardens – permitted a data centre up to 31.25m (REF: 75111/APP/2020/1955)



- 6.17 While we acknowledge the building still represents an increase in height when compared to the immediate existing context, the proposal is consistent with national, regional and local planning policy in delivering an intensification of floorspace, which will be well received in the current market conditions in this location.
- 6.18 The application is supported by a technical note from joint agents Kimmre and Colliers, which outlines the need for such units proposed and general market information. It demonstrates that there are clear supply demands of the size on units supplied which are far greater than for a larger, single unit.
- 6.19 The application is also supported by a full pack of elevational drawings and a Design and Access Statement which includes CGIs of the proposed development, these are taken from viewpoints agreed with the Case Officer on 27<sup>th</sup> April 2023 via email. A heritage impact assessment assesses the proposal from a built heritage perspective and finds no reason why the proposal should not be permitted.

#### **Highways, Transport, Car Parking and Accessibility**

- 6.20 This Planning Application is supported by a Transport Assessment (TA) and Travel Plan (TP) prepared by Vectos, Part of SLR. The TA includes a full analysis of transportation policies and assesses the impact of the proposed development including trip generations.
- 6.21 While the written pre app response and submitted documentation acknowledges the PTAL rating for the Site is 1a (indicating that accessibility to public transport is poor), the TA has set out how a modal shift to more sustainable modes of transport has been encouraged by the Applicant.
- 6.22 The Proposal provides opportunities for active travel modes allowing future employees and visitors to walk, cycle and use public transport as the main mode of travel to and from the Site. The provision of secure cycle storage, changing, shower and locker facilities are all provided to encourage this modal shift.
- 6.23 Vehicular access to the Site is achieved via an existing access point onto Swallowfield Way. This access has operated safely and suitably, serving the current Crane Hire business on the Site for a number of years.
- 6.24 Tracking and swept path analysis of the access and proposed development has confirmed HGVs, Fire Tender Vehicles and other vehicles will be able to manoeuvre safely and suitably around the Site and into the respective service yards. All vehicles which enter

the Site will have the ability to exit in a forward gear ensuring the proposal does not affect road safety. Supporting drawings are provided in Appendix D of the TA and Figure 5 of the Fire Strategy.

- 6.25 The proposal provides 7 HGV loading bays across the development with proposed trip generations set out in Section 6.5 of the TA. It is noted that following pre-application advice, some questions were raised around the interaction between private vehicles and HGVs using the Site and blocking access to spaces. Details on this are set out in Figure 4.2 of the TA which should be considered with regards to the low-speed environment created on the Site and traffic marshals to direct HGVs during manoeuvres.
- 6.26 A separate pedestrian access is provided into the Site to improve safety and vehicle interaction within the Site.
- 6.27 In accordance with the London Plan Standards, Policy T5, a total of 24 cycle parking spaces will be provided in a secure and sheltered stores. These also benefit biodiversity and ecology through the use of green roofs. Each unit will have one car parking space that when not in use can be used by up to two cargo bikes, which offers flexibility depending on how end-users operate.
- 6.28 The Proposal provides 61 car parking spaces, this is below the maximum standards of 1 space per 100sq m set in the London Plan; which would require a maximum parking figure of 78 spaces.
- 6.29 A Car Parking Management Plan has also been prepared in support of this application. The purpose of which provides an overview of the parking to be provided, the results of a demand assessment and a series of mitigation measures. It demonstrates the reasons why the number of parking spaces proposed are consistent with policy.
- 6.30 The proposal provides 20% of vehicle spaces with active electric vehicle charging provision while a further 80% will have passive provision. This is well in excess of the 5% active and 5% passive identified in the Local Plan Part 2 Table 1: Parking Standards. Four car parking spaces will be accessible bays for blue badge holders.
- 6.31 As a designated SIL in Regional and Local Planning Policy, the existing designation confirms the Site has been tested for employment uses and sustainability. The Site has consequently been deemed a suitable location for the proposed E(g)(iii), B2 and B8 Use Classes.

- 6.32 The TA concludes that the proposed development of the Site would not result in an adverse impact on highway safety or a severe impact on the highway network, and therefore the proposed development should be supported in transport terms.

### **Flood Risk and Drainage**

- 6.33 The application is supported by a Site-Specific Flood Risk Assessment (FRA) prepared by Sweco which confirms all surface water runoff will be managed within the Site accommodating events up to a 1 in 100 year plus 40% for climate change.
- 6.34 The FRA includes a drainage strategy as set out in Appendix E (of the FRA) which utilises a rain garden to the north of the proposed unit. The rain garden is a SuDS feature in accordance with the London Plan Policy SI 13 and the assessment confirms the proposal achieves greenfield run off rates incorporating this feature. The London Borough of Hillingdon SuDS proforma has been completed and provided in Appendix E (of the FRA).
- 6.35 The proposed development reduces flood risk offsite since all surface water runoff from the proposed development has been restricted to greenfield runoff rates. It also results in a betterment of 73.5% over the existing site conditions. The proposal is therefore in accordance with Policy DMEI9 of the Hillingdon Local Plan Part 2.
- 6.36 As requested in the pre-application written response, pre-development enquiries have been made with Thames Water. They have confirmed the connection into the sewer and that that proposed surface water discharge rates are acceptable. The geocellular crates will provide surface water storage and allow a restricted surface water discharge rate of 2.2 l/s to 5.9l/s to match or be just below the greenfield run off rates to the Thames Water Sewer.
- 6.37 The development accords with national planning policy and where possible reduces flood risk on and offsite. There is no reason why this application should not be granted regarding flood risk.

### **Design and Layout**

- 6.38 As discussed in the Intensification of floorspace and building height subsection of this Statement, the proposed development will introduce a significant uplift in built form on the Site. As a designated SIL in adopted regional and local planning policy, the Site can play an important role in delivering much needed Industrial and Logistics floorspace in this area of Greater London.

- 6.39 The need for careful design considerations was recently strengthened further in the latest version of the NPPF 2021. The Applicant has proactively engaged with the Council through the pre-application process and this proposal has considered feedback received as part of the pre-application written response which states that the scheme is broadly supported, subject to some amendments. A more detailed summary of the Pre application engagement and the design responses has been set out in Section 3.0 of the accompanying Design and Access Statement.
- 6.40 The scale and massing of the proposed warehouse follow a similar typology of other high quality industrial and logistics building in the local area, a key consideration in Policy DMHB 11 of the Local Plan Part 2. As set out in earlier subsections of this Statement, it is acknowledged that the proposed development is higher than its immediate surroundings however Planning Policy and recent research has demonstrated a significant need for the intensification and densification of employment sites in Greater London. As set out in the Industrial Market Technical Note, proving a unit with a clear internal haunch height of 12.5m is typical of industrial units of this size and necessary to ensure flexibility and the long-term success of this speculative proposal.
- 6.41 The material palette has been prepared to create a contemporary, high-quality finish and utilises a range of materials including cladding and glazing. A combination of tones, textures and detailing will be arranged to create visual interest and rhythm to the building elevation.
- 6.42 In response to feedback received at the pre application stage, vertically hung half round profiled metal cladding will be arranged around the base and active areas of the building with contrasting horizontally hung half round profiled metal cladding to the rest of the building. The combination of textures and tones help to add visual interest and articulate between the warehouse and active areas.
- 6.43 The proposal constitutes a high-quality design in accordance with planning policy while benefitting from excellent sustainability credential; BREEAM Outstanding and EPC A+. Full details on the design are set out in the accompany Design and Access Statement and submitted elevational drawings.

### **Landscaping and Arboriculture**

- 6.44 In addition to the high-quality design, as requested in the written pre-application response, a clear and detailed landscape section is set out in Section 7.0 of the

accompanying Design and Access Statement and separate black and white detailed landscape strategy provided.

