

Planning, Design and Access Statement

Erection of a Surface-Mounted Storage Building Anchored to Existing Hardstanding



Stellantis & You UK Ltd
Hayes
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1 Introduction

- 1.1 This Planning, Design and Access Statement accompanies a full planning application for the erection of a surface-mounted ancillary industrial storage building anchored to existing hardstanding at Dawley Road Industrial Park, Hayes on behalf of Stellantis & You UK Ltd (Stellantis).
- 1.2 This statement considers the site and its surroundings and summarises the planning policies which are material to the proposal, along with further guidance and evidence which has been considered.
- 1.3 The analysis addresses all the issues which we consider to be relevant to the determination of the planning application. It concludes that planning permission should be granted, having regard to the development plan and other material considerations.
- 1.4 This statement should be read in conjunction with the following plans and documents:
 - Existing Location Plan (Ref: 23106 - SDA - V1 - XX - DR - A - 0001)
 - Proposed Plans and Elevations (Ref: 23106 - SDA - V2 - ZZ - DR - A - 0701)
 - Contextual Elevations (Ref: 23106 - SDA - V2 - ZZ - DR - A - 0702)

2 The Proposals

2.1 The application description is as follows:

"Erection of a surface-mounted storage building anchored to existing hardstanding (retrospective)."

2.2 Stellantis & You UK is a nationwide company which handles the sales and service of automobiles produced by the Stellantis group, including brands such as Citroen, Peugeot, Fiat, Vauxhall and DS Automobiles. The application site in Hayes serves as a distribution centre for vehicle parts.

2.3 The site's operating hours are Monday 04:30 - 21:00, Tuesday to Friday 00:00 - 21:00 and Saturday 08:00 - 12:00, with the site closed on Sundays and bank holidays. There is no change to these hours of operation as a result of the development.

2.4 There are currently approximately 115 full-time employees at the application site, with 35 office and sales rep staff, and up to 80 warehouse staff and drivers. These staff members work across shift patterns and are not all permanently based at the development site in Hayes. The number of employees and shift patterns will not be impacted by the development.

2.5 The company identified a clear and urgent need for additional sheltered storage space for vehicle parts used for servicing and repairs. Current storage capacity in the existing warehouse had been exceeded and further space was urgently required to accommodate growing demand. Due to the pressing nature of this commercial need, the building was erected in December 2023.

2.6 The building is required for a period of 5 years as this is the length of Stellantis' remaining lease on the application site. The building will therefore present an agile temporary solution to meeting the company's needs for this period.

2.7 The area of hardstanding where the building is sited was previously used for external storage and parking. This storage space has been accommodated inside the warehouse and the parking provision has been relocated as explained later in this statement.

2.8 The dimensions of the building are as follows:

Internal

- 29.0m length x 15.0m width
- GIA: 435 sqm

External

- 29.3m length x 15.3m width x 6.1m height (eaves) / 8.7m height (ridge)

- GEA: 448 sqm

2.9 The building is anchored to existing hardstanding using shallow chemical anchor bolts and adjoins with the existing warehouse building via two 4.9m x 4.0m link tunnels. These allow for access of goods from the proposed storage building directly from the main warehouse by pedestrian and forklift truck.

2.10 The building is constructed from light grey 40mm insulated steel sandwich cladding walling and a translucent-white PCV-coated polyester thermo roof. As well as from the main building via the link tunnels, the building is accessible by 2 electric roller shutter doors to the north-western elevation and a pedestrian door to each of the south-western and north-eastern elevations.

2.11 Site access will remain as existing from the north-east.

2.12 The design, materials, and prefabricated method of construction of the building ensured a quick delivery and erection. This minimised disruption to neighbouring properties and existing operations and allowed the company to rapidly address its need for additional protected storage space.

