

## URBAN DESIGN COMMENTS

Site Address: Beaches Yard, Horton Road

Planning ref: 75221/APP/2022/2968

Case Officer: Michael Briginshaw

Design Officer: Antonia Whatmore

*Proposal: Redevelopment of the site to provide a flexible warehouse facility (Use Class B2/B8) and ancillary office space, with associated HGV loading and servicing bay, car and cycle parking, access arrangements, landscaping and infrastructure.*

### 1. Design Comments Summary

*“The combination of the building height beyond the prevailing height of the surrounding buildings and developing almost to the boundary edge on three sides of the site is considered to impact the setting of the Registered Park the Green Belt and accordingly contrary to DMHB 8”.*

We kindly refer the design officer to the submitted Design and Access Statement Chapter 2.7 and pages 46/47 which provide numerous views from within the Registered Park and Green Belt. These views were taken on 25<sup>th</sup> March 2022 and depicts the visual impact of the proposed warehouse in the context of limited leaf cover. The views demonstrate clearly that there will be minimal impact to setting of the Registered Park and the openness of the Green Belt as the vast majority of the mass of the building will be entirely concealed.

It is also noted that the Design Officers comments differ starkly to the conclusion of the case officer assessing the larger scheme at pre-app in which they stated (our emphasis):

*“It is recognised that there would be some impact on visual amenity from within the Green Belt, as the proposal would increase the amount of built form near its edge, however in the context a golf course which is sited next to an established SIL, this is considered to have a minimal effect on the Green Belt's key characteristics. Similarly, the proposal is considered to have no impact on the significance of the adjacent Grade II listed Stockley Park Golf Club Registered Park and Garden”.*

Despite the above advice, the applicant has reduced the height further from 18m to a maximum height of 16.5m. Therefore, the limited visual impact has been reduced further.

In addition, we have raised this matter with our Arboricultural Consultant who has confirmed that the proposed trees shall grow to at least 16.5m within three years to further alleviate visual impact over time.

The Council have approved other large warehouses developments in the vicinity of the site. At Prologis Park, which is situated directly opposite the Site to the south of Horton Road, planning permission was granted in 2015 for a significant warehouse development (Ref: 37977/APP/2015/1004). In this instance, the Officer's Report concluded in relation to the scale of the application proposals that (our emphasis):

*"The Council's Conservation/Urban Design Officer considers that although the proposed buildings would be large, even by Stockley Park standards, the views analysis provided demonstrates that a substantial amount of the visual impact of the buildings will be mitigated by good landscaping (...) as such, the siting, height, bulk and scale of the proposal would not result in a detrimental impact upon the character and appearance of the area".*

We recognise that the proposed development will introduce a mass and scale to the site which is not currently present. However, the proposal has been developed in the context of London Plan Policy E5 which states that Borough's should:

*'2) develop local policies to protect and intensify the function of SILs and enhance their attractiveness and competitiveness (...)'.*

Policy E7 of the London Plan (2021) also supports proposals to intensify B1c light industrial, B2 general industrial and B8 storage uses.

The site also lies within the Heathrow Opportunity Area in the London Plan (2021), which has a capacity for 11,000 new job Policy SD1 of the London Plan (2021) provides that proposals in Opportunity Areas should seek to maximise density and contain a mix of uses.

We are strongly of the view that any minor harm arising from the visual impact of the proposal is therefore far outweighed by the strategic aims of the London Plan.

*"The proposed scheme needs to be revised to eliminate impacts on the trees within the Register Park. Reducing the tree cover and or detrimentally affecting existing trees within the Registered Park is a key consideration in the determination of this planning applications".*

We can confirm that no trees within the Registered Park will be negatively impacted by the proposed development. Any trees located within the park will continue to benefit from good levels of light. We kindly refer the design officer to page 8 of the Design and Access Statement which shows the sun path and how the proposed building does not break this path.

Notwithstanding, we note that several trees are located in proximity to the Prologis development which have not been detrimentally impacted. We have referred this point to our specialist Arboricultural consultant who prepared the Arboricultural Report and they have confirmed for the avoidance of doubt that the Cypress trees on the boundary are within our site and they have updated their Tree Protection Plan accordingly. Notwithstanding, these trees are assessed to be of poor quality and required removal to avoid the spread of the fungus.

*"Revise building envelope to eliminate the impacts on Register Park and trees"*

As above, there is limited visual impact to the Registered Park. In addition, the submitted Arboricultural Report confirms there shall be no impact to high quality trees. We require a full justification from the Design Officer which factually contradicts the evidence we have provided in support of the application prior to actioning any wholesale alterations to the building envelope.

*“Revise the height of the building Plans and Elevations”*

*“Revised tree report to show either the retention of all trees or viable mitigation measures for the trees lost”.*

The Design Officers comment in relation to trees is factually incorrect. No trees located outside the site boundary will be altered or removed. Please refer to our above comments. The Design Officer is not an arboricultural specialist and, therefore, we kindly request the Council’s Tree Officer review our arboricultural information.

We have addressed the proposed height of the building above. We see no clear justification in the planning balance to reduce the height of the building any further. The building has a maximum height of 16.5m which will ensure the building sits comfortably in the largely industrial setting.

*“Revised elevational treatment with more details on the green wall Plans and Elevations Information to explain the material for the climbing plants and materiality of the façade behind”.*

We are unclear why this information is being requested now with detailed materials typically conditioned for major development. Notwithstanding, we have provided significant detail in relation to the proposed green wall within the submitted landscape proposals drawing prepared by Charnwood Landscape Design Limited. Should for whatever reason this drawing has not been reviewed, at this stage the scheme proposes a Jakob Green Wall trellis system. The system is fabricated from chromium-nickel austenitic stainless steel with low carbon content and contain molybdenum for excellent corrosion resistance. These systems are stainless steel, corrosion resistant, low maintenance, high tensile strength products provide design flexibility, durability, high strength-to-weight ratio, functionality, and impressive aesthetics.

Further detail includes:

- Distance from wall: 200mm
- Climbing Pattern: Vines
- System support maximum growth height: 20m
- Technical data: <https://jakob.co.uk/wp-content/uploads/Green-Solutions-G2-Technical.pdf> Page 19
- The materiality of the façade behind is the same as the other elevations.

We reiterate that this is not a policy compliance matter, and any further details (notwithstanding the above) should be secured by an appropriately worded condition.

## 2. Introduction

*“The Beaches site is located within a Strategic Industrial Location: Sites located near Hayes Town Centre and along the boundary of the Green Belt and Stockley Park Registered Park and Garden grade II listed to north and east”.*

## 3. “Height, massing and site layout

*The building footprint is located approximately 1.5m from the site boundary along the north, east*

*and southern edge. This locates the building almost directly on the edge of the Stockley Park Registered Park and the Green Belt. Accordingly, Policy DMHB 8 applies which states”;*

*“Development within, or adjacent to a registered or historic park, garden or landscape, must respect its special character, environmental quality, important views and vistas”.*

To avoid repetition, please refer to our above comments in respect of previously approved development in proximity to the site and the Council’s pre-application response which was based upon a scheme of 18m and concluded there would be limited visual impact.

*“The height of the building is 18m, the highest within the industrial area to the west of which it forms a part. Broadly, this industrial area is made up of large single storey warehousing. It is acknowledged that there are marginally larger buildings to southeast. However, the reduction in height from the pre-app height of 21m is not considered enough to satisfy this issue”.*

This comment is again factually incorrect. The proposed building has a height of 16.5m at the highest point. Notwithstanding, the comment reads as though the proposed warehouse would sit in isolation with no other tall buildings in the area by separating the industrial area into two sections, the west and southeast where the Design Officer accepts there are ‘larger’ buildings. This is a wholly incorrect way to assess the character of the area. Firstly, all Prologis warehouses are **inside** the green belt, all the roads around the warehouses are also within the green belt. Secondly the warehouses are in excess of 20m in height. It is noted that the warehouses to the west of our site are 11-15 meters in height, however, this is only marginally lower than the proposed building.

We note that LPP1 Policy BE1 (Built Environment) states that the height of all buildings should be based upon an understanding of the local character and be appropriate to the positive qualities of the surrounding townscape. As such, the proposal has been developed to regenerate what is a visual eyesore at present to bring forward a vastly improved appearance to the site which sits comfortably in the context of industrial warehouse buildings that are of a similar or larger size to that proposed.

*“A building of amplified height compared with the rest of the industrial estate”.*

See above. While the proposal seeks to maximise the site in accordance with policy, the building is not of an amplified height and shall sit comfortably within the existing context.

*“on the edge of the Register Park and Green Belt is not an appropriate response to the context. The building should broadly reflect the prevailing height of the other buildings within the industrial estate of which it is part. The proposed height lacks a convincing justification”.*

See our comments above in relation to the site’s visual impact to the Registered Park and Green Belt. The pre-application response disagrees with the Design Officer, and given the importance we provide the comment in relation to height below (our emphasis):

***“The scale, layout and height of the revised proposal are considered acceptable for the area, noting that the proposed building has been reduced to approximately 18 metres in height following concerns raised in our meeting that the proposed height of approximately 21 metres would result in the proposed building being much more visible because it would have exceeded the height of the adjacent treeline”.***

As above, even in the context of the positive response to the proposed height, to fully ensure there would be no impact the scheme has been **further reduced in height to 16.5m**.

*“for the amplified height particularly as the proposed height delivers a 12m floor to ceiling height internally”.*

It is important to understand that for commercial purposes 12m is the prevailing height for warehouses. Machinery and racking are built to 12m heights, anything below this height to the eaves limits the usability, hence the vast majority of new warehouses in the area are between 12m or 18m to the eaves as was the case for the 60,000 sqm Prologis warehouse on the same road 300 meters to the south. In addition, it is imperative that proposals seek to build upwards where appropriate to do so in order to deliver the Borough’s demand for warehouse development without the loss of further green belt land or undeveloped land.

*“The building will be visually evident from close views shown in the Design and Access statement View J – The Stockley Park Public Football Field, View L from the football club car park and View G along Horton Road looking east especially with the removal of the tree on the corner”.*

The proposal will require the removal of one tree on the corner inside the site boundary. There is significant tree cover on the boundary and new tree planting is proposed. This comment has no clear justification.

*“It is considered that the second floor office could be accommodated within the 12m warehouse space reducing the height of the building”.*

This is simply incorrect, as stated above, 12m is the minimum internal warehouse height requirement for new warehouses to secure commercial viability. This is for the reason that it is more efficient to limit the space used for warehousing by building upwards. Notwithstanding, the SIL area allows for 18m heights and Prologis has permission to build 20m+ heights immediately next to our site and **inside the green belt**. There are strong precedents for new warehouses built near and immediately up against and next to and in pockets of the green belt adjacent to the site above 18m.

#### *4. Impact on trees*

With respect, the Design Officer is not an Arboricultural specialist. We have submitted evidence from a specialist which demonstrates as a matter of fact the trees to the side of the proposed warehouse are young and vigorous and will not be affected. In addition, the trees are far enough away to avoid loss of light for their root protection areas to remain unaffected. If there remain concerns about loss of light to these trees, we remind the design officer that woodland trees simply grow taller where shade is affecting their growth.

*“The building location, almost to the edge of the site boundary necessitates the removal are a line of Leyland Cypress outside the red line boundary. Confirm is sought on whether the landowner of the adjacent property has given permission for the removal of these trees”.*

The Cypress are within the application site boundary and the tree protection plan has been updated to reflect this together with photos showing this is a drafting error.

*“While it is acknowledged these trees have limited arboreal or amenity value this approach reduces the tree cover within the designated landscape to east”.*

The trees in the triangle formation on the golf course grow between 50-70 cm per year as per the Arboricultural Report. Whereas the Prologis warehouses and especially the newly completed warehouse immediately to the south are within the green belt and highly visible in the park due to its height and will be visible for the next many years as there is no tree cover on the northern boundary of that site.

*“Mitigation measures are sought and should be provided at this full application stage rather than Conditioned as it is considered that without allowing more space between the building and the site edge there is insufficient space for mitigation tree planting”.*

We have consulted our Arboricultural consultant who wholly disagrees with this comment. The vast majority of trees are situated to the east and northeast of the proposed warehouse. As a result, there will be limited loss of sunlight or impact caused by proximity to the trees. The trees to the northeast will have limited impact to sunlight levels during the afternoon and evening time. However, for the new trees, low levels of sunlight will be for a short period before they grow to the height of the warehouse or taller. Trees commonly grow immediately adjacent to buildings throughout the area and are not affected.

*“Further, the proximity of the building to the existing trees along north will likely reduce the light to a degree that would be detrimental to their long-term health. Accordingly, it is considered that the building envelope needs to be pulled away from the site boundaries to maximise opportunities for soft landscaping/trees and biodiversity improvements so that the building blends into the natural landscape to the north and west to comply with Policy DMHB 8”.*

The Arboricultural consultant refutes this comment. Trees commonly grow adjacent to buildings. The trees will have no development on three sides and therefore the impact is minimal.

