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Horton Road, West Drayton

Sustainability Statement

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Horton Road, West Drayton

Sustainability Statement

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Executive Summary

This Sustainability Statement has been prepared on behalf of LMO Overseas Investments Ltd (the Applicant) in support of a Planning Application relating to development of the site to provide two modern employment units for employment purposes within Use Class E(g)(iii), B2, B8 with ancillary offices, car parking, landscaping, service yard areas and ancillary structures, with associated works. (the 'Proposal').

The Application Site is relating to land to the south of Horton Road, West Drayton within the London Borough of Hillingdon, the Local Planning Authority (LPA). The site is approximately 0.9Ha and is located within the Orbital Industrial Estate, bordered by residential development to the north and Grand Union Canal to the south.

The Proposal will meet the requirements set out in the National Planning Policy Framework (2024)[1] and where required, the London Plan (2021)[2]. This Sustainability Statement also responds to the supporting local policy within the adopted Hillingdon Local Plan Part 1 Strategic Policies (2012)[3] and Hillingdon Local Plan Part 2 Development Management Policies (2020)[4]. This Sustainability Statement will also address Hillingdon's Supplementary Planning Documents.

The purpose of this Sustainability Statement is to provide an independent verification that the design of the Proposal is in accordance with the sustainability objectives of relevant planning policy at all levels and is a 'good practice' example for sustainable design.

The Application Site's performance against policy, industry best practice and standards has been considered across its full lifecycle. This covers the design, construction and operation of the Proposal and includes several thematic areas: water management and flood resilience, energy, materials, pollution, ecology, waste, health and wellbeing, transport, and climate change adaptation.

A review of the Proposal's sustainability targets against the planning objectives and best practice identifies the opportunities and constraints of the Site and sets the targets for the design team. The sustainability appraisal demonstrates that the Horton Road, West Drayton employment units would meet the key policy objectives by incorporating relevant measures for each of the thematic areas considered.

By undertaking this sustainability appraisal at such an early stage of the project, the potential impact of the sustainable development has been maximised.

[1] Ministry of Housing, Communities and Local Government, 2024. National Planning Policy Framework (NPPF) December 2024. Available: https://assets.publishing.service.gov.uk/media/675abd214cbda57cacd3476e/NPPF-December-2024.pdf

[2] Greater London Authority, 2021. The London Plan, March 2021. Available at: https://www.london.gov.uk/sites/default/files/the_london_plan_2021.pdf

[3] London Borough of Hillingdon, 2012. Hillingdon Local Plan Part 1: Strategic Policies, November 2012. Available at: https://www.hillingdon.gov.uk/media/3080/Local-Plan-Part-1---Strategic-Policies/pdf/npLocal_Plan_Part_1_Strategic_Policies_15_feb_2013_a_1_1.pdf?m=1598370401647

[4] London Borough of Hillingdon, 2020. Hillingdon Local Plan Part 2: Development Management Policies, January 2020. Available at: https://www.hillingdon.gov.uk/media/3084/Hillingdon-Local-Plan-Part-2-Development-Management-Policies/pdf/pdLPP2_Development_Management_Policies_-_ADOPTED_VERSION_JAN_2020_1.pdf?m=1598370641570

1. Introduction

1.1. Background

Ramboll has been appointed by LMO Overseas Investments Ltd to provide a Sustainability Statement to support a planning application for the development of two employment units in Hillingdon.

The Proposed Development includes the development of two modern, energy efficient employment units to provide 3,155 sq m (GIA) of Use Class E(g)(iii), B2 and B8 use with ancillary offices supported by car parking, service yards, landscaping and associated works.

The purpose of this Sustainability Statement is to provide an independent verification that the design of the amended Proposal is in accordance with the sustainability objectives of relevant planning policy at all levels and is a 'good practice' example for sustainable design.

1.2. Site Location and Context

The site is located to the south of Horton Road, West Drayton, within the London Borough of Hillingdon, the Local Planning Authority (LPA). The site is approximately 0.9Ha and is located within the Orbital Industrial Estate, bordered by residential development to the north and Grand Union Canal to the south.

The proposed units sit in a densely built area of Horton Road, with some nearby industrial units and residential areas. The site is an established employment location and is allocated within a larger area known as a Strategic Industrial Location (SIL).