3 Site and Surroundings

- 3.1 The application site is a 0.69 ha area of land. More than half of the site area is occupied by the company's main existing warehouse building towards the south-east of the site. The remainder of the site is comprised of hardstanding yard area used to accommodate external storage, parking and access routes as well as the newly installed building.
- 3.2 The site is bound to the south-east, north-east and north-west by neighbouring industrial premises of a similar layout and appearance which house several wholesalers and logistics companies. To the south-west, the site is bound by Blyth Road which turns into Dawley Road after a roundabout adjacent to the site perimeter. There is a strip of vegetation which runs along this side of the site adjacent to the site perimeter, providing visual screening and separation from the surroundings.
- 3.3 The site is located in Dawley Road Industrial Park in a predominantly industrial area to the south of Hayes Town Centre. This is part of a stretch of industrial land between the Grand Union Canal and the railway lines which connect Reading and Slough with Central London. The closest service centre is Hayes, with larger centres located approximately 10km west in Slough and at various points to the east approaching central London.
- 3.4 The entire site is located in Flood Zone 1 indicating a low risk of fluvial flooding. There is also low or no flood risk from all other sources.
- 3.5 The application site consists entirely of an existing sealed concrete hardstanding and is void of habitats or natural features. The existing habitats on site do not exceed 25m² in area nor will the building have any impact on priority habitats, therefore the proposed development will qualify for the *de minimis* exception to achieving a 10% biodiversity net gain.
- 3.6 The closest asset of heritage importance is Enterprise House, a Grade II listed former gramophone factory which is located on Blyth Road approximately 350m south-east of the development site. Due to the distance of separation and the density of built form in the area separating the two, there will be no impact on Enterprise House or its setting as a result of the development.
- 3.7 The site is accessible on foot from nearby residential areas of Hayes and surrounding suburban districts, as well as by bicycle from residential areas of Southall and West Drayton, making active transport a viable option for accessing the site.
- 3.8 There are bus stops less than 100m from the site boundary on Dawley Road which are served by the U5 bus, providing regular services between Uxbridge and Hayes Town. Hayes & Harlington train station is also accessible from the site on foot in 10-15 minutes, providing access to National Rail and

Elizabeth Line services connecting the site with regional destinations such as Central London, Slough, Maidenhead and Reading.

3.9 The site is also well connected to both the local and regional road network. The A408 connects with local areas and links the site to junction 4 of the M4, serving regional destinations and the wider motorway network.

Local Plan Designation

3.10 The application site is located in an area designated as a *Strategic Industrial Location* in the London Borough of Hillingdon Local Plan Part 2 Policies Map as shown below.

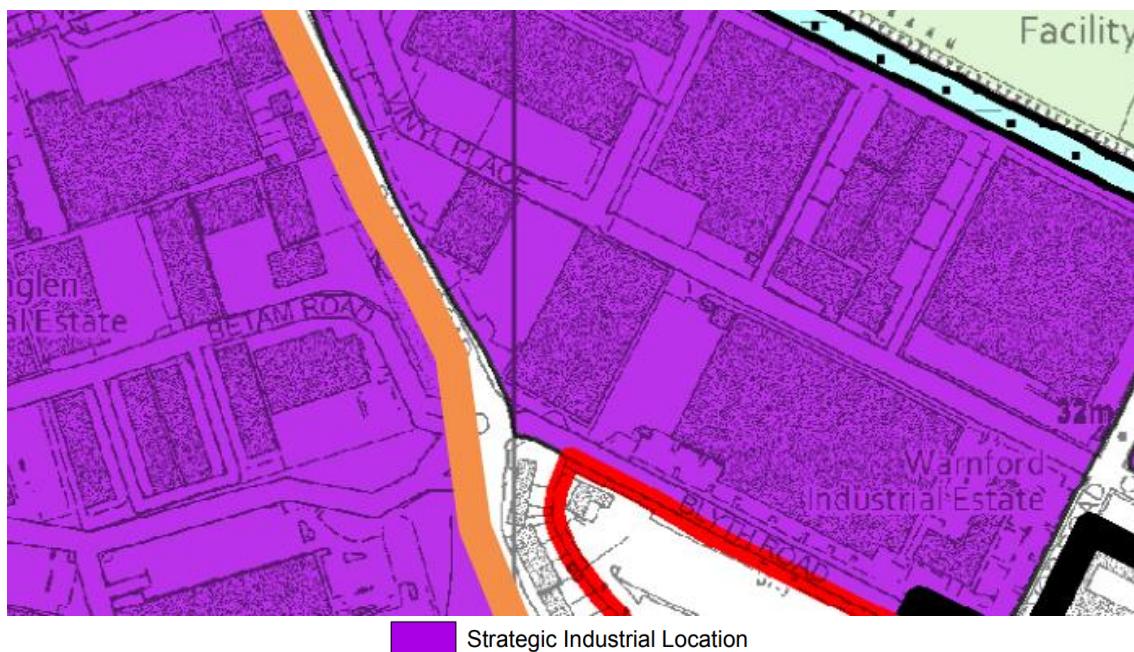


Figure 1: Extract taken from the London Borough of Hillingdon Local Plan Part 2 Policies Map

4 Planning Policy and Evidence Base

National Planning Policy Framework

4.1 The National Planning Policy Framework ('NPPF'; December 2023) sets out the purpose of the planning system of achieving sustainable development via three overarching objectives: **economic, social and environmental**.