*Information should be provided showing:*

- *the construction of the building’s foundation to show how far it will extend;* The Geotechnical report clearly demonstrates that the warehouse will be built by using piled foundation. The tree report demonstrates there will be no impact to the RPAs of the adjacent trees.
- *agreement with the adjacent landowner that the trees can be removed;* Not necessary, as there are no trees on neighbouring land to be removed or altered.
- *impact on the light to the remaining trees that potentially will impact the tree’s long term viability;* Arboricultural consultant confirms the warehouse will not affect the trees, as above.
- *a tree trench detail for the Liquidamber styraciflua ‘Slender Silhouette’ along the southern boundary.* Tree trench detail is already provided by the landscape architect and should not be agreed at this time as designs and better trenches are constantly being developed. Any further detail can be secured by condition and is not a policy compliance matter.

## *5. Façade Treatment*

*“The pedestrian entrance to the building is currently proposed along the building’s western façade which involves pedestrians crossing the vehicle entrance to the lower ground floor car park. This entrance location should be revised to accommodate the pedestrian entrance from the higher*

*quality green wall façade along the Horton Road active frontage. This would deliver a more direct route for pedestrians with better legibility and overcome the issue of pedestrian crossing the vehicular entrance to the building”.*

1. At the proposed office level, the scheme needs to provide a passage that leads to the office which is reflected by the proposed elevation drawings (west, east and south) making the warehouse appear taller on these drawings.
2. Providing an entrance to the Horton Road frontage is not practical as a ramp to the entrance is required for accessibility purposes. The proposal requires a drop of 600mm to enter the basement and this entails a ramp of 7.2m in length.
3. The proposal would subsequently lose an alternative fire exit along the private road.
4. The proposal would lose valuable soft landscaping to the Horton Road frontage to allow for a new entrance at the corner.
5. The elevation along Horton Road will need to be amended to show the elevator reaching the top floor office floor (plus the elevator overhead), making our scheme appear even taller.
6. Moving the entrance will change the area of the M&E room along the private road from 31.8 sqm to 66.5 sqm.
7. The change on the ground floor plan will need to be reflected on the basement plan affecting the cycle parking layout, M & E and water attenuation tank.

There are no safety concerns in regard to pedestrians crossing a car park entrance, it is a common feature in new development. To ensure safety, the proposal includes new bollards to make sure there is a strong demarcation between the car park entrance and the crossing of the pedestrians including clearly visible signage. This recommendation should be reconsidered.

*“Removing the entrance from the western façade has the added advantage of allowing the long windows that create the distinctive western elevation to only interrupted by the vehicular entrance”.*

The proposed location of the windows are specifically designed to follow the latest in building energy efficiency regulations and is commonly the commercial preference for warehouse operators. This is an industrial building not a public shopping centre and it should be designed accordingly. Also, the submitted design is strongly encouraged to follow the design criteria and features in the strategic industrial area as it need to be in keeping with the area and thus in keeping with current policy of the Council.

*“The entrances currently fail to align with the long narrow windows along the west elevation which disturbs the clarity of the design rational for this elevation”.*

The applicant can accept an appropriately worded condition to align the widows with the desired location of the entrance.

*“the structure column behind and allow views from the windows directly behind to designing out the plinth and triangular tips of the green wall shown on the CGIs”.*

The CGIs are to provide an indicative appearance for sales reference and the Design Officer should be assessing the application drawings. The plan drawings clearly show the green wall does not have a plinth and triangular tips. Notwithstanding, we consider the triangular and tips of the green walls, instead of monolithic straight-line design creates far more visual interest. The window behind the green wall is not designed for pedestrians to look through and into the warehouse, this would most

likely not be acceptable by the users of the warehouse. The windows are only to create enough light emissions for less use of LED artificial lighting for high energy efficiency standards.

*“This approach echoes the linear windows along the other western façade and limits the area for the climbing plants which are unlikely to colonise the extent shown”.*

Our Landscape architect and many landscape architectural articles indicate that the types of ivy's, will grow up to 30 meters. The green wall is only 12 meters tall.

*“More information is required to explain the material the climbers will be trained on and the materiality of the façade behind”.*

There are many options to fasten the ivy's for the climb, please see above suggested fastening detail, which is to be agreed as part of the build works.