- 6.45 The proposal has been designed following input from a landscape architect who has focused on an ecologically informed approach to maximise green infrastructure across the Site. As identified as part of the pre-application discussions, the Site currently has little in terms of landscape features and the proposals provides an opportunity to bring significant benefits to the Site.
- 6.46 The Landscape strategy enhances existing features along Swallowfield and wraps around the northern elevation and introduces greening within the service yards to the west of the building, creating an avenue of trees along the spine road.
- 6.47 In addition, the applicant is committed to using green roofed cycle shelters across all units which will provide an alternative habitat and ecological benefits.
- 6.48 The Applicant has engaged with Heathrow Airport Safeguarding and it has been requested that soft landscaping in of a design that is least attractive to birds and consists of non-baring / fruit bearing species. Given the scale of the development, we consider this a minimal risk however this has been considered as part of the landscape proposal in relation to species selection.
- 6.49 Hayden's has prepared a tree survey, arboricultural impact assessment, method statement and tree protection plan. The work highlights that two category B trees, a category C and category U tree will be removed, whilst a small area of category C hedge will be removed for pedestrian and sub-station access.

### **Air Quality**

- 6.50 In accordance with Local Plan Part 2 Policy; the application DMEI 14 is accompanied by an Air Quality Assessment prepared by TRC. The assessment confirms that during the construction phase the potential effects of the development can be mitigated through the conditioning of a Construction Environmental Management Plan. Upon its implementation the impacts of emissions would be insignificant.
- 6.51 During operation, and through the proposed mitigation measures, the impact of the proposed development is considered not to be significant. Measures include electric vehicle charging, cycle parking and showers and locker facilities to encourage modal shift.

**Noise**

- 6.52 The Application is supported by a Noise Impact Assessment prepared by Sharps Acoustics. The assessment has been informed by a noise survey carried out in February 2023 and concludes that a 3.5m acoustic screen on the southern and western boundaries will provide the necessary mitigation from a noise perspective.
- 6.53 With the proposed mitigation in place, the predicted noise levels are below LOAEL at all times. No further noise mitigation measures are required and there would be, by definition, no observed adverse noise effects resulting from the proposed 24-hour operations at the Site.
- 6.54 Both National and Local Planning Policies seeks to protect the local environment in particular the amenity of neighbouring uses from development. As a SIL, the principle of 24-hour a day operation on the Site is already established in Policy E5 of the London Plan. Future development proposals in or adjacent to SILs should also not impact the ability for them to operate on a 24-hour basis.
- 6.55 Local Plan Policy EM8 considers noise and states the Council will promote the maximum possible reduction in noise levels with Policy D14 of the London Plan emphasising the need to mitigate and minimise any potential adverse impacts from noise.
- 6.56 Given the local context surrounding the Site, the assessment acknowledges all predicted noise levels would be at or below the background noise levels during the day and at night and therefore there would be no adverse noise effects in this instance.
- 6.57 The Noise Impact Assessment has also carried out a BREEAM Assessment and confirms the proposal is compliant with credits Pol 05 (noise attenuation) and Hea 05 (internal noise levels).
- 6.58 No adverse noise effects are predicted as a result of the construction or operation of the development, either during daylight or night time periods and as such the scheme can operate 24/7.

**Lighting**

- 6.59 An external lighting assessment has also been provided by MBA to support this application and is accompanied by an external lighting plan.

- 6.60 In the interest of safety and security, external lighting is provided across the Site including access roads, walkways, car parking and service yards.
- 6.61 The lighting solution has been carefully generated with input from the ecologists, MKA Ecology, in order to minimise light spill to areas with more sensitive receptors. These receptors are principally in the area to the north of the Site and comprise the existing and enhance landscaped area.
- 6.62 Light spill been kept to a minimum while not compromising on the benefits the external lighting brings to the safety and security of the Site.
- 6.63 Consideration has also been given to reduce glare through shielding, choice of luminaires and efficient mounting heights.

### **Contamination**

- 6.64 A Phase I and II Geo-Environmental and Geotechnical Site Assessment has been prepared by TRC to support the application.
- 6.65 The Assessment has recommended a an intrusive Geoenvironmental and Geotechnical Site Assessment Report should be prepared in order to update the conceptual site model and to determine the environmental characterisation of the Site.
- 6.66 The Phase II finds that there is no need for remediation of soils and ground water. However, if anthropogenic soils are to be re-used on the Site, then a Materials Management Plan will be required during construction.
- 6.67 However, gas protection measures will be required in the development, this may include installing gas membranes.

### **Ecology, Biodiversity Net Gain and Urban Greening**

- 6.68 The application has been supported by a Preliminary Ecological Appraisal and Preliminary Roost Assessment prepared by MKA Ecology. The report has been informed by a Site visit undertake on 22<sup>nd</sup> February 2023.
- 6.69 Chapter 6 of the Local Plan Part 2 Development Management Policies focuses on Environmental Protection and Enhancement with Policy DMEI 7 identifying that the design and layout of new development should retain and enhance existing features of biodiversity

within the Site. While the proposal does result in some unavoidable loss, the landscape strategy has ensured replacements are proposed to exceed planning policy.

- 6.70 Ecological enhancements include native scrub, tree and hedgerow planting with other features including green roof cycle shelters and the installation of bird and bat boxes. The accompanying Biodiversity Net Gain and Urban Greening Factor Assessment has also been prepared to support the planning application and demonstrates a biodiversity net gain of 53.96% for habitat units and 66.64% for hedgerow units. This significantly exceeds the Environmental Act's mandatory target of at least 10%.
- 6.71 An Urban Greening Factor Assessment has also been undertaken and confirms a score of 0.14. Whilst Use Classes B2 and B8 are generally excluded from UGF score requirements, this score highlights the positive contribution of green infrastructure in the design scheme, as encouraged under the London Plan (2021).
- 6.72 The inclusion of ecological enhancement features is in line with local and regional planning policy, as well as the National Planning Policy Framework. Enhancements will contribute towards a net positive change in biodiversity onsite and ensure a sustainable development that helps to achieve both local and national biodiversity targets.
- 6.73 The submitted Preliminary Ecological Appraisal and Preliminary Roost Assessment demonstrates no reason why planning permission should not be granted from an ecological perspective.

### **Sustainability and Energy**

- 6.74 An Energy Strategy has been prepared by MBA in accordance with Local, Regional and National Policy to ensure the proposed development meets the requirements and can perform in the most sustainable way.
- 6.75 The energy hierarchy, as set out in Policy SI 2 of the London Plan, has been followed - Be Lean, Be Clean, Be Green.
- Be Lean: Demand Reduction – A fabric first approach (passive design measures) and energy efficient serving (active design measures) have been included in the design. This includes enhanced air tightness, efficient mechanical plant systems and higher efficiency lighting.



- **Be Clean: Heating Infrastructure** – Consideration has been given to connections to existing community heating or cooling networks, communal combined heat and power network and communal cooling heat and power. An expected lack of a continuous demand for heat in the warehouse spaces renders the proposed development unsuitable as a site for connection to community or site-wide energy networks.
- **Be Green: Renewable Energy** – Solar photovoltaic (PV) panels will be mounted at roof level of the proposed development with the addition of air source heat pumps for the main office accommodation. From undertaking a feasibility assessment, these technologies were deemed the most appropriate for the Site.

6.76 The Energy Strategy confirms the proposal will comply with London Plan Policy SI 2: Minimising Greenhouse emissions, as it results in a greater than 100% improvement over Part-L of the Building Regulations.

6.77 Table 2 below shows the regulated CO2 savings from each stage of the energy hierarchy:

	REGULATED CARBON DIOXIDE SAVINGS		
	TONNES CO <sub>2</sub> PER ANNUM	PER	%
Savings from Energy Demand Reduction	13.9		20%
Savings from Heat Network/ CHP	0.0		0%
Savings from Renewable Energy	61.4		87%
<b>Total Cumulative On-Site Savings</b>	<b>75.3</b>		<b>106%</b>
Annual savings from off-set payment	-4.4		-
<b>(Tonnes CO2)</b>			
Cumulative savings for off-set payment (calculated over 30 years)	-133		
Cash in-lieu contribution	-£12,608		

Table 2: Regulated Carbon Dioxide savings from each stage of the Energy Hierarchy

6.78 As there is no remaining shortfall to zero carbon (as shown in Table 2), no cash-in-lieu contribution will be required from the proposed development for carbon offsetting.

