



Your Ref: 63099/APP/2023/1608
Our Ref: 34460/A5/EJ/SO

30th August 2023

Karl Dafe
Planning Department
Hillingdon Council
Civic Centre
High Street
Uxbridge
UB8 1UW

BY EMAIL ONLY

Dear Karl,

RE: 84 SWALLOWFIELD WAY, HAYES – APPLICATION REF: 63099/APP/2023/1608 - SUBMISSION OF PLANNING AMENDMENTS

We write on behalf of Wrenbridge (FRELD Hayes) LLP (the Applicant) in relation to Application Ref. 63099/APP/2023/1609 at 84 Swallowfield Way, Hayes (the Site). The application is submitted for:

“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.”

Following receipt of consultation responses received on the Planning Application to date, this letter and its enclosures comprise formal amendments and consultee responses submitted by the Applicant to the London Borough of Hillingdon.

In summary, the amendments and responses address comments from the following consultees:

- Local Planning Authority
- Urban Design Officer
- Policy Officer
- Transport for London
- Hillingdon Highways Officer
- Air Quality Officer
- Drainage Officer
- Contaminated Land Officer

The amendments principally relate to changes to the Proposed Site Plan reflecting comments received from Transport for London and Hillingdon Highways. The remainder of this letter summarises our responses to consultees with additional information submitted as necessary.

Updated Plans and Documents

As part of amendments, a number of new plans and documents which explain the proposed changes have been prepared, some of which supersede previous versions. The table below sets out where a plan or document is superseded, updated or submitted as new or additional information.

Document Title	Previous Version Reference	Updated Reference / Reference Number
Proposed Site Plan	H067-CMP-SI-ZZ-DR-A-00100_PL12	H067-CMP-SI-ZZ-DR-A-00100_PL15
Drainage Response - LLFA	N/A – New Document	65208809-SWE-XX-XX-T-S-0201-P02
Remediation Strategy Verification Plan	N/A – New Document	507947.0003.0000 (August 2023, Version 2.0)
Highways Technical Note	N/A – New Document	N03-DC-Highways Response 230815
Travel Plan	N/A – New Document	R02-AD-Travel Plan 230731
Construction Logistics Plan	N/A – New Document	R04-DC-CKP 230525
Verified Views (1 of 4)	N/A – New Document	2922_1001_BM
Verified Views (2 of 4)	N/A – New Document	2922_1002_BM
Verified Views (3 of 4)	N/A – New Document	2922_1003_BM
Verified Views (4 of 4)	N/A – New Document	2922_1004_BM
Verified Views Methodology	N/A – New Document	2922_Swallowfield Way Hayes – Methodology

The latter part of the letter explains the Applicant's response to the comments.

Urban Design Officer – Response

As set out in the comments received from the Councils Urban Design Officer (dated 16.06.23), the officer raised two key points; the heights of surrounding buildings and key views from Stockley Park.

The applicant has provided a number of verified views to show how the proposal will assimilate itself with the surrounding industrial and logistics context. Three of these views were agreed with the case officer on 27th April 2023 with the additional view from Stockley Park agreed on 28th July 2023.

We understand the key views for the Councils consideration are from Stockley Park to the North and Snowdon Crescent to the south.

- Stockley Park: AVR 1001 demonstrates the proposal is not visible from the agreed viewpoint. Furthermore, there is an existing building on the skyline which reflects the nature of the viewpoint towards an allocated industrial and logistics location. As shown by the red wireline, the proposal also sits low on the horizon in any eventuality. The verified view has been reviewed by the Heritage Consultant and it is confirmed the conclusion of the submitted Heritage Assessment remains unchanged. They confirm the proposal results in no harm to the setting of Stockley Park and as such, the proposal accords with Policies HE1: Heritage, Policy DMHB 1: Heritage Assets and Policy DMHB 8: Registered Historic Parks, Gardens and Landscapes of the Hillingdon Local Plan.
- Snowdon Crescent: AVR 1003 demonstrates there will be glimpsed views of the proposed buildings and it has been acknowledged that it sits higher than its immediate surroundings. As an allocated employment area, there are also glimpsed views of other industrial and logistics buildings however these are now dated and predate the adopted London Plan. Furthermore, the site is located circa 70m north of the closest residential gardens and is separated by the existing elevated railway line serving the Hayes & Harlington Station. The proposed building would not be a standalone dominating feature and will deliver a high quality, modern building with a palette of materials supported by the Urban Design officer. Further details are set out in Section 9 of the submitted Design and Access Statement. Moreover, the Council has approved previous schemes whereby buildings of this nature

are visible from residential areas including Segro Park (1331/APP/2017/1883) and Prologis Park (18399/APP/2013/1019).

While it is acknowledged the proposal is higher than its immediate surroundings, many of these existing buildings predate adopted planning policy and do not meet the requirements of modern occupiers. Further, they do not reflect the growing and identified need for intensification of Industrial and Logistics floorspace in Greater London. Further details of this are set out in Chapter 6 of the submitted Planning Statement with the accompany Verified Views demonstrating the proposal will not have an overbearing presence on the area.

