

Town Planning Statement (Incorporating Statement of Community Involvement)

Horton Road, West Drayton, Orbital Industrial Estate

Prepared on behalf of LMO Overseas Investments Ltd

September 2025

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Appendix 1 – Letter Drop Distribution Area

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1. INTRODUCTION

- 1.1 This planning statement has been prepared by Michael Sparks Associates on behalf of LMO Overseas Investments Ltd ('the Applicant') in support of a full planning application at Horton Road, West Drayton, Orbital Industrial Estate ('the Site').
- 1.2 The Proposed Development comprises the demolition of all existing buildings and erection of 2 modern, energy efficient employment units to provide 3,155 sq m of flexible Class E(g)(iii), B2 and B8 use with ancillary offices supported by car parking, service yards, landscaping and associated works.
- 1.3 The red line on the site location plans indicates all the land and buildings falling within the application site, to which this planning application relates.
- 1.4 The development will make best use of this brownfield site which will support job creation and complement the wider development objectives of Hillingdon District Council through the optimisation of the land with new, modern employment floorspace.
- 1.5 Full planning permission is sought for the following:

"Demolition of existing buildings and structures and redevelopment of the site to provide modern employment units for flexible use across classes E(g)(iii), B2, B8 with ancillary office areas for car parking, landscaping, service yard areas and ancillary structures, as well as associated works."
- 1.6 The site falls within the London Borough of Hillingdon and forms part of the Orbital Industrial Estate. The site comprises 13 existing employment units that are coming to the end of their design life, including a variety of smaller premises with low internal clear heights. These existing units currently provide 3,938 sqm of floorspace (GIA). The proposed development will replace these existing units with modern, energy efficient units which are proposed in response to market demands and occupier interest.
- 1.7 This statement provides a summary of the proposed development and identifies the key planning considerations that should be taken into account in its determination and establishes the justification for the development of the site.
- 1.8 The proposals have been assessed in accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004. The Proposed Development accords with the London Plan (2021) and the Hillingdon Local Plan (2012/2020) taken as a whole. There are no other material considerations of sufficient weight to indicate that planning permission should not be granted.

Application Documentation

1.9 This Planning Statement should be read in conjunction with the planning drawings and the following reports that support this application:

- i. Air Quality Assessment, prepared by Kairus Ltd
- ii. Preliminary Ecological Appraisal, prepared by Applied Ecology
- iii. Biodiversity Net Gain Assessment, prepared by Applied Ecology
- iv. Arboricultural Impact Assessment, prepared by Hayden's Arboricultural Consultants
- v. Tree Survey & Constraints Plan, prepared by Hayden's Arboricultural Consultants
- vi. Ground Condition Assessment, prepared by Ridge and Partners LLP
- vii. Design & Access Statement (inc Accessibility Assessment), prepared by Michael Sparks Associates;
- viii. Transport Assessment, prepared by SLR Consulting Limited
- ix. Travel Plan, prepared by SLR Consulting Limited
- x. Framework Travel Plan, prepared by SLR Consulting Limited
- xi. Servicing and Refuse Management Plan, prepared by SLR Consulting Limited
- xii. Noise Assessment, prepared by Sharps Acoustics
- xiii. Landscape Planting Layout and UFG Drawing, prepared by Terry Anderson Landscape Architects
- xiv. Telsar Agent Report (dated 08 April 2025), prepared Telsar Ltd
- xv. Agent Supporting Note (dated 17 February 2025), prepared by Knight Frank
- xvi. Flood Risk Assessment prepared by Ramboll
- xvii. Drainage Strategy and appendices, prepared by Ridge and Partners LLP
- xviii. Energy Strategy, prepared by Ramboll
- xix. Sustainability Statement, prepared by Ramboll
- xx. External Lighting Details, prepared by Ridge and Partners LLP
- xxi. Fire Statement, prepared by Octa Fire

1.10 This suite of planning application documents for submission were agreed with the planning officer ahead of submission.

2. THE PROPOSED DEVELOPMENT

- 2.1 The proposed development seeks the redevelopment of the site to erect 2 modern, energy efficient employment units to provide 3,155 sq m (GIA) of flexible Class E(g)(iii), B2 and B8 use with ancillary offices supported by car parking, service yards with loading docks and landscaping.
- 2.2 Unit 1 will be position to the north of the site. Unit 2 will be positioned to the south of the site. Both Units will have their own dedicated servicing yards and car parking.
- 2.3 The design proposes a high quality, modern elevational treatment with simple and clean lines. New landscaping is proposed on site across the Horton Road frontage, the eastern boundary and the Canalside. Sedum roofs are also proposed for the cycle shelters.
- 2.4 Two dedicated service yards are proposed to accommodate two HGV loading bays. A total of 16 cycle parking spaces and 31 car parking spaces are proposed across the site. Bin stores will be located within each service yard.
- 2.5 This development represents an opportunity to create a high quality, sustainable development to suit the needs of future occupiers and meet market demand. The proposed development will make efficient and effective use of the site and create modern employment floorspace, attracting investment to and creating jobs in the district.
- 2.6 The proposed development comprises the following areas (GIA):

