



Planning Statement

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Contents

1.	Introduction.....	4
2.	Site Context	7
3.	Planning History.....	9
4.	Pre-Application Discussions and Consultation	10
5.	Application Proposals	16
6.	Planning Policy Framework and Overview	18
7.	Planning Policy Assessment.....	22
8.	Conclusions.....	33



1. Introduction

- 1.1 This Planning Statement has been prepared by DP9 Ltd ('the Agent') on behalf of RGP Holdings Limited ('the Applicant') in support of a temporary planning application for the erection of two single storey buildings for industrial use and associated works at Land to the east of Craufurd Industrial Estate, Silverdale Road, Hayes, UB3 3BL ('the Site').
- 1.2 This application is hereby submitted to the London Borough of Hillingdon (LBH) and this Planning Statement sets out the planning case in support of the proposals in the context of relevant national, regional and local policy guidance.
- 1.3 This application seeks temporary planning permission for the following description of development ('the proposed development'):

"Temporary planning permission for the erection of two buildings for industrial use and associated works."
- 1.4 The proposal does not seek to change the use of the site, given it is already within an industrial use, but seeks permission for the erection of 2 building structures for meanwhile industrial use (Class B2/B8) of up to 5 years. The long-term vision for the Site is to bring forward a residential masterplan as in dictated in the LBH Local Plan. However, in the short-term, it is intended to make better use of this industrial land by delivering an improved and more controlled operation of the current industrial uses. This would be achieved through a temporary planning permission for the erection of two industrial buildings on the Site. This would replace the current open storage and industrial uses and would create a more controlled, regularised and ultimately more appropriate industrial use.
- 1.5 The proposed development will serve to revitalise the Site and make better use of the land by removing the open storage and replacing this with a controlled and managed building/operation. This will reduce noise and dust emissions to improve the amenity for neighbouring properties. The proposals will provide an enhancement to the nearby Grade II Listed Building with the proposed new industrial buildings, which have been sensitively designed to a high-quality. The proposed development will also create 12 no. of cycle parking spaces and 6 no. car parking spaces in a more regularised manner with safe and secure pedestrian, cyclist and vehicular accesses. Furthermore, the scheme will introduce urban greening and landscaping including the provision of 19 new trees to enhance biodiversity on site.



1.6 This application has been subject to extensive pre-application engagement with the LBH since 2023 and most recently in April 2025. Further information regarding these discussions is provided in Section 4 of this Planning Statement.

1.7 This Planning Statement should be read and considered in conjunction with the following accompanying documents outlined below:

- Application Forms, Ownership Certificates, and CIL Form, prepared by DP9 Ltd;
- Architectural Drawings, prepared by WGI;
- Design and Access Statement, prepared by WGI;
- Landscaping Strategy (including Urban Greening Factor), prepared by Outerspace;
- Construction Environmental Management Plan, prepared by AEWC;
- Protected Species Walkover Survey Report, prepared by AEWC;
- Biodiversity Net Gain Report and Metric Assessments, prepared by AEWC;
- Transport Assessment (inc. Servicing Plan), prepared by TTP Consulting;
- Drainage Strategy, prepared by Morgan Engineering;
- Noise and Vibration Impact Assessment, prepared by Rappor;
- Air Quality Assessment, prepared by Rappor;
- Contaminated Land Survey and Report, prepared by GEA;
- Fire Statement, prepared by Fire Dynamics;
- Townscape and Heritage Statement, prepared by GJ Heritage Planning.

1.8 This Planning Statement is structured as follows:

- Section 2 describes the Site and the surroundings;
- Section 3 outlines the planning history of the site;
- Section 4 describes the pre-application process and consultation;
- Section 5 sets out the proposed development;



- Section 6 identifies the relevant national, regional and local planning policies;
- Section 7 assesses the development against the relevant planning policies;
- Section 8 provides the overall conclusions.



2. Site Context

- 2.1 The Site is located to the south of Silverdale Road within the eastern part of the Crauford Industrial Estate in the London Borough of Hillingdon (LBH). It is bounded by Silverdale Road to the north and residential houses beyond this on Chalfont Road. The site is bounded to the east and west by further industrial units and to the south by the Shackles Dock (part of the Grand Union Canal). The industrial and warehouse units to the west of the Site are within the Applicant's wider land ownership. The Site is located just to the east of Hayes Town Centre and is currently used by a concrete services company and for the storage of building materials.
- 2.2 The existing Site currently comprises of industrial uses with a range of hard standings, loading bays, and containers with open-air works providing concrete, aggregate and general building supplies. The Site is accessed from a service road which connects to Silverdale Road on the northern boundary of the Site. The Site is enclosed by a range of ad hoc fences, walls and retaining structures including the boundary along Shackles Dock which adjoins the south-west corner of the site.
- 2.3 To the south of the Site is the Shackles Dock which is a historic canal dock accessed from the Grand Union Canal. Shackles Dock is currently underutilised with refuse and overgrown planting towards the dock entrance and the Grand Union Canal. The Dock falls outside of the application Site.
- 2.4 In the adopted LBH Local Plan, the Site is allocated for residential-led mixed use development under Policy SA23. Further details of the Site Allocation SA23 are provided in Section 6. The Site is also adjacent to a Strategic Industrial Location (located to the east of the Site).
- 2.5 There are no statutorily or locally listed buildings on the Site, however, there is a statutory listed building in close proximity to the Site. The Grade II listed Benlow Works is located to the east of the Site which has historically operated as an industrial factory. The Benlow Works is included in LBH's Local Plan under Site Allocation SA24 and is identified as being suitable for release to mixed use development. The Site is not located within or in close proximity to a Conservation Area. Furthermore, the Site is located entirely within Flood Zone 1 and is therefore at low risk of flooding. There are no Tree Preservation Orders (TPOs) on or in close proximity to the Site.
- 2.6 The wider surrounding context of the Site comprises of a mix of uses including industrial, retail and residential uses. To the south west of the Site is Hayes and Harlington station which is served by the Elizabeth Line and national rail services. The



Site benefits from a Public Transport Access Level (PTAL) score of 4 which indicates a good level of accessibility through public transport.