See Google maps screenshot (Figure 1-1) confirming location and site boundary.

Figure 1-1 Google maps showing the locations of Orbital Industrial Estate

1.3. Proposed Development

The Proposed Development includes development of the site to provide two modern employment units of 3,155sqm (GIA) for employment purposes within Use Class E(g)(iii), B2, B8 with ancillary offices, car parking, landscaping, service yard areas and ancillary structures, with associated works. See proposed site location plan in Figure 1-2 below.

The two units comprise the following GIA:

- Unit 1 – 1,079 sqm
- Unit 2 – 2,076 sqm

Figure 1-2 Proposed Site Layout Plan

1.4. Limitations and Constraints

This report has been prepared by Ramboll exclusively for the intended use by the client in accordance with the agreement between Ramboll and the client defining, among others, the purpose, the scope and the terms and conditions for the services. No other warranty, expressed or implied, is made as to the professional advice included in this report or in respect of any matters outside the agreed scope of the services or the purpose for which the report and the associated agreed scope were intended, or any other services provided by Ramboll.

In preparation of the report and performance of any other services, Ramboll has relied upon publicly available information, information provided by the client and information provided by third parties. Accordingly, the conclusions in this report are valid only to the extent that the information provided to Ramboll was accurate, complete, and available to Ramboll within the reporting schedule.

Ramboll's services are not intended as legal advice, nor an exhaustive review of site conditions and/or compliance. This report and accompanying documents are intended solely for the use and benefit of the client for this purpose only and may not be used by or disclosed to, in whole or in part, any other person without the express written consent of Ramboll. Ramboll neither owes nor accepts any duty to any third party, unless formally agreed by Ramboll through that party entering into, at Ramboll's sole discretion, a written reliance agreement.

1.5. Structure of Report

Section 2.11 of the Ministry of Housing, Communities and Local Government, National Planning Policy Framework (NPPF)[1], dated December 2024 states that there is a presumption in favour of sustainable development. Based upon the key drivers for the project (discussed further in section 2) the following themes will be covered in this report:

- Water (section 3.1)
- Energy (section 3.2)
- Materials (section 3.3)
- Pollution (section 3.4)
- Land use and ecology (section 3.5)
- Transport (section 3.6)
- Health and Wellbeing (section 3.7)
- Waste (section 3.8)
- Climate Change Adaptation (section 3.9)
- Environmental Assessment (section 3.10)

The sections within this report have been structured so that they each contain the following:

- An introduction to the section.
- The key drivers for the Site.
- The sustainability considerations for the Site and:
- A conclusion.

2. Key Drivers

2.1. National Policy Context

The National Policy context includes:

2.1.1. Ministry of Housing, Communities & Local Government, National Planning Policy Framework, dated December 2024[1]

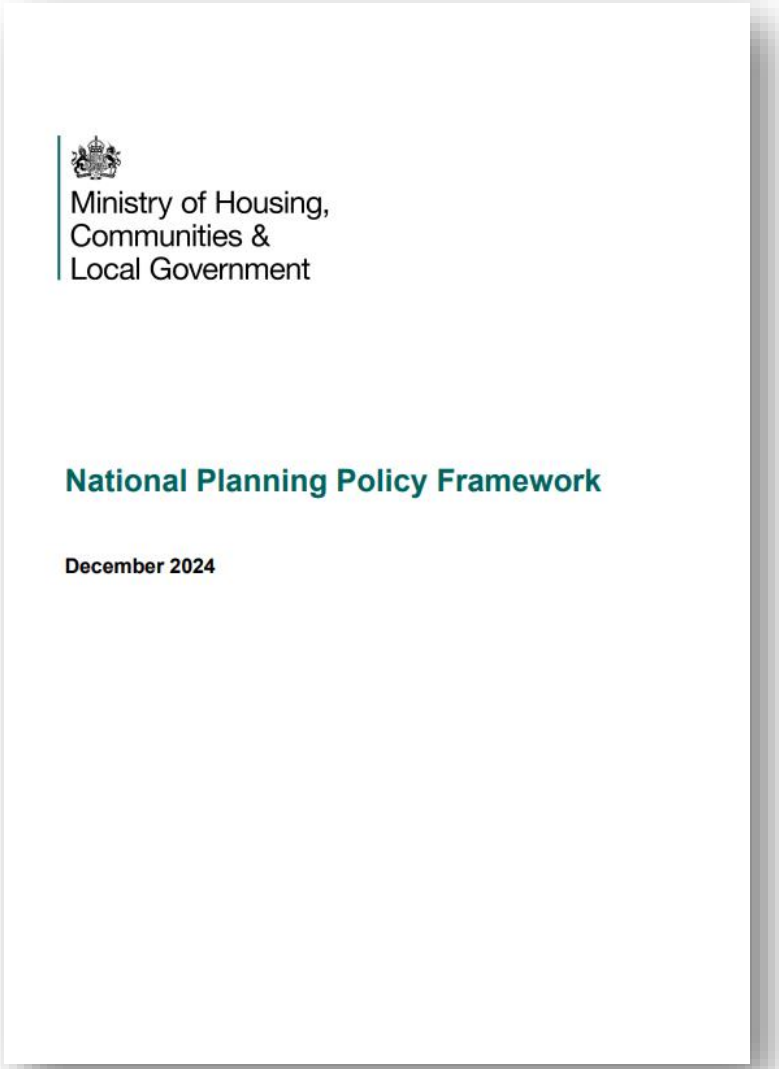
The National Planning Policy Framework (NPPF) 2024 sets out the UK Government's planning policies for England and outlines how these are expected to be applied.

Section 2.11 of the Ministry of Housing, Communities and Local Government, National Planning Policy Framework (NPPF)[1], dated December 2024 states that there is a presumption in favour of sustainable development.

Planning law requires that applications for planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise. The National Planning Policy Framework must be taken into account in preparing the development plan and is a material consideration in planning decisions. Planning policies and decisions must also reflect relevant international obligations and statutory requirements.

In addition, compliance with the following sections will be demonstrated through this report:

- Section 2 - Achieving Sustainable Development
- Section 3 - Plan Making
- Section 4 - Decision Making
- Section 6 – Building a Strong, Competitive Economy
- Section 8 - Promoting healthy and safe communities
- Section 9 - Promoting sustainable transport
- Section 11 - Making effective use of land
- Section 14 - Meeting the challenge of climate change, flooding and coastal change
- Section 15 - Conserving and enhancing the natural environment
- Section 17 - Facilitating the sustainable use of minerals



2.2. Regional Policy Context

The Regional Policy context includes:

2.2.1. The London Plan, dated March 2021[2]

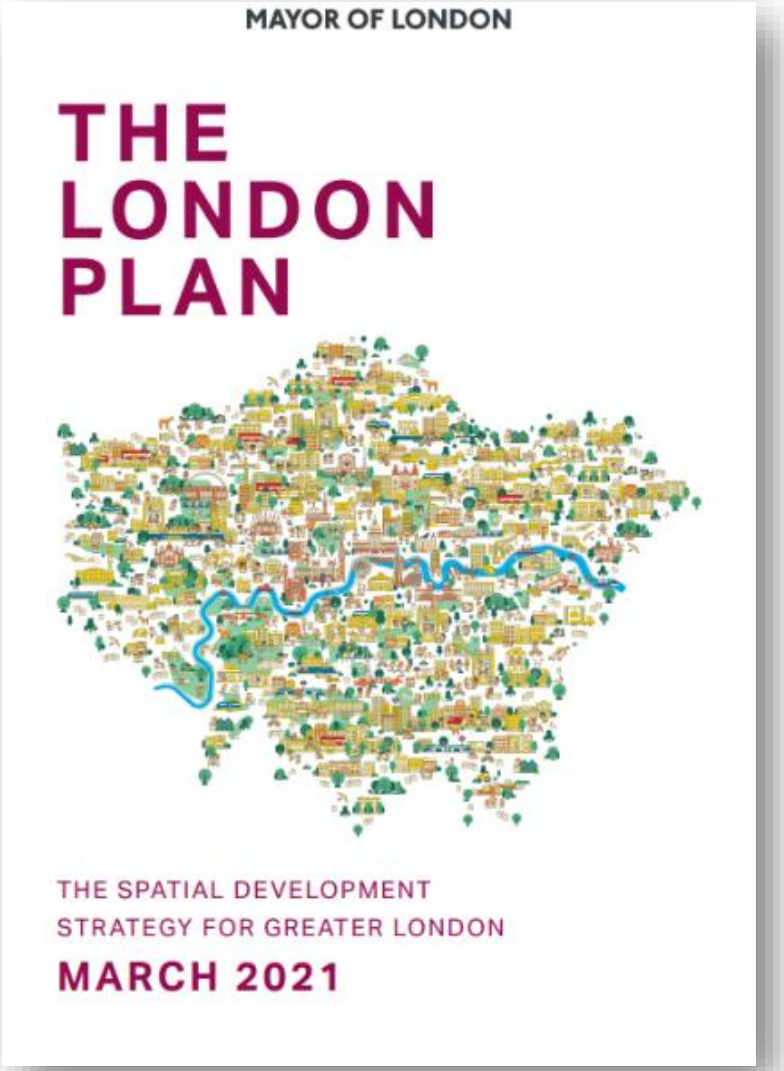
Representing the overall strategic plan for London, the London Plan (2021)[2] sets out an integrated economic, environmental, transport and social framework for the development of London to 2041.

