Appendix A

Planning Policy Overview (as of March 2025)

Introduction

1. This Appendix of the Planning Statement will provide an overview of national, regional, and local planning policies relevant to the determination of this application. It should be read alongside the summary of key planning policies, as set out in Section 5 of this Statement.

2. Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that the determination of planning applications is made in accordance with the Development Plan unless material considerations indicate otherwise.

3. The development plan for LBH includes the following plans:

    *   The London Plan (March 2021);
    *   The Local Plan: Part 1 Strategic Policies (LPP1) (November 2012) (LPP1);
    *   The Local Plan: Part 2 Development Management Policies and Site Allocations and Designations (January 2020) (LPP2); and
    *   The West London Waste Plan (July 2015).

4. All of the above plans are considered to be directly relevant except the West London Waste Plan.

5. Whilst not having development plan status, the National Planning Policy Framework (December 2024) (NPPF) is evidently a material consideration in the determination of planning applications.

6. LPP1 is of some age, having been adopted in November 2012. The Plan Period for LLP1 runs until 2026. LPP1 was examined, and adopted, subsequent to the NPPF in 2012 so to a large degree reflects an, albeit, previous version of the NPPF. The NPPF sets a presumption in favour of sustainable development, indicating in Paragraph 11 what this means for decision-taking depending on whether there is either an up to date development plan (Paragraph 11c) or an out of date development plan (Paragraph 11d). As, overall, the policies of LPP1 remain up to date, including with NPPF 2024, it is not considered at the time of writing that there is any need to engage part d of Paragraph 11. Therefore, as there is considered to be an up-to-date development plan, the decision maker is expected to approve development proposals that accord with the development plan without delay.

The London Plan (March 2021)

7.   The London Plan, revised in March 2021, provides the Spatial Development Strategy for Greater London. It outlines a framework for the city's development over the next 20-25 years, aligned with the Mayor's vision for Good Growth.

8.   Under the legislation establishing the Greater London Authority (GLA), the Mayor is required to publish a Spatial Development Strategy (SDS) and keep it under review. The SDS is known as the London Plan. As the overall strategic plan for London, it sets out an integrated economic, environmental, transport and social framework for the development of London over the next 20-25 years.

9.   The general objectives for the London Plan, and the process for drawing it up, altering it and replacing it, are set out in the Greater London Authority Act 1999 (as amended) and the Town and Country Planning (London Spatial Development Strategy) Regulations 2000. The London Plan has been developed in line with these requirements.

10.   The legislation stipulates that the London Plan should only deal with things of strategic importance to Greater London[1] taking account of the principal purposes of the Greater London Authority which are:[2]

- promoting economic development and wealth creation in Greater London
- promoting social development in Greater London and
- promoting the improvement of the environment in Greater London.

11.   The London Plan is legally part of each of London's Local Planning Authorities' Development Plan and must be taken into account when planning decisions are taken in any part of Greater London. Planning applications should be determined in accordance with it, unless there are sound planning reasons (other material considerations) which indicate otherwise. All Development Plan Documents and Neighbourhood Plans have to be 'in general conformity' with the London Plan

12.   The structure of the Plan is as follows:

- Chapter one, together with the Foreword, sets out the Mayor's vision and explains what Good Growth is. Chapter one contains six core 'good growth' objectives which should be taken into account for all planning and development in London. Each sets out a high-level objective, which is a more detailed expression of the Mayor's vision, with clauses underneath setting out the strategic approach to development in London. The subsequent chapters provide the topic-specific and spatially-specific policies that are required to deliver the Good Growth objectives.
- Chapter two sets out the overall spatial development pattern for London, focusing on the growth strategies for specific places in London and how they connect with the Wider South East.

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[1] GLA Act 1999, section 334(5)

[2] GLA Act 1999, section 30

- Chapters three to twelve cover topic-based policies and implementation:
  - Chapter 3 Design
  - Chapter 4 Housing
  - Chapter 5 Social Infrastructure
  - Chapter 6 Economy
  - Chapter 7 Heritage and Culture
  - Chapter 8 Green Infrastructure and Natural Environment
  - Chapter 9 Sustainable Infrastructure
  - Chapter 10 Transport
  - Chapter 11 Funding the London Plan
  - Chapter 12 Monitoring

Planning London's Future – Good Growth

13. **Policy GG1 (Building strong and inclusive communities)** sets out the Plan's objectives for inclusive growth, which includes encouraging early and inclusive engagement with stakeholders, and seeking to ensure that London continues to generate a wide range of economic and other opportunities.

14. **Policy GG2 (Making the best use of land)** promotes making the best use of land, which includes enabling the development of brownfield land, prioritising sites which are well-connected by existing or planned public transport, promoting higher density development, and promoting the creation of new green infrastructure and urban greening, including aiming to secure net biodiversity gains where possible.

15. **Policy GG5 (Growing a good economy)** is concerned with conserving and enhancing London's global economic competitiveness. The policy encourages the promotion of the strength and potential of the wider city region, and seeks to ensure that London's economy diversifies. The policy also notes that those involved in planning and development must plan for sufficient employment and industrial space in the right locations to support economic development and regeneration.

16. Supporting text for policy GG5 notes that the right infrastructure is also required to help businesses succeed across London. The digital economy, underpinned by world-class digital connectivity, data and digital services is of ever-increasing importance, improving processes, opening up new markets and allowing more flexible working.

17. **Policy GG6 (Increasing efficiency and resilience)** seeks to help London become a more efficient and resilient city through the creation of safe and secure environments, which are resilient to the impact of emergencies including fire and terrorism. The supporting text outlines the importance of collaborative planning with London's police forces and public safety experts.

Spatial Development Patterns

18.   **Policy SD1 (Opportunity Areas)** sets out a series of opportunity areas. To ensure that Opportunity Areas fully realise their growth and regeneration potential, the Mayor will: 1) provide support and leadership for the collaborative preparation and implementation of planning frameworks that: a) set out a clear strategy for accommodating growth b) assist in delivering specific infrastructure requirements that unlock capacity for new homes and jobs c) support regeneration d) are prepared in an open and timely manner e) encourage the strategic remediation of contaminated land, 2) bring together the range of investment and intervention needed to deliver the vision and ambition for the area 3) support and implement adopted planning frameworks, in order to give them appropriate material weight in planning decisions 4) ensure that his agencies (including Transport for London) work together and with others to promote and champion Opportunity Areas, and identify those that require public investment and intervention to achieve their growth potential, 5) ensure that Opportunity Areas maximise the delivery of affordable housing and create mixed and inclusive communities 6) ensure that Opportunity Areas contribute to regeneration objectives by tackling spatial inequalities and environmental, economic and social barriers that affect the lives of people in the area, especially in Local and Strategic Areas for Regeneration 7) monitor progress in delivering homes, jobs and infrastructure, taking action where necessary to overcome any barriers to delivery 8) ensure that development facilitates ambitious transport mode share targets.

19.   It is also noted that boroughs, through Development Plans and decisions, should support development which creates employment opportunities, and support and sustain Strategic Industrial Locations (SIL) and other industrial capacity by considering opportunities to intensify and make more efficient use of land in SIL, in accordance with Policy E4 Land for industry, logistics and services to support London's economic function, Policy E5 Strategic Industrial Locations (SIL), Policy E6 Locally Significant Industrial Sites and Policy E7 Industrial intensification, co-location and substitution, co-location and substitution.

20.   The site is located within the Heathrow Opportunity Area, which is in the Mayor's London Plan as an Opportunity Area (OA) with potential for 13,000 new homes and 11,000 new jobs by 2041. The OA was designated 2008 and is part of the Heathrow/Elizabeth Line West Growth Corridor.
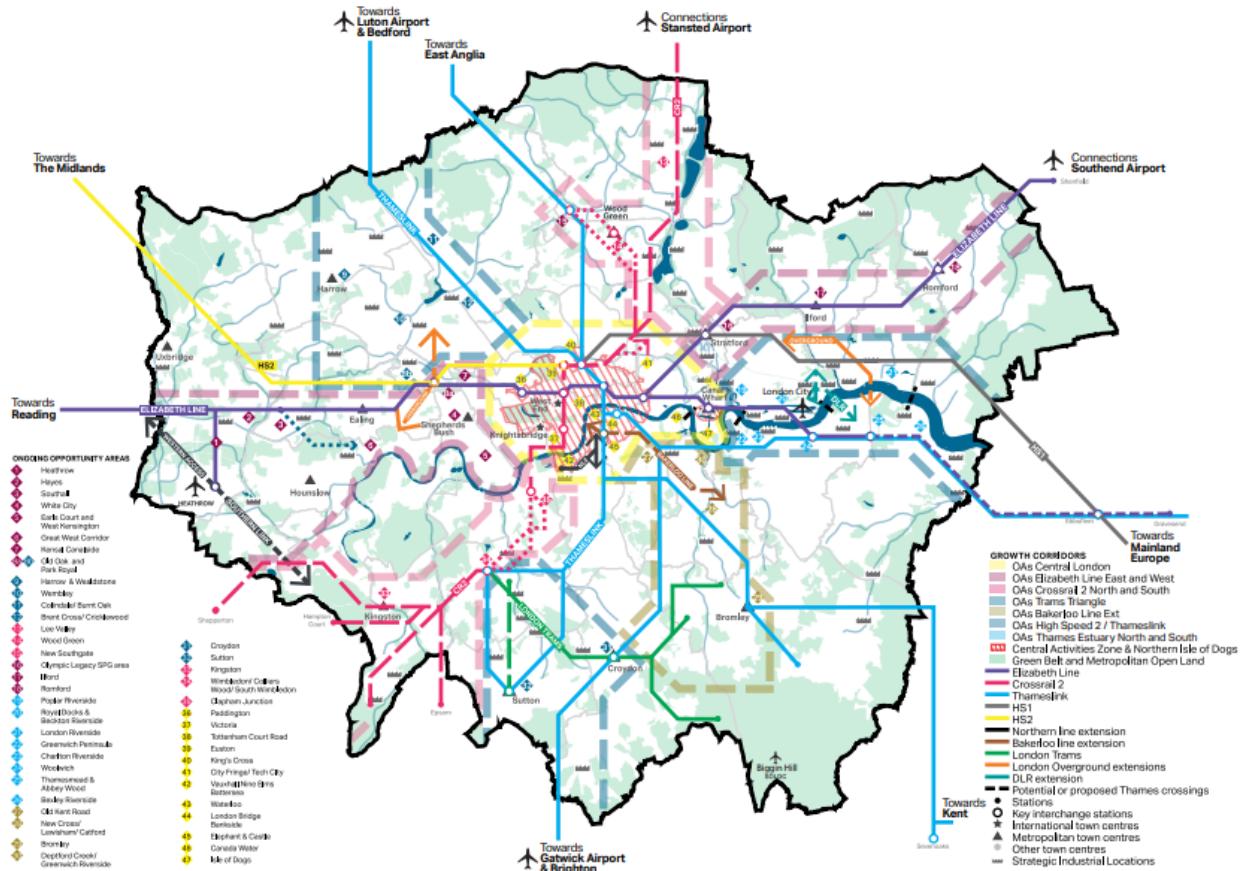
Figure 1. The Key Diagram

Design

21. **Policy D1** focuses on **London's form, character, and capacity for growth.** The key points are as follows:
    1. Defining Character: Boroughs should conduct area assessments to understand the characteristics, qualities, and value of different places. This includes demographic data, housing types, urban form, transport networks, air quality, open spaces, heritage assets, and more.
    2. Planning for Growth: Development Plans should use these assessments to identify suitable locations for growth and determine the scale of growth. This involves evaluating the capacity of existing and planned infrastructure to support new development.
    3. Design Principles: The policy emphasises good design principles, ensuring that new developments are responsive to their context and provide high-quality user experiences

22. **Policy D2 (Infrastructure requirements for sustainable densities)** and **Policy D3 (Optimising site capacity through the design-led approach)** consider how infrastructure requirements and the capacity of existing infrastructure may be balanced and thus proportionate to the scale of the development, and how a design led approach can optimise site capacity. This means that the development proposed takes the most appropriate form for the site, and will not necessarily mean the maximum capacity. The design-led approach is therefore based on an evaluation of the site's attributes, its surrounding context and its capacity for growth to determine the appropriate form of development for that site.

23. **Policy D4 (Delivering good design)** identifies how development delivers good design, noting that the responsibility for undertaking the various process or actions suggested in the policy (i.e. masterplans and design codes, design scrutiny / review etc) will depend on the nature of the development – however the key outcome is reiterated as this process must ensure the most efficient use of land is made so that development on all sites is optimised.

24. **Policy D5 (Inclusive Design)** expects development proposals to achieve the highest standards of accessible and inclusive design.

25. **Policy D9 (Tall Buildings**) notes that based on local context, Development Plans should define what is considered a tall building for specific localities, the height of which will vary between and within different parts of London but should not be less than 6 storeys or 18 metres measured from ground to the floor level of the uppermost storey. It sets out the various criteria that development proposals for tall buildings should address, including visual impacts, functional impact, environmental impact and cumulative impacts.

26. **Policy D11 (Safety, security and resilience to emergency)** requires that development proposals should maximise building resilience and minimise potential physical risks, and should include measures to design crime out.

27. **Policy D12 (Fire Safety)** requires that all major development proposals should be submitted with a Fire Statement.

28. **Policy D14 (Noise)** proposes a number of requirements in order to reduce, manage and mitigate noise to improve health and quality of life, residential and other non-aviation development proposals should manage noise by:
    1. avoiding significant adverse noise impacts on health and quality of life
    2. reflecting the Agent of Change principle as set out in Policy D13 Agent of Change
    3. mitigating and minimising the existing and potential adverse impacts of noise on, from, within, as a result of, or in the vicinity of new development without placing unreasonable restrictions on existing noise-generating uses
    4. improving and enhancing the acoustic environment and promoting appropriate soundscapes (including Quiet Areas and spaces of relative tranquillity)

5. separating new noise-sensitive development from major noise sources (such as road, rail, air transport and some types of industrial use) through the use of distance, screening, layout, orientation, uses and materials – in preference to sole reliance on sound insulation

6. where it is not possible to achieve separation of noise-sensitive development and noise sources without undue impact on other sustainable development objectives, then any potential adverse effects should be controlled and mitigated through applying good acoustic design principles

7. promoting new technologies and improved practices to reduce noise at source, and on the transmission path from source to receiver.

Social Infrastructure

29. **Policy S1 (Developing London's Social Infrastructure)** states that new facilities should be easily accessible by public transport, cycling and walking and should be encouraged in high streets and town centres.

Economy

30. **Policy E4 (Land for Industry, Logistics and Services to Support London's Economic Function)** notes that sufficient supply of land and premises in different parts of London to meet current and future demands for industrial and related functions should be provided and maintained, taking into account strategic and local employment land reviews, industrial land audits and the potential for intensification, co-location and substitution (see Policy E7 Industrial intensification, co-location and substitution). This includes making provision for storage and logistics/distribution (Use Class B8).

31. **Policy E5 (Strategic Industrial Locations (SIL))** notes that London's SILs are the capital's main reservoir of land for industrial, logistics and related uses. SILs are given strategic protection because they are critical to the effective functioning of London's economy. They can accommodate activities which - by virtue of their scale, noise, odours, dust, emissions, hours of operation and/or vehicular movements - can raise tensions with other land uses, particularly residential development.

32. To ensure that London can retain an efficient logistics function it is particularly important to secure and enhance strategic provision in SILs in west London, especially at Park Royal and around Heathrow; in north London in the Upper Lee Valley; in east London, north and south of the Thames; and in the Wandle Valley in south London.

33. **Policy E7 (Industrial intensification, co-location and substitution)** states that development Plans and development proposals should be proactive and encourage the intensification of business uses in Use Classes B1c, B2 and B8 occupying all categories of industrial land through the development of multi-storey schemes.

34. **Policy E8 (Sector growth opportunities and clusters)** states that employment opportunities for Londoners across a diverse range of sectors should be promoted and supported along with support for the development of business growth and sector-specific opportunities.

35.   The Mayor wants London to continue to provide the best environment in the world in which to do business, so that businesses of all different sizes and sectors can reach their growth potential. This includes supporting business and employment across all sectors of the economy and capitalising on new growth opportunities in emerging sectors. This Plan provides the planning framework to complement the Mayor's Economic Development Strategy (EDS) to ensure that the varied innovation and workspace requirements of London's businesses are met.

36.   In the EDS, the Mayor has identified a number of sector-specific opportunities and challenges that require a more targeted approach where he believes there are specific business growth opportunities. This includes the tech and digital sector – which supports the growth and evolution of all sectors in the economy. Planning should ensure that new developments have the digital connectivity required to support London's global competitiveness (see Policy SI 6 Digital connectivity infrastructure).

37.   **Policy E11 (Skills and opportunities for all)** notes that development proposals should support employment, skills development, apprenticeships, and other education and training opportunities in both the construction and end-use phases, including through Section 106 obligations where appropriate.

Heritage and Culture

38.   **Policy HC1 (Heritage conservation and growth)** states that development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings. The cumulative impacts of incremental change from development on heritage assets and their settings should also be actively managed. Development proposals should avoid harm and identify enhancement opportunities by integrating heritage considerations early on in the design process

Green Infrastructure and Natural Environment

39.   **Policy G1 (Green Infrastructure)** notes that development proposals should incorporate appropriate elements of green infrastructure that are integrated into London's wider green infrastructure network

40.   **Policy G5 (Urban Greening)** states that the inclusion of urban greening measures in new development will result in an increase in green cover, and should be integral to planning the layout and design of new buildings and developments. This should be considered from the beginning of the design process.

41.   **Policy G6 (Biodiversity and access to nature)** notes that development proposals should manage impacts on biodiversity and aim to secure net biodiversity gain. This should be informed by the best available ecological information and addressed from the start of the development process.

42.   **Policy G7 (Trees and Woodlands)** is concerned with London's urban forest and woodlands. Development proposals should ensure that, wherever possible, existing trees of value are retained.

Sustainable Infrastructure

43. **Policy SI1 (Improving air quality)** states that development proposals should ensure that where emissions need to be reduced to meet the requirements of Air Quality Neutral or to make the impact of development on local air quality acceptable, this is done on-site.

44. Assessment of the impacts of a scheme on local air pollution should include fixed plant, such as boiler and emergency generators, as well as expected transport-related sources. The impact assessment part of an Air Quality Assessment should always include all relevant pollutants. Industrial, waste and other working sites may need to include on-site vehicles and mobile machinery as well as fixed machinery and transport sources. An Air Quality Assessment has been submitted as part of this application.

45. **Policy SI2 (Minimising greenhouse gas emissions)** requires that major development proposals should include a detailed energy strategy to demonstrate how the zero-carbon target will be met within the framework of the energy hierarchy.

46. **Policy SI4 (Managing Heat Risk)** states that major development proposals should demonstrate through an energy strategy how they will reduce the potential for internal overheating and reliance on air conditioning systems

47. **Policy SI5 (Water Infrastructure)** is concerned with the minimisation of mains water, water supplies, and resources, which should be protected and conserved in a sustainable manner.

48. **Policy SI6 (Digital connectivity infrastructure)** seeks to ensure London's global competitiveness now and in the future. It notes that the provision of digital infrastructure is as important for the proper functioning of development as energy, water and waste management services and should be treated with the same importance. London should be a world-leading tech hub with world-class digital connectivity that can anticipate growing capacity needs and serve hard to reach areas. Fast, reliable digital connectivity is essential in today's economy and especially for digital technology and creative companies. It supports every aspect of how people work and take part in modern society, helps smart innovation and facilitates regeneration.

49. It is recognised that for some types of development (such as commercial) specific requirements regarding communications access and security may apply. Data centres, in particular, depend on reliable connectivity and electricity infrastructure. Warehouse-based data centres have emerged as a driver of industrial demand in London over recent years and this will need to be taken into account when assessing demand for industrial land.

50. The Mayor will work with network operators, developers, councils and Government to develop guidance and share good practice to increase awareness and capability amongst boroughs and developers of the effective provision of digital connectivity and to support the delivery of policy requirements. The Mayor will also help to identify spatial gaps in connectivity and overcome barriers to delivery to address this form of digital exclusion,

in particular through his Connected London work. Boroughs should encourage the delivery of high-quality / world-class digital infrastructure as part of their Development Plans.

51.   Digital connectivity supports smart technologies in terms of the collection, analysis and sharing of data on the performance of the built and natural environment, including for example, water and energy consumption, waste, air quality, noise and congestion. Development should be fitted with smart infrastructure, such as sensors, to enable better collection and monitoring of such data. As digital connectivity and the capability of these sensors improves, and their cost falls, more and better data will become available to improve monitoring of planning agreements and impact assessments, for example related to urban design.

52.   **Policy SI7 (Reducing waste and supporting the circular economy)** is concerned with resource conservation, waste reduction, increases in material re-use and recycling, and reductions in waste going for disposal. Referable applications should promote circular economy outcomes and aim to be net zero-waste. A Circular Economy Statement should be submitted, to demonstrate a series of factors, such as how the proposal's design and construction will reduce material demand, and how performance will be monitored and reported. This application is supported by a Circular Economy Statement.

53.   **Policy SI12 (Flood risk management)** states that current and expected flood risk from all sources (as defined in paragraph 9.2.12 of the London Plan) 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. This should include, where possible, making space for water and aiming for development to be set back from the banks of watercourses.

54.   **Policy SI13 (Sustainable drainage)** notes that development proposals should aim to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible, and drainage should be designed and implemented in ways that promote multiple benefits including increased water use efficiency, improved water quality, and enhanced biodiversity, urban greening, amenity and recreation.

55.   **Policy SI14 (Waterways – strategic role)** references the importance of London's waterways, noting that they are multifunctional assets which provide transport and recreation corridors; green infrastructure; a series of diverse and important habitats; a unique backdrop for important heritage assets, including World Heritage Sites, landscapes, views, cultural and community activities; as well as drainage, flood and water management and urban cooling functions.

56.   **Policy SI16 (Waterways – use and enjoyment)** states that development proposals should protect and enhance waterway infrastructure, including inclusive public access to and along the waterway front and explore opportunities for new, extended, improved and inclusive access infrastructure to/from the waterways. The policy also references that collaboration will be required with Canal and River Trust, whom have been consulted as part of this application.

57.   **Policy SI17 (Protecting and enhancing London's waterways)** states that development proposals should support and improve the protection of the distinct open character and heritage of waterways and their settings, and should respect their local character, environment and biodiversity and should contribute to their accessibility and active water-related uses.

Transport

58.   **Policy T1 (Strategic approach to transport**) states 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.

59.   **Policy T2 (Healthy Streets)** notes that development proposals should deliver patterns of land use that facilitate residents making shorter, regular trips by walking or cycling. Development proposals also should:

    1) demonstrate how they will deliver improvements that support the ten Healthy Streets Indicators in line with Transport for London guidance
    2) reduce the dominance of vehicles on London's streets whether stationary or moving
    3) be permeable by foot and cycle and connect to local walking and cycling networks as well as public transport.

60.   The Healthy Streets Approach uses 10 indicators that reflect the experience of being on streets. These indicators are based on evidence of what is needed to create a healthy, inclusive environment in which people choose to walk, cycle and use public transport.

61.   **Policy T3 (Transport capacity, connectivity and safeguarding)** states that development proposals should support capacity, connectivity and other improvements to the bus network and ensure it can operate efficiently to, from and within developments, giving priority to buses and supporting infrastructure as needed.

62.   **Policy T4 (Assessing and mitigating transport impacts)** notes that development proposals should reflect and be integrated with current and planned transport access, capacity and connectivity. When required in accordance with national or local guidance,179 transport assessments/statements should be submitted with development proposals to ensure that impacts on the capacity of the transport network (including impacts on pedestrians and the cycle network), at the local, network-wide and strategic level, are fully assessed. Transport assessments should focus on embedding the Healthy Streets Approach within, and in the vicinity of, new development. Travel Plans, Parking Design and Management Plans, Construction Logistics Plans and Delivery and Servicing Plans will be required having regard to Transport for London guidance.

63.   The cumulative impacts of development on public transport and the road network capacity including walking and cycling, as well as associated effects on public health, should be taken into account and mitigated, and development proposals should not increase road danger.

64.   The policy recognises that It is important that the impacts and opportunities which arise as a result of development proposals are identified and assessed so that appropriate mitigations and opportunities are secured through the planning process. Transport assessments are therefore necessary to ensure that planning applications can be reviewed and assessed for their specific impacts and for their compatibility with the Healthy Streets Approach. This information has been provided as part of the application.

65.   **Policy T5 (Cycling)** states that development proposals should help remove barriers to cycling and create a healthy environment in which people choose to cycle. Cycle parking should be designed and laid out in accordance with the guidance contained in the London Cycling Design Standards.

66.   **Policy T6 (Car Parking)** notes that in order to manage London's road network and ensure that people and businesses can move about the city as the population grows and housing delivery increases significantly, new parking provision must be carefully controlled. Maximum standards for car parking take account of PTAL as well as London Plan spatial designations and use classes.

67.   The general principles outlined in paragraphs 10.6.4 to 10.6.6 of the London Plan apply to the parking standards set for residential, office (and Use Classes B2 and B8), retail, and hotel and leisure uses under Policy T6 .1 Residential parking to Policy T6 .5 Non-residential disabled persons parking. In relation to Policy T6 Car parking Part L, where industrial sites are redeveloped parking will be considered on a case by case basis as set out in paragraph 10.6.18.

68.   **Policy T6.5 (Non-residential disabled persons parking)** states that disabled persons parking should be provided in accordance with the levels set out in Table 10.6, ensuring that all non-residential elements should provide access to at least one on or off-street disabled persons parking bay. Disabled persons parking bays should be located on firm and level ground, as close as possible to the building entrance or facility they are associated with, and designated bays should be marked up as disabled persons parking bays from the outset.

69.   **Policy T7 (Deliveries, servicing and construction)** notes that development proposals should facilitate sustainable freight movement by rail, waterways and road. Development proposals should facilitate safe, clean, and efficient deliveries and servicing. Provision of adequate space for servicing, storage and deliveries should be made off-street, with on-street loading bays only used where this is not possible. Construction Logistics Plans and Delivery and Servicing Plans will be required and should be developed in accordance with Transport for London guidance and in a way which reflects the scale and complexities of developments. Developments should be designed and managed so that deliveries can be received outside of peak hours and in the evening or night time. Appropriate facilities are required to minimise additional freight trips arising from missed deliveries and thus facilitate efficient online retailing.

Local Planning Policy

70.   The "Local Plan Part 1: Strategic Policies" (LPP1) which was adopted in November 2012. The LLP1 does not make land use designations or contain detailed development management policies, instead comprising of a modest number of high level strategic policies. It is accompanied by the "Local Plan Part 2: Development

Management Policies" (LPP2 DMP) and "Local Plan Part 2: Site Allocations and Designations" (LPP SAD) which were adopted in January 2020 and contain land use allocations and detailed policies.

71.   In addition, the adopted Proposals Map shows land use allocations and designations. The relevant extract for the application site is replicated below:
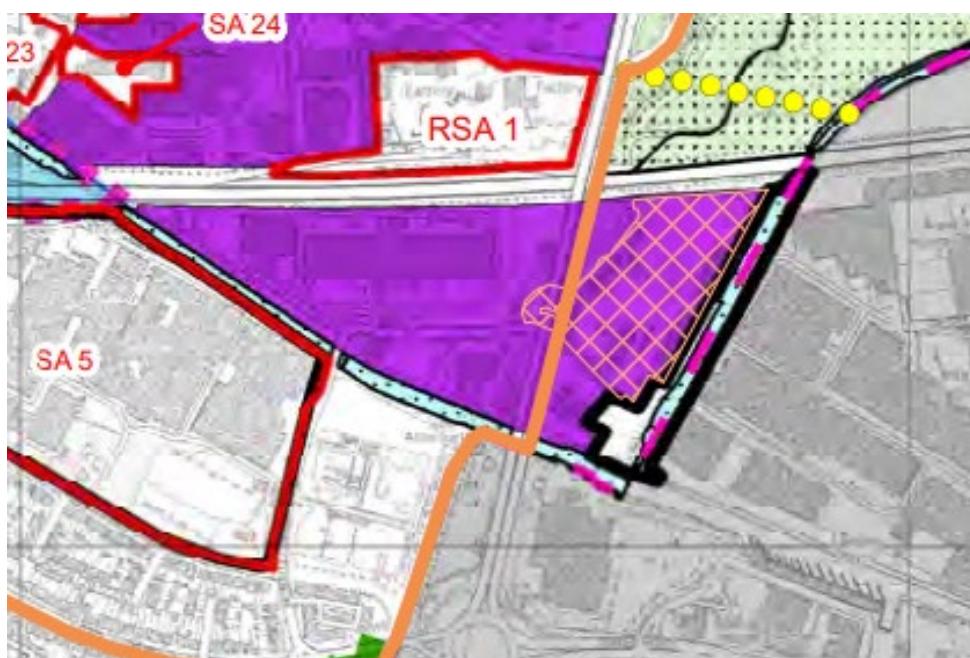
Figure 2. Extract of LLP2 Proposals Map

72.   The Proposals Map shows that:

- the site is designated as a SIL (the purple shading),
- the Grand Union Canal (to the south of the site) and the River Crane (to the east of Bulls Bridge Industrial Estate) are designated as Nature Conservation Sites of Metropolitan or Borough Grade I Importance (shown as green dots),
- the site is within the Hayes Housing Zone (the orange line),
- the FM Conway site to the east of the Site is an Aggregate Processing and Recycling Location (shown as orange hatching), and
- there are two conservations areas outside, but in proximity to the site (as delineated by the thick black line).

Local Plan Part 1: Strategic Policies

73. The LLP1 sets out the vision for Hillingdon by 2026, proposing that Hillingdon continues to prosper through the implementation of a seven point vision. This notes that sustainable growth around Heathrow and the Hayes/West Drayton Corridor is being managed through the Heathrow Opportunity Area Framework. Objective SO15 outlines the need to protect land for employment uses to meet the needs of different sectors of the economy. The LLP1 policies are considered pertinent in the determination of this application are considered below.

74. **Policy E1 (Managing the Supply of Employment Land)** of the LPP1 states that LBH will accommodate growth by protecting SILs. The supporting text notes that the Hayes Industrial Area is designated as a SIL, which is considered a Preferred Industrial Location (PIL) in LLP1. **Policy E2 (Location of Employment Growth)** goes on to set out the job creation target for LBH of 9,000 jobs over the plan period to 2026. The SILs are identified as having a key role in achieving this job creation target. Particular support is offered for the creation of such jobs in sustainable and accessible locations.

75. **Policy E3 (Strategy for Heathrow Opportunity Area)** reiterates the London Plan's aspirations to intensify development within the Heathrow Opportunity Area and deliver benefits to the LBH.

76. **Policy E7 (Raising Skills)** encourages the development of major sites for construction and end use occupiers ensures a ranges of training and employment opportunities, and LBH encourage workforce development initiatives and training programmes.

77. **Policy HE1 (Heritage)** relates to heritage matters, seeking to ensure proposals do not have a harmful on designated heritage assets, as well as locally recognised historic features such as Locally Listed Buildings.

78. **Policy BE1 (Built Environment)** seeks to ensure that all new development is of high quality, responds to local character, improves environmental quality, and includes a safe network of routes. It is noted that criteria 10 relates specifically to tall buildings, stating that they should:

"not adversely affect their surroundings including the local character, cause harm to the significance of heritage assets or impact on important views."

79. The policy notes that appropriate locations for tall buildings will be defined on a Character Study and may include parts of Hayes, subject to considering the Obstacle Limitation Surfaces for Heathrow Airport. The height of the buildings are expected to be based upon an understanding of the local character and be appropriate to the positive qualities of the surrounding townscape.

80. **Policy EM1 (Climate Change Adaptation and Mitigation)** sets out various climate change mitigation measure that should be addressed at every stage of the development process. This include to encourage a modal split away from the private car, promote the use of decentralised energy, incorporate low carbon strategies, and provide for renewable energy generation. The policy also encourages the location of new development on previously developed land, promotes the use of green walls/roofs as well as passive design, and seeking to focus development on those areas that are not subject to sensitivities.

81.   **Policy EM3 (Blue Ribbon Network)** indicates that LBH will promote and contribute to the positive enhancement of the strategic river and canal corridors.