The Site is located within a Strategic Industrial Location (SIL) with both the London Plan Policy E7 and Hillingdon Local Plan Part 2 Policy DME 1 emphasising the need to intensify floorspace within SILs. There is also growing pressure on making efficient use of land, set out in Chapter 11 of the NPPF which states Councils should make as much use as possible of previously developed land. Furthermore, the building height was reduced following pre-application discussions from 18.8m to 15.7m at its maximum.

The building will deliver high quality floorspace which meets the requirement of a modern occupier in this location. The proposed building is for 12.5m u/s of haunch and this is expected in a Greater London last mile location to meet intensification and operational racking requirements of end occupiers. The high quality palette of materials proposed has been supported by the Urban Design officer and the proposal will demonstrate an appropriate redevelopment of the site in accordance with national, regional and local planning policy.

We are of the opinion the submitted Verified Views and methodology satisfy the Urban Design Officers comments and demonstrate the height of the proposed building in relation to the surrounding buildings and show the necessary key view, as agreed with officers.

Policy Officer

We accept a condition to restrict the Use Classes within Use Class E(g)(iii) as per the description of development. We also recognise that due to a lack of sufficient information submitted alongside the planning application, it will also be necessary to restrict the use of the site as a data centre. If interest in the Site was to come forward for a data centre a S73 application would be submitted, with additional information, to vary the condition.

Transport for London and Hillingdon Highways Officer

In response to consultee feedback received from both Transport for London (TfL) and Hillingdon Highways, Vectos has prepared a Highways Technical Note setting out our responses and providing additional information when required.

As part of the Active Travel Zone (ATZ) assessment, a night-time audit was conducted along key routes. The response sets out further details on the routes to the site including 1 (Blyth Road) and 5 as requested. The applicant has amended the Site Plan (H067-CMP-SI-ZZ-DR-A-00100_PL15) to incorporate zebra crossings across the service yards to ensure enhanced safety across the site. A signage plan is also set out in Appendix A to demonstrate how a safe and suitable route can be achieved by all users of the site. While it is noted the need to reduce reversing in the Site, an element of reversing is required to unload / load HGVs and park vehicles. The site will be a low speed environment and reversing is typical of this type of building across London and the wider area.

We note the request for £132,000 via S106 contribution for healthy streets. However, no information has been provided to set out how the request meets the tests for planning obligations as set out in The Community Infrastructure Levy Regulations 2021 (as amended) Part 11, Regulation 122. The regulations require the Council to set out the following:

- (a) [why the obligations is] necessary to make the development acceptable in planning terms;

- (b) [how the payment is] directly related to the development; and
- (c) [how the payment is] fairly and reasonably related in scale and kind to the development

The request for payment via an obligation has not set out what mitigation would be put in place that is directly relatable to the development, and why it is required to make the application acceptable in planning terms. This also flows through to paragraph 57 of the National Planning Policy Framework

Further Traffic Surveys have also been submitted to establish baseline traffic flows on the local highway network surrounding the site. Classified Turning Counts (CTCs) and Queue Surveys were undertaken at the Dawley Road/ Swallowfield Way roundabout.

We have also submitted a framework Construction Logistics Plan as requested by TfL, and a full plan would need to be secured by condition to be discharged prior to commencement. The Travel Plan has been updated and provided as part of this planning addendum.

Air Quality Officer

The applicant is still undertaking work in relation to air quality and we will respond to this under separate cover.

Drainage

Sweco have prepared a response to the Drainage officer received on 12th July 2023. The response includes updated drainage calculations based on revised site area figures. The response does not result in any proposed amendments to the site layout.

While the applicant considered rainwater harvesting methods, the water use on a scheme of this type is relatively small and irregular. The applicant has chosen to maximise the available roof space for photovoltaic panels (PVs) and roof lights which has been considered a priority to minimise energy use and ensure a maximum EPC A+ rating can be achieved. Further details are set out in the previously submitted Energy Statement (Rev P2, March 2023). Justification is also provided as to why infiltration isn't appropriate on this site and additional detail on the surface water features is also provided.

Contaminated Land Officer

As set out in comments received from the Contaminated Land Officer (31.05.23), it is acknowledged the submitted Phase II indicated that various contaminative substances are present. As a result, the officer has recommended a number of pre-commencement conditions are imposed on any planning consent. The recommended conditions are for a Remediation Scheme and Written Method statement to set out how contamination will be dealt with on the site.

In order to reduce the number of pre-commencement conditions, as set out in Planning Practice Guidance (Paragraph: 018), the Applicant has prepared a Remediation Strategy to prevent the need for this to be a pre-commencement condition, instead the Strategy can just be conditioned for compliance.

Summary

This letter and its enclosures comprise formal amendments to planning application ref. 63099/APP/2023/1609 submitted to the London Borough of Hillingdon by Wrenbridge (FRELD Hayes) LLP.

The amendments and responses have been made to directly respond to comments by the Local Planning Authority, the Urban Design Office, the Planning Policy Officer, Transport for London, the Hillingdon Highways Officer, Drainage Officer and the Air Quality Officer.

I would be grateful for confirmation of receipt and registration of this submission. Please do not hesitate contact me if you require further information.

Yours sincerely,



Edward Jones
Planner
on behalf of Stantec UK Ltd

Encs: