



GERALDEVE

Former MSD Facility, Breakspear Road South, Ickenham, Hillingdon

On behalf of: Keltbray Development Ltd.

October 2022

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1 Executive Summary

- 1.1 This planning application brings forward proposals for the retention, demolition, and construction of buildings at the Former MSD Facility, Breakspear Road South, Ickenham, on behalf of Keltbray Developments Limited.
- 1.2 The existing site comprises a range of old, outdated and not fit for purpose buildings which have been vacant for several years. The site was previously occupied by MSD, and animal research facility and the structures on site are suitable only for this use.
- 1.3 Keltbray are seeking to demolish all but one of the buildings on the site, to provide 4 high quality, sustainable and adaptable warehouse buildings to be used to clean, catalogue and temporarily store materials and tools used across their sites in London and the South East.
- 1.4 The site known as Previously Developed Land within the Green Belt in accordance with the NPPF (paragraph 149). The priority in bringing forward any proposal for this site has therefore been to maintain the appearance of openness within the Green Belt. This has been achieved through proposing an overall reduction in the built volume across the site, consolidating 22 buildings in to 5, optimising the topography of the site and proposing an extensive landscaping strategy across the site.
- 1.5 The total employment floorspace on the site has marginally increased, in line with regional planning policy objectives. This is not to the determinant of the Green Belt however, through the installation of mezzanine levels to maximise the envelope of the buildings where appropriate.
- 1.6 The ecological value of the site has been assessed and analysed in detail, and opportunities to promote this throughout the site have been proposed. These include creation of ponds and site specific tree and shrub species.
- 1.7 Creating an industry leading sustainable site is a key priority for Keltbray. Promotion of circular economy objectives, whole life carbon and the GLA's energy hierarchy are included throughout the proposals.

- 1.8 Keltbray are seeking to occupy the site and are committed to being a good neighbour. In the lead up to the submission of this application, the team have undertaken extensive stakeholder, community and political consultation to fully understand the concerns of the local community.
- 1.9 Further details of the proposals are contained within this planning statement and the documents submitted with this planning application.

2 Introduction

2.1 This Planning Statement has been prepared by Gerald Eve on behalf of our client, Keltbray Developments Ltd ('the Applicant'), in relation to the site known as the Former MSD Facility, Breakspear Road South, Ickenham within the London Borough of Hillingdon ('the Site').

2.2 The Applicant is bringing forward proposals for the retention, demolition, and construction of buildings, all within Use Class B8 with ancillary uses, on the Site alongside a number of site enhancements including widening of the vehicular access off Breakspear Road South, associated car and cycle parking and enhanced landscaping and ancillary works ('the Proposed Development').

2.3 The Applicant seeks to create a long-term and industry leading home for their construction operational businesses. The Site will be used to service the central London projects, by providing the space and infrastructure to store materials and machinery to be used on construction sites across London and the South East. The objective is to create a sustainable solution to delivery, by consolidating materials and machinery on a central site for cleaning, creating inventories and distributing to various construction sites this will minimise vehicle movements and waste.

2.4 The Applicant holds a distinctive corporate purpose of '*re-defining the way sustainable development is delivered*'. From the initial identification of the Site to the design development that has been undertaken, this corporate purpose has been at the heart of it.

2.5 The description of development for the Proposed Development is:

"Retention and demolition of existing buildings, construction of new buildings, all within Use Class B8 with ancillary uses, hardstanding, widening of vehicular access off Breakspear Road South, associated car and cycle parking, enhanced landscaping and ancillary works."

2.6 In Summary, the Proposed Development would deliver the following planning benefits:

- 1) Utilising Previously Developed Land in the Green Belt;
- 2) Revitalising and bringing back into active use a vacant employment site;

- 3) Providing an increase in industrial floorspace which will aid creation of job opportunities for local people and contribute to the London Borough of Hillingdon's employment floorspace;
- 4) Maintaining and protecting the openness of the Green Belt for ecological value and biodiversity enhancement on the Site;
- 5) Integrating buildings and spaces that are suitable and flexible for employment use;
- 6) Providing a rationalised and consolidated approach to the built development to improve operation, function and crucially, the appearance of the Site within the Green Belt;
- 7) Retaining existing structures where possible to contribute to the circular economy;
- 8) Improving the Site with a specific drainage strategy; and
- 9) Developing a landscape and maintenance strategy that enhances the Site's greenery whilst retaining the landscape' ecological value to ensure continued protection and increase in biodiversity.

2.7 This Town Planning Statement (herein referred to as 'this Statement') provides an assessment of the Proposed Development against the relevant national, regional and local planning policy framework for the Site. It is structured as follows:

- A description of the Site and its Surroundings at Section 3;
- A summary of the Planning History at Section 4;
- A summary of pre-application engagement with the London Borough of Hillingdon and consultation with other stakeholders at Section 5;
- A description of the Development Proposals in detail at Section 6;
- A summary of the Planning Policy Context at Section 7;
- An assessment of the Planning Policy Considerations at Section 8;
- A summary of Planning Obligations (including draft Heads of Terms) at Section 9; and
- A summary and main conclusions of this Statement at Section 10.

2.8 The Proposed Development has been the subject of comprehensive pre-application discussions with officers at the London Borough of Hillingdon (LBH), Greater London Authority (GLA) and local stakeholders, including local Ward Councillors and local community groups and the general public.

2.9 This Statement provides an assessment of the Proposed Development in line with Section 38(6) of the Planning and Compulsory Purchase Act 2004 (as amended) which requires planning applications to be determined in accordance with the Development Plan unless material considerations otherwise.

2.10 The adopted Development Plan for the Site comprises the London Plan (2021); and the Hillingdon Local Plan (2020). The National Planning Policy Framework ('the NPPF') (2021) is a material consideration, along with relevant supplementary planning policy guidance.

2.11 This Statement should be read in conjunction with the plans and drawings prepared by Campbell Architects and submitted as part of the planning application, as well as the following documents:

- Application Form, with Certificate A completed;
- Site Location Plan, prepared by Campbell Architects;
- Block Plan, prepared by Campbell Architects;
- Drawings, prepared by Campbell Architects.
- Archaeological Desk Based Assessment, prepared by Brindle and Green
- Air Quality Neutral Assessment, prepared by Mott McDonald
- Arboricultural Impact Assessment (including Tree Protection Plan), prepared by Brindle and Green
- Biodiversity Impact Assessment for Net Gain, prepared by Brindle and Green
- Circular Economy Statement, prepared by IN2.
- Construction and Environmental Management Plan, prepared by Keltbray
- Demolition and Construction Logistics Plan, prepared by Keltbray
- Design and Access Statement, prepared by Campbell Architects. This documents also includes the following:
 - Accessibility Statement
 - Materials Schedule
- Drainage Strategy Report and Drainage Management and Maintenance Plan, prepared by Symmetrys

- Flood Risk Assessment, prepared by Symmetrys
- Ground Investigation Report, prepared by Johnson, Poole and Bloomer
- Ecological Impact Assessment, prepared by Brindle and Green
- Energy Strategy, including GLA spreadsheet, prepared by IN2
- Landscape Report, prepared by OPEN.
- Noise and Vibration Impact Assessment, prepared by Mott McDonald
- Planning Statement, prepared by Gerald Eve
- Remediation Strategy, Johnson, Poole and Bloomer
- Sustainability Statement, prepared by IN2
- Statement of Community Involvement, prepared by Concilio
- Transport Assessment, prepared by Mot McDonald. This document also includes the following:
 - Proposed s278 Works Plan
 - Swept Path Analysis Plans
 - Car Park Management Plan
- Interim Travel Plan prepared by Mott McDonald. This document also includes the following:
 - Delivery and Servicing Management Plan
- Utilities Survey and Proposals, prepared by Johnson, Poole and Bloomer
- Operational Waste Management Strategy, prepared by Mott McDonald
- Whole Life Carbon Assessment, prepared by IN2

2.12 The Proposed Development would deliver land use, design, environmental and economical environmental benefits. It is considered that the Proposed Development is in accordance with the objectives of planning policy and guidance.

3 Site and Surroundings

- 3.1 The Site is located in the London Borough of Hillingdon on the north-west side of Breakspear Road South and comprises an irregularly shape, approximately 4.87 ha.
- 3.2 Breakspear Road South runs along the eastern edge of the Colne Valley Regional Park. To the north, it connects with Breakspear Road. North to provide access towards Harefield and with Breakspear Road to access Ruislip Common. To the south, the road connects to the B467, providing onward access to Ickenham and to the A40 Western Avenue.
- 3.3 This Site is a previously developed site with extensive hardstanding and built structures, however, buildings are small, not fit for purpose with a convoluted layout and therefore not suitable for reuse for a modern, sustainable employment operator. The Site has been vacant for approximately 2 years and the previous employment use on the Site was a mix of office, light industrial, and research facilities.
- 3.4 We understand that the lawful use of the site comprises a mix of Class B8 Use (storage and distribution) and Class E Use (research facilities and offices) with ancillary amenity areas. Further details are set out within the Planning History section of this Statement, and the Design and Access Statement, prepared by Campbell Architects.
- 3.5 The Site has a unique topography and slopes significantly downwards from west to east with the highest point being north west of the Site.
- 3.6 The Site has a Public Transport Accessibility Level of 0, reflecting a lack of stations and bus stops within 960m and 640m walks of the Site respectively. The nearest railway stations to the Site are West Ruislip, served by Chiltern Railway Line and around 1.7 miles from the Site, as the crow flies, and Ickenham, which provide access to the Piccadilly and Metropolitan London Underground services.
- 3.7 The south section of the former MSD facility currently forms part of the HS2 Breakspear Road Satellite Compound. The construction compound is accessed via the former MSD facility access road, with a new road and associated priority junction constructed in 2019/20 to the north, to allow for the ongoing use of the MSD facility.