The London Plan is legally part of each of the 32 London boroughs' Development Plans and must be taken into account when planning decisions are taken in any part of Greater London.

Consolidating the geographical and locational aspects of the Mayor of London's other strategies, the London Plan aims to ensure consistency across Greater London.

Of particular reference to this Sustainability Statement are a number of key considerations concerning the Proposed Development:

- Policy GG3 - Creating a healthy city
- Policy GG6 - Increasing efficiency and resilience
- Policy D14 – Noise
- Policy E4 – Strategic Industrial Locations
- Policy E7 – Industrial Intensification, co-location and substitution
- Policy G5 – Urban Greening
- Policy G6 – Biodiversity and access to nature
- Policy SI1 - Improving air quality
- Policy SI2 – Minimising Greenhouse Gas Emissions
- Policy SI5 - Water infrastructure
- Policy SI7 - Reducing waste and supporting the circular economy
- Policy SI12 - Flood risk management
- Policy SI13 - Sustainable drainage
- Policy T5 – Cycle Parking
- Policy T6.2 – Office Parking



2.3. Local Policy Context

The Site is located in Hillingdon and is therefore covered by:

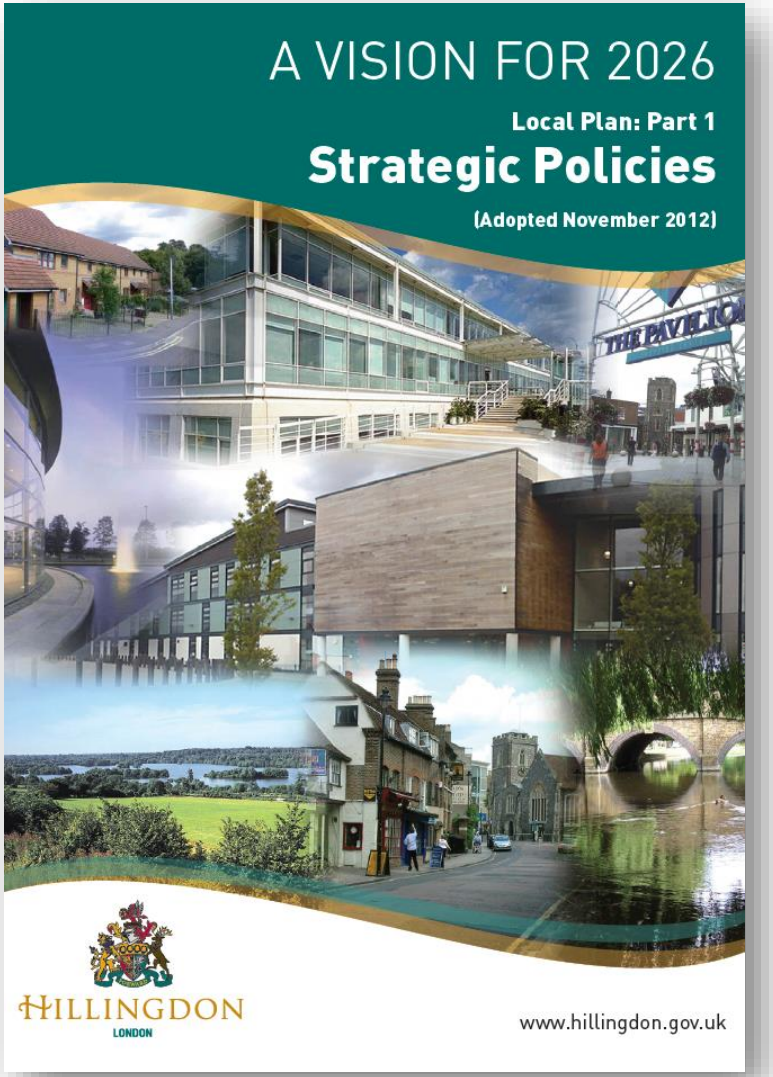
- Hillingdon Local Plan Part 1 Strategic Policies (2012)[3]
- Hillingdon Local Plan Part 2 Development Policies (2020)[4]