Plot	Unit Floor Space (GIA)	Unit Haunch Height from FFL	Unit Max Height from FFL
Unit 1	1,079 sq m	8m	11m
Unit 2	2,076 sq m	12m	15m
Total	3,155sqm		

- 2.7 In summary the development would deliver the following key planning benefits:
- A new employment-led development at this established industrial location with the provision of new, high quality floorspace to meet an identified need in the Borough;
 - Exceptional quality architecture which will significantly improve the appearance of this part of Horton Road;
 - Greatly improved urban greening and Biodiversity Net Gain benefits, compared with the baseline habitats present on site;

- A sustainable led design solution, including targeting BREEAM “Excellent” to ensure the delivery of market leading new floorspace;
- Improvements to encourage active travel and improved pedestrian access.

3. SITE AND SURROUNDING AREA

- 3.1 The site is approximately 0.9 Ha in size and is located within the Orbital Industrial Estate. The site contains 13 existing employment units that are now coming to the end of their design life, comprising relatively small lettable premises with low internal clear heights.
- 3.2 The site is accessed via Horton Road. The units are accessed from a private estate road that connects to Horton Road in a roughly rectangular shaped site. Horton Road is located to the north and the Grand Union Canal to the south.
- 3.3 The site is located within a Strategic Industrial Location (SIL) referred to as “Hayes Industrial Area” and the Hillingdon Hayes Air Quality Management Area.
- 3.4 The site has two PTAL ratings. The site access has a PTAL rating of 2. The remaining parts of the site has a score of 1b on a scale of 0 to 6b (where a score of 0 is very poor access to public transport, and 6b is excellent access to public transport). Horton Road links directly to the A408 and in close proximity to the M4 motorway which lies to the south.
- 3.5 Horton Road benefits from single yellow line parking restrictions and there are bus stops within proximity to the site, with service 350 offering connections to Hayes and Harlington and Heathrow Terminal 5. West Drayton railway station is located 0.7km west of the site.
- 3.6 Public access to the towpath is available via Horton Bridge Road which is located 0.2km to the southeast of the site where a crossing of the railway lines that run parallel with the canal is also available.
- 3.7 The development plot abuts the towpath of the Grand Union Canal to the south, with some of the existing units visible from this area, although this is limited due to mature vegetation and existing planting along the boundary.
- 3.8 The site is located within Flood Zone 1 as defined by the Environment Agency Flood Zone Maps, meaning it has the lowest probability of flooding. The topography of the site is flat, comprising of mainly hardstanding and limited areas of soft landscaping.
- 3.9 There is residential development to the northern side of Horton Road comprising 4 storey flats/maisonettes that are set back from the street edge. Otherwise, the surrounding character is primarily industrial in character, reflective of the location within the SIL.
- 3.10 The site is not within a Conservation Area or Area of Special Local Character and does not contain any listed buildings.

4. PLANNING HISTORY

4.1 A review of the London Borough of Hillingdon's online planning database has been undertaken. A summary of the applications identified is set out below.

Address	Application Ref:	Description	Decision Date	Decision
UNITS 1,5,6 & 7, Orbital Industrial Estate HORTON ROAD YIEWSLEY	72906/APP/2017/1951	Installation of new cladding	07.08.2017	Approved
UNITS 12, 13 Orbital Industrial Estate HORTON ROAD YIEWSLEY	73259/APP/2018/305	Alterations to doors to front and rear elevation	27.03.2018	Approved
Orbital Industrial Estate HORTON ROAD YIEWSLEY	27958/ADV/2019/73	1 advertisement board and 3 internally illuminated totem signs	20.02.2020	Refused
Unit 6 & 7 Orbital Industrial Estate HORTON ROAD YIEWSLEY	72906/APP/2022/2555	Change of use of Units 6 and 7 From Class E(g)(iii) to flexible use classes E(g)(ii-iii)/B2/B8	18.01.2023	Approved
Unit 6 & 7 Orbital Industrial Estate HORTON ROAD YIEWSLEY	72906/APP/2025/333	Details pursuant to the discharge of Condition 4 (Low Emission Strategy) of planning permission ref. 72906/APP/2022/2555 dated 23-06-2023. Change of use of Units 6 and 7 from Class E(g)(iii) to flexible Use Classes E(g)(ii-iii)/B2/B8.	18.08.2025	Approved

Table 1: Recent Planning History

5. STATEMENT OF COMMUNITY INVOLVEMENT

5.1 This section outlines and summarises the consultation strategies and tools that were used during the pre-application process for the Proposed Development.

5.2 Paragraph 40 of the National Planning Policy Framework (NPPF) states that “Early engagement has significant potential to improve the efficiency and effectiveness of the planning application system for all parties. Good quality preapplication discussion enables better coordination between public and private resources and improved outcomes for the community”.

Pre-Application Engagement with LB Hillingdon

5.3 Pre-application advice for the proposed development and associated works was sought in August 2024. A meeting with the Planning Officer and Head of Planning was undertaken on 03 October 2024.

5.4 A formal written response from LB Hillingdon was received on 22 November 2024. The advice suggested that the development proposed may be acceptable in principle subject to further clarification on the following:

- Amount of Floorspace
- Access Arrangements
- Detailed Design

5.5 From a policy perspective, the Council considered the principle of development was acceptable and complied with Policy E2 of the Hillingdon Local Plan.

5.6 The Proposed Development has sought to respond to the feedback received wherever possible.

Wider Consultation

5.7 The site is in a densely built area of Horton Road, with some nearby industrial units and residential areas. In order to inform the local community about the emerging proposals for the site, a letter drop was undertaken in March 2025.

5.8 The distribution area for consultation is shown in Appendix 1. Nearby residential properties and businesses were given the opportunity to respond to the details forwarded and to raise any questions in relation to the proposal.

5.9 The mailshot provided residents with information about the proposal and identified the development site. The mailshot was accompanied by a letter which is set out in Appendix 2. In advance of submission of the application, local ward councillors were also contacted inviting any thoughts or comments.

5.10 To date, no request for more information have been received.

6. PLANNING POLICY FRAMEWORK

- 6.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the Statutory Development Plan unless material considerations indicate otherwise.
- 6.2 Planning policy operates at national, regional and local levels. The National Planning Policy Framework (NPPF) provides the framework within which the local and regional planning policy (which forms the development plan) operate. It sets out the government's planning policies for England and how these are expected to be applied.
- 6.3 The Statutory Development Plan in LB Hillingdon comprises:
- London Plan (2021)
 - Hillingdon Local Plan Part 1: Strategic Policies (2012)
 - Hillingdon Local Plan Part 2: Development Management Policies (2020)
 - Hillingdon Local Plan Part 2: Site Allocations and Designations (2020)
 - The West London Waste Plan (2015)
- 6.4 The following also comprise material planning considerations.
- National Planning Practice Guidance (2014 and updated since)
 - LB Hillingdon Employment Land and Capacity Study (2023)
 - Borough-wide Supplementary Planning Documents (SPDS)

7. PLANNING ASSESSMENT

- 7.1 In line with Paragraph 7 of the National Planning Policy Framework, the Proposed Development seek to contribute to the sustainable development within Hillingdon, providing modern, energy efficient employment units that will support economic.
- 7.2 The site represents a fantastic opportunity to deliver new Grade A employment floorspace of which there is significant demand that will meet an existing need to enable job creation and growth within the wider transport, distribution and general industrial market.

Land Use

Planning Policy

- 7.3 Paragraph 85 of the 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.
- 7.4 London Plan Policy E5(C) confirms that development proposals within Strategic Industrial Locations should be supported where the uses fall within the industrial-type activities set out in Part A of London Plan Policy E4.
- 7.5 London Plan Policy E5(D) states that development proposals within or adjacent to SILs should not compromise the integrity or effectiveness of these locations in accommodating industrial type activities and their ability to operate on a 24-hour basis.
- 7.6 Local Plan Part 2 Policy DME 1(A) states that the Council will support employment proposals in Strategic Industrial Locations (SILs) – Preferred Industrial Locations (PILs) or Industrial Business Parks (IBPs) – in accordance with relevant policies in the London Plan.

Assessment

- 7.7 The site is located within a Designated Employment Location (a Strategic Industrial Location - SIL) and Preferred Industrial Location (PIL) as defined within the London Plan and Hillingdon Local Plan. The proposed uses (Use Class E(g)(iii), B2 and B8) fall within the list of industrial-type activities as set out in Part A of London Plan Policy E4.
- 7.8 As confirmed through the pre-application discussions with the Council, the principle of developing this site for employment uses within Class E(g)(iii), B2 and B8 is acceptable.

- 7.9 The Proposed Development will see the demolition of the existing buildings on site and replacement with two larger employment units each with dedicated service yards and car parking. The proposed floorspace comprises 3,155sqm (GIA) of floorspace, meaning an overall reduction of 783sqm.
- 7.10 However, the existing units on site are of poor and deteriorating policy which cannot accommodate the needs of modern industrial occupiers. In addition, a key part of the commercial offering is the quality, usability and size of the service yards required to facilitate as many potential employment occupiers as possible. This flexibility is not possible with the current building configuration, which is defined by the expanse of low-density buildings of deteriorating quality with very poor circulation space.
- 7.11 Additionally, whilst the total overall floorspace has reduced, the overall volume proposed within the new units is substantially increased, allowing for a greater range of employment uses to take occupation (many of whom require significant internal floor to ceiling heights).
- 7.12 The Applicant has instructed Telsar Commercial Property Specialists to provide a Report analysing the existing condition of the building alongside commentary on current market conditions and market demand for Grade A industrial floorspace within proximity to the site. In addition, Knight Frank has provided an Agency Note that endorses the proposed re-development, having regard to other recent developments within the local area. Both Reports are submitted alongside the planning application.
- 7.13 Hillingdon's Employment Land and Capacity Study (December 2023) was instructed by LB Hillingdon to, in part, understand the future employment floorspace and land needed to accommodate economic growth in Hillingdon.
- 7.14 In relation to the Hayes Industrial Area, the study states that it **"...is well utilised, but some areas could be better organised or utilised to unlock employment floorspace. There are also a small number of older and vacant industrial units that present opportunities for redevelopment. There have already been large redevelopment schemes across the area (e.g. Prologis Park Heathrow) demonstrating high levels of market appetite to invest in the area."**
- 7.15 The Study goes on to state that **"...In terms of future uses it is clear that the character, existing uses and current occupiers in the Hayes Industrial Area make it a suitable location for more industrious type uses including light industrial, industrial and larger warehousing type uses (i.e. B2/EG(iii)/B8)."**
- 7.16 The Horton Industrial Estate (within which the site is specifically located) is defined as being **"An industrial area to the west of the Hayes Industrial Area that offers a range of low-to-medium quality industrial units. The site is mainly occupied by warehouse and service units, although there are some manufacturing and commercial facilities"**.

- 7.17 It is therefore evident that the redevelopment of this site to replace the existing low-quality employment floorspace with new, high-quality units that offer maximum flexibility for a wider range of employment uses is an inherent benefit of the proposals, fully according with the ambitions and recommendations as set out within the Study.
- 7.18 The development will deliver new Grade A employment floorspace of which there is significant demand that will meet an existing need, to enable job creation and growth within the wider transport, distribution and general industrial market.
- 7.19 It is concluded that the proposed development fully accords with London Plan Policies E4 and E5 and Local Plan Policies DME 1 and DME 2.

Urban Design

Planning Policy

- 7.20 Policy BE1 of Hillingdon Council's Local Plan Part 1 (2012) state that 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 and be designed to be appropriate to the identity and context of Hillingdon's buildings, townscapes, landscapes, and views.
- 7.21 Policy DMHB 11 of Hillingdon Council's Local Plan Part 2 (2020) states that all development, including extensions, alterations and new buildings will be required to be designed to the highest standards and incorporate principles of good design.
- 7.22 The Proposed Development represents a scheme of high quality that has been designed to ensure its enduring quality. The design concept has been based on the following key principles:
- a regular and efficient site layout that maximises the site density while satisfying the requirements for sufficient vehicular access, amenities, cycle routes, roads and service areas along with reasonable balance with hard and soft landscape,
 - focus on the outward facing aspect of the development onto Horton Road and provide an active frontage,
 - use of high quality, robust modern materials to create a contemporary aesthetic,
 - simple and clean elevations giving it a modern and high-quality appearance,
 - consistent use of materials and colours on all proposed buildings,
 - designed with safe access routes for pedestrians and cyclists to all units,

- 7.23 Overall, the design is considered to comprise high quality, that optimises the site layout whilst proposing a clean and efficient character that is reflective of the proposed use of the building. This is considered to accord with London Plan Policy D3, and Local Plan Policies BE1 and DMHB 11.

Neighbouring Amenity

Planning Policy

- 7.24 Paragraph 135 of the NPPF states that planning policies and decision should ensure that developments 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.
- 7.25 Local Plan Part 2 Policy DMHB 11(B) states that Development proposals should not adversely impact on the amenity, daylight and sunlight of adjacent properties and open space.