Planning Designations

- 3.8 With regards to the Site's planning policy designations, it is located within the Green Belt and in Colne Valley Park. The Site itself is Previously Developed Land within the Green Belt.

- 3.9 In the immediate vicinity of the Site, a Nature Conservation Site of Metropolitan or Borough Grade I Importance, Archaeological Priority Area and Schedule Ancient Monument (Brackenbury Farm) are located. These lie on the adjacent side of the railway track, to the South, and a Nature Conservation Site of Borough Grade II or Local Importance to the east, on the adjacent side of Breakspear Road South.

4 Planning History and Existing Uses

Planning History

4.1 A thorough review of the online planning records held by Hillingdon Council has been undertaken. The Site has an extensive planning history, the key permissions are set out below.

4.2 Planning permission (LPA Ref. 2715/APP/2022/3014) was granted in 2003 for **the erection of a 997sq.m storage building with associated office and welfare facilities.** (This is known as Building One on the existing and proposed plans).

4.3 In 1992, planning permission (LPA Ref. 2725/BG/91/12234) was granted for **the erection of a two storey laboratory and office building at existing research farm (phase 2 of outline permission for redevelopment).**

4.4 Planning permission (LPA Ref. 2725/AX/90/1531) was granted in 1991 for **the erection of 2 detached animal houses and 1 library building.**

4.5 Planning permission (LPA Ref. 2725/AR/89/2205) was granted in 1990 for **the outline planning permission for the erection of new buildings and extensions to the existing research farm.**

4.6 In 1998, a Certificate of Lawfulness (LPA Ref. 2725/CC/97/05/9) was granted for **the use of premises for Class B1 purposes comprising building with a total floorspace of 11,839 sq.m.**

Existing Uses

4.7 As outlined in the previous section, there are a variety of buildings on the Site which vary in scale, height, mass and orientation.

4.8 A Design and Access Statement, prepared by Campbell Architects, has been submitted alongside the planning application. The Design and Access Statement includes a 3D Land Use Model showing the existing Site and its built structures. This Model is provided below:



4.9 The 3D Land Use Model confirms the following number and use of buildings on the Site:

1. Industrial Unit/2 Storey Office (Use Class B8 / E)
2. Single Storey Office (Use Class E)
3. Single Storey Office (Use Class E)
4. Single Storey Office (Use Class E)
5. Two Storey Office (Use Class E)
6. Single Storey Office (Use Class E)
7. Single Storey Office (Use Class E)
8. Cattle Building (Use Class B8)
9. Barn and Open Sided Cattle Building (Use Class B8)
10. Barn (Use Class B8)
11. Single Storey Office
12. Industrial Building and Tanks (Use Class B8)
13. Plant Outbuilding (Ancillary Use Class B8 / E)
14. Single Storey Office (Use Class E)
15. Two Storey Office (Use Class E)
16. Single Storey Office (Use Class E)

5 Consultation and Engagement

- 5.1 The Localism Act 2011 emphasises the need for effective and meaningful pre-application consultation.
- 5.2 Paragraphs 39-46 of the National Planning Policy Framework (NPPF) highlight the importance of pre-application engagement and front loading; early engagement has significant potential to improve the efficiency and effectiveness of the planning system for all parties. Good quality pre-application discussion enables better coordination between public and private resources and improves outcomes for the community.
- 5.3 Local Planning Authorities have a key role to play in encouraging other parties to take maximum advantage of the pre-application stage and, the more issues that can be resolved at pre-application stage, the greater the benefit.

Community Consultation

- 5.4 A comprehensive community consultation was carried out by Concilio Communications Ltd between June and September 2022.
- 5.5 The Applicant sought for engagement with the local community and other key stakeholders to gain valuable feedback regarding the Site and honest views on emerging proposals so that these could be considered whilst developing proposals.
- 5.6 The community consultation programme included the following:
 - Digital Consultation Website;
 - Engagement with locally elected representatives;
 - Engagement with interested community stakeholders; and
 - Direct liaison with residents and businesses.

- 5.7 A number of comments were received, and a total of 1,911 people viewed the consultation website. The consultation clarified that landscaping, sustainability, drainage and transport implications are important concerns for the local community. These concerns have been at the forefront of the proposals and consideration has been given to these to ensure they have been addressed where possible.
- 5.8 Further details are provided within the Statement of Community Involvement prepared by Concilio Communications Ltd and submitted with the planning application.

Key Stakeholder Consultation

High Speed Rail 2 (HS2)

- 5.9 The site neighbours the HS2 development, the applicant therefore considered it important to engage with them from an early stage to understand their proposals, timeframes for construction and completion to ensure the proposals for the MSD site complimented the neighbouring development aspirations. The applicant engaged with the HS2 ecology, drainage and design team to ensure a seamless cohesion of the two schemes, both in construction phase and in operation.

Ickenham Residents Association (IRA)

- 5.10 The IRA are a key local residents group who show an active interest in proposed developments in the area. The applicant engaged with them after initial, positive meetings with LB Hillingdon and the GLA. First, providing details of the website and second, arranging a video call with key members to explain the proposals and answer questions regarding the proposals.
- 5.11 The applicant has since sent further information to the IRA for their information and have shared transport data for their review ahead of submission of the full planning application. We expect to continue this engagement following the submission of the application.

London Borough of Hillingdon

5.12 On 12 May 2022, a pre-application meeting was held with LBH officers.

5.13 At this meeting the initial scheme was discussed with officers. The key themes discussed were the openness of the Green Belt, the intensification of employment floorspace, use of the yard spaces and landscaping / ecological benefits together with transport and trip generation.

5.14 A detailed written pre application response was received, which has informed the evolution of the scheme and information provided at application stage. This is explained throughout this document.

5.15 The applicant team then met with the case officer on site to run through the proposals and to further explain how the orientation, scale, height and mass of the proposed buildings would maintain the openness of the Green Belt. It was also discussed that verified views should not be required, which is discussed further in this planning statement.

5.16 Following this, specific technical meetings were held with the transport, air quality and noise officers where the scope and methodology of the relevant assessments were discussed.

5.17 Ahead of submission, officers were supportive of the principles of the scheme and the applicant have provided further information where requested to demonstrate that the proposals comply with the objectives within the LB Hillingdon Development Plan.

Greater London Authority

5.18 On 1 July 2022, an 'In Principle' pre-application meeting was held with GLA officers to discuss the proposals. Key points raised in the written feedback and the subsequent response are as follows:

5.19 Green Belt vs Intensification of Employment Use

- The GLA considered more weight should be given to maintaining the openness of the Green Belt over the intensification of the employment floorspace.

- This has been noted and the requirement to maintain the openness of the Green Belt has been prioritised.

5.20 Greening

- The quantum of landscaped areas was discussed and noted that whilst the proposed is of a higher quality, the quantum is in fact less. It was requested that in the full application the design team need to justify this 'loss' through demonstrating that a) the existing quality is very poor and b) that the quality of the proposals is significantly improved in comparison to this.
- This has been addressed in the DAS and landscape report and a through site survey carried out to assess the quality of the existing green areas.

5.21 Use of the Yard Spaces

- The use of these spaces to store materials potentially conflicting with the objectives the openness of the Green Belt was discussed.
- We have therefore included justification on the need, use and proposed layout of the yards.

5.22 Transport

- Comments were raised over car parking outside building one, access to site (Breakspear Road and height of bridge), total trip generation and associated air quality impacts.
- These have all been addressed throughout the application. The applicant is seeking to reach an agreement with HS2 (via Glenn Tobin at Queenswood) and LB Hillingdon to propose 'goal posts' to the north of the site to prevent larger HGVs coming from the surrounding area and hitting the bridge.

5.23 Sustainability and Climate Change

- Careful consideration should be given to the Circular Economy and latest sustainability and energy guidance. Justification on the loss of the existing buildings must be included.
- In2 have prepared a Whole Life Carbon, circular Economy and energy / sustainability documents to support the proposals.

6 Proposals

- 6.1 Planning permission is sought for the:

"Retention and demolition of existing buildings, construction of new buildings, all within Use Class B8 with ancillary uses, hardstanding, widening of vehicular access off Breakspear Road South, associated car and cycle parking, enhanced landscaping and ancillary works."
- 6.2 The Proposed Development is described in detail in the Design and Access Statement. This Statement should be read in conjunction with the suite of other technical reports and drawings supporting the planning application.
- 6.3 The proposals comprise the demolition of all but one of the buildings on the site, known as 'building one' and the erection of 4 new warehouse buildings with associated yard spaces. Where possible, the buildings have openings on either side with access onto two different yard spaces, to improve flexibility.
- 6.4 Building one is to be retained, refurbished and reclad. It is proposed to be used as an office space for staff with a car park adjacent with 65 staff car parking spaces, 4 of these will be blue badge accessible parking spaces and 4 will be enlarged parking spaces. There is proposed to be 12 electric charging spaces within the car park.
- 6.5 The 4 new warehouse buildings are designed to a high quality with a graded appearance in colour. Double height vehicular entrance doors are proposed to provide access inside the buildings.
- 6.6 The existing access road through the site is to be retained and widened slightly to accommodate larger vehicles. Several trees are required to be removed to facilitate the development, however these will be replaced by higher quality trees and landscaping. The remainder of the site will be covered by extensive and site-specific landscaping strategy, including two new ponds at either end of the site.
- 6.7 A total of 24 secure, covered cycle spaces are proposed to be located within the car park area of building one. 16 will be long-stay cycle parking spaces and 8 will be short-stay.

- 6.8 Parts of the landscaped areas are to be utilised for staff break out areas, with benches for staff to sit on in their break times.
- 6.9 Photovoltaic panels are proposed for the roofs of the new warehouse buildings, to supply electricity to the site.

Yard Spaces Operation

- 6.10 The general scale of, quantity of and space restrictions within, London construction projects mean organisation is key. These proposals are designed to ensure Keltbray can return equipment and small tools / plant from a project, catalogue and clean the individual items, repair (if necessary) and store them efficiently. The stored items will then be 'picked' as necessary and loaded within our vehicles (a mixture of HGVs and OGVs) and delivered to the required construction site within London.
- 6.11 This equipment includes formwork, scaffolding, access stairs and other concrete equipment, along with plant attachments and tools. Considering the large number of small items to be stored, the formalised organisation of the facilities will be key. This will include racking systems (both internally and externally – there is existing racking within the MSD lands which will be tested and reused) along with dedicated zones for certain items (which may be more sensitive than others). The repairing of certain items will require welding and other mechanical facilities, activities which will be carried out within dedicated zones throughout the site. The storage zones are located within the yard spaces and internally within the warehouses. The turnover of materials is relatively high, with goods being held, documented and cleaned at the site on their way to or back from construction sites across London and the south east. Any materials which are stored in the yard spaces, will be done so carefully to ensure safety of employees is prioritised.
- 6.12 Maintaining the use of the yard spaces for vehicles accessing the warehouses and collecting & dropping off goods is also key to the effective operation of the site.
- 6.13 No materials will be stored on the landscaped areas. Where materials are stored in the yards, this will be for a temporary time period only. The sufficient size of the yard spaces allows these materials to be spread out and not concentrated in one corner of the site.

6.14 Only the 4 yard spaces surrounding the proposed warehouse units are to be utilised for any kind of temporary storage. The car parking area adjacent to unit 1 will be a car park only, and will not be used for storage. The reason for this is that this is the highest most point of the site, and to store items on this area of hardstanding would be inappropriate given the potential views into the site and the need to maintain the appearance of openness of the Green Belt.

6.15 It is key to note that certain activities or uses will not be occurring within the site, including storage of scrap, waste transfer activities, aggregate or mineral storage or the storage / treatment of concrete, contaminated materials or recycling activities. The site itself will be accessible only by Keltbray employees, and materials stored are for use by Keltbray only. There will be no public access to the site. Further information including indicative diagrams of how the yard spaces will be used are within the DAS.

Land Use Summary

6.16 The four new warehouse building are proposed to fall under Use Class B8, (storage and distribution) with the retained and refurbished building being an office for Keltbray, which will be ancillary to the wider B8 use across the site.

6.17 A breakdown of each building is in the below table:

Proposed Buildings		
Building Name	Proposed Use	Floor Area (GIA sqm)
Building One (retained and refurbished)	Office, ancillary Use Class B8	1,223
Building Two	Warehouse, Use Class B8	1,800
Building Three	Warehouse, Use Class B8	1,820
Building Four	Warehouse, Use Class B8	1,820
Building Five	Warehouse, Use Class B8	507

6.18 The existing and proposed comparison are set out in the table below and are further explained in the Design and Access Statement, prepared by Campbell Architects.

Existing and Proposed Area Comparison			
	Existing	Proposed	Difference
GIA	6,710	7170	+460
Volume	31,382	31,295	-87
Developed Land	18,930	21,060	+2,130
Soft Landscape	30,420	27,590	-2830

7 Planning Policy Context

7.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the statutory development plan unless material considerations indicate otherwise.

7.2 The statutory development plan for the purposes of Section 38(6) comprises:

- The London Plan (2021);
- The Hillingdon Local Plan Part 1 (2012);
- The Hillingdon Local Plan Part 2 – Development Management Policies (2020);
- The Hillingdon Local Plan Part 2 – Site Allocations and Designations (2020); and
- The West London Waste Plan (2015)

National Planning Policy Framework (NPPF) (2021)

7.3 The revised NPPF was published in July 2021. This follows the 2019 revision of the NPPF which was originally published in 2012. The NPPF is a material consideration for the purposes of section 38(6).

7.4 The NPPF sets out the Government's requirements for the planning system and provides a framework within which local people and their accountable councils can produce their own distinctive local and neighbourhood plans, which reflect the needs and priorities for their communities.

7.5 The NPPF establishes the presumption in favour of sustainable development at paragraph 7. Paragraph 8 sets out the three overarching objectives of the planning system to achieve sustainable development, which are:

- An economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;
- A social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe

places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and

- An environmental objective – to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.

7.6 The revised 2021 NPPF, places emphasis on the importance of well-designed and sustainable developments.

National Planning Practice Guidance (NPPG)

7.7 The NPPG is a web-based resource which was first published online in March 2014 and is updated periodically. It provides supplementary guidance for policies of the NPPF.

The London Plan (2021)

7.8 The most recent version of the London Plan was adopted in March 2021. It is the overall strategic plan for Greater London, defined to include the 32 Boroughs and the City of London. The London Plan forms the London-wide policy context within which the Boroughs set their local planning agendas and forms part of the statutory development plan.

7.9 The London Plan is centred around 'Good Growth', with a focus on building strong and inclusive communities, making the best use of land, creating a healthy city, growing a good economy and increasing efficiency and resilience. The Plan recognises the key role of Central London as a driver for London and the wider UK economy with the City of London and the wider CAZ being critical in supporting growth.

Other GLA Guidance

7.10 The following GLA Supplementary Planning Guidance (SPG) are also considered to be material to the determination of this application:

- Accessible London (2014)
- Planning for Equality and Diversity (2007)
- Character and Context (2014)
- Public London Charter (2021)
- Housing (2016)

- Energy Planning Guidance (2020)
- The control of dust and emissions in construction (2014)
- Mayoral Community Infrastructure Levy 2 (2019)
- The Mayor's Transport Strategy (2018)

7.11 There are a number of draft London Plan SPG documents which have also been considered in the preparation and assessment of the proposals. These include:

- Draft Safety (2021)
- Draft Sustainable Transport, Walking and Cycling Guidance (2021)
- Draft Air Quality Neutral (2021)
- Draft Air Quality Positive (2021)
- Draft Whole Life Carbon (2020)
- Draft Circular Economy Statement Guidance (2021)
- Draft Urban Greening Factor (2021)

Local Planning Policy

Hillingdon Local Plan (2021 and 2020)

7.12 The Development Plan for the London Borough of Hillingdon currently consists of the following documents:

- Local Plan: Part 1 – Strategic Policies (2020)
- Local Plan: Part 2 – Development Management Policies (2020)
- The Local Plan: Part 2 – Site Allocations and Designations (2020)
- West London Waste Plan (2015)

8 Planning Policy Considerations

8.1 The Proposed Development has been assessed against the following principal planning matters:

- Land Use;
- Design;
- Landscaping and Ecology;
- Transport and Parking;
- Sustainability;
- Noise;
- Air Quality;
- Flood Risk and Drainage; and
- Ground Conditions.

8.2 This section of this Statement addressed the Proposed Development against National, Regional and Local policies.

Land Use

8.3 The land use section of this Statement is structured as follows:

1. Principle of Development; and
 - a) Green Belt
 - b) Demolition
2. Employment Use.

1. Principle of Development

8.4 Paragraph 11 of the NPPF states that there is a presumption in favour of sustainable development, and that development that accords with an up-to-date Local Plan should be approved. For the reasons set out within this chapter, the Proposed Development is considered to be in accordance with the key policies contained in the development plan and represents sustainable development.

8.5 Chapter 1 of the London Plan sets out how growth should be managed in the Capital to build strong and inclusive communities, making the best use of land, creating a healthy city,

delivering the homes Londoners need, growing a good economy and increasing efficiency and resilience.

- 8.6 London Plan Policy GG1 encourages development to seek to ensure changes to the physical environment achieve an overall positive contribution to London.
- 8.7 London Plan Policy GG2(C) sets out that development should proactively explore the potential to intensify the use of land to support additional workspaces, promoting higher density development, particularly in locations that are well connected to jobs, services, infrastructure and amenities by public transport, walking and cycling. London Plan Policy GG2(D) highlights that proposals should use a design-led approach to determine the optimum development capacity of sites.
- 8.8 London Plan Policy GG5 seeks to ensure that sufficient employment and industrial space is located in the right locations to support economic development and regeneration within London.
 - a) Green Belt
- 8.9 The Government attaches great importance to Green Belts. Paragraph 137 of the NPPF states the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belt are their openness and their permanence.
- 8.10 Paragraph 149 of the NPPF states that a local planning authority should regard the construction of new buildings as inappropriate in the Green Belt. The list of exceptions is comprehensive however, in particular relation to the Site, states the following:

limited infilling or the partial or complete redevelopment of previously developed land, whether redundant or in continuing use (excluding temporary buildings), which would:

– not have a greater impact on the openness of the Green Belt than the existing development.

8.11 London Plan Policy G2 states that the Green Belt should be protected from inappropriate development:

- 1) Development proposals that would harm the Green Belt should be refused except where very special circumstances exist,
- 2) Subject to national planning policy tests, the enhancements of the Green Belt to provide appropriate multi-functional beneficial uses for Londoners should be supported.

8.12 Local Plan Policy EM2 of the Hillingdon Local Plan Part 1 states that any proposals for development in Green Belt and Metropolitan Open Land will be assessed against the national and London Plan policies, including the very special circumstances test.

8.13 Local Plan Policy DMEI 4 of the Hillingdon Local Plan Part 2 (Development Management Policies) sets out that inappropriate development in the Green Belt and Metropolitan Open Land will not be permitted unless there are very special circumstances.

Assessment

8.14 The Site is previously developed land in the London Green Belt, which was occupied by MSD Animal Health, a veterinary pharmaceutical company. The Site has been vacant for approximately 2 years.

8.15 The Site comprises a range of existing buildings and a significant amount of hard standing including a vehicle access road through the centre of the Site.

8.16 The Proposed Development seeks to demolish all but one of the existing buildings on the Site and provide a similar quantum of development through a consolidated approach.

8.17 Paragraph 149 of the NPPF sets out an exception to inappropriate development in the Green Belt being the limited infilling or the partial or complete redevelopment of previously developed land. The policy states that any development must not have a greater impact on the openness of the Green Belt than the existing development.

- 8.18 As such, important consideration has been given to ensuring the openness of the Green Belt has not been impacted on through the Proposed Development. Given the above national policy, a case for very special circumstances is not required.
- 8.19 The existing site comprises a range of various buildings, which have come forward in a piecemeal fashion. Arguably, due to the quantum and unconsidered approach to the previous development of this site together with the quality of the hard and soft landscaping of the site, the existing position is not the most appropriate use / layout of this Green Belt site.
- 8.20 It is recognised that the height, size, appearance and use of any proposal coming forward on this site has the potential to harm the Green Belt. The design team have worked in a coordinated approach to ensure that each and all of these points are carefully considered and the proposals maintain the openness of the Green Belt. The overall built volume of the proposed development is less than the existing. Whilst the overall floorspace is a slight increase, this is due to the introduction of mezzanines into the warehouse buildings to maximise the employment floorspace on the site.
- 8.21 Together with ensuring the quantum of development is appropriate, the design team considered this an opportunity to explore possible enhancements to the site to ensure the openness of the Green Belt is, as a minimum, maintained, in order to comply with relevant national, regional and local planning policies.
- 8.22 The topography of the site is such that it slopes down quite considerably from the western edge to the eastern end of the site. Furthermore, once the HS2 site is completed, this will form a large mound which will further enclose the site and obstruct it from view. This existing and proposed topography has been utilised in the design approach and has shaped the height, orientation and general location of the proposed buildings in order to utilise the topography to maintain the appearance of openness.
- 8.23 Where appropriate, the buildings are set into the slope, to minimise the appearance of the warehouse buildings from surrounding publicly accessible views. In accordance with feedback from LB Hillingdon at the pre application stage, we have undertaken a view assessment exercise which demonstrates that there are minimal views into the site at

present. However, once HS2 is completed the topography of the surrounding landscape changes, at which point the additional height proposed will further obscure the views into the site. Therefore, whilst under the existing topography, the openness of the Green Belt is maintained through the proposals, following the completion of the HS2 works, the site will be further obscured from public view.

- 8.24 The materials selected for the proposals include a green cladding which is graded to add architectural interest to the warehouse buildings. The green colour scheme ensures the buildings blended more successfully into the surrounding landscape.
- 8.25 Specific and detailed consideration has been given to the landscape during the design of the proposals, with particular regard to maintaining the openness of the Green Belt. The Proposed Development provides a significant improvement to the landscape of the existing site and provides a range of landscaping enhancements including additional planting of trees, other landscaping and ponds. A green buffer around the perimeter of the site further enhances the quality of the site visual appearance, further reducing the impact of the proposals on the openness of the Green Belt.
- 8.26 The Proposed Development meets National, Regional and Local policies in terms of development in the Green Belt as maintains the openness of the site.

b) Demolition

- 8.27 Paragraph 209 of the NPPF states that it is essential there is a sufficient supply of minerals to provide the infrastructure, buildings, energy and goods that the country needs.
- 8.28 The London Plan (specifically Figure 3.2) shows a hierarchy for building approaches which maximises use of existing materials. Paragraph 3.3.12 notes that “Diminishing returns are gained by moving through the hierarchy outwards, working through refurbishment and re-use through to the least preferable option of recycling materials produced by the building or demolition process. The best use of the land needs to be taken into consideration when deciding whether to retain existing buildings in a development.”

8.29 The London Plan sets targets for the re-use of construction, demolition and excavation waste and recycling of these wastes is promoted in the West London Waste Plan. The process of recycling aggregates should ideally be carried out on-site and as much of the recycled waste be re-used in the construction process. This helps to reduce the need for primary aggregates and also reduces the need to transport minerals to and from the site.

8.30 Policy DMIN 4 of the Hillingdon Local Plan: Part 2, sets out that all developments will be encouraged to:

- i) recycle and re-use construction, demolition and excavation waste as aggregates;
- ii) process and re-use the recyclable material on-site, and where this is not possible, the material should be re-used at another site or for land restoration; and

8.31 iii) use substitute or recycled materials in new development in place of primary minerals.

Assessment

8.32 The existing buildings on site have come forward in a piece meal fashion and there is no rationalised approach to the built form. The buildings are specific to the use of the former MSD facility, in terms of layout, function, size and use. These comprise a mix of research and office buildings, with some agricultural / storage buildings suitable only for the storage of animals.

8.33 An assessment has been undertaken to explore whether any of these buildings can be retained for the proposed use of the site and as a result, the largest building (known as building one) is sought to be retained and refurbished.

8.34 The remainder of the buildings are of poor quality, inaccessible and generally not suitable for a continued employment use even when refurbished internally. It is therefore proposed to demolish the remainder of the buildings, to be replaced by rationalised, consolidated and ultimately flexible buildings which are adaptable for future, reducing the need for any potential demolition and redevelopment in the future.

8.35 Where possible, the existing materials on site are being re-used in the proposals to promote the Circular Economy. Further details of this are set out within the Circular Economy report, prepared by IN2.

2. Employment Use

8.36 Chapter 6 of the NPPF is named 'Building a strong, competitive economy' and sets out that planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt.

8.37 Policies E4 and E7 of the London Plan seek to resist the loss of employment floorspace and recommends that redevelopment proposals on industrial land should seek to intensify industrial uses, with intensification particularly prioritised in locations that are accessible to the strategic road network or have potential for the transport of goods by rail or water transport.

8.38 This is echoed at a local level, with the Hillingdon Local Plan: Part 1 DME 2 also resisting employment floorspace. It states that the loss of employment floorspace will be permitted if:

- i) the existing use negatively impacts on local amenity, through disturbance to neighbours, visual intrusion or has an adverse impact on the character of the area; or
- ii) the site is unsuitable for employment reuse or development because of its size, shape, location, or unsuitability of access; or
- iii) Sufficient evidence has been provided to demonstrate there is no realistic prospect of land being reused for employment purposes; or
- iv) The new use will not adversely affect the functioning of any adjoining employment land; or
- v) The proposed use relates to a specific land use allocation or designation identified elsewhere in the plan.

Assessment

- 8.39 The site is an existing, yet undesignated employment site. The employment use and floorspace has evolved and increased over time.
- 8.40 This site is situated in an excellent location in terms of the strategic transport network. It is close to Heathrow Airport and the M25, making it an ideal location for a distribution use where direct access to London is required.
- 8.41 The London Plan seeks to intensify such uses in this location as part of any redevelopment. The need for this intensification is, however, in conflict with the above requirements to maintain the openness of the Green Belt, which was discussed at length at pre application meetings with both the GLA and LB Hillingdon. Ultimately, the GLA confirmed that given the piecemeal evolution of the site, and that fact it was undesignated, they considered the need to maintain the openness to be a greater priority than complying with policy E4 and E7 in the London Plan.
- 8.42 Campbell Architects have developed a scheme which maximises the proposed employment floorspace through the introduction of mezzanines in the warehouse buildings. This results in an overall increase in the employment floor area by 460sqm, whilst providing buildings which are appropriate for this site in the context of maintaining the openness of the Green Belt.
- 8.43 The proposals therefore comply with policies E4 and E7 of the London Plan and intensify the employment use of the site, albeit using a sensitive approach.

Design

- 8.44 The Government attaches great importance to the design of the built environment in the NPPF.
- 8.45 Paragraph 126 of the NPPF states that the creation of high-quality buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people.

- 8.46 Paragraph 130 of the NPPF stipulates that it is important to plan positively for the achievement of high quality and inclusive design for all development, which will function well over the lifetime of the development, are visually attractive, sympathetic to local character, establish a strong sense of place, optimise the potential of the site, and create places that are safe.
- 8.47 London Plan policy D2 states that the density of development should be proportionate to the Site's connectivity and access to public transport.
- 8.48 Policy D3 of the London Plan states that all development must make the best use of land by following a design-led approach that optimises the capacity of sites. Optimising site capacity means ensuring that development is of the most appropriate form and land use for the site whilst the design-led approach requires consideration of design options to determine the most appropriate form of development that responds to a site's context and capacity for growth, including existing and planned supporting infrastructure capacity.
- 8.49 Policy D4 states that the design of development proposals should be thoroughly scrutinised. The scrutiny of a proposed development's design should cover its layout, scale, height, density, land uses, materials, architectural treatment, detailing and landscaping. The design and access statement should explain the approach taken to these design issue.
- 8.50 Policy D5 requires development proposals to achieve the highest standards of accessible and inclusive design.
- 8.51 Policy BE1 of the Hillingdon Local Plan: Part 1 sets out that in order to create successful and sustainable neighbourhoods, new development (including new buildings, alterations and extensions) should be of a high quality design which enhances the local distinctiveness of the area and contributes to a sense of place. As such, proposals should be designed to be appropriate to the context of Hillingdon's buildings, townscapes, landscapes and views, and make a positive contribution to the local area in terms of layout, form, scale and materials.
- 8.52 Policy DMHB 11 of the Hillingdon Local Plan: Part 2, further sets out that all development will be required to be designed to the highest standards and incorporate principles of good design

by taking into account the scale and height of nearby buildings, and taking note of street patterns, building lines, rooflines, visual gaps, plot sizes, landscaping and external materials.

8.53 Policy DMEI 4 of the Hillingdon Local Plan: Part 2 (Development in the Green Belt or on Metropolitan Open Land) and Policy DMEI 6 (Development in Green Edge Locations) recommend that new development affecting the Green Belt should incorporate proposals to assimilate development into the surrounding area by the use of extensive peripheral landscaping to site boundaries, and that proposals which affect the openness of the Green Belt should be refused. There is no one definition of openness however it is generally understood to relate to the absence of buildings, structures, roads and infrastructure.

Assessment

8.54 The design approach taken to this scheme has been one that has endeavoured to work sensitively within the context of the area, to bring forward proposals that respond positively to the existing site, whilst enhancing visual amenity, biodiversity, and sustainability of the land.

8.55 The layout of the proposed buildings on the site responds to the client objectives for providing flexible and suitable warehouse floorspace, together with the need to retain the openness of the Green Belt. Four new building are proposed which sit well within the topography of the site and are obscured by the surrounding landscape features and topography.

8.56 The materiality of the building units was chosen to soften the prominence of the masses on the green belt site. An array of greens and greys were selected for the main cladding of the buildings, inspired by the sites rich, forested boundary, where the leaves of trees merge with the grey sky,

8.57 For building 1, the main destination of the site for visitors & staff alike, a solid, dark green cladding is used. This differentiation from the support buildings provide a hierarchy, giving Building 1 importance and grandeur. This is balanced by the chosen shade of green, integrating seamlessly with the dense woodlands that surround it.

8.58 As such, the redevelopment of the site considers the height, size, appearance and use which might affect the open characteristics of the Green Belt, ensuring openness remains the same or better following redevelopment. The layout and scale also has regard to the operational and functional requirements of the proposed B8 use and ensures there is no net loss of employment floorspace in accordance with Policies E4 and E7 of the London Plan, by optimising site layout in accordance with Policy D3 of the London Plan.

Landscaping and Ecology

8.59 London Plan Policy G5 states that major developments should 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. The policy goes on to recommend that boroughs seek an Urban Greening Factor (UGF) target score of 0.3 for predominately commercial development. This, however, excludes B2 and B8 uses.

8.60 London Plan Policy G6 sets out the expectation that development proposals should manage impacts on biodiversity and aim to secure net biodiversity gain. It is stated that this should be informed by the best available ecological information and addressed from the start of the development process.

8.61 Further, Policy G6 highlights that proposals which reduce deficiencies in access to nature should be considered positively.

8.62 London Plan Policy G7 seeks to protect London's forests and woodlands and encourages new trees and woodlands to be planted in appropriate locations to increase the extent of London's forests.

8.63 Hillingdon Local Plan: Part 2 Policy EM7 sets out that new development should be designed to retain (and enhance where possible) any existing features of biodiversity value within the Site.

- 8.64 Policy EM7 states that where loss is unavoidable and the development is considered necessary, replacement features of equivalent biodiversity value should be provided on-site, or off-site as a financial contribution as a last resort.
- 8.65 Furthermore, Policy EM7 outlines that if development is proposed on or near to a site considered to have features of ecological or geological value (e.g. a SINC), appropriate surveys and assessments must be submitted to demonstrate that the proposed development would not cause harm to these sites, as proposals that cause significant harm to biodiversity which cannot be avoided, mitigated, or as a last resort, compensated for, will normally be refused.
- 8.66 Policy DMEI 6 sets out that new developments adjacent to SINCs should incorporate measures to ensure the proposal assimilates into the surrounding area. Policy DMEI 6 emphasises that all ecological reports or information submitted should adhere to nationally accepted best practice survey standards and be consistent with the British Standard BS 42020: 2013 Biodiversity - Code of Practice for Planning and Development or an updated variation.

Assessment

- 8.67 The Site sits within an area that is designated as Green Belt and is also part of Colne Valley Park. There are no protected trees within or directly adjacent to the Site.
- 8.68 To the north west is an area of ancient woodland within a nature conservation site. To the south of the Chiltern Main Railway Line is a Grade II Listed building within a scheduled monument area that sits within an archaeological priority area.
- 8.69 A bridleway runs up the eastern boundary of the Site and there are a series of footpaths connecting to the surrounding area.

8.70 A Landscaping Report has been prepared by OPEN and submitted with the planning application. Additionally, a separate Arboricultural Report has been prepared by Brindle and Green and submitted with the planning application.

8.71 The landscape proposals for the Proposed Development seek to respond to the surrounding context within the wider landscape of the Colne Valley Regional Park and the Borough of Hillingdon. The main landscape aspects aim to reinforce the character that already exists within the surrounding context. This is defined by field boundaries of mature trees and areas of woodland that serve as green corridors.

8.72 The Site has a unique topography that slopes gradually from north west to south east and is currently contained on its north eastern boundary by mature trees. Views into the Site are from the south east and west. The landscape proposals will include a new 5m wide strip of woodland screening along the south and western boundaries to mitigate the impact of the Proposed Development on these views.

8.73 Additionally, further landscape proposals for the Site include:

- 1) Species rich wildflowers will be planted within the road verges and around the edges of the Site;
- 2) Understory planting to supplement the existing scrub planting on the Site;
- 3) New specimen tree planting (as further detailed within the Landscape Report);
- 4) Retention of the existing woodland to the north of the Site;
- 5) External amenity spaces for employees of the Site; and
- 6) Inclusion of a Sustainable Drainage System Scheme which will enhance biodiversity across the Site as much as possible with attenuation ponds.

8.74 Further details of the landscape enhancements can be found in the Landscaping Report. It is considered that these respond well to the site context and surroundings and seek to maximise the level of biodiversity on the Site. Therefore, the Proposed Development accords with those policies set out in this Statement in respect to landscaping.

Transport and Parking

8.75 Chapter 9 of the NPPF sets out the Government's policies with regards to transport. The overall aims are to promote solutions that support a reduction in greenhouse gas emissions and reduce congestion and will contribute to wider sustainability and health objectives. The NPPF outlines aims for a transport system balanced in favour of sustainable transport modes, in order to give people a real choice about how they travel. It also encourages solutions which support reductions in greenhouse gas emissions and reduce congestion. Paragraph 110 of the NPPF states it should be ensured that:

- i. appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location;
- ii. safe and suitable access to the site can be achieved for all users;
- iii. 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; and
- iv. 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.

8.76 Paragraph 111 of the NPPF is clear that development should only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.

8.77 At a regional level, one of the strategic objectives of the London Plan is to improve accessibility, making London an easier city to move around and making public transport and the pedestrian environment accessible to everyone. The Mayor's Transport Strategy sets out policies and proposals to achieve the goals set out in the Plan.

8.78 London Plan Policy T1 'Strategic approach to transport' examines the integration of transport and development, outlines 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.

- 8.79 London Plan Policy T1 also states that developments should facilitate the delivery of the Mayor's strategic target of 80 per cent of all trips in London to be made by foot, cycle or public transport by 2041
- 8.80 London Plan Policy T2 advises that development proposals should promote and demonstrate the application of the Mayor's Healthy Streets Approach to: improve health and reduce health inequalities; reduce car dominance, ownership and use, road danger, severance, vehicle emissions and noise; increase walking, cycling and public transport use; improve street safety, comfort, convenience and amenity; and support these outcomes through sensitively designed freight facilities.
- 8.81 London Plan Policy T3 states that development proposals should reflect and be integrated with current and planned transport access, capacity and connectivity.
- 8.82 London Plan Policy T4 sets out that development proposals should reflect and be integrated with current and planned transport access, capacity and connectivity.
- 8.83 Hillingdon Local Plan Policy DMT1 focusses on managing transport impacts of new development, including the requirements for documents to support planning applications. Developments should maximise safe, convenient and inclusive accessibility by sustainable travel modes, provide equal access for all people, include appropriate delivery, servicing and drop-off facilities and not have a significant adverse transport (or associated noise or air quality impact) on the local and wider environment.
- 8.84 This notes the requirement for a Travel Plan or Local Level Travel Plan to be produced for major developments.
- 8.85 Policy DMT 6 requires parking for new developments to be in line with the standards identified in Appendix C of the document. For non-office B class use (employment uses based on the land use class order superseded in 2020), car parking is to be provide to a maximum of 2 spaces plus 1 space per 50-100sqm. Of these, 10% must be suitable for blue badge

holders, with a minimum of 5% of total spaces having active electric vehicle (EV) charging provision and 5% having passive provision.

8.86 This policy also notes that Cycle parking is to be provided at a minimum rate of one space per 500sqm for B2-B8 land uses.

Assessment

Access

8.87 To facilitate the use of the occasional larger HGVs associated with such a storage yard, the existing site access road and bellmouth with the junction of Breakspear Road South will be widened. A gate will also be provided from the access road to an HS2 maintenance area, however the activity associated with ongoing HS2 maintenance is anticipated to be minimal (two vehicles per week).

Trip Generation

8.88 The Proposed Development is intended to primarily provide a new facility to replace Keltbray's existing storage yards located in Ashford, LB Hounslow and near West Drayton on the edge of LB Hillingdon. It may also include some activity associated with another Keltbray yard located in Egham.

8.89 Surveys were undertaken of the Ashford and West Drayton facilities to establish the potential level of activity associated with the Proposed Development. Surveying these sites has resulted in a detailed understanding of the likely trip generation to be experienced by the proposed development.

8.90 There will typically be in the region of 258 two-way (i.e. combined inbound and outbound) movements per day. The peak level of activity has been identified to be 296 two-way movements per day. Core activity is between 0600-1800, with minimal movements outside this period. The inbound morning peak occurs between 0600-0700 (outside the local highway peak) and outbound evening peak at 1700-1800.

- 8.91 On an average day, there are expected to be 22 HGVs (44 movements) accessing the site, with a maximum of six movements in a single hour. Larger HGCs will be even less at 8 vehicles accessing the site on an average day (16 movements).
- 8.92 The analysis indicates that the level of vehicle trip generation would be insignificant in both absolute and percentage change terms.

Parking

- 8.93 The proposals include 65 parking spaces of which four would be marked for blue badge use and a further four would be enlarged bays. Twenty percent of the spaces would be provided with EV charging points at opening, with passive provision made for the remaining spaces. The overall level of car parking provision is below LB Hillingdon maximum standards but is considered an appropriate level of provision noting the forecast staff activity on the site and the desire to minimise the amount of land provided for car parking, noting the importance of maintaining the openness of the Green Belt, while ensuring sufficient provision is made in light of the site location and the impact that inappropriate parking would have on the operation of the Site.
- 8.94 The proposals include space to accommodate parking for three motorcycles in line with LB Hillingdon standards. Provision will also be made for 16 long-stay and 8 short-stay cycle parking spaces, in line with London Plan standards and in excess of LB Hillingdon minimum standards.

HS2

- 8.95 The construction of HS2 generates a significant level of HGV movements, working within a cap of average daily movements agreed with LB Hillingdon. The activity associated with the Proposed Development is considered to be minimal in this context. Once HS2 works are complete, the minimal ongoing maintenance activity associated with HS2 (estimated to be two vehicles a week) would be expected to mean a significant reduction in traffic flow, focused along the Breakspear Road / B467 corridor to the south of the Proposed Development. This would be anticipated to result in a significant reduction in local congestion at peak times, and the trip generation associated with the Proposed Development, given its

absolute low hourly flow, would be considered to remain insignificant in the context of the local highway network operation.

Mitigation Measures

8.96 A series of demand management measures have been identified to further minimise any potential effects associated with the Proposed Development activity. This includes the production of a Travel Plan to encourage sustainable travel behaviour, including a Delivery and Servicing Strategy, and the identification of a Car Parking Management Plan. Overall therefore, it is considered that the development proposals will have a minimal impact on the operation of the local transport networks and should be considered as acceptable on transport grounds.

Sustainability

8.97 This section considers the Proposed Development against relevant planning policy regarding sustainability.

8.98 At the heart of the NPPF is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making and decision-taking.

8.99 The NPPF contains the Government's policy on climate change. Paragraph 20 of the NPPF encourages strategic policies to consider the conservation of the natural, built and historic environment including landscapes, green infrastructure and planning measures to address climate change mitigation and adaptation.

8.100 Paragraph 119 of the NPPF encourages development that makes as much use as possible of previously developed or 'brownfield' land.

8.101 Paragraph 152 of the NPPF sets out that planning policy should consider a low carbon future in a changing climate. Planning plays a key role in helping shape places to secure radical reductions in greenhouse gas emissions, minimising vulnerability and providing resilience to the impacts of climate change, and supporting the delivery of renewable and low carbon

energy and associated infrastructure. This is central to the economic, social and environmental dimensions of sustainable development.

8.102 Paragraph 149 states that local planning authorities are required to adopt proactive strategies to mitigate and adapt to climate change. Paragraph 150, states that to support the move to a low carbon future, local planning authorities should plan for new development in locations and ways that reduce greenhouse gas emissions, such as through suitable adaptation methods, location, orientation and design.

8.103 The London Plan sets out the Mayor's vision to ensure that London becomes a World leader in improving the environment locally and globally, taking the lead in tackling climate change, reducing pollution, development a low carbon economy, consuming fewer resources and using them more effectively.

8.104 London Plan Policy GG6 considers how London can become a more efficient and resilient city. The policy highlights the needs for developments to improve energy efficiency and support the move towards a low carbon circular economy, contributing towards London becoming a zero-carbon city by 2050, as well a need for developments to ensure buildings and infrastructure are designed to adapt to a changing climate.

8.105 London Plan Policy D3 states that developments should aim for high sustainability standards and take into account the principles of the circular economy.

8.106 As identified in London Plan Policy SI 2, major development should be net-zero carbon. This means reducing greenhouse gas emissions in operation and minimising energy demand in accordance with the following 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; and
- 4) Be seen: monitor, verify and report on energy performance.

8.107 Part C of the London Plan Policy SI 2 sets out that a minimum on site reduction of 35% is required for major development, 10% of which should be achieved through energy efficiency measures for residential development and 15% for non-residential development. A carbon

offsetting contribution will be sought for the remainder to make up the shortfall to net zero at a rate of £95 per tonne for 30 years.

- 8.108 London Plan Policy SI 4 states that development proposals should minimise adverse impacts on the urban heat island through design, layout, orientation, materials and the incorporation of green infrastructure
- 8.109 Policy SI 7 of the London Plan focuses on reducing waste and supporting the circular economy. The Mayor seeks to achieve resource conservation, waste reduction, increases in material re-use and recycling and reductions in waste going for disposal.
- 8.110 Furthermore, Policy SI 7 of the London Plan sets out that referable applications should promote circular economy outcomes and aim to be net zero-waste.
- 8.111 At a local level, Local Plan Policy DMEI 2 states that all developments are required to make the fullest contribution to minimising carbon dioxide emissions in accordance with London Plan targets. All major development proposals must also be accompanied by an energy assessment showing how these reductions will be achieved. Proposals that fail to take reasonable steps to achieve the required savings will be resisted.
- 8.112 Local Plan Policy DMEI 3 sets out the borough's Decentralised Energy programme which has been developed to facilitate and accelerate the uptake of district heating.

Assessment

Sustainability

- 8.113 A Sustainability Statement has been prepared by IN2 and submitted as part of the application. The Statement responds specifically to the Mayor's London Plan 2021 and the Hillingdon Local Plan Policies.
- 8.114 The Sustainability Statement has been development around the following key themes which are outlined in the context of the Proposed Development below.

Energy & Carbon Emissions Reduction

8.115 The Proposed Development will reduce energy demand through a range of passive design and energy efficiency measures such as best practice levels of insulation and low fabric air permeability.

Water

8.116 The Proposed Development will be fitted with water efficient fixtures and fittings in order to satisfy local planning policies and applicable assessment methods.

Materials

8.117 The Proposed Development will use building elements selected in accordance with the BRE Green Guide to Specification, with the aim of selecting elements in the range A+ to C to minimise environmental impact where feasible. All timber used within the Proposed Development will aim to be FSC certified or similar and where possible materials will be locally sourced.

Waste

8.118 The contractor will be required to produce and adhere to a Resource Management Plan which sets out requirements to maximise diversion of demolition, construction and excavation waste from landfill.

8.119 The Proposed Development will provide a sufficient capacity of bin storage. An Operational Waste Management Plan has been prepared and submitted along with the planning application which sets out further details.

Transport

8.120 The Proposed Development seeks to actively encourage sustainable travel to/from the Site and measures are included to improve low carbon transport options to the Site. These types

of measures include electric vehicle charging. Full details are included within the Travel Plan prepared and submitted with the planning application.

Biodiversity

8.121 It is expected that the Proposed Development will lead to a net gain in Urban Greening Factor. Whilst there is no required measurement for non-residential developments, it is a positive benefit of the scheme.

Air Pollution

8.122 No combustion plant is being installed as part of the development for the provision of heating or hot water. Heating and hot water will be provided by air source heat pumps.

8.123 External luminaires will direct lighting appropriately to minimise light pollution and loss of light to the sky. The main contractor of the Proposed Development will minimise the risk of pollution and will be registered with the Considerate Constructors Scheme or similar.

Environment Assessment (BREEAM)

8.124 A BREEAM pre-assessment has been undertaken and a target rating of Very Good is deemed to be achievable for the Proposed Development with a target score of 65.15%.

Energy

8.125 An Energy Statement, prepared by IN2, has been submitted with the planning application which seeks to detail a robust energy demand reduction and supply strategy to enable the Proposed Development to meet national, regional and local policies.

8.126 A summary of the individual carbon savings for the Be Lean, Be Clean, Be Green and Be Seen stages of the energy hierarchy are set out below.