82.   **Policy EM6 (Flood Risk Management)**, in line with national planning policy, sets a framework that focusses new development (particularly where vulnerable) into Flood Zone 1. It states that all developments should use SUDs unless demonstrated it is not viable.

83.   **Policy EM7 (Biodiversity and Geological Conservation)** states that LBH's biodiversity will be maintained and enhanced. This will be achieved through the retention and enhancement of designated ecological sites and the provision of ecological enhancements (including green roofs and living walls) for new development.

84.   **Policy EM8 (Land, Water, Air and Noise)** states that water quality will be maintained at the Grand Union Canal. Specifically to air quality, it places the requirement for major developments in AQMAs to demonstrate air quality neutrality. With regard to noise, it indicates that LBH will seek to ensure that noise sensitive development and noise generating development are only permitted if noise impacts can be adequately controlled and mitigated.

85.   **Policy T1 (Accessible Local Destinations)** seeks to focus new development in accessible and sustainable locations.

Local Plan Part 2: Site Allocations and Designations (LPP2: SAD)

86.   The LPP2: SAD makes a series of land use designations and allocations to ensure that the requirements set in the LPP1 are delivered and to comply with national and local policy. Much of the document relates to housing and mixed use allocations, but the LLP2: SAD also makes the various employment designations for the Borough.

87.   It refers to the Heathrow Opportunity Area (OA). The OA includes the Hayes and West Drayton corridor, a key location for employment growth in the Borough. Paragraph 2.9 recognises that, whilst traditional manufacturing has declined, the logistics and distribution secure has strengthened.

88.   The site is identified as a PIL and a SIL as part of the wider Hayes town cluster. The summary for the Bulls Bridge Cluster is as follows:

> *"The Bulls Bridge site is located on the eastern boundary of the Borough and adjoins the Bulls Bridge Conservation Area. The western part of the site is Formerly occupied by British Airways Engineering. The eastern part of the site has received planning permission for the provision of an aggregates recycling and processing plant. The site is proposed to be retained in employment use and should form part of the proposed Strategic Industrial Location"*

89. The relevant policy within the LPP2:SAD is **Policy SEA 1 (Strategic Industrial Locations)** which states that such locations will be promoted, managed, and protected. This policy states that development in these areas will be required to meet the provisions of Policy DME 1 In LLP2: DMP and Policy 2.17 of the London Plan.

Local Plan Part 2: Development Management Policies (LLP2: DMP)

90. LPP2: DMP contains detailed development management policies. Relevant policies are summarised below.

91. **Policy DME 1 (Employment Uses on Designated Employment Sites)** relates to designated employment locations (such as SILs). Part A of the policy states that the Council will support employment proposals in SILs in accordance with the relevant policies in the London Plan.

92. **Policy DMHB 1 (Heritage Assets)** indicates that the Council will expect development proposals to avoid harm to the historic environment. Part A of this policy identifies where development that has an effect on heritage assets will be supported, notably criteria (ii) whereby development would only be supported if it will not lead to a loss of significance or harm to an asset, unless it can be demonstrated that it will provide public benefit that would outweigh the harm or loss (in accordance with the NPPF). Likewise, developments that make a positive contribution to the local character and distinctiveness of the area (criteria iii) and would relate appropriately in terms of siting, style, scale, massing, height, design and materials (criteria v) would be supported.

93. **Policy DMHB 4 (Conservation Areas)** states that development either within or on the fringes of Conservation areas should preserve or enhance its character, sustaining and enhancing its significance.

94. **Policy DMHB 10 (High Buildings and Structures)** identifies a series of criteria that proposals for tall buildings will need to satisfy. The following criteria are pertinent when considering this application. it should be:

    1. *be located in Uxbridge or Hayes town centres or an area identified by the Borough as appropriate for such buildings;*

    2. *be located in an area of high public transport accessibility and be fully accessible for all users;*

    3. *be of a height, form, massing and footprint proportionate to its location and sensitive to adjacent buildings and the wider townscape context. Consideration should be given to its integration with the local street network, its relationship with public and private open spaces and its impact on local views;*

4.   *achieve high architectural quality and include design innovation. Consideration should be given to its silhouette, so that it provides a positive contribution to the skyline, its design at street level, facing materials and finishes, lighting and night time impact;*

5.   *not adversely impact on the microclimate (i.e. wind conditions and natural light) of the site and that of the surrounding areas, with particular focus on maintaining useable and suitable comfort levels in public spaces;*

6.   *be well managed, provide positive social and economic benefits and contribute to socially balanced and inclusive communities;*

7.   *comply with aviation and navigation requirements and not adversely impact upon telecommunication, television and radio transmission networks; and*

8.   *demonstrate consideration of public safety requirements as part of the overall design, including the provision of evacuation routes*

95.   **DMHB 11 (Design of New Development)** is a general design policy, stating that new development should be appropriate to its context (in terms of scale and composition), use high quality materials, protected designated and undesignated heritage, biodiversity, and landscape assets, and be acceptable on amenity grounds. It is accompanied by the Accessible Hillingdon Supplementary Planning Document which provides further guidance on inclusive design.

96.   **Policy DMHB 12 (Streets and Public Realm)** requires that new development is well integrated with the surrounding area and accessible. Proposals that improve legibility, improve the public realm, provides safe pedestrian and cycle connectivity, and promote inclusive design are supported.

97.   **Policy DMHB 14 (Trees and Landscaping)** encourages the retention of existing landscape features as well as the inclusion of landscaping works as part of new proposals

98.   **Policy DMHB 15 (Planning for Safer Places)** encourages the design of new buildings to incorporate secured by design measures.

99.   **Policy DMEI 1 (Living Walls and Roofs and on-site Vegetation)** sets a requirements for all major developments in Air Quality Management areas to incorporate living roofs or walls.

100.   **Policy DMEI 2 (Reducing Carbon Emissions)** requires that all development looks to achieve London Plan renewable energy targets, are accompanied by an Energy statement, and, where they don't meet necessary standards, make a payment in lieu.

101.   **Policy DMEI 3 (Decentralised Energy)** requires that all developments are designed so that they can plug-in to decentralised energy networks. Major development that is within 500m of an existing network or a network that will come online in the next three years are required to be connected to the network.

102. **Policy DMEI 7 (Biodiversity Protection and Enhancement)** requires development to retain features of biodiversity value. For sites alongside the Grand Union Canal there is a requirement to contribute to its biodiversity.

103. **Policy DMEI 8 (Waterside Development)** provides guidance on waterside development and how development should integrate into aquatic features.

104. **Policy DMEI 9 (Management of Flood Risk)** seeks to focus development into Flood zone 1 and provides a framework for what information should be submitted, and how applications should be assessed, for proposals for development within Flood Zone 2 and Flood Zone 3.