Assessment

- 7.26 The Site is located within a Strategic Industrial Location which is bound to the east and west by other employment uses. To the north lies residential uses, which is separated by Horton Road and a green bank beyond.
- 7.27 The Proposed Development seeks the continuation of the site for employment generating purposes. The proposed landscaping along Horton Road is considered an enhancement on the existing situation in terms of outlook.
- 7.28 The overall height, bulk and massing of the proposed buildings, in combination with the distance from the nearest residential properties is considered to ensure that neighbouring amenity in relation to amenity, daylight and sunlight will not be impacted.
- 7.29 The Proposed Development is therefore considered to accord with the NPPF and Local Plan Part 2 Policy DMHB 11. Noise impact is discussed further below.

Noise

Planning Policy

- 7.30 Paragraph 198 of the NPPF states that decisions should ensure that new development is appropriate for its location. In doing so, they should mitigate and reduce to a minimum potential adverse impact resulting from noise from new development – and avoid noise giving rise to significant adverse impacts on health and the quality of life.

- 7.31 London Plan Policy D13 sets out the Agent of Change principle, which places the responsibility for mitigating the impact of noise and other nuisances on new development.
- 7.32 London Plan Policy D14 states that to improve health and quality of life, residential and other non-aviation development proposals should manage noise 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.
- 7.33 Local Plan Part 1 Policy EM8 states that the Council will seek to ensure that noise sensitive development and noise generating development are only permitted if noise impacts can be adequately controlled and mitigated.

Assessment

- 7.34 The Applicant has instructed Sharps Acoustics LLP to undertake a noise assessment in support of this application. As part of this assessment, a noise survey has been undertaken to determine the existing noise levels in the area. Appendix A of the Report identifies the location of the closest sensitive noise receptors. The results of the survey have been used to set criteria against which the impact of noise from the proposed development on nearby sensitive receptors can be determined.
- 7.35 Accordingly, the design of the scheme has been acoustically optimised to minimise any impact to nearby receptors, including through orientating the proposed service yards to the south, screening them from the nearest residential receptors by the proposed buildings.
- 7.36 The Noise Assessment confirms that there would be an overall reduction in the number of LGV and OGV vehicle movements when compared to the existing situation. The Assessment also confirms that the site layout has been designed such that noise emanating from the premises is reduced and any adverse impacts would be mitigated, concluding that the noise emanating from the proposed development would have a low impact during daytime and night-time periods.
- 7.37 Overall, the Proposed Development is considered acceptable in relation to noise, in line with London Plan Policies D13 and D14.

Air Quality

Planning Policy

- 7.38 Paragraph 199 of the NPPF states that planning policies and 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.

- 7.39 London Plan Policy GG3 requires that planning and development seek to improve London's air quality, reduce public exposure to poor air quality and minimise inequalities in levels of exposure to air pollution.
- 7.40 London Plan Policy SI1 (B) states that to tackle poor air quality, protect health and meet legal obligations the following criteria should be addressed, as a minimum all development proposals must be at least Air Quality Neutral.
- 7.41 Local Plan Part 1 Policy EM8 states that all major development within the Air Quality Management Area (AQMA) should demonstrate air quality neutrality (no worsening of impacts) where appropriate.
- 7.42 Local Plan Part 2 Policy DEMI 14 states that development proposals should, as a minimum be at least "air quality neutral"; include sufficient mitigation to ensure there is no unacceptable risk from air pollution to sensitive receptors, both existing and new; and actively contribute towards the improvement of air quality, especially within the Air Quality Management Area.

Assessment

- 7.43 The site is located within an Air Quality Management Area and within proximity to an Air Quality Focus Area. An Air Quality Assessment has been undertaken by Kairus Ltd which is submitted alongside this application.
- 7.44 As set out within the AQA, the Proposed Development will be air quality neutral in terms of building emissions. However, operational trips will exceed the AQN Transport Benchmark. As such, a total damage cost has been calculated of £107, 922 which is proposed to be paid to the LPA to mitigate the impact of the development on local air quality, in addition to the following further mitigation measures:
- Site Specific Travel Plan setting out measures to encourage more sustainable travel and reduce single occupancy trips.
 - 7no. Electric Vehicle (EV) charging point (22% of parking spaces based on total parking provision of 32 spaces) – this is above policy requirements which require a minimum of 20% of spaces with EV charging.
 - 16.no secure and covered cycle parking spaces.
 - Dedicated pedestrian route linking both units to Horton Road.
- 7.45 Given the above it is considered that the Proposed Development is acceptable in terms of air quality and complies with London Plan Policies GG3, SI1 and Local Plan Policies EM8 and DEMI 14.

Land Contamination / Construction Principles

Planning Policy

- 7.46 Policy DMEI 12 of Hillingdon Council's Local Plan Part 2 requires Proposals for development on potentially contaminated sites will be expected to be accompanied by at least an initial study of the likely contaminants.
- 7.47 Part B) states that B) Conditions will be imposed where planning permission is given for development on land affected by contamination to ensure all the necessary remedial works are implemented, prior to commencement of development.