6.79 In accordance with Policy EM1: Climate Change Adaption and Mitigation, the Site has incorporated various sustainable and energy measures within the design. As part of this a BREEAM rating of 'Outstanding' is targeted for the Site. By incorporating the requirements for a BREEAM rated building, aspects of the design have been improved against a typical development.

6.80 Following the pre-application feedback, MBA has made enquiries regarding a connection to the district heating network however the Council confirmed a connection is not possible.

- 6.81 The Strategy is prepared in accordance with the Hillingdon Local Plan and London Plan and suggests no reason why the proposal should not be supported from a planning perspective.

## 7.0 CONCLUSIONS

- 7.1 This Planning Statement has been prepared by Barton Willmore, now Stantec, in support of a planning application made by Wrenbridge (FRELD Hayes) LLP (the 'Applicant') to redevelop 'the Site' known as the Ainscough Crane Hire Site, 84 Swallowfield Way, Hayes, London, UB3 1DQ (Appendix 1) to provide flexible E(g)(iii), B2 and B8 uses with ancillary offices. The development included car parking, landscaping, means of enclosure, access and servicing arrangements.
- 7.2 The Site is previously developed brownfield land in a designated SIL in both adopted regional and local planning policy. This proposal provides an opportunity to intensify the Site for employment uses in accordance Planning Policy.
- 7.3 The proposal comprises one building which is split into four units of varying sizes ranging from 1,379sq m to 2,272sq m. A total of 7,439 sq. m (GIA) is proposed with 5,720sq. m at ground floor level and a generous ancillary office provision totalling 861sq. m at first floor level, representing over 15% of the total floorspace. A further 858sq. m is provided across the units through first floor mezzanines. The increased provision of office floorspace has been combined with extensive glazing along the western elevation. This glazing wraps around the north and southern elevations and provides an active, high quality frontage across the service yards and Swallowfield Way.
- 7.4 The buildings will be high-quality; designed and constructed to a modern standard with glazing to the office space along the active frontage with Swallowfield Way and the yards to the west. A mixture of cladding treatments break up the massing of the buildings and add visual interest.
- 7.5 A comprehensive, high quality landscaping scheme has been prepared, this includes the strengthening of existing soft landscaping, introducing new amenity planting and enhanced understorey woodland planting; the landscaping scheme has been prepared in conjunction with the ecology consultant to ensure that opportunities to maximise biodiversity gains will be achieved. The proposed landscaping significantly enhances the Site along Swallowfield Way.
- 7.6 The proposal has also been shaped following a pre-application discussion with officers and a written response (please refer to **Appendix 2**). The scheme has taken onboard comments received from officers.

- 7.7 The applicant has excellent market knowledge and has carried out a number of similar schemes across the country. The applicant has a very strong track record of delivering high quality, flexible commercial floorspace to meet the needs of the market and the modern occupier.
- 7.8 This proposal has been informed by a wide range of technical assessments including; transport, flood risk and drainage, landscaping, noise, air quality and ecology. The development constitutes sustainable development and a BREEAM score of 'Outstanding' and EPC A+ is achieved. The proposal will also result in a Biodiversity Net Gain, which significantly exceeds the upcoming mandatory requirements of 10%. A net gain of 53.96% for habitat units and 66.54% for hedgerow units is achieved on Site and demonstrates the positive contribution the scheme makes to the local environment.
- 7.9 The proposal is consistent with the development plan and wholly accords with the principles of sustainable development, bringing social, economic and environmental benefits to the borough without and significant effects. It is regarded as sustainable development, for which we consider planning permission should be granted without delay.

# **APPENDIX 1**

## **Site Location Plan**



Based on ordnance and topographical measured survey  
Ordnance Survey Licence Number: 100022432  
Topographical & measured building survey  
prepared by Terrain Surveys:  
Drawing Number TS23-044-1

 Planning Boundary

Rev PL1: Planning Issue. MS - 03.05.2023

Drawing Status:  
PLANNING ISSUE

**CMP**  
Architects

Client  
Wrenbridge (FRELD Hayes) LLP



Project  
Ainscough Crane Hire Site, 84 Swallowfield Way, Hayes, London, UB3 1DQ

Title  
Location Plan

Scale 1:1250@A3	Drawn MS	Date 20.02.2023
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Drg.No. <b>H067-CMP-SI-ZZ-DR-A-00001</b>	Revision <b>PL1</b>
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Do not scale from this drawing, use figured dimensions only. Subject to accurate site survey. All dimensions to be checked and verified for any discrepancies. All drawings to be read in conjunction with all CMP Architects and other consultants' contract documentation. Any discrepancies to be reported before any work commences. All items installed by others are to be fully site coordinated and programmed with the Contractor. All products to be installed to manufacturers recommendations.  
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# **APPENDIX 2**

## **Written Pre-application Formal Response**



Edward Jones  
Barton Willmore Now Stantec  
St Andrews House  
St Andrews Road  
Cambridge  
CB4 1WB

Planning Applications Team  
Hillingdon Council  
Civic Centre, High Street  
Uxbridge UB8 1UW

Tel: 01895 250230  
Case Officer: Karl Dafe  
Email: [kdafe@hillington.gov.uk](mailto:kdafe@hillington.gov.uk)  
Date: 4th April 2023  
Our Ref: 63099/PRC/2023/14

Dear Edward Jones

**RE:** Demolition of existing structures and redevelopment for Use Classes E(g)(iii) B2 and B8 (applied flexibly) including hard and soft landscaping, servicing and associated works

**SITE:** 84 Swallowfield Way Hayes

I refer to your request for pre-application planning advice dated 08-02-23 and our subsequent meeting on 16/3/2023, 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:**

Existing site plan - received 08 Feb 2023  
Proposed site plan - received 08 Feb 2023  
Design Document prepared by CMP Architects. - received 08 Mar 2023  
Location Plan - received 08 Feb 2023

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 brownfield land and currently used as an established employment site for B8 Storage and Distribution uses. The Site is designated within the Hayes Industrial Area, a Strategic Industrial Location



(SIL) in the adopted London Plan and Hillingdon Local Plan. The Hillingdon Local Plan divides SILs into Preferred Industrial Locations (PIL) and Industrial Business Parks (IBP). The Site is located within a PIL, which is defined as being suitable for general industrial, light industrial and warehousing uses in the Local Plan.

Ainscough Crane Hire currently occupy the Site, however you state that they are vacating as their business dynamics change, and this presents an opportunity for redevelopment. You submit that the proposed development will lead to intensification and a more efficient use of land in a highly suitable and desirable location for the proposed uses.

The existing site is accessed from Rigby Lane/Swallowfield Way and consists of hardstanding with four small buildings and a landscape frontage along the road edge. The adjacent sites to the north and east have large buildings with areas of car parking. Although predominantly hard standing open storage, the site has a total of 1,108 m<sup>2</sup> of existing buildings.

Although the Site is within an established industrial area, a designated heritage asset is located in close proximity, namely the Stockley Park: Business Park Phases I and II, country park and golf club, which is a Grade II Registered Park and Garden. The setting of Registered Park and Gardens is protected through National (Chapter 16 of the NPPF) and Local Policy (HE1).

The Site falls within Flood Zone 1 (low probability of flooding) and the proposed uses are classified as 'less vulnerable'.

A railway line runs along the southern boundary of the site.

## **The Proposal**

The proposal for which you request pre-application advice on, is the demolition of all structures on the Site and subsequent re-development for a single building, divided into 4 independent commercial units of varying floorspace. The units are being built speculatively with the range of floor areas and flexibility of use classes necessary to attract a range of enterprises consistent with the SIL designation. The proposal seeks permission for E(g)(iii) Light Industrial, B2 Manufacturing and B8 Storage and Distribution uses across all of the units.

The units vary in size from 1,375sq. m to 2,265sq. m. The units will have a maximum height of c.18.5m with 15m to underside of haunch. Ancillary office space is provided in each unit, which you state, will allow for a broader range of jobs including management operations and administrative roles. The percentage of ancillary office floorspace is higher than a typical building of these use classes at approximately 15% of GIA floorspace.