4.2 Paragraph 11 of the NPPF requires Local Planning Authorities to apply a presumption in favour of sustainable development during decision-taking. This means that Local Planning Authorities should be:

“...approving development proposals that accord with an up-to-date development plan without delay; or

...where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:

- i) The application of the policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or*
- ii) Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.”*

4.3 In support of building a strong and competitive economy, paragraph 85 of NPPF 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.”

4.4 Paragraph 87 of NPPF also goes on to explain that planning policies and decisions should *“recognise and address the specific locational requirements of different sectors.”* This requirement includes making provision *“for storage and distribution operations at a variety of scales and in suitably accessible locations.”*

Local Policy

4.5 The local development plan consists of the Hillingdon Local Plan and the London Plan (2021). The former is made up of two constituent parts; Part 1: Strategic Policies (2012), and Part 2: Development Management Policies, and Site Allocations and Designations (2020). It is noted that the Hillingdon

Local Plan is currently under review, however, the current stage of this process is the preliminary gathering of evidence, therefore the Local Plan Review will not be material to the determination of this application in line with NPPF paragraph 48.

4.6 The policies of most relevance from each development plan document are outlined below.

Hillingdon Local Plan: Part 1 - Strategic Policies (Adopted November 2012)

- Policy NPPF1: National Planning Policy Framework - Presumption in Favour of Sustainable Development

“When considering development proposals the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework.”

- Strategic Objective SO15

“Protect land for employment uses to meet the needs of different sectors of the economy.”

- Policy BE1: Built Environment

The Council will require all new development to improve and maintain the quality of the built environment in order to create successful and sustainable neighbourhoods, where people enjoy living and working and that serve the long-term needs of all residents.

All new developments should:

...

2. Be designed to be appropriate to the identity and 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 and seek to protect the amenity of surrounding land and buildings, particularly residential properties;”

- Policy EM1: Climate Change Adaptation and Mitigation

The Council will ensure that climate change mitigation is addressed at every stage of the development process by:

1. Prioritising higher density development in urban and town centres that are well served by sustainable forms of transport.

...

The Borough will ensure that climate change adaptation is addressed at every stage of the development process by:

...

12. Giving preference to development of previously developed land to avoid the loss of further green areas.”

Hillingdon Local Plan: Part 2 - Development Management Policies (Adopted January 2020)

- Policy DME 1: Employment Uses on Designated Employment Sites

“A) The Council will support employment proposals in Strategic Industrial Locations (SILs) - Preferred Industrial Locations (PIL) or Industrial Business Parks (IBP) - in accordance with relevant policies in the London Plan.”

- Policy DMHB 11: Design of New Development

“A) All development, including extensions, alterations and new buildings will be required to be designed to the highest standards and, incorporate principles of good design including:

i) harmonising with the local context by taking into account the surrounding:

- ***scale of development, considering the height, mass and bulk of adjacent structures;***
- ***building plot sizes and widths, plot coverage and established street patterns;***

ii) ensuring the use of high quality building materials and finishes;

iii) ensuring that the internal design and layout of development maximises sustainability and is adaptable to different activities;”

- Policy DMEI 2: Reducing Carbon Emissions

“A) All developments are required to make the fullest contribution to minimising carbon dioxide emissions in accordance with London Plan targets.”

Hillingdon Local Plan: Part 2 - Site Allocations and Designations (Adopted January 2020)

- Policy SEA 1: Strategic Industrial Locations

“In accordance with Policy 2.17 of the London Plan the Council will promote, manage and where appropriate protect a network of Strategic Industrial Locations across the Borough.”