Assessment

- 7.48 The planning application is supported by a Desk Top Assessment prepared by Ridge Consultants which assesses the status of the site in relation to land contamination.
- 7.49 The Assessment concludes that several types of contamination sources are likely to be present on site. In line with the pre-application feedback provided by the LPA, the report therefore recommends that planning conditions are attached to any planning permission that secures further investigation ahead of works commencing on site, including through undertaking of a watching brief.
- 7.50 It is also anticipated that a Construction Management Plan would be required by way of condition as part of any future permission to ensure that the demolition and construction of the proposed development, in coordination with any land contamination conditions, can come forward in a safe and managed way.

Transport and Servicing

Planning Policy

- 7.51 Paragraph 116 of the NPPF states 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.
- 7.52 London Plan Policy T1 (B) 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.

- 7.53 London Plan Policy T5 (through Table 10.2) sets out the minimum cycle parking standards for all new developments.
- 7.54 London Plan Policy T6 states that car parking should be restricted in line with levels of existing and future public transport accessibility and connectivity. Appendix 1, Table C of the Local Plan Part 2 set out the maximum car parking standards acceptable within Hillingdon.

Assessment

- 7.55 In accordance with the policies detailed above, a Transport Assessment has been prepared by SLR Consulting Limited and is submitted alongside this application.
- 7.56 As the site comprises of existing industrial units and is therefore well placed to accommodate the proposed scheme. The site already benefits from highways access, which is achieved across two access points, currently serving Orbital Industrial Estate and Northpoint Business Park. This supporting infrastructure is considered sufficient to support development at the site.
- 7.57 The Proposed Development proposes a total of 31 car parking spaces (13 for Unit 1 and 18 for Unit 2). This provision is within the maximum parking standards as set out within London Plan Policy T6.2 and adopted standards contained within the Local Plan (Part 2). A total of 7 EV charging bays will be provided on site.
- 7.58 The Proposed Development provides 6 cycle parking spaces for Unit 1 and 10 cycle parking spaces for Unit 2. This provision meets and exceeds the cycle parking requirements as set out within London Plan Policy T5 and adopted standards contained within the Local Plan (Part 2). Changing facilities will be provided for staff within each of the units, as well as lockers to store cycling equipment / clothing.
- 7.59 To demonstrate safe manoeuvrability of all vehicles through the site, including the loading and turning circles of HGVs, swept path analysis has been undertaken. The analysis is provided at Appendix F & G of the Transport Statement.
- 7.60 The Proposed Development is considered to meet and exceed the requirements as set out in the NPPF, London Plan Policies T1, T5 and T6, and the standards contained within the Local Plan Part 2.

Ecology & Biodiversity Net Gain

Planning Policy

- 7.61 Paragraph 187 of the NPPF states that Planning policies and decisions should contribute to and enhance the natural and local environment by 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.

- 7.62 Local Plan Policy Part 1 Policy EM7 seeks the provision of biodiversity improvements from all development, where feasible.
- 7.63 Local Plan Policy Part 2 Policy DMEI 7 (C) states that all development alongside, or that benefits from a frontage on to a main river or the Grand Union Canal will be expected to contribute to additional biodiversity improvements.
- 7.64 Local Plan Policy Part 2 Policy DMHB 14(A) states that all developments will be expected to retain or enhance existing landscaping, trees, biodiversity or other natural features of merit.

Assessment

- 7.65 An Ecological Appraisal has been undertaken by Applied Ecology Limited. Surveys to inform the appraisal were undertaken on 01 October 2024.
- 7.66 As confirmed within the submitted Ecological Appraisal, the proposed site does not fall within any statutory designated sites of nature conservation interest and comprises very limited vegetation. There is very limited existing landscaping on site and the survey confirmed no evidence of roosting bats or birds.
- 7.67 To the south of the site (adjacent to the Canal Towpath) there is existing mature landscape and vegetation. This is to be retained as part of the proposals in accordance with Policy DM7. In addition, additional planting is proposed across the site (where practical), including along the Canal, in accordance with Policy DMEI 7.
- 7.68 A Biodiversity Net Gain Assessment has also been undertaken. This assessment confirms that the proposed development would result in a net gain of +0.26 habitat units, equivalent to a biodiversity net gain of +307.68%. This greatly exceeds the minimum uplift of 10% as mandated by the Environment Act 2021.

Landscape & Urban Greening

Planning Policy

- 7.69 London Plan Policy G5 (A) of The London Plan states that major development proposals should contribute to the greening of London by including urban greening as a fundamental element of site and building design, and by incorporating measures such as high-quality landscaping (including trees), green roofs, green walls and nature-based sustainable drainage.