The existing access to the Site would be retained and utilised for the proposal with the existing landscaping around the periphery of the Site also retained and enhanced. The landscape strategy is intended to ensure that both Biodiversity Net Gain and Urban Greening is achieved.

As a SIL, you are seeking unrestricted 24/7 hours of operation to each unit.

## **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 and national guidance:

### **Development Plan**

Planning law requires that applications for planning permission be determined in accordance with the

development plan, unless material considerations indicate otherwise. The Development Plan for the London Borough of Hillingdon currently consists of the following documents:

The Local Plan: Part 1 - Strategic Policies (2012)

The Local Plan: Part 2 - Development Management Policies (2020)

The Local Plan: Part 2 - Site Allocations and Designations (2020)

The West London Waste Plan (2015)

The London Plan (2021)

## Material Considerations

The National Planning Policy Framework (NPPF) (2021) is also a material consideration in planning decisions, as well as relevant supplementary planning documents and guidance.

## Part 1 Policies:

PT1.E1	(2012) Managing the Supply of Employment Land
PT1.HE1	(2012) Heritage
PT1.BE1	(2012) Built Environment
PT1.EM1	(2012) Climate Change Adaptation and Mitigation
PT1.EM3	(2012) Blue Ribbon Network
PT1.EM6	(2012) Flood Risk Management
PT1.EM7	(2012) Biodiversity and Geological Conservation
PT1.EM8	(2012) Land, Water, Air and Noise
PT1.T1	(2012) Accessible Local Destinations

## Other Policies:

NPPF2	NPPF 2021 - Achieving sustainable development
NPPF6	NPPF 2021 - Building a strong, competitive economy
NPPF9	NPPF 2021 - Promoting sustainable transport
NPPF11	NPPF 2021 - Making effective use of land
NPPF12	NPPF 2021 - Achieving well-designed places
NPPF14	NPPF 2021 - Meeting the challenge of climate change flooding
NPPF15	NPPF 2021 - Conserving and enhancing the natural environment
NPPF16	NPPF 2021 - Conserving & enhancing the historic environment
LPP D3	(2021) Optimising site capacity through the design-led approach
LPP D4	(2021) Delivering good design
LPP D5	(2021) Inclusive design
LPP D8	(2021) Public realm
LPP D11	(2021) Safety, security and resilience to emergency
LPP D12	(2021) Fire safety
LPP D13	(2021) Agent of change
LPP D14	(2021) Noise
LPP E1	(2021) Offices
LPP E2	(2021) Providing suitable business space

LPP E4	(2021) Land for industry, logistics and services to support London's economic function
LPP HC1	(2021) Heritage conservation and growth
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 SI2	(2021) Minimising greenhouse gas emissions
LPP SI4	(2021) Managing heat risk
LPP SI5	(2021) Water infrastructure
LPP SI7	(2021) Reducing waste and supporting the circular economy
LPP SI13	(2021) Sustainable drainage
LPP SI17	(2021) Protecting and enhancing London's waterways
LPP T1	(2021) Strategic approach to transport
LPP T2	(2021) Healthy Streets
LPP T4	(2021) Assessing and mitigating transport impacts
LPP T5	(2021) Cycling
LPP T6	(2021) Car parking
LPP T6.5	(2021) Non-residential disabled persons parking
LPP T7	(2021) Deliveries, servicing and construction
LPP T9	(2021) Funding transport infrastructure through planning
DME 1	Employment Uses in Designated Sites
DME 3	Office Development
DMHB 1	Heritage Assets
DMHB 8	Registered Historic Parks, Gardens and Landscapes
DMHB 11	Design of New Development
DMHB 12	Streets and Public Realm
DMHB 14	Trees and Landscaping
DMHB 15	Planning for Safer Places
DMEI 1	Living Walls and Roofs and Onsite Vegetation
DMEI 2	Reducing Carbon Emissions
DMEI 3	Decentralised Energy
DMEI 6	Development in Green Edge Locations
DMEI 7	Biodiversity Protection and Enhancement
DMEI 8	Waterside Development
DMEI 10	Water Management, Efficiency and Quality
DMEI 12	Development of Land Affected by Contamination
DMEI 14	Air Quality
DMCI 7	Planning Obligations and Community Infrastructure Levy
DMT 1	Managing Transport Impacts
DMT 2	Highways Impacts
DMT 5	Pedestrians and Cyclists

## Main Planning Issues

### 1. Principle of development

The Site is currently established as an employment use (assumed B8 - Storage and Distribution) and is designated within the wider Hayes Industrial Area, a Strategic Industrial Location (SIL) within the adopted London Plan and Hillingdon Local Plan. Local Plan Policy SEA1 seeks to protect SILs for employment uses. Local Plan Policy DME1 supports employment proposals in SILs and states that proposals for other uses will only be acceptable in certain specified circumstances.

Hayes Industrial Area is identified as a Preferred Industrial Location (PIL); these areas are considered suitable for general industrial, light industrial, storage and distribution, waste management, recycling, some transport related functions and other industrial related uses (e.g. generally former Use Classes B1 (c), B2 and B8). This is also consistent with London Plan Policies E4 and E5.

The proposed development is proposing a significant increase in industrial floorspace that falls within the Use Classes E(g)(iii), B2 and B8. The proposal represents an increase in floorspace of 6,302sqm across these three Use Classes.

You note that the need for intensification and densification of commercial schemes within London was highlighted in a recent Report titled; 'Making Space: Accommodating London's Industrial Future' by the Industrial Land Commission. It states: "London will inevitably face pressures to use scarce land more intelligently and intensively. One solution is to build upwards to create additional floorspace". With suitable land in tight supply and demand pushing towards smaller industrial sites with enhanced connectivity to local residents; intensification of land is becoming a potential solution to the situation. Increasing floorspace capacity on existing industrial sites is key to securing London's long-term prosperity.

The intensification of industrial uses within the SIL is supported by the Local Plan Part 2 Policy DME1 and Policies E4 and E5 of the London Plan 2021. Within SILs, Policy E5 supports the industrial type uses listed in Part A of Policy E4. Generally, proposals for uses that fall within Use Classes E(g)(iii) - formally B1c, - B2 and B8, are supported by the London Plan.

It should be noted however, that Class E includes a number of uses that are not considered appropriate within the SIL. As such, in order to safeguard the future integrity, character and viability of the SIL, it is likely that a condition would be attached to any planning permission, to restrict other Class E uses apart from E(g)(iii) and also restrict use of the site as a data centre.

London Plan Policy E5 also states 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. When considering any forthcoming application proposal, the layout, servicing, access, orientation, air quality, public realm, soundproofing and other relevant factors, would therefore be key considerations.

### 2. Design

This pre-application submission is accompanied by a Design Document prepared by CMP Architects. It states that the vision is to deliver high quality, attractive employment floorspace in a highly sought after location. The material palette will create a contemporary finish and utilise a range of materials including cladding and glazing. The materials will combine a combination of tones, textures and detailing to create visual interest and rhythm across the scheme.

Policy DMHB 1 (Heritage Assets) of the Hillingdon Local Plan 2 - Development Management Policies (January 2020) requires development to avoid harm to the historic environment and amongst other criteria, requires that buildings and structures within the curtilage or in close proximity to a heritage asset, do not compromise its setting and opportunities are taken to ensure the significance of the asset can be appreciated more readily.

Policy DMHB 8 (Registered Historic Parks, Gardens and Landscapes) requires development proposals within or adjacent to a registered or historic park, garden or landscape to respect its special character, environmental quality, important views and vistas; provide for the restoration and long term management of the park, garden or landscape and advises that applications which impact detrimentally on the significance of a registered park or garden will normally be refused.

Policy DMHB 10 (High Buildings and Structures) establishes the criteria under which tall buildings should be considered, including the need to be of a height, form, massing and footprint proportionate to its location and sensitive to adjacent buildings and the wider townscape context and consideration should be given to its integration with the local street network, its relationship with public and private open spaces and its impact on local views and that it achieves a high architectural quality.