105. **Policy DMEI 10 (Water Management, Efficiency, and Quality)** sets a requirement for new development to incorporate SuDS measures and include measures to facilitate the efficient use of water.

106. **Policy DMEI 12 (Development of Land Affected by Contamination)** provides guidance on what documentation is expected to be submitted for sites on contaminated land and how planning conditions can should be used in this regard.

107. **Policy DMEI 14 (Air Quality)** sets a requirement to be air quality neutral, include mitigation measures, and contribute to the improvement of air quality, particularly within Air Quality Management Areas.

108. **Policy DMCI 7 (Planning Obligations and Community Infrastructure Levy)** provides the framework for the provision of planning obligations.

109. **Policy DMT 1 (Managing Transport Impacts)** places a requirement on development to be accessible by walking/ cycling and by public transport, provide equal access measures for all, address servicing requirements, and have no significant adverse air quality or noise impact. It also states the requirement for Transport Assessments and Travel Plans for certain forms of development.

110. **Policy DMT 2 (Highways Impacts)** sets a requirement for new development to provide safe vehicular access, to not have a detrimental impact on amenity in terms of noise and air quality, to provide safe pedestrian and cycle access, and to incorporate mitigation and improvement measures where required.

111. **Policy DMT 5 (Pedestrians and Cyclists)** builds upon Policy DMT2 by requiring the provision of safe and accessible pedestrian access through the retention and enhancement of existing facilities. Where next to the Blue Ribbon, this should be enhanced.

112. **Policy DMT 6 (Vehicle Parking)** requires car parking provision to be in accordance with adopted car parking standards.

National Planning Policy

113. National Planning Policy is contained within the National Planning Policy Framework (NPPF), the latest version of which was published in December 2024 and is accompanied by Planning Policy Guidance (PPG) which expands on various matters within the NPPF. The NPPF is a material consideration in the determination of this planning application.

Presumption in Favour of Sustainable Development

114. The NPPF sets a presumption in favour of sustainable development which is placed at the document's heart, with the planning system having a social objective, economic objective, and environmental objective. **Paragraph 11** sets out what this means for decision-taking, reiterating that, as the case in LBH where this is an up-to-date development plan, that it should approve development proposals that accord with the development plan without delay.

Decision Making

115. **Paragraph 39** of the NPPF reminds LPA's that they should approach decisions on proposed development in a positive and creative way, and work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area.

    "Decision-makers at every level should seek to approve applications for sustainable development where possible".

116. Chapter 4 of the NPPF goes on to set out the importance of good quality pre-application discussion and early engagement. It also notes in **Paragraph 47** that applicants and LPAs should consider the potential for voluntary planning performance agreements (PPAs) and it should be noted that, in this instance, a PPA has been agreed between LBH and Ark and this has helped to facilitate an effective pre-application process.

Economic Growth

117. Chapter 6 of the NPPF relates to building a strong and competitive economy. **Paragraph 85** states that:

    "Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future. This is particularly important where Britain can be a global leader in driving innovation, and in areas with high levels of productivity, which should be able to capitalise on their performance and potential."

118. **Paragraph 86** builds on this approach, recognising the significance of the technology, data, and create sectors to the economy. It states that planning policies should:

*"Pay particular regard to facilitating development to meet the needs of a modern economy, including by identifying suitable locations for uses such as laboratories, gigafactories, **data centres**, digital infrastructure, freight and logistics" (emphasis added by Savills).*

119.   **Paragraph 87** further notes that planning policies and decisions should recognise and address the specific locational requirements of different sectors. This includes making provision for:

"a) clusters or networks of knowledge and data-driven, creative or high technology industries; and for new, expanded or upgraded facilities and infrastructure that are needed to support the growth of these industries (including data centres and grid connections);

b) storage and distribution operations at a variety of scales and in suitably accessible locations that allow for the efficient and reliable handling of goods, especially where this is needed to support the supply chain, transport innovation and decarbonisation; and

c) the expansion or modernisation of other industries of local, regional or national importance to support economic growth and resilience."

Healthy and Safe Communities

120.   The thrust of this policy relates to the development of new housing and communities. However, with regard to industrial development, as is proposed as part of this application, it is relevant that the NPPF in **Paragraph 96** requires planning decisions to aim to achieve healthy, inclusive and safe places, which are safe and accessible and enable and support healthy lifestyles.

121.   Specifically, **Paragraph 102** requires planning decisions promote public safety and take into account wider security and defence requirements, and criteria b) expects that this includes the recognition and support of development required of operational defence and security purposes, and ensuring that operational sites are not affected adversely by the impact of other development proposed in the area. However, it should be noted that whilst the proposed development has very specific and significant security requirements, ancillary to its main data centre use, it is not to be considered an 'operational site'.

Transport

122.   Chapter 9 of the NPPF relates to the promotion of sustainable transport. Central to the NPPF's vision is the focussing of growth in those locations which are sustainably located and benefit from good connections for a range of means of transport. **Paragraph 109** notes that transport issues should be considered from the earliest stages of plan-making and development proposals, using a vision-led approach to identify transport solutions that deliver well-designed, sustainable and popular places.

123. Paragraph 115 of the NPPF requires that in assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that:

    "a) sustainable transport modes are prioritised taking account of the vision for the site, the type of development and its location;

    b) safe and suitable access to the site can be achieved for all users;

    c) the design of streets, parking areas, other transport elements and the content of associated standards reflects current national guidance, including the National Design Guide and the National Model Design Code; and

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

124. Paragraph 116 goes on to state that:

    "Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network, following mitigation, would be severe, taking into account all reasonable future scenarios."

125. As such, **Paragraph 117** sets out the expectations for development in a series of criteria relating to prioritising pedestrian and cycle movements, facilitating access to public transport, being inclusive to all, creating safe, secure and attractive places, allowing for efficient delivery of goods and access by service and emergency vehicles and to be designed to enable charging of plug-in and other ultra-low emissions vehicles in safe, accessible and convenient locations.

126. Finally, **Paragraph 118** requires that developments that will generate significant amounts of movements should be required to provide a travel plan and be supported by a transport statement or transport assessment (TA). Both a TA and travel plan are therefore submitted as part of this application.

Making Effective Use of Land

127. Chapter 11 sets out how planning policies and decisions should promote an effective use of land, and this should be in a way which makes as much use as possible of previously developed or 'brownfield' land. The entirety of the site is previously developed land.

128. **Paragraph 125**, criteria c) confirms that planning decisions should:

    "give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, proposals for which should be approved unless substantial harm would be caused, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land."