Long-Term Vision of the Site

- 2.7 As noted in Section 1, the long-term vision for the Site and the immediate surrounding context within the Applicant's ownership is to bring forward a comprehensive, residential-led, mixed-use redevelopment for the entire landholding which includes the wider Crauford Industrial Estate. However, in the short-term, it is intended to make better use of this industrial land by delivering an improved and more controlled operation of the current industrial uses. This would be achieved through a temporary planning permission for the erection of two industrial buildings on the Site. This would replace the current open storage and industrial uses and would create a more controlled, regularised and ultimately more appropriate industrial use.
- 2.8 The long-term aspiration for a residential-led redevelopment of the Site and surrounding area reflects the vision of the adopted Local Plan for the area and the wider Site Allocation SA23. The work on the residential masterplan has begun and has also been subject to early pre-application meetings with the Council. This application seeks to make best use of the Site as an interim use and therefore seeks permission for temporary industrial buildings of high quality.



3. Planning History

3.1 There have been a number of planning applications at the Site, however, many of these applications are not considered relevant in the context of the emerging proposals for the Site.

3.2 Table 1 below sets out a summary of the key relevant planning history for the Site.

Reference Number	Description of Development	Decision Date	Decision
17956/S/94/0351	Change of use of former builders yard to yard for storage of street lighting materials, associated vehicles and retention of diesel tank and hard- standing (retrospective application)	17 th May 1995	Refused
17956/L/91/1237	Change of use of land and buildings from builders yard to bus parking area (retrospective application)	15 th October 1991	Refused
6224/H/85/1756	Erection of extension to manufacturing workshop including partial filling in of canal basin.	3 rd December 1985	Approved
6224/F/84/1391	Part 2 storey, part 3 storey industrial building with ancillary offices and car parking.	28 th September 1984	Approved
6224/E/83/1803	Erection of general industrial building with ancillary offices.	1 st May 1984	Approved
17956/B/79/1938	Erection of a building for use as a store	25 th April 1980	Approved
17956/A/79/1498	Erection of a 1,300 litre capacity adhesive store.	28 th April 1980	Approved

3.3 Due to the historic nature of the available planning applications, there are no documents available to view for the planning applications listed in Table 1.

3.4 The Site has been in operation for industrial uses for many years. The existing use is therefore industrial and storage (Class B2/ B8).



4. Pre-Application Discussions and Consultation

Planning Pre-Application Discussions

- 4.1 Prior to the submission of this application, several pre-application discussions have taken place which have informed the Proposed Development. This section provides an overview of this extensive process with LBH.
- 4.2 The proposals intend to make better use of this industrial land by delivering an improved and more controlled operation of the current industrial uses through a temporary planning permission for two industrial units. This was presented to the Council at a pre-application meeting in April 2025 (ref. 71374/PRC/2025/53). The written feedback from the pre-application is summarised below:
- Principle of development: Given the nature of the use and the erection of substantial structures, reassurance is needed regarding the timescales of the development and that the long-term proposal and vision for the Site is residential in line with the Local Plan. The Council recognised the desire to enable a more efficient and productive use of the site before a more permanent solution is brought forward.
 - Design: The height and appearance of the industrial units were considered acceptable within the site context and appropriate given the industrial use. However, it was noted that the units should be set back from the Silverdale Road boundary to reduce the impact on the residential amenity of neighbouring properties in terms of noise and disturbance. The boundary treatment should be carefully considered to provide screening and provide a better and more sympathetic relationship to the street including landscaping, where possible, to soften the boundary. A scheme comprising two industrial units arranged further back would be more appropriate for the site, to allow for more generous space between the buildings to prevent conflicts between users.
 - Amenity: It was considered that the siting of the buildings has the potential to impact on daylight and sunlight to windows serving habitable rooms and gardens, and noise given the distance between the proposed buildings and the nearby dwellings. Details to demonstrate the distances and impact is acceptable was requested.
 - Transport: Concerns were raised regarding the layout and whether a safe, segregated pedestrian and cyclists' entrance can be provided to ensure that safe access and egress from the units and the Site itself can be provided.



4.3 Following the written pre-application advice, the scheme was amended further in response to the feedback. This included an amended layout to create 2 units instead of 3 and the provision of additional landscaping. Updated plans were issued to the case officer and feedback was provided via email in July 2025. The feedback is summarised below:

- The development is considered appropriate in terms of building heights and in terms of its architecture and materiality and is considered to be appropriate given the industrial use being proposed.
- The proposed unit to the north has been slightly set back from the boundary to Silverdale Road to allow some soft landscape on the edge, however, concerns remained regarding the impact on the residential amenity of the neighbouring properties. Further information to show this relationship is acceptable should be provided.
- It is important that separate routes are provided to ensure the safety and security of the different types of users, notably pedestrians and cyclists.
- The unit adjacent to the water inlet has been pushed back on the boundary line to create more space at the front, however, the size and details of this space should be considered further.
- It was suggested that trees should be introduced within the proposals.
- Additional separation is afforded to the neighbouring dwelling to the north of the site (1 Chalfont Road), however, the rear elevation of the building remains close, and it must be demonstrated that the development would not impact adversely on daylight/sunlight to this property.

4.4 Following the April 2025 pre-application meeting, the proposals have been updated in line with the written feedback received (ref. 71374/PRC/2025/53) from the Council and are now being submitted as part of this application. The feedback received throughout the pre-application phase has directly informed the proposals now the subject of this application.

4.5 It should be noted that in May 2023, a pre-application meeting was held with officers from LBH to discuss a residential-led proposal at the Site (and the wider adjoining land holdings). We understand that the case officer has since left the Council. The scheme is at the masterplan stage, and some of the feedback related to detailed matters will of course need to be tested later in the design process. We have since refined and adjusted the masterplan and sought to respond to the strategic points in relation to placemaking, layout, density, residential quality, relationship to the inlet and relationship to the locally listed building.



- 4.6 The proposals are still being developed with regard to the long-term strategy for a residential scheme in this location in the context of the emerging Local Plan. The long-term vision for the Site and the immediate surrounding context within the Applicant's ownership is to bring forward a comprehensive, residential-led, mixed-use redevelopment for the entire landholding. However, in the short-term, it is intended to make better use of this industrial land by delivering an improved and more controlled operation of the current industrial uses through a temporary planning permission for two industrial units.
- 4.7 The below sub-sections (and Section 5 of the submitted Design and Access Statement) set out how the proposed development has addressed the feedback received from LBH on the key pre-application discussions.

Principle of Development

- 4.8 The pre-application feedback noted that further reassurance is needed regarding the timescales for the development and its temporary nature. Nonetheless, the Council recognised the desire to enable a more efficient and productive use of the site during the intervening period between now and the date at which development can commence on a more permanent residential-led scheme.
- 2.10 The current scheme addresses this by providing clarity on the intentions for the Site in the short and long term (see paragraph 2.7 of Section 2 for reference). This application seeks to make best use of the Site as an interim use and therefore seeks permission for temporary industrial buildings of a high quality.