Policy DMHB 11 (Design of New Development) requires all development to be designed to the highest standards and incorporate principles of good design, including harmonising with the local context; use of high quality building materials and finishes; internal design and layout maximises sustainability and is adaptable; protects features of positive value and their settings and includes landscaping and tree planting. Proposals should also not impact upon the amenity, daylight and sunlight of adjoining properties and open space, development does not prejudice the development of adjoining sites and appropriate provision is made for the storage of waste and recycling.

Policy DMHB 12 (Streets and Public Realm) re-iterates Policy DMHB 11 by stating that development should be well integrated with the surrounding area and be accessible by improving legibility and promote routes and wayfinding between the development and local amenities; public realm design takes account of the established townscape character and quality of the surrounding area; includes landscaping that is suitable for the area; makes provision for the safe and direct movement of pedestrians and cyclists; incorporates appropriate and robust hard landscaping; incorporates public art where appropriate and incorporates inclusive design. Public realm improvements will also be sought from developments close to transport interchanges and community facilities.

Policy DMHB 14 (Trees and Landscaping) of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020) requires all development to retain or enhance existing landscaping, trees, biodiversity or other natural features of merit and to provide a landscape scheme that includes hard and soft landscaping appropriate to the character of the area, which supports and enhances biodiversity and amenity particularly in areas deficient in green infrastructure.

Policy DMEI 1 (Living Walls and Roofs and on-site Vegetation) of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020) states that all development proposals are required to comply with the following:

- i) All major development should incorporate living roofs and/or walls into the development. Suitable justification should be provided where living walls and roofs cannot be provided; and
- ii) Major development in Air Quality Management Areas must provide onsite provision of living roofs and/or walls. A suitable offsite contribution may be required where onsite provision is not appropriate.

Policy G5 (Urban Greening) of the London Plan requires major development proposals to contribute to the greening of London by including urban greening as a fundamental element of site and building design, and by incorporating measures such as high-quality landscaping (including trees), green roofs, green walls and nature-based sustainable drainage.

Policy D9 (Tall Buildings) of the London Plan considers the visual, functional, environmental, and cumulative impacts of tall buildings and in particular, advises that long, mid and immediate range views will require assessment, architectural quality and materials should be of an exemplary standard and that proposals should take account of and avoid harm to the significance of London's heritage assets and their settings and those that do result in harm will require clear and convincing justification, demonstrating that alternatives have been explored and there are clear public benefits of the proposal that outweigh the harm and that buildings should positively contribute to the character of the area.

London Plan Policy D3 focuses on optimising site capacity through the design led approach. The policy aims to ensure development makes the best use of land and responds to the sites context and capacity for growth. The policy supports higher density developments in locations which are well located to jobs, services and infrastructure.

Policy E7 of the London Plan emphasises the need for industrial intensification, co-location and substitution. The policy sets out this can be achieved through smaller units, multi storey schemes and higher plot ratios.

## THE SITE LAYOUT

The site layout demolishes the existing buildings to be replaced with a single large building divided into four units. The building is positioned along the eastern boundary with frontage and entrances along the western side building elevation facing onto the car parking/service yards.

While this layout is broadly accepted, it should be improved with the provision of a facade treatment to the building facing Rigby Lane/Swallowfield Way that includes windows and doors accommodating direct pedestrian access from Rigby Lane. This will provide an active road frontage with direct access to the end unit, conforming to good urban design practice and secure by design principles.

Further, the sub-station should be re-located to ensure it is not visually obvious from the road and placed in a more secluded part of the site.

The landscape intention is to introduce new species within the existing green strip along the road frontage. This is supported, subject to detail and vitality of delivering additional planting and biodiversity in this area.

It should be noted that the proposed planting along the eastern boundary between the existing and adjacent building is unlikely to be viable due to poor light levels.

It should also be noted that there are concerns surrounding pedestrian access and parking layouts, which are dealt with in following sections of this letter.

## BUILDING HEIGHTS, SCALE AND MASSING

The proposed building has an eaves height of 16.6m high and the ridge height is 18.8m. Further information is required to indicate the prevailing height within the immediate context of the industrial park to ensure the proposed building is generally in line with this.

A clear operational rationale for the building height is sought, as it is considered that the void above the offices is unnecessary and the building height could be reduced.

## MATERIALITY

The design intent to provide a higher quality material palette to distinguish between the entrances and

office areas of the building from the warehouse is supported. However, the cladding with curtain walling would appear flat. It would be preferable to create depth of reveals or materials with a more distinctive profile within these elevations, to create visual interest reflecting a high quality design approach.

The warehouse materiality is proposed to be horizontally fixed profile steel sheeting. This material should be combined with a brick material for the lower part of the building, to break up the uniformly large elevation of steel sheeting.

The curved profile roof form, although not typical in this industrial area could be accommodated as the estate hosts a variety of building forms, materials and roofscapes delivering a varied context.

In conclusion, the scheme is broadly supported, subject to amendments, further justification of the height, as well as heritage and highway considerations dealt with below.

## HERITAGE

Historic England added Stockley Park: Business Park Phases I and II, and Country Park and golf course, to the east and west of Stockley Road, Hillingdon to the Register of Parks and Gardens of Special Historic Interest in England at Grade II on 18/08/20.

The reasons given for designation are:

Historic Interest:

- first established in the mid 1980s, it was a pioneering design from the early phase of business park development in England;
- a skilled reuse of highly contaminated land.

The Site is considered to form part of the wider industrial setting of Stockley Park. The proposals will see the introduction of built form on the Site comprising an industrial building with an eaves height of 15m and maximum height of c.18.5m. The proposed built form will rise above the surrounding industrial buildings. However, you argue that it will still remain contextually appropriate. Whilst it will largely be screened by trees, you acknowledge that the built form may be visible in glimpsed views from within the registered park and garden given its height. Whilst the proposed building will be seen within the context of the surrounding business park and industrial area, it will need to be demonstrated that it will not appear incongruent within this existing context and setting of the registered park and garden.

Although the Register in itself entails no additional statutory controls, the historic interest of a registered park or garden is a material planning consideration, and the Register provides the key means by which sites of special historic interest are identified. It draws attention to the fact that the sites included should receive special consideration if changes or proposals for development are being contemplated.

The Council is required to consult Historic England over any planning applications received which may affect sites graded I or II\* on the Register. The Council are also directed to consult The Gardens Trust on applications which may affect any site on the Register, regardless of grade.

With the application site so close to the registered park, it will be necessary for a heritage impact assessment to be submitted in support of any application.

Paragraph 194 of the NPPF states that: In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum the relevant historic environment record should have been consulted and the heritage

assets assessed using appropriate expertise where necessary.

Where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.

When assessing the application, the Council will need to take into consideration paragraphs 194-208 of the NPPF in the same way it would do with any other heritage asset.

### 3. Amenity

#### IMPACT ON NEIGHBOURS

Policy D13 (Agent of Change) of the London Plan advises at Part C that new noise and other nuisance-generating development proposed close to residential and other noise-sensitive uses should put in place measures to mitigate and manage any noise impacts for neighbouring residents and businesses.

Policy DMHB 11 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020) requires that development proposals should not adversely impact on the amenity, daylight and sunlight of adjacent properties and open space.

The proposal would increase the height of the existing buildings and extend their footprint, It is unlikely that this would have a significant adverse impact on the amenities of the surrounding development in terms of daylight and sunlight, although this would need to be confirmed once the detailed plans had been finalised.

You will be submitting a noise assessment and would welcome confirmation from the Authority's Environmental Health Officer on the scope of assessment. Please find below details of the Council's Noise officer.

Phillip Brewer - Noise Planning Specialist Team - [planningnoise@hillingdon.gov.uk](mailto:planningnoise@hillingdon.gov.uk)

Given the close proximity of the railway line to the south of the site, you are advised to engage in discussions with Network Rail, early on in the design process.

### 4. Highways

This highway pre-application advice refers to a proposal to demolish the existing structures and redevelop them for Use Class E(g)(iii) B2 and B8 (applied flexibly), including hard and soft landscaping, servicing and associated works. The development will make provision for 66no. on-site parking spaces, 24no. on-site cycle spaces and 7no. HGV loading bays. Active and passive electric vehicle charging points will be included in any future application. The development will share its only vehicle access with the adjacent Portakabin site.

The site is located on Rigby Lane. The site is currently being occupied for the storage of cranes for hire by Ainscough Crane, with the local area being dominated by industrial and logistical buildings. No number has been provided on the levels of staffing and possible shift patterns. There is currently no pedestrian access or footpath into the site. The proposal site has a PTAL rating of 1b indicating that its access to public transport is poor when compared to London as a whole, suggesting that there will be a strong reliance on the private car for trip-making.

The nearest station is Hayes & Harlington which is served by the Elizabeth Line and local bus stops on Dawley Road are only served by the U5. Hayes & Harlington station is accessible to/from the development via a c.14min bus ride, c.7min bike ride and a much longer c.22min walk.

Planning law requires that applications for planning permission be determined in accordance with the development plan unless material considerations indicate otherwise. The published London Plan 2021



Policy T6.2 Parking and the London Borough of Hillingdon Local Plan Part 2 Development Management Policies 2020 requires that development proposals must comply with the relevant parking standards. For a development of this type an E(g)(iii) B2 and B8 (applied flexibly) with a PTAL ranking of 1b the maximum number of car parking spaces the London Plan 2021 would allow is up to 1 space per 100 sqm which would be 74no. spaces and the Local Plan 2020 1 space per 50 sqm gross floor space, which would be 148no. spaces, therefore the proposed 66no. would not be a significant under provision of parking. Taking this into account the Highway Authority anticipates that a higher amount of people will choose to drive to the development because of its low PTAL and its distance from the station. It is recommended that the London Plan 2021 parking standards of 74no. spaces should be adopted by the development.

The development would provide a total of 7no. docking bays for loading and unloading HGVs. However, when an HGV is parked in 2no. of these bays, the HGV would 'block in' parked cars, up to 10no. car parking spaces would be affected. A parked HGV would also prevent vehicles from leaving these parking bays. With nowhere else to park, it is anticipated that this would result in drivers parking injudiciously across the site, these parked vehicles would hinder the movement of traffic and put the people walking to and from their cars in a vulnerable situation. They would walk across yard areas where vehicles are manoeuvring. This contradicts the published London Plan 2021 Policy T7 Deliveries, servicing and construction, which states that development proposal for new consolidation and distribution facilities should 'reduce road danger, noise and emission from freight trips'.

The development will provide no dedicated pedestrian access for the entire site. The Highway Authority takes note from submitted plans that a separate access is to be provided for pedestrians, although it is difficult to determine where this meaningfully leads to, as a single building will be created and separated into 4no. commercial units. This means that once footpaths have ended, pedestrians will need to proceed via the highway to reach any of the units. This would create unsafe conditions for them from HGVs and cars. This would contradict the published London Plan 2021 Policy T4 (Assessing and mitigating transport impacts), which states that 'development proposals should not increase road danger'.

As mentioned above, the development will provide 24no. cycle spaces, located throughout the development. Parking standards according to the London Plan 2021 Policy T5 Cycle for Use Class B2-B8 long-stay would be 1 space per 500 sqm and short-stay 1 space per 100 sqm, which would equate to 15 long-stay and 7 short-stay. Therefore, it is found that the provision of 24no. on-site cycle parking would be deemed suitable for this development. The applicant should be made aware that Policy T5 Cycle of the London Plan 2021 requires that developments 'provide the provision of appropriate levels of cycle parking which should be fit for purpose, secure and well-located and be in accordance with the minimum standards'.

The London Plan requires that all operational parking should make provision for electric or other Ultra-Low Emission vehicles including rapid charging. You state that the development will be providing active and passive electric vehicle charging points for the on-site car spaces. For a development of this type to comply with policy, at least 4no. active and 4no. passive should be provided, although, the Highway Authority would welcome any higher provision. This would be in accordance with the published London Borough of Hillingdon Local Plan Part 2 Development Management Policies 2020 parking standards, which states that 'Parking for electric vehicles should be provided at a current minimum of 5% of car parking spaces with 5% passive provision'.

If a planning application is forthcoming the Highway Authority would require that a Travel Plan is submitted. This Travel Plan should contain include targets for reducing the number of car trips that the development generates and should set out those measures that will be implemented to achieve these targets. The proposal should incorporate shower and changing facilities in each unit to encourage a model shift to more sustainable modes of transport.

As surety that the Travel Plan will be implemented and targets achieved, the Highway Authority requires that the developer provides a £20,000 bond. In the event of the Travel Plan not being delivered the Highway Authority will use this bond to implement the Travel Plan itself. This should be secured by way of a s.106 legal agreement. If the Travel Plan is successful, the bond will be returned. The Travel Plan should be drafted in accordance with the Guidance produced by TfL available at <https://tfl.gov.uk/info-for/urban-planning-and-construction/transport-assessment-guide/travel-plans>

The Highway Authority would require that a Transport Statement is provided alongside any forthcoming planning application. The Transport Statement should demonstrate how the number of car parking spaces to be provided was derived. This should include for example details of the number of employees working at the site and shift patterns to show how the numbers vary over a 24-hour period. This analysis should also consider visitors.

Both long stay and short stay cycle parking provision should be based on the standards contained in the published London Plan 2021. The development should also provide end of trip facilities such as showers and lockers. The long stay cycle parking should be accessible covered and secure, for the short stay parking Sheffield stands would suffice.

The Highway Authority require that the dimensions of all carriageway and footway widths, parking bays and visibility splays etc and location of cycle stands, disabled parking, EV charge points, refuse storage and collection and vehicle swept paths should be shown and annotated on the deposited plans. Copies of all plans should be provided printable to scale at A3.

The published London Plan 2021 Policy T6.5 Non-residential disabled persons parking requires that a development of this type provides designated disabled parking bays at a rate of 5% of total parking provision and a further 5% should be enlarged bays.

If a planning application is submitted the applicant is advised that the Highway Authority also requires that a Construction Logistics Plan, Service and Delivery Plan are submitted for approval. These documents should be produced based on the guidance produced by TfL tailored to the development and local circumstances. These would be secured by way of suitable planning condition and/or a 1990 Town and Country Planning s.106 legal agreement.

Construction Logistic Plans:- <http://content.tfl.gov.uk/construction-logistics-plan-guidance.pdf>

Service and Delivery Plans:- <http://content.tfl.gov.uk/delivery-and-servicing-plans.pdf>

It is noted that the applicant's highways consultant is engaging with Transport for London concurrently to this pre-application submission. Further to the pre-application discussions held on 6/3/2023, your consultants have prepared a proposed ATZ walking route assessment, which has been circulated to TfL, who will be including their thoughts on this within their formal response.

Highway comments made at this stage in the process are entirely without prejudice to the views of the Planning Authority or advice that may be provided at a formal submission. As presently submitted, the Highway Authority would not be able to support an application if received, because it would not be in accordance with the published London Plan 2021 Policies T4 Assessing and mitigating transport impacts and T7 Deliveries, servicing and construction.

## 5. Other

### ECOLOGY

Paragraph 174 of the NPPF (2021) states that planning decisions should contribute to and enhance the natural and local environment by: d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures.

Policy G6 of the London Plan (March 2021) states that development proposals should wherever

possible, make a positive contribution to the protection, enhancement, creation and management of biodiversity.

Policy DMEI 7 (Biodiversity Protection and Enhancement) of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020) states that the design and layout of new development should retain and enhance any existing features of biodiversity within the site.

It is acknowledged that in its current state, the Site provides very little in terms of Urban Greening and landscape features. You state that the proposal will enhance existing landscaping and introduce new species and features which will bring benefits to the Site and surrounding area. In addition to landscaping to the north, east and south of the Site, green roof cycle shelters will be introduced and provide greening in the service yard to the west of the building. This is supported. The proposal should ensure a Biodiversity Net Gain and Urban Greening is achieved in accordance with National and Local Planning Policy requirements.