The London Plan (March 2021)

- Policy E5: Strategic Industrial Locations (SIL)

“Development proposals in SILs should be supported where the uses proposed fall within the industrial-type activities set out in Part A of Policy E4” (B1c, B2, B8)

- Policy E7 Industrial intensification, co-location and substitution

“A 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:

- 1) introduction of small units***
- 2) development of multi-storey schemes***
- 3) addition of basements***
- 4) more efficient use of land through higher plot ratios having regard to operational yard space requirements (including servicing) and mitigating impacts on the transport network where necessary.”***

5 Analysis

Principle

- 5.1 In accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004 and Section (2) of the Town and Country Planning Act 1990, the application must be considered alongside prevailing development plan policies. The development plan is made up of constituent parts of the Hillingdon Local Plan, as well as the London Plan.
- 5.2 The application site is located in Dawley Road Industrial Park which has been designated as a *Strategic Industrial Location* in the Local Plan policies map. Local Plan **Policy SEA1** states that these areas will be identified and managed in accordance with the London Plan, notably with **Policy E5**. This policy outlines that where the proposed use falls within the employment generating B-class uses, ***“development proposals in SILs should be supported”***.
- 5.3 The Local Plan also seeks to protect sites such as SILs which have been designated for employment uses through **Policy DME1** and **Strategic Objective 15**. A key objective of the Council will be to ***“Protect land for employment uses to meet the needs of different sectors of the economy”*** and in line with the London Plan, will support proposals for employment uses in SILs.
- 5.4 The proposed development is supported by London Plan **Policy E7** which supports the development of employment uses where appropriate to make efficient use of previously developed land. This includes through the ***“introduction of small units”*** which help to make ***“more efficient use of land through higher plot ratios”***. The canopies will be placed on an existing area of developed yard area and will improve the operational efficiency of the business by expanding the range of commercial activities which can be carried out.
- 5.5 The proposals are in line with national policy guidance as well as local policy. The NPPF emphasises the significant weight that should be placed on the need to support economic growth and productivity, taking into account the need of local businesses and creating ***“conditions in which businesses can invest, expand and adapt”*** (para. 85).
- 5.6 The proposals are suitably located, compliant with local and national policy, entirely appropriate to the surrounding area, and will meet the needs of an established local business and employer. The development should therefore be supported in principle.

Development Management Considerations

Design and Layout

- 5.7 The siting of the building has been chosen to ensure the most efficient use of the site by positioning the building directly adjacent to the main existing warehouse, allowing for ease of access between the two. The buildings are connected by two 4.9m x 4.0m link tunnels allowing for employees to access goods directly from the main warehouse including by forklift truck.
- 5.8 The building is subordinate to the main warehouse building on site in terms of footprint, scale and massing, minimising the visual impact of the building on its surroundings.
- 5.9 The building is constructed from light grey 40mm insulated steel sandwich panel walling and a translucent-white PVC-coated polyester thermo roof. This reflects the materials, colour palette and building style of the existing adjacent warehouse building, as well as those used in surrounding industrial premises in Hayes.
- 5.10 The building is appropriate to its surroundings in terms of layout, form, scale and materials. The development is harmonious with the local context which in this case is industrial in character, satisfying the design parameters set out in **Policies BE1 and DMHB11**.

Parking, Access and Vehicular Movement

- 5.11 The storage building will be ancillary to existing operations on site and will not result in a change or intensification of these operations. Consequently, there will be no material impact on the volume or type of vehicular traffic leaving and entering the site. Access to the site will remain as existing to the north-east for both pedestrians and vehicles.
- 5.12 As existing, there is capacity for parking of 96 vehicles (62 cars, 4 disabled bay, 20 bicycles, 10 motorcycles) on the development site. Whilst the development will lead to a reduction in on site provision of 14 car parking spaces, this will be relocated to a nearby plot less than 150m from the site which the applicant has agreed to rent for the remainder of their outstanding lease on the application site. This land will provide up to 34 additional car parking spaces, leading to an overall increase in parking capacity and reducing the risk of parking being accommodated on the public road network.
- 5.13 The building is accessible from the existing warehouse via the two building links and from the remainder of the site via 2 no. 4.9m x 4.0m electric roller shutter doors to the north-west elevation and a pedestrian access door to each of the north-east and south-west facing elevations.
- 5.14 The area which the building occupies was previously used for parking and external storage, as such, there will be no impact on areas used to accommodate vehicular access or manoeuvrability within the site.

Flood Risk and Drainage

- 5.15 The application site is an established industrial site comprised entirely of existing hardstanding and is located in Flood Zone 1, signalling a low probability of fluvial flooding. The risk of surface water flooding is also deemed low by the Environment Agency and there is no risk of reservoir or groundwater flooding.
- 5.16 The building forms a relatively minor adaptation to an existing industrial site and will not lead to any change in the permeable area of the site. The proposals will make use of satisfactory existing drainage arrangements, the details of which have been submitted with this application. Furthermore, the building will be dismantled and removed from the site when the temporary period has elapsed, returning the site to its existing state.