129.   **Paragraph 129** relates to how appropriate densities of development should be encouraged to make efficient use of land, albeit relates predominantly to housing proposals. However, with regard to industrial forms of development, proposals that makes efficient use of land that takes into account need and the availability of land suitable for accommodating it (criteria a) should be taken into account in planning decisions. Amongst other criteria, it is noted that this needs to be considered alongside the availability and capacity of infrastructure and services – both existing and proposed – as well as their potential for further improvement and the scope to promote sustainable travel modes that limit future car use (criteria c) and the desirability of maintaining an area's prevailing character and setting, or promoting regeneration and changes (criteria d).

Design Achieving well-designed places

130.   Chapter 12 relates to design, with **Paragraph 131** stating that the creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. This notes that being clear about design expectations, and how these will be tested, is essential for achieving this. This is important given the proposed form of development, which as explained in the Design and Access Statement in further detail and as has been emphasised in preapplication discussions, data centre design is an example of 'form following function' and therefore the building envelope, its mass, its layout and its overall form reflect what the building needs to do (and the technology that does it).

131.   **Paragraph 135** includes a series of criteria which should be considered in the determination of planning decisions, requiring that development should:

   a)   *function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;*
   b)   *are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;*
   c)   *are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);*
   d)   *establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;*
   e)   *optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and*
   f)   *create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.*

132.   **Paragraph 136** emphasises the importance of trees, noting that trees make an important contribution to the character and quality of urban environments, and can also help mitigate and adapt to climate change. Planning policies and decisions should ensure that new streets are tree-lined, that opportunities are taken to incorporate trees elsewhere in developments (such as parks and community orchards), that appropriate measures are in place to secure the long-term maintenance of newly-planted trees, and that existing trees are retained

wherever possible. Applicants and local planning authorities should work with highways officers and tree officers to ensure that the right trees are planted in the right places, and solutions are found that are compatible with highways standards and the needs of different users.

133. **Paragraph 137** states that design quality should be considered throughout the evolution and assessment of individual proposals, and that early discussions about design and style of proposals are important for clarifying expectations and reconciling local and commercial interests. As set out in Chapter 3 of this Statement, the applicant has worked closely with the LPA and local community to evolve the design of the proposed development.

134. It is noted in **Paragraph 139** that development that is not well designed should be refused, especially where it fails to reflect local design policies and government guidance on design[3], taking into account any local design guidance and supplementary planning documents such as design guides and codes.

Climate Change and Flooding

135. Chapter 14 relates to climate change and flooding. **Paragraph 164** states that new development should be planned for in ways that a) avoid increased vulnerability to the range of impacts arising from climate change. When new development is brought forward in areas which are vulnerable, care should be taken to ensure that risks can be managed through suitable adaptation measures, including through incorporating green infrastructure and sustainable drainage systems; and, b) help to reduce greenhouse gas emissions, such as through its location, orientation and design.

136. This means that, as set out in **Paragraph 166**, new development should comply with any development plan policies on local requirements for decentralised energy supply unless it can be demonstrated by the applicant, having regard to the type of development involved and its design, that this is not feasible or viable; and take account of landform, layout, building orientation, massing and landscaping to minimise energy consumption.

137. **Paragraphs 170 – 182** relate to flood risk considerations. As reported in Chapter 2, the site is not located in an area at risk of flooding. However, in accordance with **Paragraph 178**, a Flood Risk Assessment has been carried out to demonstrate that flood risk is not increased elsewhere. **Paragraph 182** indicates that major development should incorporate sustainable drainage systems unless there is clear evidence that this would be considered inappropriate.

The Natural Environment

138. **Paragraph 187** provide a series of criteria outlining how planning decisions should contribute to and enhance the natural and local environment. Relevant to this application, this includes:
   1. Criteria a) by protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);

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[3] Contained in the National Design Guide and National Model Design Code.

2. Criteria d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures and incorporating features which support priority or threatened species such as swifts, bats and hedgehogs; and

3. Criteria e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans.

139. **Paragraph 193** states that proposals that result in significant harm to biodiversity resulting from a development that cannot be avoided or adequately mitigated or compensated for, then planning permission should generally be refused.

140. **Paragraph 196** relates to ground conditions, requiring that the site requiring that the site is suitable for its proposed use taking account of ground conditions and any risks arising from land instability and conditions. It requires that adequate site investigation information is required to be available to inform these assessments, and it should be noted that a comprehensive suite of ground investigations surveys have been undertaken and are submitted as part of this application.

141. **Paragraph 198** notes that planning decisions should ensure that new development is appropriate for its location taking into account the likely effects (including cumulative 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 the development. **Paragraph 199** notes how planning decisions should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and Clean Air Zones, and the cumulative impacts from individual sites in local areas.

142. **Paragraph 201** reiterates that the focus of planning decisions should be on whether proposed development is an acceptable use of land, rather than the control of processes or emissions (where these are subject to separate pollution control regimes).

Heritage

143. Chapter 16 relates to the historic environment and sets the requirement on local authorities to consider (and applicants to assess through a planning application) the impact a development will have on designated heritage features.

144. **Paragraph 207** requires applicants to describe the significance of any heritage assets affected, including any contribution made by their setting. This has been provided in the Heritage Assessment submitted with this application.

145. **Paragraph 210** is therefore relevant as it sets out that LPAs should take account of the following in determining applications:

a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;

b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and

c) the desirability of new development making a positive contribution to local character and distinctiveness.

146. **Paragraphs 212 – 221** set out how impacts should be considered, and refers to the different potential amount of 'harm' to the significance of heritage assets (defined as substantial harm, total loss or less than substantial harm'). As set out in **Paragraph 212**, irrespective of the amount of any harm to the significance of a designated heritage asset, great weight should be given to the asset's conservation – and the more important the asset, the greater the weight should be. As required by **Paragraph 213**, the Heritage Assessment provides a clear and convincing justification is provided as to the perceived amount of harm to the setting of heritage assets – concluding that there is no harm. As such, **Paragraph 215**, which provides the policy context for development proposals that will lead to 'less than substantial harm' to the significant of a designated heritage asset (which requires the harm to be weighed up against the public benefits of the proposal) is not considered to be relevant in this application. Notwithstanding this, the significant public benefits of the application are set out elsewhere as these nevertheless affect the overall planning balance.

147. **Paragraph 216** confirms that the effect of an application on the significance of a non-designated heritage asset (such as a locally listed building) should be taken into account in determining the application. it is stated that:

In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.

148. **Paragraph 219** encourages that LPA's should look for opportunities for new development in Conservation Areas, and within the setting of heritage assets, to enhance or better reveal their significance. **Paragraph 220** however notes that not all elements of a Conservation Area necessarily contribute to its significance.