Design

- 2.11 Initially, the pre-application feedback noted that the units should be set back from the Silverdale Road boundary to reduce the impact on the residential amenity of neighbouring properties in terms of noise and disturbance. The boundary treatment should be carefully considered to provide screening and provide a more sympathetic relationship to the street including landscaping to soften the boundary. A scheme comprising two industrial units arranged further back was suggested to allow enough space around the buildings to resolve pedestrian and cycling movement through the Site and to provide adequate turning areas.
- 2.12 Following this, the scheme was revised from 3 industrial units to 2 industrial units as per the feedback to break down the massing and these units have been set back to allow for space around the buildings.



- 4.9 Further feedback was received from LBH to confirm that the development is considered appropriate in terms of building heights, architecture and materiality and is considered to be appropriate given the industrial use being proposed. However, comments were raised about maximising the landscaping, softening the boundary treatment further and introduction trees if possible.
- 4.10 The proposals have been updated to ensure there is sufficient space for landscaping and pedestrian, cycling and vehicular movements. The two proposed buildings are now positioned to align with the service road and service yard to the east of the Site, and Silverdale Road to the north giving two clear frontages parallel to those boundaries. The western frontage to the unit positioned at the north of the Site faces the parking and service courtyards and includes both the building entrance (for pedestrians) and the loading bay. For the unit positioned at the south of the Site, the western frontage faces Shackles Dock and includes the building entrance, and the northern frontage which faces the service courtyard as it extends between the two buildings includes the loading bay. The northern gable frontage on Silverdale Road has also been moved further from 1 Chalfont Road to increase the boundary area for landscaping in response to feedback and to make a more contextually and neighbourly building.

Landscaping

- 4.11 The written pre-application feedback requested that soft landscaping and trees should be incorporated into the proposals. This would assist with placemaking and enhance the Site was existing.
- 4.12 In response to the feedback, the northern gable frontage on Silverdale Road has been moved further from 1 Chalfont Road to increase the boundary area for landscaping and enhance the relationship from existing and create a neighbourly industrial building. Landscaping is now provided in various parts of the Site, including around the boundary with Shackles Dock, and to the northern boundary alongside Silverdale Road. The landscape strategy has sought to maximise and enhance the soft landscape where possible to provide biodiversity enhancement as well as visual amenity. The hard landscape strategy has been developed to ensure clear legibility within the site and connectivity into its context for both pedestrians as well as vehicles.
- 4.13 In response to the Council's request for more landscaping including trees, 19 new trees are proposed to provide visual amenity to the site perimeter and to soften the



proposed buildings and associated parking/access yard. Overall, the proposals seek to enhance the inlet through landscaping and placemaking.

Amenity

- 4.14 The pre-application feedback initially considered that the siting of the buildings has the potential to impact on daylight and sunlight to windows serving habitable rooms and gardens, and noise given the distance between the proposed buildings and the nearby dwellings. Details in relation to the Daylight and Sunlight impact was requested.
- 4.15 The gable (north) elevation of the unit proposed in the northern section of the Site is set approximately 16.8m away from the ground floor of 1 Chalfont Road and has no windows. This dimension has been increased from 15m following feedback to address the concerns regarding amenity impacts. As there are no windows in the north gable of this unit, there is no impact on the privacy (i.e. no overlooking) to surrounding residential properties, in particular No.1 Chalfont Road. This is a typical distance and relationship for properties across a street and given the reduced noise, dust and odour impacts from the existing use of the land, this would result in an improved relationship to the residential properties.
- 4.16 The submitted DAS contains a section (see Daylight/Sunlight Impact in Section 6) to address the daylight and sunlight concerns for the surrounding properties. Overall, it is concluded that the proposed development passes both the daylight and sunlight tests set out in the guidance in BRE document BR209. A Noise Impact Assessment, prepared by Rappor, has been submitted in support of this application which concludes that the proposed development would not cause an unacceptable adverse impact on the acoustic environment at nearby noise-sensitive receptors. Similarly, the Air Quality Assessment, prepared by Rappor, concludes that the proposed development will have an insignificant impact on air quality and it is considered to be an improvement to current site operations where higher traffic flows and dust generation would contribute considerably more to poor air quality than the operations of the light industrial units proposed. Therefore, the proposals have addressed any previous concerns regarding amenity and offer an improvement to the current site operations.

Transport



- 4.17 Initially, concerns were raised regarding the layout and whether a safe, segregated pedestrian and cyclists' entrance can be provided to ensure that safe access and egress from the units and the Site itself can be provided.
- 4.18 The follow-up pre-application advice noted that it is important that separate routes are provided to ensure the safety and security of the different types of users, notably pedestrians and cyclists.
- 4.19 The layout of the proposals including the rectangular shaped buildings and service courtyard consolidates the servicing of the extended Craufurd Industrial Estate through one clearly identifiable entrance off Silverdale Road. The service area is contained within the industrial estate and has minimal impact and visibility to the surrounding area. This allows for safer vehicle movements in and out of the site and within the extended area off the estate access road. It also reinforces the identity of the extended estate with the single vehicular access point off Silverdale Road.
- 4.20 A separate and secure access gate is provided on Silverdale Road, near the entrance to the unit towards the north of the Site for both pedestrians and cyclists. By separating this from the main vehicular access point, a safer access route to and from the Site for both pedestrians and cyclists is now provided. Within the site, 2m wide footpaths also provide separate, safe access to parking areas, cycle parking, refuse stores and the entrance to each unit. Overall, the pre-application advice has been addressed by providing a safe and separate access for pedestrians and cyclists.
- 4.21 The section below provides an overview of the application proposals.



5. Application Proposals

Description of Development

- 5.1 This application seeks full planning permission for the following description of development ('the proposed development'):

"Temporary planning permission for the erection of two buildings for industrial use and associated works."

Proposed Development

- 5.2 This application seeks a temporary planning permission for the erection of two single storey buildings for industrial use (Class B2/B8) and associated works. It is envisaged that the temporary planning permission would be for 5 years and the duration will be secured by planning condition. It should be noted that we expect a planning condition to be attached to the decision notice to require the removal of the structures after a period of 5 years.
- 5.3 In summary, the proposed development will comprise of the following:
- The erection of two single-storey buildings (Units A1 and A2) for industrial use (Class B2/B8) – located on an existing open industrial/ storage Site;
 - Service courtyards and a loading bay;
 - 6 no. of car parking (4 standard and 2 blue badge spaces);
 - 12 no. of cycle parking spaces (8 standard and 4 cargo bikes);
 - Landscaping (including 12 new trees) and associated works.
- 5.4 The full extent of the proposals is shown on the submitted scheme drawings and described within the accompanying Design and Access Statement.
- 5.5 The accommodation schedule provided in the table below provides the GIA and GEA floorspace figures for Units A1 and A2. It should be noted that Unit A1 contains a mezzanine level as part of the proposed development.



Unit	Level	GEA (m2)	GIA (m2)
A1	Ground floor	510.41	469.56
	Mezzanine	86.77	75.18
A2	Ground floor	471.49	432.39
TOTAL		1068.67	977.13

Figure 1: Accommodation Schedule



6. Planning Policy Framework and Overview

6.1 Section 38(6) of the Planning and Compulsory Act 2004 requires any planning application to be determined in accordance with the development plan (i.e. Planning Policy), unless 'material considerations' indicate otherwise. This section provides a brief summary of the key planning policies relevant to the Site and its redevelopment. The planning policy context comprises three levels of adopted and emerging policy from national, regional and local policies. Within each level, there is both planning policy and guidance which combine to provide the framework for the consideration of the proposed development.

National Planning Policy

6.2 National planning policy is set out in the form of the revised National Planning Policy Framework (NPPF), which was most recently updated in February 2025. At the heart of the NPPF is a presumption in favour of sustainable development (Paragraph 11), with three overarching objectives: economic, social and environmental. These are to be delivered through the preparation and implementation of plans and the application of policies within the NPPF. To note, a draft NPPF has been published and is open for consultation from the 16th of December 2025 - 10th of March 2026. The consultation seeks views on a revised version of the NPPF which includes planning reforms and other changes to the planning system.

6.3 For decision making, the presumption of sustainable development means approving development proposals that accord with the development plan without delay and where the development plan is absent, silent or out of date, granting planning permission unless the adverse impacts of doing so would significantly and demonstrably outweigh the benefits of development, or specific policies in the NPPF indicate otherwise.

The Development Plan

6.4 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that proposals are determined in accordance with the statutory Development Plan unless material considerations indicate otherwise. Where there is a difference in policy, Section 38(5) requires that the most recently adopted policy takes precedence.

6.5 The Statutory Development Plan for the Site comprises the following:

- The London Plan (2021);



- Hillingdon Local Plan Part 1: Strategic Policies (2012);
- Hillingdon Local Plan Part 2: Development Management Policies (2020);
- Hillingdon Local Plan Part 2: Site Allocations and Designations (Adopted 2020).

6.6 There are no Supplementary Planning Documents or Guidance under the Local Plan that are relevant to the proposals. The London Plan Guidance (LPG) and Supplementary Planning Guidance (SPG) under the London Plan (2021) are material considerations but do not form part of the Development Plan. The relevant London Plan documents include:

- Draft Industrial Land and Uses LPG (December 2023)
- Draft Fire Safety LPG (February 2022)
- Characterisation and Growth Strategy LPG (June 2023)
- Optimising Capacity - A design-led approach LPG (June 2023)
- Planning for Equality and Diversity in London SPG (October 2007)
- Accessible London SPG (October 2014)
- Urban greening factor LPG (February 2023)
- The control of dust and emissions in construction SPG (July 2014)
- Sustainable Transport, Walking and Cycling LPG (March 2023)

6.7 To note, the Greater London Authority (GLA) are in the process of reviewing the London Plan. An initial consultation period ran for six weeks from Friday 9 May 2025 to Sunday 22 June 2025. Following this consultation, a full draft London Plan is anticipated to be published in 2026. It is anticipated that the Draft London Plan consultation will take place in the Summer of 2026.

6.8 LBH are also in the process of reviewing their Local Development Plan. An initial call for views consultation (Regulation 18) was completed on the 24th of June 2024 (to which the Applicant responded) which was the first stage of consultation for the new Local Plan. The next consultation (Regulation 19) on the proposed submission version of the Local Plan was programmed for early 2025, however, this has not yet been published.

Site Designations

6.9 The adopted Hillingdon Local Plan Policies Map (2020) shows that there are no designations applicable to the Site other than it being allocated for development (see below). However, the Site is adjacent to a Strategic Industrial Location (located to the east of the Site).