Be Lean

- 8.127 A range of passive design and energy efficiency measures have been incorporated into the Proposed Development to optimise the balance between beneficial winter solar gains and summer comfort, while maximising internal daylight levels.
- 8.128 It is anticipated that these measures will achieve a 15% reduction in site-wide regulated CO2 emissions beyond the requirements of the Building Regulations Part L (2021) 'baseline'.

Be Clean

- 8.129 No existing heat network is available for consideration in the Proposed Development. Therefore, the reduction remains the same as seen in 'Be Lean'.

Be Green

- 8.130 The Proposed Development will include the installation of an all-electric heat pump solution which will provide a 50% reduction in carbon emissions. As such, the Site will meet GLA energy assessment guidance on NOx emissions.
- 8.131 The potential for incorporating further renewable energy systems has been reviewed and photovoltaic panels are proposed to the roofs of the proposed buildings. These are expected to achieve a significant amount of CO2 savings and will reduce CO2 emissions a further 65%.
- 8.132 Combining the lean and green savings gives rise to an overall reduction in regulated carbon emissions of 130% for the Proposed Development.

Be Seen

- 8.133 A full GLA Be Seen spreadsheet can be found within Appendix C of the Energy Strategy.

In consideration of the above, the Proposed Development is in accordance with national, regional and local policies related to energy.

Circular Economy

8.134 A Circular Economy Statement has been prepared by IN2 and submitted with the planning application. The Statement seeks to demonstrate that the six core principles of a circular economy are a fundamental part of the Proposed Development design. These six core principles include:

- 5) Building in layers;
- 6) Designing out waste;
- 7) Designing for longevity;
- 8) Designing for adaptability and flexibility;
- 9) Designing for disassembly; and
- 10) Using systems, elements or materials that can be reused and recycled.

8.135 The Proposed Development seeks the partial retention and refurbishment of existing Building 1 on the Site. This strategy of refurbishment over rebuild aims to greatly reduce the overall carbon impact onsite through a reduction of new materials provided.

8.136 The Proposed Development includes the demolition and erection of four buildings. The Circular Economy Statement sets out that the strategy for the warehouses will be to disassemble and reuse building components where possible. It is proposed that 90% of steel used onsite will be reused from other developments. Additionally, a pre-demolition waste audit will be carried out to ensure that any materials suitable for reuse are tested and used onsite where possible and if not, reused on a nearby site or off-site.

8.137 It is proposed that 95% of construction and excavation waste will be reused or recycled. Further details of this can be found in the Circular Economy Statement.

8.138 The Proposed Development will be compliant with national, regional and local sustainability and circular economy policies.

Noise

8.139 The NPPF outlines the importance of ensuring that planning policies and decisions consider the likely effects that new development will have on the potential sensitivity of the site and wider area. Paragraph 185 states that:

a) planning should help to mitigate and reduce potential adverse impacts resulting from noise from new development and avoid noise giving rise to significant adverse on health and the quality of life.

b) identify and protect tranquil areas which have remained relatively undisturbed by noise and are prized of their recreational and amenity value.

8.140 London Plan policy D13 states that development proposals should manage noise and other potential nuisances by:

a) Ensuring that good design mitigates and minimises existing and potential nuisances generated by existing uses and activities loaded in the area

8.141 b) exploring mitigation measures early in the design state, with necessary and appropriate provisions including ongoing and future management of mitigation measures secured through planning obligations

c) separating new noise-sensitive development where possible from existing noise-generating businesses and uses through distance, screening, internal layout, soundproofing, insulation and other acoustic design measures.

8.142 The Agent of Change principle places the responsibility for mitigating the impact of noise and other nuisances firmly on the new development. This means that where new developments are proposed close to existing noise-generating uses, for example, applicants will need to design them in a more sensitive way to protect the new occupiers, such as residents, businesses, schools and religious institutions, from noise and other impacts.

8.143 Policy D14 specifies how noise should be reduced, managed and mitigated. The management of noise should be an integral part of development proposals and considered as early as possible. Managing noise includes improving and enhancing the acoustic environment and promoting appropriate soundscapes. Consideration of existing noise sensitivity within an area is important to minimise potential conflicts of uses or activities, for example in relation to internationally important nature conservation sites which contain noise sensitive wildlife species, or parks and green spaces affected by traffic noise and pollution.

8.144 At a local level, Policy DMHB 11 of the Hillingdon Local Plan: Development Management Policies and Policy BE1 of the Hillingdon Local Plan: Strategic Policies seek to ensure that while there are no adverse impacts on the residential amenity of neighbouring polices. While there is the potential for additional noise and disturbance being created due to the more intensive use of the site, it's likely that direct impacts to neighbours will be relatively low.

Assessment

8.145 A Noise and Vibration Impact Assessment has been prepared by Mott McDonald and has been submitted as part of this application. This report has assessed the potential noise impact of the proposed development in both operational and construction phase.

8.146 The assessment indicates that predicted levels of noise during demolition and construction activities in all phases are below the 65 dB threshold value applicable to category A receptors. Noise during piling may marginally exceed the threshold value if a drop hammer piling method is used. However, the duration of this impact is not expected to exceed 10 consecutive days out of 15. Therefore, no potential significant effect is expected to occur at any nearby receptors.

8.147 An assessment of changes in road traffic noise due to additional vehicles during construction has been undertaken considering changes in daytime vehicle movements on Breakspear Road South. This has found that the impact is assessed as negligible impact and therefore not significant from a noise and vibration perspective.

8.148 In terms of the operational phase, detailed information and specifications of noise-emitting fixed plant to be installed on site are not available at this stage. Rating noise level criteria applicable to the combined levels due to all sources at the receptor position is required by the LB of Hillingdon to not exceed 5 dB below background sound level (LA90) at any receptors when assessed in accordance with BS 4142 guidance for representative receptor locations.

8.149 The predictions for site operations (materials handling and vehicle movements) indicate that noise levels are likely to fall below the prevailing background sound level at the nearest noise sensitive receptors, but are marginally above the rating level limit agreed with LB of Hillingdon. If it is considered essential that rating level from these activities falls 5 dB below

the prevailing background consideration should be given to the installation of an acoustic barrier (approximately 2.4-3m tall) around the south-east and north-east perimeter of Yard 3. The barrier should have a minimum density of 10kg/m² and be free of gaps between and below panels.

- 8.150 Increases in road traffic noise due to additional operational road traffic Breakspear Road South are assessed as negligible.
- 8.151 In summary therefore, the Proposed Development is expected to have negligible impacts in terms of noise and vibration, during both the construction and operational phase. The Proposed Development is therefore in line with London Plan policies D13 and D14 and LB Hillingdon Local Plan policies DMHB 11 and BE1.

Air Quality

- 8.152 At a national level, paragraph 185 of the NPPF advises that planning decisions should ensure that development is located appropriately. Development proposals should consider the likely effects of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from development. In pursuance of this, development proposals should mitigate and reduce to minimum potential adverse impact in amenity.
- 8.153 Paragraph 174 of the NPPF states that development should not contribute to or be put at unacceptable risk of, or be adversely affected by unacceptable levels of pollution, including air pollution.
- 8.154 London Plan Policy SI 2 requires major developments are net zero-carbon, through reducing greenhouse gas emissions during operation through being leave, clean and green. Major proposals should include a detailed energy strategy to demonstrate how the zero-carbon target will be met.
- 8.155 At a local level, Local Plan Policy EM8 notes that all development should not cause deterioration in the local air quality levels and should ensure the protection of both existing and new sensitive receptors. Policy EM8 seeks to reduce the levels of pollutants referred to

in the Government's National Air Quality Strategy and will have regard to the Mayor's Air Quality Strategy.

8.156 Furthermore, Local Plan Policy EM8 states that London Boroughs should also take account of the findings of the Air Quality Review and Assessment and Actions Plans, in particular, where Air Quality Management Areas have been designated.

8.157 Local Plan Policy DMEI 14 sets out that development proposals should demonstrate appropriate reductions in emissions to sustain compliance with and contribute towards meeting EU limit values and national air quality objectives for pollutants.

8.158 Policy DMEI 14 goes on to state that development proposals should, as a minimum, be at least 'air quality neutral', include sufficient mitigation to ensure there is no unacceptable risk from air pollution to sensitive receptors (both existing and new) and actively contribute towards the improvement of air quality, especially within the Air Quality Management Area.

Assessment

8.159 An Air Quality Assessment has been prepared by Mott MacDonald Limited which seeks to provide an assessment of the following key impacts associated with the construction and operational phases of the Proposed Development:

- Nuisance, impact upon health and/or loss of amenity caused by construction dust on sensitive receptors;
- Changes in pollutant concentrations caused by the Proposed Development; and
- Air quality neutral in line with London planning policy requirements.

8.160 The Site is not located within an Air Quality Management Area (AQMA). The Hillingdon AQMA is located 90m to the south of the Site.

8.161 The qualitative assessment of construction dust effects has been undertaken for the Proposed Development. It is predicted that there will be a 'low to medium risk' of dust

creating nuisance and/or loss of amenity and 'low risk' of PM₁₀ leading to adverse health effects (without mitigations).