2.3.1. Hillingdon Local Plan Part 1 Strategic Policies (2012)[3]

Hillingdon's Local Plan Part 1 was adopted in November 2012. It sets out the overall level and broad locations of growth up to 2026. It comprises a spatial vision and strategy, strategic objectives, core policies and a monitoring and implementation framework with clear objectives for achieving delivery.

As a minimum, the following policy requirements will be demonstrated within this Sustainability Statement:

- Policy E2: Location of Employment Growth
- Policy BE1: Built Environment
- Policy EM1: Climate Change Adaptation and Mitigation
- Policy EM2: Green Belt, Metropolitan Open Land and Green Chains
- Policy EM6: Flood Risk Management
- Policy EM7: Biodiversity and Geological Conservation
- Policy EM8: Land, Water, Air and Noise
- Policy EM11: Sustainable Waste Management
- Policy T1: Accessible Location Designations
- Policy T2: Public Transport Interchanges

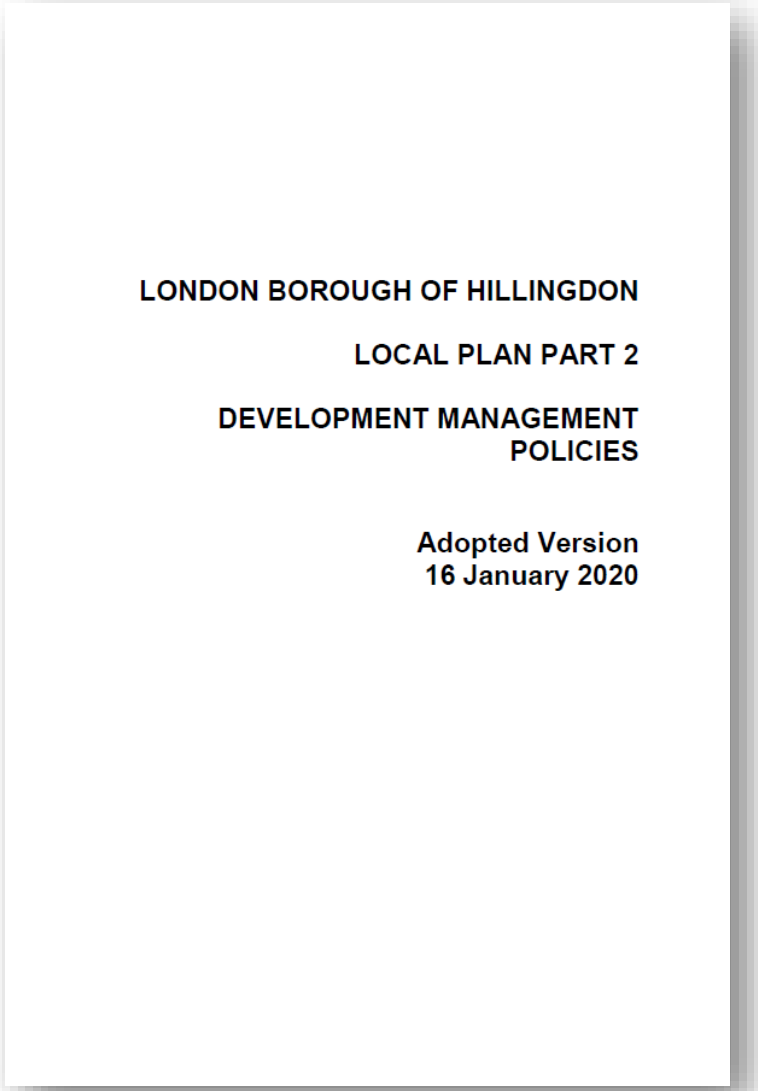


2.3.2. Hillingdon Local Plan Part 2 Development Policies (2020)[4]