- 7.70 London Plan Policy G5 (B) confirms that the Mayor recommends a target score of 0.4 for developments that are predominately residential, and a target score of 0.3 for predominately commercial development but explicitly states that this UGF target excludes B2 and B8 uses.
- 7.71 Local Plan Part 2 Policy DMEI 1 requires all major development to incorporate living roofs and/or walls.
- 7.72 Local Plan Part 2 Policy DMHB 14 (C) states that where space for ground level planting is limited, such as high-rise buildings, the inclusion of living walls and roofs will be expected where feasible.

Assessment

- 7.73 The Applicant has instructed Terry Anderson Landscape Architects to inform a landscape strategy for the site. A robust Planting Layout Plan and Urban Greening Factor Drawing have been submitted alongside this application.
- 7.74 The Proposed Development will result in an enhancement of the existing urban greening on site, proposing an UGF of 0.09. Given the site's industrial use and location, this is considered to be acceptable in this instance, according with London Plan Policy G5.
- 7.75 As described above, the existing vegetation along the Canal is proposed to be retained and enhanced along the southern boundary with a native species rich palette to enhance this part of the wildlife corridor. The northern boundary is proposed to be planted with a combination evergreen shrubs, hedges and leafed Lime Trees, selected to enhance the visual outlook of the site from the street.
- 7.76 Across the remaining site, opportunities for additional landscaped pockets have been optimised where possible, including through the use of the recesses along eastern boundary. Green roofs are proposed to be incorporated on the cycle enclosures.
- 7.77 The application is also supported by a tree survey and Arboricultural Impact Assessment prepared by Hayden's. Arboricultural Consultants. The overall landscaping and urban greening strategy, having regard to the existing condition and use on site is considered to accord with London Plan Policy G5, and Local Plan Policies DMEI 7 and DMHB 14.

Flood Risk / Drainage

Planning Policy

- 7.78 Paragraph 182 of the NPPF states that Applications which could affect drainage on or around the site should incorporate sustainable drainage systems to control flow rates and reduce volumes of runoff, and which are proportionate to the nature and scale of the proposal.

- 7.79 London Plan Policy SI12 states that proposals should ensure that flood risk is minimised and mitigated, and that residual risk is addressed.
- 7.80 Policy EM6 of Hillingdon Council's Local Plan Part 1 states that Applicants must demonstrate that Flood Risk can be suitably mitigated.
- 7.81 Policy DMEI 9(E) of Hillingdon Council's Local Plan Part 2 states the Council will refuse proposals that fail to make appropriate provision for flood risk mitigation, or which would increase the risk or consequences of flooding.

Assessment

- 7.82 The Applicant has instructed Ramboll to prepare a Flood Risk Assessment and Drainage Strategy. Both documents and associated appendices are submitted alongside this application.
- 7.83 The site is located within Flood Zone 1 which is defined as having a low probability of flooding, with a probability of flooding less than a 1 in 1,000 years in any given year, from rivers and seas.
- 7.84 Whilst there are small parts of the site that are identified as having an increased risk of surface water flooding, the proposed the drainage hierarchy has been followed to manage any surface water runoff, proposing two underground infiltration tanks and various porous surfacing across the site.

Fire Safety

Planning Policy

- 7.85 London Plan Policy requirement D5 requires as a minimum of one lift per core for an evacuation lift.
- 7.86 London Plan Policy D12(A) states in the interests of fire safety and to ensure the safety of all building users, all development proposals must achieve the highest standards of fire safety.
- 7.87 Part B of the Policy states that all major development proposals should be submitted with a Fire Statement, which is an independent fire strategy, produced by a third party, suitably qualified assessor.

Assessment

- 7.88 The application is supported by a Fire Statement prepared by Octa Fire. The details confirming who prepared the report (being a suitably qualified person) are detailed on page 3 of the Octa Report.
- 7.89 The report confirms that in accordance with Policy D5, an evacuation lift shall be provided within each unit/warehouse in accordance with the relevant building control standard. Table 2 of the report sets out

London Plan Policy D12 and confirms how the proposed development is compliant with each part of the policy.

- 7.90 Overall, the report concludes that the proposed development is compliant with London Plan Policies D5 & D12 in terms of fire safety.

Energy and Sustainability

Planning Policy

- 7.91 At the heart of the NPPF is a presumption in favour of sustainable development. Paragraph 166 of the NPPF states that in determining planning applications, local planning authorities should expect new development to:

- a) 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
- b) take account of landform, layout, building orientation, massing and landscaping to minimise energy consumption.