Energy and Sustainability

- 5.17 The translucent design of the roof allows for light transmission, eliminating the need for internal lighting during daylight hours, offsetting a large amount of the energy which would otherwise be required. Furthermore, the building will be for storage purposes only and will not be occupied by employees for extended periods of time, further limiting the window where artificial lighting will be necessary.
- 5.18 This takes a 'fabric-first' approach to energy efficiency, designing out a considerable proportion of the energy requirements from the outset and ensuring a significant reduction in carbon emissions from the operation of the building.
- 5.19 The design and proposed use of the building also mean that there will be no energy requirement for heating, cooling or mechanical ventilation.
- 5.20 In relation to material consumption, the modular, prefabricated nature of the building means that at the end of the temporary duration for which the building will be required by Stellantis, it will be disassembled into its constituent parts to be used elsewhere. In addition, the building is mounted to existing hardstanding and requires no foundations, resulting in minimal material waste throughout the building's lifespan including the construction period and removal from the site. The building therefore presents an inherently sustainable solution to meeting the company's needs.
- 5.21 The building was erected in the space of one week, considerably lower than the equivalent period for a building of permanent construction, thus limiting energy consumption and disruption to surroundings during the construction process.

5.22 The development is sustainably located as set out in Local Plan **Policy EM1** which states that development should be focussed in accessible urban areas where possible, "***Giving preference to development of previously developed land to avoid the loss of further green areas***".

5.23 It is evident that proportionally to the scale and temporary nature of the development, through designing out a proportion of the building's prospective energy requirements, the proposals contribute to reducing carbon emissions, in line with **Policy DME12** of the Local Plan.

Presumption in Favour of Sustainable Development

5.24 Paragraph 11 of NPPF outlines the presumption in favour of sustainable development which should be applied to planning decisions. This is echoed in Local Plan **Policy NPPF1**. We have demonstrated throughout this statement that the proposed development mutually supports the objectives of sustainable development which are set out in paragraph 8 of NPPF, particularly in relation to the economic objective.

5.25 The proposed development will support the temporary business needs of an established business and local employer. The building will provide a flexible solution to meeting this need, creating an environment where the company can adapt, securing its efficient operation and ongoing contribution to the local economy.

5.26 From a social standpoint, the building will improve working conditions for employees on site by providing a sheltered area for employees to access goods which would otherwise be stored externally. In addition, it has been demonstrated that the proposed development would have no adverse amenity impact on surrounding areas.

5.27 The proposals also meet the environmental objective, presenting a sustainable solution to meeting the company's temporary operational needs. The building makes efficient use of a previously developed area of land and will be disassembled and removed at the end of the temporary period, resulting in minimal material waste throughout the lifespan of the building. Furthermore, several aspects of the building's design significantly reduce the prospective energy consumption required for the operation of the building.

5.28 The proposed development mutually supports the economic, social and environmental objectives and constitutes sustainable development. A presumption in favour of approval should therefore be applied.

6 Conclusion

- 6.1 This Statement has demonstrated that the proposals should be approved having regard to national and local planning policy, together with other material considerations.
- 6.2 The application site is within Dawley Road Industrial Park which has been designated as a *Strategic Industrial Location*. Several development plan policies apply to such areas, which state that they will be safeguarded and appropriate development supporting employment generating uses will be supported.
- 6.3 There are also general policies in the Hillingdon Local Plan and London Plan which encourage the sustainable growth of businesses through making optimal use of previously developed land.
- 6.4 As well as local policy, the proposals are also in line with policy guidance in the NPPF which refers to the significant weight which should be placed on supporting development of this kind, enabling local businesses to invest, expand and adapt. The principle of development is therefore acceptable.
- 6.5 The building's appearance is appropriate to its surroundings, reflecting the design and materials used in surrounding industrial premises. The scale, massing and siting of the building also ensure that the visual impact on its surroundings is minimal.
- 6.6 Matters including flood risk, heritage assets, natural features, energy and sustainability, parking, access and vehicular movement have also been examined and it has been shown that the development will not negatively impact on any of these.
- 6.7 We have demonstrated that the proposals meet the sustainable objectives as set out in Paragraphs 8 and 11 of the Framework. The development will sustainably meet the operational needs of an established local business and employer.
- 6.8 The proposals are entirely appropriate and comply with relevant planning policy and guidance. There is therefore a compelling case for the granting of permission without delay.



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