Hillingdon's Local Plan Part 2 was adopted in January 2020. The Local Plan Part 2 Development Management Policies and Site Allocations and Designations were adopted as part of the borough's development plan at Full Council on 16 January 2020. This replaces the Local Plan Part 2 Saved UDP Policies (2012).

As a minimum, the following policy requirements will be demonstrated within this Sustainability Statement:

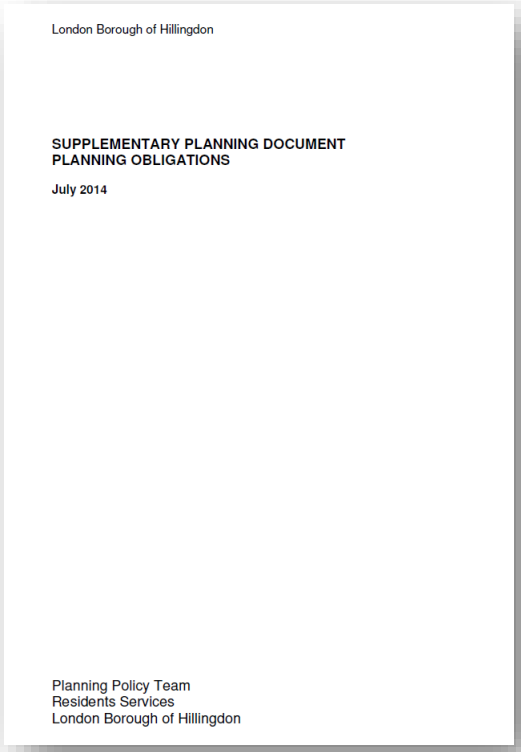
- Policy DME1: Employment Uses on Designated Sites
- Policy DMEI2: Reducing Carbon Emissions
- Policy DMEI4: Air Quality
- Policy DMEI7: Biodiversity Protection and Enhancement
- Policy DMEI9: Management of Flood Risk
- Policy DMEI14: Air Quality
- Policy DMT1: Managing Transport Impacts
- Policy DMT6: Vehicle Parking



2.4. Supplementary Planning Documents

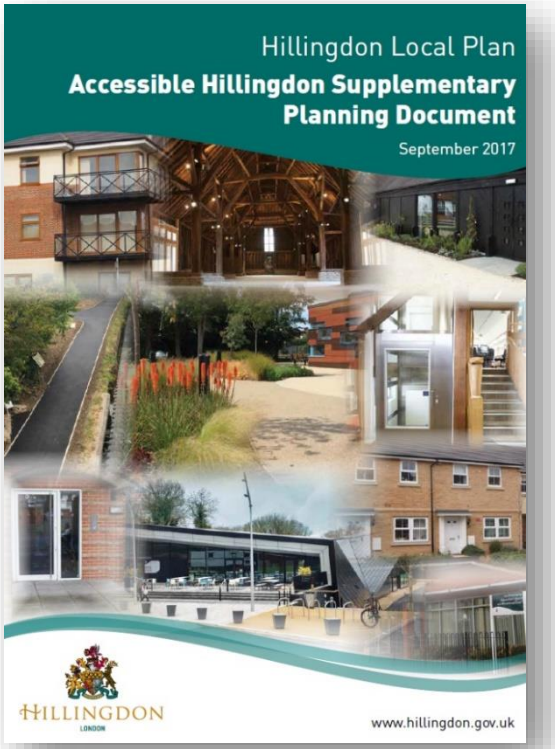
2.4.1. Planning Obligations SPD[5]

The Planning Obligations Supplementary Planning Document was adopted in July 2014. It provides guidance on the use of planning obligations in Hillingdon, for all those involved in the submission and determination of planning applications.