Should an application be submitted, the following should accompany any formal application submission:

1. A tree report to BS5837:2012 is required to identify and assess all of the trees on and off the site which influence, or may be influenced by, the development. The report should be used to inform the site layout and set out a tree removal/retention strategy, together with tree protection measures. All retained and proposed tree planting should be sustainable in the long term.
2. A detailed ecological appraisal is required, based on the submitted detailed proposed plans to support the scheme and demonstrate that there will be a net gain of biodiversity.
3. Clear and detailed landscape objectives should be set out in a D&AS, or a stand alone landscape strategy document. This should be supported by a masterplan with cross-sections and relevant design details and images to support the proposal.
4. An Urban Greening Factor assessment, including plans and calculations, should be submitted in accordance with the GLA's guidance.
5. Further landscape details will be required (by condition) to support the masterplan, including plans, specifications and management / maintenance specifications.

## ENERGY

Policy SI 2 (Minimising Greenhouse Gas Emissions) of the London Plan states that:

A. Major development should be net zero-carbon. This means reducing greenhouse gas emissions in operation and minimising both annual and peak energy demand in accordance with the following energy hierarchy:

- 1) be lean: use less energy and manage demand during operation
- 2) be clean: exploit local energy resources (such as secondary heat) and supply energy efficiently and cleanly
- 3) be green: maximise opportunities for renewable energy by producing, storing and using renewable energy on-site
- 4) be seen: monitor, verify and report on energy performance.

B. Major development proposals should include a detailed energy strategy to demonstrate how the zero-carbon target will be met within the framework of the energy hierarchy.

C. 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: 1) through a cash in lieu contribution to the borough's carbon offset fund, or 2) off-site provided that an alternative proposal is identified and delivery is certain.

E. Major development proposals should calculate and minimise carbon emissions from any other part

of the development, including plant or equipment, that are not covered by Building Regulations, i.e. unregulated emissions.

Policy DMEI 2 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020) states:

A) All developments are required to make the fullest contribution to minimising carbon dioxide emissions in accordance with London Plan targets.

B) All major development proposals must be accompanied by an energy assessment showing how these reductions will be achieved.

C) Proposals that fail to take reasonable steps to achieve the required savings will be resisted.

However, where it is clearly demonstrated that the targets for carbon emissions cannot be met onsite, the Council may approve the application and seek an off-site contribution to make up for the shortfall.

Policy SI 2 therefore now requires all major development proposals to be net zero carbon. The be seen element requires developers to enter into a more formal reporting structure of how their schemes will be managed and operated.

If zero carbon can not be delivered on site, an off-site carbon contribution will be sought. The total is £95/tonne over 30 years so that carbon offsets are calculated as:

Cost of carbon (£) x 30 (years) x shortfall (tCO<sub>2</sub>) i.e. 95 x 30 x (shortfall).

## FLOOD RISK

The following planning policies and guidance are considered relevant:

London Plan Policy SI 5 (Water Infrastructure) states that development should minimise the use of mains water and protect water supplies and resources should be protected in a sustainable manner, by such means as smart metering, water saving and recycling measures.

London Plan Policy SI 12 (Flood Risk Management) requires current and expected flood risk from all sources to be managed and amongst other criteria, development should where possible, make space for water.

London Plan Policy SI 13 (Sustainable Drainage) requires the use of sustainable drainage measures and amongst other criteria, development proposals should aim to achieve green field runoff rates and ensure that surface water run-off is managed as close to its source as possible.

Policy EM6 of the Hillingdon Local Plan: Part 1 - Strategic Policies (November 2012) states that applicants must demonstrate that Flood Risk can be suitably mitigated.

Policy DMEI 1 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020) states that all major development should incorporate living roofs and/or walls into the development. Suitable justification should be provided where living walls and roofs cannot be provided.

Policy DMEI 9 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020) states that proposals that fail to make appropriate provision for flood risk mitigation, or which would increase the risk or consequences of flooding, will be refused.

Policy DMEI 10 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020) states that development within areas identified at risk from surface water flooding which fail to make adequate provision for the control and reduction of surface water run-off rates will be refused.

The management of surface water is a material planning consideration for all major development, so a sustainable drainage assessment is required with all Major applications.

No information has been submitted as part of this pre-application for review. Details of Hillingdon's requirements can be found on the Council website, including a Design and Evaluation Guide as well as detailed pro-formas to speed up review of any technical submission:-  
<http://www.hillingdon.gov.uk/article/12578/Sustainable-drainage-requirements-for-planning-applications>

A scheme shall clearly demonstrate the following:

a) SuDS features:

i. A site investigation must be provided to establish the infiltration potential and level of groundwater on the site to determine appropriate SuDS methods (This should be undertaken at the appropriate time of year as groundwater levels fluctuate). Where this cannot be undertaken at initial application stage a best case and worst case scenario should be undertaken.

ii. Evaluation of all sustainable urban drainage options in accordance with the hierarchy set out in Policy 5.13 of the London Plan. Where the proposal does not utilise the most sustainable solution, justification must be provided,

- Living Walls and Roofs and on site vegetation should be integrated in any drainage design
- Any proposal should use of methods to minimise the use of potable water through water collection, reuse and recycling by:

i. incorporate water saving measures and equipment.

ii. provide details of water collection facilities to capture excess rainwater and or

iii. provide details of how rain and grey water will be recycled and reused in the development.

iii. calculations showing storm period and intensity and volume of storage required to control surface water and size of features to control that volume to Greenfield runoff rates at a variety of return periods including 1 in 1, 1 in 30, 1 in 100, and 1 in 100 year plus Climate change,

iv. Safe access and egress must be demonstrated - any above ground storage and or overland flooding or flows paths should be mapped, (please include depths and velocities and hazards) above the 100, plus climate change.

b) During Construction

i. How temporary measures will be implemented to ensure no increase in flood risk from commencement of construction.

c) Long Term Management and Maintenance of the drainage system.

i. Clear plans showing the responsibility of different parties should be provided, such as the landowner, PMC, sewers offered for adoption and that to be adopted by the Council Highways services. Where it is a PMC the details of the body legally responsible for the implementation of the management and maintenance plan must be provided

There should be demonstration that the proposals connect into a wider functioning Thames Water network, i.e. that the point a proposal connects into is part of a wider network. Please contact Thames Water's free pre-planning service to discuss development proposals and intended delivery programme to assist with identifying any potential water and wastewater network reinforcement requirements. A formal approval from Thames Water should be provided as part of your application.

Developments which result in the need for off-site upgrades will be subject to conditions to ensure the occupation does not outpace the delivery of necessary infrastructure upgrades. Please check their website for charging information.

If an application is not found to be policy compliant please note that a contribution for off site works / mitigation may be required through Section 106.

## CRIME PREVENTION

Policy DMHB 15 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020) states that the Council will require all new development to ensure safe and attractive public and private spaces by referring to the Council's latest guidance on Secured by Design principles.

Where relevant, these should be included in the Design and Access Statement. Development will be required to comprise good design and create inclusive environments whilst improving safety and security by incorporating the following specific measures:

- i) providing entrances in visible, safe and accessible locations;
- ii) maximising natural surveillance;
- iii) ensuring adequate defensible space is provided;
- iv) providing clear delineations between public and private spaces; and
- v) providing appropriate lighting and CCTV.

Any grant of planning permission would be subject to a secure by design condition which would be attached to achieve appropriate accreditation. You may wish to contact the Metropolitan Police's Secure by Design Officer, PC Robert Palin who can be contacted on 020 8733 5245 or by e-mail on [Robert.Palin@met.pnn.police.uk](mailto:Robert.Palin@met.pnn.police.uk)

## AIR QUALITY

The proposal is for the development of a site within the declared AQMA and in close proximity to a declared Air Quality Focus Area. Focus Areas are defined as places where the pollution levels are already elevated and therefore improvements are required.

### Policy

The development must demonstrate compliance with:

- LBH Local Plan Part 1, Policy EM8
- LBH Local Plan Part 2, Policy DME1 14
- London Plan Policy SI1
- LBH Local Action Plan 2019-2024

### Comments

Given its location, and the nature of the development, air quality is a material consideration. To be compliant with policy the development must demonstrate:

- it is at least air quality neutral, it should be noted that as the proposal may impact upon Air Quality Focus Areas more stringent mitigation may be required;
- it includes sufficient mitigation to ensure that the demolition, construction phase and operational phases to do not impact on relevant receptors;
- that the demolition and construction phases are carried out in accordance with the relevant Mayor of London guidance including the use of NRMM compliant machinery;
- that the design aspects have been assessed to provide a clean by design development, such as the use of low/zero emissions technologies for energy, for associated traffic;
- that protection has been provided for any nearby receptors from the emissions of the operation of the development, this includes design layout, use of green infrastructure as a buffer, environmental operations policies such as No Idling on site.