- 7.92 London Plan Policy SI 2(A) states that major development should be net zero-carbon. Part B states 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.

- 7.93 Policy DMEI 2 of Hillingdon Council's Local Plan Part 2 states that all major development proposals must be accompanied by an Energy Strategy showing how reductions will be achieved in accordance with Policy SI of The London Plan

Assessment

- 7.94 In accordance with London Plan Policy SI 2 and Policy DMEI 2, the Applicant has instructed Ramboll to prepare an Energy Strategy which has been submitted alongside this application.
- 7.95 The Energy Strategy has been prepared using the "Be Lean, Clean and Green" energy hierarchy, proposing a package of passive design measures and renewable technologies, including through use of a VRF System and solar panels.
- 7.96 In accordance with London Plan Policy SI 2, the proposed development will achieve a 100% reduction in carbon emission when considered against Part L.

7.97 The Sustainability Statement submitted alongside this application confirms that the proposed development is targeting an overall score of 73.56% which is equivalent to a BREEAM "Excellent" rating.

8. CONCLUSION

- 8.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires proposals to be determined in accordance with the statutory development plan unless material considerations indicate otherwise.
- 8.2 The development will optimise the site to provide an employment scheme within West Drayton which adopts a sustainable approach (targeting BREEAM excellent) and a high-quality design, delivering new, modern employment floorspace.
- 8.3 The principle of development is in accordance with Local Development Plan (2021) and will deliver a sustainable form of development that will support the local economy.
- 8.4 This development represents an opportunity to create high quality, sustainable development to suit the needs of future occupiers and meet market demand. The proposed development will make efficient and effective use of the site, improving the environment and bringing the site up to the standards required by modern businesses.
- 8.5 This Planning Statement has assessed the proposals against the development plan and other relevant planning policy and guidance at national, regional, and local policy level and the proposals have been assessed in a number of documents which accompany this application. It is concluded that the proposals comply with planning policy at all levels.
- 8.6 It is considered that this development accords with the policy provisions within the adopted Local Plan and forms a sustainable form of development that will not give rise to any unacceptable impacts. Planning permission should accordingly be granted without delay.



Horton Road- Investment Proposals



Site Location – Outlined in Red

Introduction

LMO Overseas Investments Ltd are preparing a detailed planning application for the development of the land that forms part of the Orbital Industrial Estate, to provide new modern employment units.

This proposal represents an opportunity to create a high-quality development, providing new premises to meet business needs.

The site comprises 13 existing employment units that no longer meet the modern needs with poor energy efficiency and limited external areas for service vehicles and car parking. The proposed development will replace these existing units, making efficient and effective use of the site so that it continues to support jobs and businesses within Hillingdon.

In advance of submitting an application, we are seeking your views on this development.

The Site

The site is in established employment use and in planning policy it is allocated as part of a Strategic Industrial Location (SIL) which is identified in both the London Plan and the adopted Hillingdon Local Plan as an area for continued employment activity to support the London economy.

Therefore, the principle of continued employment use at this site is supported.

Existing access to the site is from Horton Road and it is proposed that this existing access arrangement will be retained to serve the new development.

There is very little existing landscape at the site and opportunities will be taken to include tree planting and landscaped areas to improve the environmental quality along the street frontage and support biodiversity.

Horton Road- Investment Proposals

Proposal

A detailed planning application is being prepared for the development of two modern, energy efficient employment units to meet demand from businesses.

It is proposed that these units will be for flexible employment use across industrial and storage and distribution uses (Classes E(g)(iii)/B2/B8) with ancillary offices. Space will be provided to include areas for car parking, service yards and new landscaping.

The completed development will create an attractive employment development which will increase investment and support further jobs during both its construction and operation.



Illustrative Proposals – site outlined in red

Benefits

The development will regenerate and make effective use of this site and continue its employment function to provide space for businesses seeking new premises of this type..

It is anticipated that the proposal will support in the region of 33 -88 jobs depending on the type of businesses that operate from these new premises.

The proposals will be accompanied by proposals for additional tree planting and landscape and measures to secure a net gain in biodiversity (as calculated using the DEFRA metric).

Further details of the development will be set out within the reports that are submitted to accompany the planning application.

Next Steps

A planning application is being prepared for submission later this year, which will be supported by a number of reports.

A range of surveys have already been undertaken which will inform these reports, to consider matters such as:

- Transport and Highways
- Air Quality
- Noise
- Ecology & Biodiversity
- Drainage
- Landscape

Subject to receiving planning consent, demolition and construction work is planned to start in 2026.

Get in Touch

To make any comments or for more information on the proposal, please get in contact with us at:

planning@msa-architects.co.uk