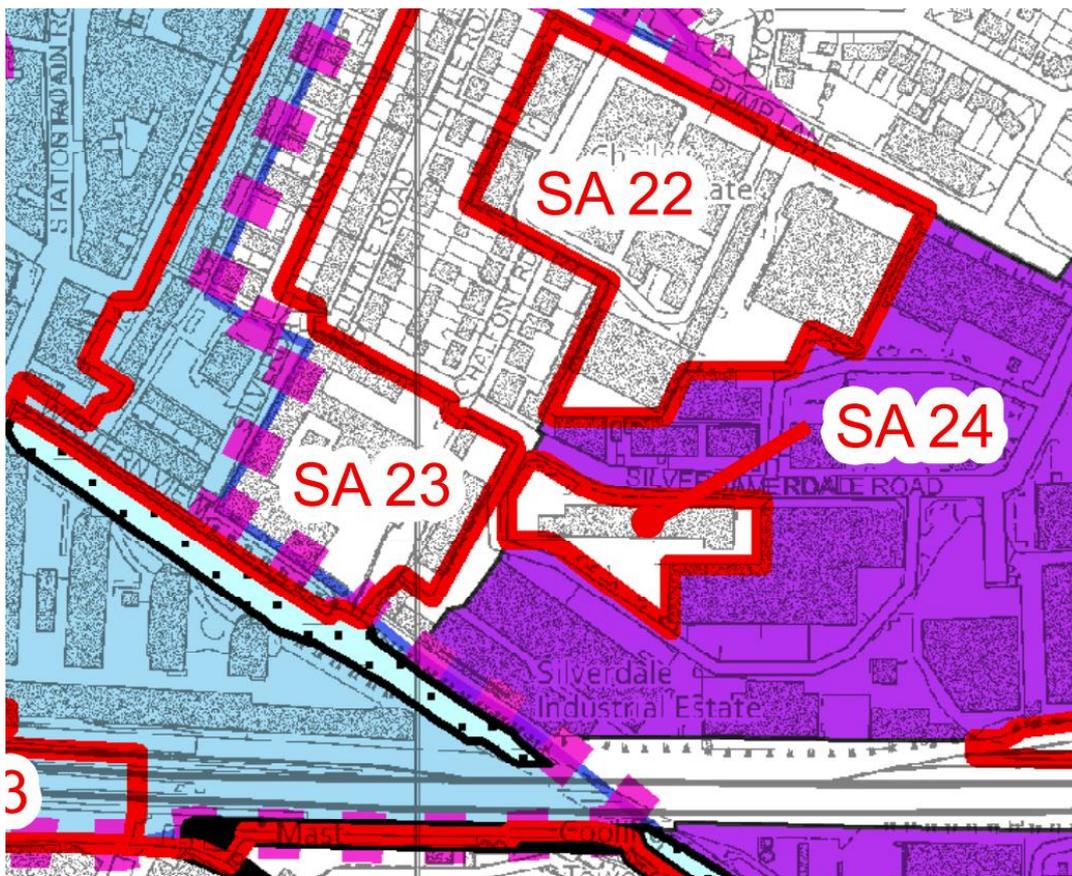


Figure 2: Adopted Local Plan Policies Map Extract

Site Allocation

- 6.10 The Site forms part of a wider site allocation (SA23) contained within the Hillingdon Local Plan Part 2 (Silverdale Road/Western View). Site SA23 is divided into three parcels (Sites A, B and C). The Proposed Development would be located on Site A, the easternmost parcel of the site. Policy SA23 is permissive of the provision of residential-led mixed-use development on the site for 122 units.
- 6.11 In relation to all of the parcels of land falling under site allocation SA23, the following criteria apply:
- The Council will expect comprehensive development across the whole site and consideration should be given to the feasibility of linking both site elements to Hayes Town Centre.
 - Proposals should include a heritage assessment which considers the retention and reuse of Locally Listed structures.



- Amenity space and car parking should be provided in accordance with the standards set out in the Council's Development Management Policies document.
- Development should include active frontages at ground floor level and be designed to maximise the canal frontage.
- Development should incorporate canal side improvements to be agreed with the Council and enhance the Strategic Canal and River Corridor, in accordance with relevant policies on the Blue Ribbon Network.

6.12 As outlined earlier in this document, the long-term vision for the Site continues to be aligned with this Site Allocation. The Applicant is developing a comprehensive residential-led masterplan for the wider site and has discussed the early thinking with the Council at a pre-application meeting.

6.13 This application is for a temporary industrial application that makes better use of the existing industrial site and enhances its relationship to its neighbours in the short term.



7. Planning Policy Assessment

7.1 This section seeks to appraise the Proposed Development against the relevant planning policies. This section is structured as follows:

- Principle of Development
- Design and Heritage;
- Landscaping;
- Transport, Access and Servicing;
- Biodiversity and Ecology;
- Daylight and Sunlight;
- Noise;
- Drainage;
- Fire.

Principle of Development

7.2 At the heart of the NPPF is a presumption in favour of sustainable development (paragraph 11). For decision taking, this means approving development proposals that accord with an up-to-date development plan without delay.

7.3 London Plan Policy E4 states that future demand for industrial and related functions should be provided and maintained, including light and general industry (Class B1c and B2) and storage and logistics/distribution (Use Class B8). The retention, enhancement and provision of additional industrial capacity across industrial land should be planned, monitored and managed. London Plan Policy E7 states that proposals should be proactive and encourage the intensification of business uses in Use Classes B1c, B2 and B8 occupying all categories of industrial land.

7.4 Local Plan Policy E1 states that the Council will accommodate growth by protecting Strategic Industrial Locations and the designation of Locally Significant Industrial Sites (LSIS) and Locally Significant Employment Locations (LSEL) including the designation of 13.63 hectares of new employment land. Local Plan Policy DME 1 states that development adjacent to SILs, LSIS and LSELS must be located and/or designed so as to not to compromise the integrity or operation of these employment areas.

7.5 As identified in the planning history section of this Planning Statement, the Site currently comprises of general industrial and storage uses (Class B2 and B8) and is located within an industrial estate and adjacent to Strategic Industrial Land. Given it is already within an industrial use, this application seeks permission for the erection of



2 building structures for meanwhile industrial use (Class B2/B8) up to 5 years. The principle of the continued use is therefore clearly acceptable.

- 7.6 Planning benefits will be realised by making better use of this industrial land enhancing its relationship to neighbouring development (by reducing noise/ dust and any ad hoc activities).
- 7.7 The short-term nature of the application (we anticipate a time limiting condition) means there is no conflict with the adopted Site Allocation and a residential-led masterplan is currently being developed for the wider Site Allocation. The proposals enable a more efficient and productive use of the site during the intervening period between now and the date at which development can commence on a more permanent residential-led scheme.
- 7.8 It should also be noted that in the draft NPPF, one of the key significant reforms being proposed is in relation to boosting local and regional economic. This includes encouraging economic growth by giving substantial weight to the benefits of supporting business growth and to particular areas and sectors including those named in the Industrial Strategy. Draft Policy E2 proposes that substantial weight should be given by the decision-maker to the economic benefits of proposals for commercial development (with particular references included to certain areas, e.g. supporting improvements in industrial uses). Therefore, the proposed development would also align with the draft NPPF policies for industrial uses.

Design and Heritage

- 7.9 Paragraph 135 of the NPPF sets out that development should be visually attractive as a result of good architecture, layout and appropriate and effective landscaping. Development is required to establish or maintain a strong sense of place, using the arrangements of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit.
- 7.10 At a regional level, London Plan Policy D4 outlines that the form and layout of a place should enhance local context by delivering buildings and spaces that positively respond to local distinctiveness, which have clearly defined public and private realms. London Plan Policies GG2, D1 and D2 seek to ensure that new development responds positively to local form, style and appearance to effectively integrate into the local character of an area, positively relate to the natural environment, respect and enhancement of the historic environment and be of high-quality. London Plan Policy D3 requires developments to optimise capacity through a design-led approach, by



responding to a site's context, capacity for growth and supporting infrastructure capability.