- 8.162 Mitigation measures have been listed within Section 6.2 of the Air Quality Assessment and should these be appropriately implemented, the impacts are not predicted to be significant.
- 8.163 The Transport Statement submitted alongside the planning application confirms the trips generated by the Proposed Development would be lower than that associated with the consented use of the Site. To summarise, on an average day, there are expected to be 22 HGVs accessing the Site, with a maximum of six movements in a single hour.
- 8.164 The air quality effects from road traffic emissions during the construction and operation phase of the proposed development have been considered at sensitive receptors using an atmospheric dispersion model.
- 8.165 Modelled concentrations of NO₂, PM₁₀ and PM_{2.5} are below air quality objectives in the Do-Minimum and Do-Something scenarios of the construction and operational phases. The Proposed Development results in 'negligible' changes the concentration of all modelled pollutants at all receptors. In accordance with the IAQM significance criteria adopted for the assessment, impacts are concluded to be not significant.
- 8.166 Furthermore, an Air Quality Neutral Assessment has been undertaken in line with the Mayor of London's 'Draft Air Quality Neutral' SPG (2021). The assessment considered transport emissions only due the design of the Proposed Development. The assessment concludes that the proposed development is considered to be air quality neutral.
- 8.167 Overall, the air quality effects of the Proposed Development are judged to be not significant, with suitable mitigation. As such, the Proposed Development therefore complies with the relevant national, regional and local planning policies.

Flood Risk and Drainage

- 8.168 Paragraph 159 of the NPPF states that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether

existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere. Paragraph 169 details the importance of drainage systems as it states that major developments should incorporate sustainable drainage systems unless there is clear evidence that this would be inappropriate.

The systems used should:

- a) take account of advice from the lead local flood authority;
- b) have appropriate proposed minimum operational standards; and
- c) have maintenance arrangements in place to ensure an acceptable standard of operation for the lifetime of the development; and
- d) where possible, provide multifunctional benefits

8.169 At a regional level, policy SI12 of the London Local Plan states that current and expected flood risk from all sources across London should be managed in a sustainable and cost-effective way in collaboration with the Environment Agency, the Lead Local Flood Authorities, developers and infrastructure providers. Development proposals should ensure that flood risk is minimised and mitigated, and that residual risk is addressed.

8.170 Policy SI13 of the London Local Plan details that London is at particular risk from surface water flooding, mainly due to the large extent of impermeable surfaces. Lead Local Flood Authorities have responsibility for managing surface water drainage through the planning system, as well as ensuring that appropriate maintenance arrangements are put in place. Local Flood Risk Management Strategies and Surface Water Management Plans should ensure they address flooding from multiple sources including surface water, groundwater and small watercourses that occurs as a result of heavy rainfall. Development proposals should aim to get as close to greenfield run-off rates as possible depending on site conditions.

8.171 At a local level, policy EM6 of the Hillingdon Local Plan states that the Council will require new development to be directed away from flood zones 2 and 3 (medium and high probability flood risk areas) in accordance with the principles of the NPPF.

Assessment

- 8.172 A Flood Risk Report and Drainage Strategy has been prepared by Symmetrys and submitted as part of this planning application.
- 8.173 In accordance with NPPF, SFRA and EA the site is located in a Flood Zone 1, with no requirement for an Exception test. The site has been assessed as being low probability of flooding from rivers and sea; reservoirs; groundwater; sewers and surface water.

The proposed development will benefit from SuDS drainage scheme, which implements mitigations measurements for surface water runoff arising from the woodlands north of the site. The proposed overland flow attenuation system will result into a reduction of the flood risk and the proposal will provide an overall betterment the existing arrangement. In addition, any runoff generated from the site will be restricted to Greenfield run-off rate before discharging into the public network. With the implantation to the above, and the proposed measurements to manage surface water flooding within the site this will also provide a betterment and reduce the flooding downstream off the site.

- 8.174 The proposed development is having an acceptable flood risk within the terms and requirements of the NPPF, London Plan policy SI13 and and LB Hillingdon Policy EM6.

Contamination

- 8.175 Paragraph 183 of the NPPF states that a site is suitable for its proposed use taking account of ground conditions and any risks arising from land instability and contamination.
- 8.176 Policy EM8 of the Hillingdon Local Plan: Part 1 states that the Council expects proposals for development on contaminated land to provide mitigation strategies that will reduce the impacts on surrounding land uses. Major development proposals will be expected to demonstrate a sustainable approach to remediation that includes techniques to reduce the need to landfill.
- 8.177 Policy DME1 11 of the Hillingdon Local Plan: Part 2 sets out that any risk to groundwater resources must be assessed to demonstrate that groundwater would be protected throughout the construction and operational phases of development.

8.178 Further, Policy DME1 12 of the Hillingdon Local Plan: Part 2 states that proposals on potentially contaminated sites will be expected to be accompanied by an initial study of the likely contaminants, through a phase 1 preliminary risk assessment. Development on land potentially affected by contamination will only be supported 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.

Assessment

8.179 A Ground Contamination and Geotechnical Interpretative Report and Remediation Strategy has been prepared by Johnson Poole and Bloomer and submitted with this planning application. The Report provides a summary of ground investigation whilst the Remediation Strategy provides appropriate remedial options.

8.180 This report indicates that there is a potential for some ground contamination on the site, and suggests various recommendations during the construction phase to further understand the level of potential contamination.

8.181 This strategy is in line with Local Plan policy DME1 12 and EM8.

9 S106 Heads of Terms and Community Infrastructure Levy

S106

9.1 Policy DMCI 7 of the Hillingdon Local Plan Part 2 states that to ensure development is sustainable, planning permission will only be granted to development that clearly demonstrates there will be sufficient infrastructure of all types to support it.

9.2 This policy continues to note that Planning Obligations will be sought on a scheme by scheme basis... where development has infrastructure needs that are not addressed through CIL and to ensure that development proposals provide or fund improvements to mitigate site specific impacts made necessary by the proposals.

9.3 In line with this policy it is expected that some small scale contributions may be sought however these are to be agreed between the applicant and LB Hillingdon during the determination of the application. It is anticipated that these may comprise the following:

- Travel Plan
- Carbon Offsetting
- Construction Training
- Access rights to HS2

Community Infrastructure Levy

9.4 From 1 April 2012, all planning approvals for schemes with a net additional floor area of over 100sqm or more are liable for both Mayoral and LB Hillingdon Community Infrastructure Levy.

9.5 In accordance with the MCIL2 Charging Schedule (2019), the chargeable rate per square metre of floorspace is £60, payable to the Mayors Office.

9.6 The LB Hillingdon charging schedule came into effect in 2014, and the liable floorspace is considered to fall under Use Class B8 which equates to £5 per square metre.

10 Conclusion

- 10.1 The Site at the Former MSD Facility in Ickenham is currently vacant site, formally in employment use. The site is considered to be Previously Developed Land within the Green Belt, in accordance with paragraph 149 of the NPPF.
- 10.2 There are two conflicting London Plan policy objectives on this site; the need to intensify existing employment floorspace whilst also seeking to maintain the openness of the Green Belt. The GLA have confirmed that the latter is the priority in this instance, which has been fed into the design of the site including the overall built volume, layout, orientation, height and materials of the proposed buildings.
- 10.3 Through careful design and consolidation of the buildings, the openness of the Green Belt is maintained. The quality of the Green Belt is further enhanced through an extensive landscaping strategy. From an early stage in the design process we have worked with our landscape architect and ecologist, to devise a unique, site specific strategy to landscaping whilst seeking to improve the ecological value of the site. The proposals result in a Biodiversity Net Gain of just over 23%.
- 10.4 Notwithstanding this, we have sought to increase the employment floorspace where possible and appropriate, whilst ultimately not increasing the built volume of the proposed structures in such a way that it would affect the openness of the Green Belt. This has been achieved through the introduction of mezzanine floors to the warehouse buildings. Both the policies seeking intensification of employment floorspace, and the requirement to protect the openness of the Green Belt, have been met.
- 10.5 A sustainable approach to design has also been sought, through the reuse of existing materials on the site to promoting renewable energy through the installation of PV panels where appropriate. EV charging spaces are provided on the site, with cycle parking to encourage sustainable modes of travel where possible.
- 10.6 The site is within an area of poor public transport accessibility, with a PTAL rating of 0. Car parking is therefore provided on site for staff, however the introduction of a Travel Plan seeks to reduce the need to travel to the site by car over time.

10.7 Through our extensive public and stakeholder consultation, we understand that the transport and specifically traffic implications of the site were of a key concern for this site. We have therefore undertaken detailed surveys, engaged with LB Hillingdon Highways officers and with the neighbouring developer, HS2, to ensure the proposed trip generation is suitable for the local area, resulting in minimal impact to the community. Our analysis indicates that the level of vehicle trip generation would be insignificant in both absolute and percentage change terms.

10.8 Further wider public benefits include the following:

- To avoid the need for a second vehicular access off Breakspear Road South, it is proposed to allow access via the Former MSD entrance into the HS2 site during the operational phase of this development.
- Reuse of this employment site to create new jobs, boosting the local economy
- Commitment to training and apprenticeships to encourage young people into the industry
- Creation of ponds across the site, enhancing and encouraging wildlife to the local area whilst also ensuring the risk of flooding to the site is minimised
- The applicant is seeking to reach an agreement with HS2 (via Glenn Tobin at Queenswood) and LB Hillingdon to propose 'goal posts' to the north of the site to prevent larger HGVs coming from the surrounding area and hitting the bridge.

10.9 The applicant is looking for a long-term home in Hillingdon and it committed to being a good neighbour and relocating into a site which sets an example for the industry. The proposals have come forward after extensive consultation and detailed inputs from the wider consultant team and complies with National, Regional and Local Planning Policy objectives.