2.4.2. Accessible Hillingdon SPD[6]

The Accessible Hillingdon Supplementary Planning Document was adopted in September 2017. It echoes various Codes of Practice pertinent to designing inclusive environments, often going beyond minimum requirements.



[5] London Borough of Hillingdon, 2014. Supplementary Planning Document: Planning Obligations, July 2014. Available at: https://www.hillingdon.gov.uk/media/3291/Document-B---Planning-Obligations-SPD/pdf/rlDocument_B_-_Planning_Obligations_SPD.pdf?m=1598975715390

[6] London Borough of Hillingdon, 2017. Accessible Hillingdon Supplementary Planning Document, September 2017. Available at: https://www.hillingdon.gov.uk/media/3297/Accessible-Hillingdon-SPD---September-2017/pdf/1rAccessible_Hillingdon_SPD_2017_Published_1.pdf?m=1598976226033

3. Sustainability Considerations

3.1. Water

3.1.1. Introduction

The water industry is at the forefront in the fight against climate change as all the main impacts; temperature change, more intense rainfall, changing rainfall patterns, and sea level rises all directly affect water companies, water sources, and the impacts of flooding.

Some of the impacts, such as severe droughts and flooding can be obvious; however, others, such as saline intrusion into groundwater sources and the changes to peak demand can be subtler and could lead to concerns on the supply of fresh potable water and the impact and security of buildings against future flooding.

3.1.2. Key Drivers

3.1.2.1. National Policy Context

Ministry of Housing, Communities and Local Government, National Planning Policy Framework (NPPF)[1], dated December 2024, Section 14 - Meeting the challenge of climate change, flooding and coastal change says new development should be planned for in ways that avoids increased vulnerability to the range of impacts arising from climate change. Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk.

3.1.2.2. Local Policy Context

Hillingdon Local Plan Part 1: Strategic Policies, dated November 2012, Policy EM6: Flood Risk Management, says the Council will require all development across the borough to use sustainable urban drainage systems (SUDS) unless demonstrated that it is not viable.

Hillingdon Local Plan Part 2: Development Policies, dated January 2021, Policy DMEI10: Water Management, Efficiency, and Quality, says all new build developments are required to include a drainage assessment demonstrating that appropriate sustainable urban drainage systems (SuDS) have been incorporated in accordance with the London Plan Hierarchy.

3.1.3. Sustainability Considerations

3.1.3.1. Flood Risk

As of April 2025, the Environment Agency Flood Map for planning (Figure 3-1) shows that the Site is located within Flood Zone 1, with a low probability of flooding.

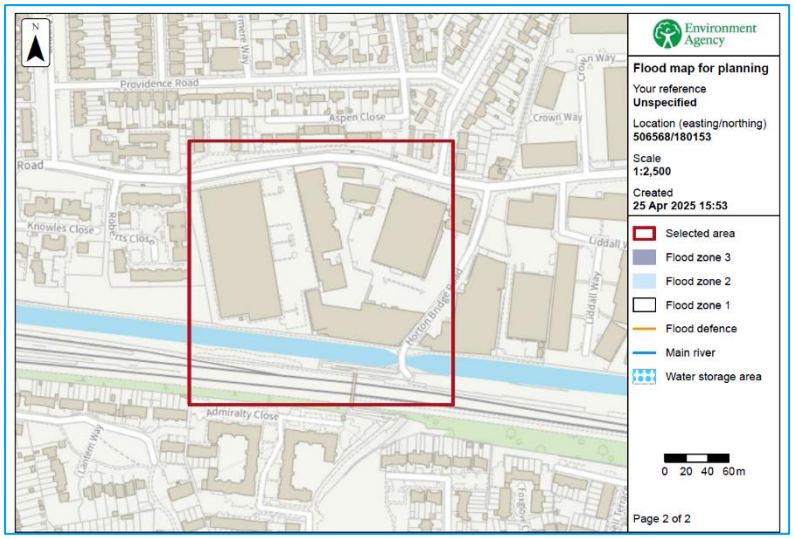


Figure 3.1-1 EA Flood Risk Map for Planning

The Flood Risk Assessment produced by Ramboll in May 2025 confirms that the Site is located in Flood Zone 1 and has no other significant sources of flood risk. The Proposed Development is therefore concluded to require no additional mitigation with respect to the risk of flooding at the site.