- 7.11 Local Plan Policy BE1 and Policy DMHB 11 outline how the Council will require all new development to improve and maintain the quality of the built environment in order to create successful and sustainable neighbourhoods including achieving a high quality of design in all new buildings. The policies state that proposals should make a positive contribution to the local area in terms of layout, form, scale and materials and seek to protect the amenity of surrounding land and buildings, particularly residential properties.
- 7.12 Local Plan Policy HE1 states that the Council will conserve and enhance Hillingdon's distinct and varied environment, its settings and the wider historic landscape, which includes any listed buildings. Policy DMHB 2 notes that planning permission will not be granted for proposals which are considered detrimental to the setting of a Listed Building. Policy DMHB 11 states that proposals should protect features of positive value within and adjacent to the site, including the safeguarding of heritage assets.
- 7.13 As noted in Section 4 of this Planning Statement, the proposals have evolved positively in line with the pre-application feedback received from the Council to address any previous concerns. The scheme has been revised from providing 3 industrial units to 2 industrial units, to break down the massing and to further set back the buildings to allow for more space around the units. This has ensured that there is sufficient space for landscaping and pedestrian, cycling and vehicular movements now. The northern gable frontage on Silverdale Road has also been moved further back from 1 Chalfont Road to increase the boundary area for landscaping in response to the feedback and to make a more contextually suitable building. Please see the submitted DAS and drawings for full details of the proposed design.
- 7.14 The Grade II listed Benlow Works is located to the east of the Site which has historically operated as an industrial factory. The Benlow Works, currently unoccupied and in a dilapidated state of repair, is included in LBH's Local Plan under Site Allocation SA24 and is identified as being suitable for release to mixed use development. The design provides an efficient and functional site layout with simple, industrial buildings which fit into the largely industrial surroundings and yet respect both the residential properties to the north of the site as well as the heritage of the Benlow Works nearby to the east. To respond positively to the Benlow Works the horizontal profile cladding is in a "copper beech" colour as a visual reference to the listed building. The submitted Townscape and Heritage Assessment, prepared by GJHP, concludes that the design of the scheme enhances the relationship of the Site to this heritage asset, and confirms



that there will be harm to the heritage asset. This represents another planning benefit of the proposal.

- 7.15 It should be noted that the proposals are for temporary buildings and this is reflected in the use of façade materials with high quality metal cladding which can be dismantled given the temporary nature of the planning permission. Overall, the proposals have been revised in response to the pre-application feedback received from LBH and it was confirmed that the development is considered appropriate in terms of building heights, architecture and materiality. Therefore, the proposed development provides a high-quality industrial scheme which both protects and enhances the surrounding environment including the nearby Grade II Listed Benlow Works.

Landscaping

- 7.16 London Plan Policy G5 (Urban Greening) states that proposals should incorporate measures such as high-quality landscaping (including trees), and nature-based sustainable drainage. The policy also states that a target score of 0.3 is recommended for major predominately commercial developments (excluding B2 and B8 uses). The supporting text for Policy G5 states that whilst the target score of 0.3 does not apply to B2 and B8 uses, these uses will still be expected to set out what measures they have taken to achieve urban greening on-site and quantify what their UGF score is.
- 7.17 Local Plan Policy DMHB 14 states that all developments will be expected to retain or enhance existing landscaping, trees, biodiversity or other natural features of merit. Development proposals will be required to provide a landscape scheme that includes hard and soft landscaping appropriate to the character of the area and supports and enhances biodiversity.
- 7.18 The landscape strategy as proposed has maximised and enhanced the soft landscaping where possible to provide biodiversity enhancement as well as visual amenity. The hard landscaping strategy has been developed to ensure clear legibility within the Site and connectivity into its context for both pedestrians as well as vehicles. Please see the submitted Landscaping Strategy and drawings for full details.
- 7.19 Native boundary planting forms a buffer to the south-western periphery of the site. Species have been selected to support wildlife and biodiversity with blossom and berries providing local birds and pollinators with shelter and food. Remaining planting areas comprise of attractive mid-low level ornamental shrub and herbaceous planting and groundcover planting within the planting beds further north into the site. Species



have been selected to provide year-round interest, comprising of flower rich evergreen and deciduous species for pollinators. The proposed palette comprises of low-maintenance planting, with a mix accommodating both drought tolerant as well as flood resistant species.

- 7.20 The tree planting strategy includes the proposal of 19 new trees which will provide visual amenity to the Site perimeter and soften the proposed industrial units and associated parking/access yard. This is a planning benefit and will enhance the Site from the existing context. The tree planting that has been proposed has been reviewed in relation to available soil volumes. Tree species have been selected to provide seasonal interest through their form, flowering and autumn colour.
- 7.21 The Proposed Development comprises of a minor planning application (given it is under 1,000sqm GIA of new floorspace) and therefore the proposals have aimed to maximise urban greening on-site as far as possible. The proposals achieve a high UGF score (0.26) despite this not actually being required for a minor planning application comprising B2/B8 uses in order to enhance the Site's urban greening. The proposals have responded positively to the pre-application feedback and have addressed any previous concerns by moving the northern gable frontage on Silverdale Road further from 1 Chalfont Road to increase the boundary area for landscaping.
- 7.22 The tree provision, area of green space and softening of boundaries clearly provides and enhancement from the existing context. This is a planning benefit of the scheme.

Transport, Access and Servicing

- 7.23 Paragraph 116 of the NPPF states that development should only be refused on highways grounds if there would be an unacceptable impact on highway safety or where residual cumulative impacts on the road network would be severe.
- 7.24 London Plan Policy T1 notes that all development should make the most effective use of land, reflecting its connectivity and accessibility by existing and future public transport, walking and cycling routes, and ensure that any impacts on London's transport networks and supporting infrastructure are mitigated. London Plan Policy 2 continues by stating that proposals should facilitate residents making shorter, regular trips by walking or cycling.
- 7.25 London Plan Policy T4 requires transport impacts to be assessed and mitigated and avoid road danger. London Plan Policy T5 sets out the minimum standards for cycle parking that should be complied with and how this should be designed in accordance with the London Cycle Design Standards (LCDS).



- 7.26 London Plan Policy T7 (Deliveries, Servicing and Construction) indicate that Delivery and Servicing Plans should be developed in accordance with TfL guidance in a way that reflects the scale and complexities of development. Policy T7 states that development proposals should facilitate safe, clean, and efficient deliveries and servicing. Developments should be designed and managed so that deliveries can be received outside of peak hours and in the evening or night-time.
- 7.27 Local Plan Policy T1 and DMT1 notes that the Council will steer development to the most appropriate locations in order to reduce their impact on the transport network. All development should encourage access by sustainable modes and include good cycling and walking provision.
- 7.28 Local Plan Policy DMT 5 states that proposals will be required to ensure that safe, direct and inclusive access for pedestrians and cyclists is provided on the site connecting it to the wider network. Policy DMT 6 outlines how proposals must comply with the parking standards outlined in the Local Plan in order to facilitate sustainable development and address issues relating to congestion and amenity.
- 7.29 The Site benefits from a PTAL score of 4 which indicates a good level of accessibility through public transport. The site is also accessible on foot and cycle and therefore will provide a dedicated point of access for pedestrians and cyclists that leads to a segregated route through the Site.
- 7.30 The existing access on the eastern side of the Site will be closed and vehicles will instead use the access road to the Craufurd Industrial Estate. There will be two vehicular points of access into the Site from the estate access road, one of which will lead to a small parking area outside one of the units towards the northern extent of the Site; the other will lead to the shared parking/loading area between the two proposed units. A separate pedestrian/cycle access will be located approximately 10m to the east of the vehicular access, as well as a 2m wide footway.
- 7.31 6 car parking spaces are to be provided (including 2 blue badge spaces and 2 electric vehicle charging points) and an additional 2 marked bays will be provided for each unit for (un)loading of vehicles. 12 cycle parking spaces are to be provided including 8 standard spaces and 4 cargo bike spaces. Therefore, the vehicle parking provision accords with the London Plan standards and the secure cycle parking accords with the Local Plan standards.