### Requirements on application

The development will require an air quality assessment, with an Air Quality Neutral (AQN) assessment, including the construction phase with risk assessment and mitigation, and include all aspects of operation including operational traffic. It is recommended that the client's air quality team contact the Council prior to carrying out the assessment so that parameters can be agreed.

The Council will apply a pollution damage cost approach in terms of costs with a preference for

mitigation to be on-site ie use of clean technologies to reduce emissions.

If the development requires an EA permit it should be noted that the Council will be assessing this application from a local air quality management perspective, using the London Council's significance criteria. This uses different significance guidelines from those considered by the EA for an environmental permit. It is strongly advised that the planning process and permitting regime, if relevant, are considered in parallel.

In regards to the demolition and construction phases, the development will need to demonstrate compliance with the Mayor of London's Control of Dust and Emissions SPG which includes the requirement to comply with the Non Road Mobile Machinery Low Emission Zone regulations.

## CONTAMINATION

Policy DMEI 12 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020) states:-

A) Proposals for development on potentially contaminated sites will be expected to be accompanied by at least an initial study of the likely contaminants. The Council will support planning permission for any development of land which is affected by contamination where it can be demonstrated that contamination issues have been adequately assessed and the site can be safely remediated so that the development can be made suitable for the proposed use.

B) Conditions will be imposed where planning permission is given for development on land affected by contamination to ensure all the necessary remedial works are implemented, prior to commencement of development.

C) Where initial studies reveal potentially harmful levels of contamination, either to human health or controlled waters and other environmental features, full intrusive ground investigations and remediation proposals will be expected prior to any approvals.

D) In some instances, where remedial works relate to an agreed set of measures such as the management of ongoing remedial systems, or remediation of adjoining or other affected land, a S106 planning obligation will be sought.

## FIRE SAFETY

A Fire Statement will be needed to support the proposals, in accordance with Policy D12 (Fire Safety) of the London Plan (March 2021).

### 6. Planning Obligation and CIL (Mayor and LBH)

#### S106 PLANNING OBLIGATIONS

Policy R17 of the Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012), requires that where developments generate the need for additional facilities, financial contributions will be sought.

#### S106 PLANNING OBLIGATIONS

Policy DMCI 7 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020) states:-

A) To ensure development is sustainable, planning permission will only be granted for development that clearly demonstrates there will be sufficient infrastructure of all types to support it. Infrastructure requirements will be predominantly addressed through the Council's Community Infrastructure Levy (CIL).

B) Planning obligations will be sought on a scheme-by-scheme basis: i) to secure the provision of affordable housing in relation to residential development schemes; ii) where a development has infrastructure needs that are not addressed through CIL; and iii) to ensure that development proposals provide or fund improvements to mitigate site specific impacts made necessary by the proposal.

C) Applications that fail to secure an appropriate Planning Obligation to make the proposal acceptable

will be refused.

The Community Infrastructure Levy Regulation 2010 (Regulations issued Pursuant to the 2008 Act) and the NPPF have put three tests on the use of planning obligations into law. It is unlawful (since 6th April 2010) to request planning obligations that do not meet the following tests:

- i. necessary to make the development acceptable in planning terms
- ii. directly related to the development, and
- iii. fairly and reasonable related in scale and kind to the development

The effect of the Regulations is that the Council must apply the tests much more strictly and is only to ask for planning obligations that are genuinely necessary and directly related to a development. Should planning obligations be requested that do not meet the policy tests the Council would have acted unlawfully and could be subject to a High Court challenge.

On the basis of the NPPF and the Community Infrastructure Levy Regulation 2010, it is considered likely that, at full planning permission stage if recommended for approval, the following planning obligations could be requested:

- S278/S38 agreement to secure highway works (if applicable).
- Construction Training: either a contribution equal to the formula within the Council Planning Obligations Supplementary Planning Document (SPD) 2014, or an in-kind training scheme equal to the financial contribution delivered during the construction period of the development. Details shall be in accordance with the Council Planning Obligations SPD with the preference being for an in kind scheme to be delivered. Securing an Employment/Training Strategy Agreement is the Council's priority. A financial contribution will only be accepted in exceptional circumstances.
- Green Travel Plan: Prior to occupation a full Green Travel Plan shall be submitted to and approved in writing by the Local Planning Authority. The Plan will include such as matters as: targets for sustainable travel arrangements; effective measures for the ongoing monitoring of the Travel Plan; and a commitment to delivering the Travel Plan objectives. A £20,000 Travel Plan bond is also to be secured.
- Air Quality Mitigation/Carbon Offset contributions (subject to the outcome of the Air Quality/Energy Assessment).
- ATZ contribution/Highways mitigation
- Project Management & Monitoring Fee: A financial contribution equal to 5% of the total cash contributions.

## COMMUNITY INFRASTRUCTURE LEVY (CIL)

Please be advised that as from 1 April 2012, all planning approvals for schemes with a net additional internal floor area of 100m<sup>2</sup> 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 £64.55 per sq. m including indexation since 2019.' 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.

Please note that the Council is in the early stages of reviewing our CIL charging schedule, through which some rates are likely to rise, including the rate for industrial/warehousing uses. Though this project is in the very early stages and a firm timeline to adoption has yet to be finalised, this would be likely to apply to anything that may seek approval to be granted from about February 2024.

It is important to note that this CIL liability will be in addition to the planning obligations (s106) that the



Council may seek from your scheme.

## 7. Application Submission

List of documents to be submitted

The Council's 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 the Full 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 Floorplans and Elevations at scale 1:100 or 1:200;
- Planning Statement;
- CIL Additional Information Form;
- Design and Access Statement;
- Heritage Impact Assessment;
- Views Assessment; (positions to be agreed with LPA)
- Landscape Strategy;
- Urban Greening Factor Assessment;
- Tree Report to BS5837:2012;
- Ecology Report;
- Flood Risk Assessment;
- Drainage Assessment and Statement;
- Transport Assessment;
- Draft Travel Plan;
- Draft Construction Logistics Plan;
- Service and Delivery Plan;
- Air Quality Assessment;
- Energy Assessment;
- Contaminated Land Assessment;
- Noise Impact Assessment;
- Fire Statement;
- Financial Viability Assessment (if applicable);
- Infrastructure Assessment, including electricity supplies;
- Statement of Community Involvement.

## 8. Conclusion

Following the updates to the Use Class Order since the adoption of the Hillingdon Local Plan, the redevelopment of the Site for a flexible Class E(g)(iii) Industrial Processes / B2 General Industrial / B8 Storage and Distribution use accords with adopted regional and local planning policy and therefore the proposed uses are acceptable.

However, Class E includes a number of uses that are not considered appropriate within the SIL. As such, in order to safeguard the future integrity, character and viability of the SIL, in the event of an approval, a condition be likely to be attached to any planning permission to restrict other Class E uses apart from E(g)(iii) and also restrict use of the site as a data centre.

In addition, 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. When considering any forthcoming application, the layout, servicing, access, orientation, air quality, public realm, noise generation, flood risk, energy and other relevant factors, would be key considerations.

In design terms, the scheme is broadly supported, subject to amendments, further justification of the

height, as well as heritage and highway considerations referred to in the relevant sections of this report.

In terms of access arrangements, parking and loading provisions, for the reasons set out in this letter, as presently submitted, the Highway Authority would not be able to support an application if received, because it would not be in accordance with the published London Plan 2021 Policies T4 Assessing and mitigating transport impacts and T7 Deliveries, servicing and construction. It is however noted that an alternative layout for a single unit (accessed from the rear of the site) was suggested and this layout is likely to raise less highways concerns. The applicant is encouraged to investigate this option further in order to resolve the highways concerns. A further pre-application meeting on this revised layout is strongly advised.

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

**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.

**Karl Dafe  
Principal 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.**

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