- 7.32 The submitted Transport Statement, prepared by TTP Consulting, confirms that a low level of trips to and from the Site is anticipated and the report concludes that there are no transport reasons for which the development should be resisted.
- 7.33 Therefore, the proposals will not have any adverse effects on the highway, and the development aligns with the London Plan and LBH's adopted policies by providing sustainable transport choices.

Biodiversity and Ecology

- 7.34 Chapter 15 of the NPPF highlights that *"planning policies and 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."*
- 7.35 London Plan Policy G6 states that proposals should manage impacts on biodiversity and aim to secure net biodiversity gain.
- 7.36 Local Plan Policy DMEI 7 states that the design and layout of new development should retain and enhance any existing features of biodiversity or geological value within the site. Policy EM7 also states that proposals should enable the provision of biodiversity improvements from all development where feasible.
- 7.37 The proposals aim to improve the biodiversity and ecology of the site. Therefore, ecological enhancement works will be carried out as part of the proposals including the creation of areas of grassland and green walls, tree planting, and a new hedgerow with trees. The submitted Biodiversity Net Gain (BNG) Assessment, prepared by AEWC, states that these enhancements are sufficient to offset the loss of the baseline habitats on the site for the BNG metric. The headline results indicate that there is an estimated net gain of 255.75% for habitat units and the trading rules have been satisfied. There is also a gain of 0.12 hedgerow units, but no percentage gain can be provided since there are no hedgerow units at baseline.
- 7.38 A Protected Species Walkover Survey has been prepared by AEWC to assess the site for potential presence of any protected species or species of conservation concern and identify habitats of conservation importance. The submitted report concludes that the site provides low suitability for protected species, primarily associated with features of the temporary building structures and small areas of boundary ruderal vegetation. Therefore, no further surveys are required for protected species (with the exception of a check for nesting birds prior to any works beginning).



7.39 Furthermore, a Construction Environment Management Plan (CEMP) has been prepared by AEWC to set out the procedures that will be implemented to avoid or mitigate constructional impacts on species or habitats. The CEMP notes that currently, the Site is considered to have very limited potential to support protected species with low ecological value. It also addresses appropriate mitigation measures for Shackles Dock located to the south-west of the Site to prevent any impacts on the canal.

7.40 Overall, the proposed development enhances the natural and local environment by minimising any potential impacts on biodiversity and carrying out ecological enhancement works and therefore aligns with national and local planning policies.

Daylight and Sunlight

7.41 The NPPF states that developments should maintain a high standard of amenity for existing and future users (Paragraph 135f).

7.42 The BRE Guidance is intended for building designers, developers, consultants and local planning authorities. The advice it gives is not mandatory and should not be used as an instrument of planning policy.

7.43 Local Plan Policy BE1 states that proposals should seek to protect the amenity of surrounding land and buildings, particularly residential properties. Policy DMHB 11 states that development proposals should not adversely impact on the amenity, daylight and sunlight of adjacent properties and open space.

7.44 During the pre-application process, it was requested that the Daylight and Sunlight impact was acceptable and aligned with the BRE guidance. For daylight, the BRE guidance states that its guidelines on existing buildings and new development relate to living rooms, kitchens, and bedrooms, but windows to bathrooms, toilets, storerooms and circulation areas do not need to be analysed. It also states that if the angle to the horizontal subtended by the new development at the level of the centre of the lowest window is less than 25 degrees for the whole of the development then it is unlikely to have a noticeable effect on the diffuse skylight enjoyed by the existing building.

7.45 In terms of sunlight, it states that its guidelines on existing buildings and new development relate to main living rooms, (kitchens and bedrooms are less important), and they have a window facing within 90 degrees of due south. It also states that the sunlight of an existing dwelling may be adversely affected if a living room of an existing dwelling has a main window facing within 90 degrees of due south, and any part of a new development subtends an angle of more than 25 degrees to the horizontal



measured from the centre of the window in a vertical section perpendicular to the window.

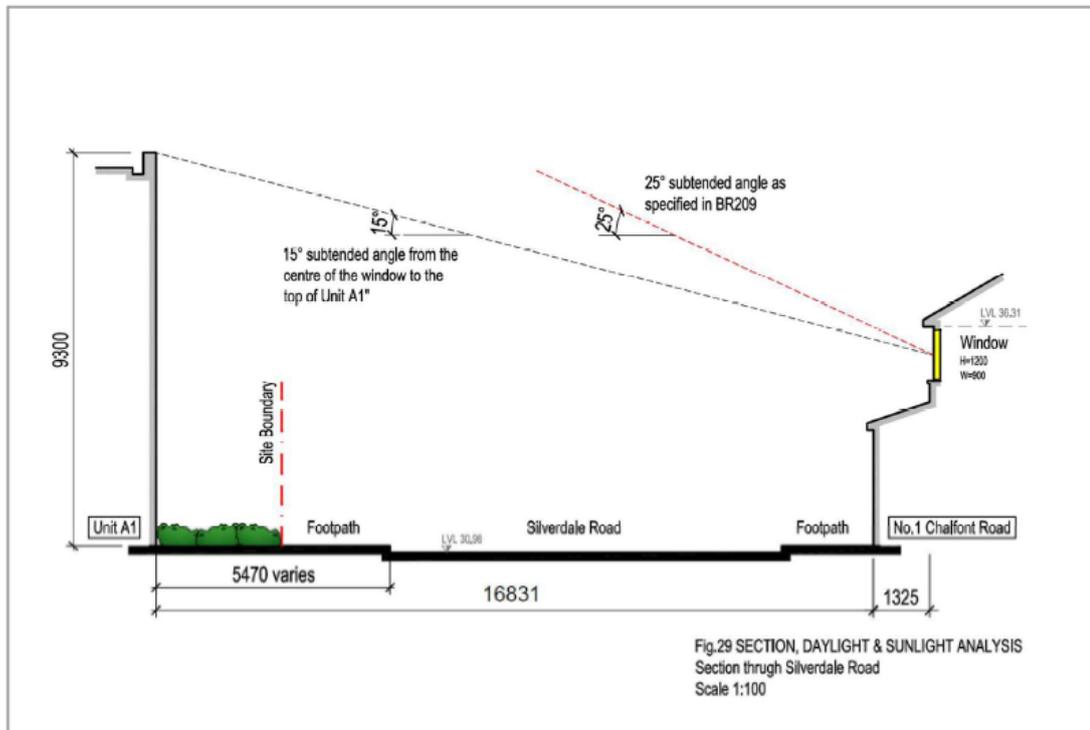


Figure 3: Section Analysis

- 7.46 By using this '25-degree test' for both daylight and sunlight, the proposed development (Unit A1) subtends an angle of 15 degrees to the centre of the first floor window in 1 Chalfont Road which is less than 25 degrees (see Figure 3 above). Therefore, the new building will not have a noticeable effect on the daylight enjoyed by the existing building and the sunlight of the existing dwelling will not be adversely affected by the new building, particularly as there appears to be no living room in the southern elevation of the existing property. Please see the Daylight/Sunlight Impact section in part 6 of the DAS which provides further details.

Noise

- 7.47 Paragraph 187 of the NPPF states that '*Planning policies and decisions should contribute to and enhance the natural and local environment by... preventing new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by, unacceptable levels of... noise pollution...'*.
- 7.48 London Plan Policies D13 and D14 relate to Agent of Change and Noise respectively. The Agent of Change principle places the responsibility for mitigating impacts from



existing noise and other nuisance-generating activities or uses on the proposed new noise-sensitive development. Design should be used to separate noise sensitive development from the noise source through distance, screening, layout, orientation, uses and materials. Where it is not possible to achieve separation, any potential adverse effects should be controlled and mitigated through applying good acoustic design principles.

- 7.49 Local Plan Policy EM8 states that the Council will seek to ensure that noise sensitive development and noise generating development are only permitted if noise impacts can be adequately controlled and mitigated.
- 7.50 During the pre-application process, it was noted that the units should be set back from the Silverdale Road boundary to reduce the impact on the residential amenity of neighbouring properties in terms of noise and disturbance. The proposals have been designed accordingly and have been further setback to reduce any potential impacts on noise. The Proposed Development would also provide an improvement in noise impacts from the existing industrial use at the Site, as the proposed B2/B8 uses will be contained within the proposed buildings rather than the current open storage use. This is confirmed in the submitted Noise Impact Assessment, prepared by Rappor, which concludes that the proposed development would not cause an unacceptable adverse impact on the acoustic environment at nearby noise-sensitive receptors.
- 7.51 Therefore, the proposals have been designed to reduce any potential impacts on residential amenity and are in accordance with the national and local planning policies.

Drainage

- 7.52 London Plan Policies SI12 and SI13 require development proposals to ensure that flood risk is minimised and mitigated, and that residual risk is addressed. Development proposals should aim to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible.
- 7.53 Local Plan Policy DMEI 9 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 EM1 also promotes sustainable forms of drainage to manage surface water run-off.
- 7.54 The latest Environment Agency flood depth maps indicate that the proposed development would not experience any flooding, including during a 'Low' probability storm event. The submitted Drainage Design Report, prepared by Morgan



Engineering, demonstrates the drainage strategy for the proposed development which comprises the use of permeable paving, geocellular crates, bioretention systems and a dual pump system to manage runoff generated by proposed impermeable area. Outflows would be pumped to the Grand Union Canal by a bespoke pump, fitted with an additional backup pump and alert system. The proposals therefore accord with the national and local planning policies

Fire

- 7.55 London Plan Policy D12 establishes that all development proposals must achieve the highest standards of fire safety and London Plan Policy D5 requires proposals to ensure safe and dignified emergency evacuation for all building users.
- 7.56 The development of the design of the scheme has been informed by key fire safety advice at all stages. The details of this advice and those recommendations for future fire assessment matters are contained in the Fire Statement that accompanies this application for planning permission.

Overall Planning Benefits

- 7.57 The proposed development will serve to revitalise the Site and make better use of the land by removing the open storage and replacing this with a controlled and managed building/operation. Overall, the proposals will provide the following planning benefits:
- Reduction in noise and dust emissions to improve the amenity for neighbouring properties.
 - The proposals will provide an enhancement to the nearby Grade II Listed Building with the proposed new industrial buildings, which have been sensitively designed to a high-quality.
 - The creation of 12 no. of cycle parking spaces and 6 no. car parking spaces in a more regularised manner with safe and secure pedestrian, cyclist and vehicular accesses.
 - The scheme will introduce urban greening and landscaping including the provision of 19 new trees to enhance biodiversity on site.



8. Conclusions

- 8.1 This Planning Statement has been prepared by DP9 Ltd ('the Agent') on behalf of RGP Holdings Limited ('the Applicant') in support of a temporary planning application for the erection of two single storey buildings for industrial use and associated works at Land to the east of Craufurd Industrial Estate, Silverdale Road, Hayes, UB3 3BL ('the Site').
- 8.2 Extensive pre-application discussions have been undertaken prior to submitting this application to ensure that any comments received during the pre-application process have informed the proposed development.
- 8.3 The application is supported by a suite of documents which show how the proposed development accords with the development plan and material considerations.
- 8.4 The Applicant is committed to the regeneration of the Site in the short-term and long-term. The proposals provide an opportunity to bring the Site into a more active use, make better use of the land by delivering an improved and more controlled operation of the current industrial uses, and will bring significant benefits to the wider economy and the Council.
- 8.5 No harm or adverse impacts have been identified. In fact, the proposal will deliver a number of planning benefits. These include:
- Introduction of urban greening and landscaping including 19 new trees.
 - Removal of open storage/industrial and replacement with a controlled and managed building/operation. This will reduce noise and dust emissions.
 - Enhancement to the nearby Grade II Listed Building (as identified by the Heritage Statement, prepared by GJ Heritage Planning).
 - Creation of cycle parking and car parking spaces in a more regularised manner.
- 8.6 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that applications for planning permission must be determined in accordance with the statutory development plan unless other material considerations indicate otherwise. The application proposals fully accord with the statutory development plan. There are no material considerations which otherwise indicate that this application should not be determined favourably. The development will give rise to significant economic, social and environmental benefits and is considered to be a sustainable form of development situated within an accessible location. Therefore, the proposals are considered acceptable in principle and should be consented.



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