The Site is considered to be at low risk from fluvial or tidal flooding and there is a negligible risk that the site could lead to an increased risk of fluvial flooding elsewhere. There are currently areas of the Site considered to be at risk from surface water flooding, however following full redevelopment of the Site, these will no longer be applicable. The Site is assessed to be at a low risk of flooding from all other sources including groundwater, reservoirs, and canals based on review of available EA data.

As the Site is located in Flood Zone 1 and is at a low risk of flooding, the sequential test is not required.

3.1.3.2. Drainage Strategy

The Flood Risk Assessment produced by Ramboll in May 2025 confirms the surface water runoff will be managed through infiltration to ground, via two underground infiltration tanks in combination with porous surfacing of car parking areas at locations distributed across the Site, in line with the SuDS hierarchy. The feasibility has been confirmed through soakaway testing at several locations.

The proposed SuDS measures at the Site include a combination of permeable paving, geocellular infiltration tans and tanked permeable paving systems. These are further confirmed in the Drainage Strategy drawings produced by Ridge in May 2025.

Small amounts of flooding occur across the network in the 1 in 100 + 20% climate change rainfall scenario event. These will be manged by allowing surface water flooding on limited areas of paving and roadway, away from buildings.

3.1.3.3. Potable Water Use

Commercial water use

The current BREEAM assessment for the development has targeted 4 out of 5 credits under the Wat 01 credit issue. This will require the installation of efficient water-consuming components commensurate with a 50% improvement in water consumption (litres/person/day) for the assessed building over baseline performance. The sanitaryware specification will be developed further in line with this target as the design progresses.

Sub-metering of water usage allows water consumption to be better accounted for. Large water consumers can be identified with the aim of encouraging the reduction in water use where practical. Fluctuations in consumption can also be identified and dealt with as appropriate. The development will therefore be provided with appropriate water meters.

In addition, a leak detection system will be installed on the utilities water supply, to detect any major leaks between the utilities supply and the buildings, as well as within the building.

Flow control devices will also be installed to regulate the water supply to each WC area or sanitary facility according to demand, in order to minimise undetected wastage and leaks from sanitary fittings and supply pipework.

3.1.3.4. Construction Water Use

Monitoring water consumption is valuable in informing construction practices and maximising performance. The current BREEAM pre-assessment for the industrial building ensures that the Principal Contractor is required to assign responsibility to an individual for monitoring, recording, and reporting water consumption from all on-site construction processes throughout the build programme. The contractor will be required to set targets for the potable water consumption (m3) and then compare this to the actual water consumption at the end of the project.

3.1.4. Conclusion

The Site is in Flood Zone 1 and is therefore at a low risk of flooding from all sources.

The drainage design for the Site is bespoke and includes no increase in the impermeable surfaces as a result of the refurbishment works and hardstanding areas will be served by SuDS to allow full infiltration for rainfall events up to and including the 1 in 100 (1%) + 20% climate change allowance.

Measures have also been incorporated into the design and construction of the development to reduce the consumption of potable water, as well as to reduce potable water wastage associated with leaks and unregulated water demands.

3.2. Energy

3.2.1. Introduction

Emissions from buildings account for 37% of total UK greenhouse gas emissions. These are made up of 45% direct emissions due to the burning of fossil fuels for heat, and 55% indirect emissions related to electricity use. Factors such as the thermal insulation, air permeability, shading and glazing areas should be carefully considered early as they can be used to reduce heating, cooling and lighting demands. Systems efficiency and carbon intensity of the selected energy source are also important.

Detailed and accurate energy modelling can consider factors like occupancy, weather scenarios and management of building services as well as any contributions from renewable and low carbon technologies. More detailed modelling helps the design teams predict the expected energy performance and take appropriate actions to reduce the performance gap where they are involved post occupation. Actual usage patterns are changing over time, and it is possible that predicted energy consumption will not be that close to the actual energy consumption. However, with the use of accurate modelling any areas of difference can be identified, and appropriate actions can be taken to optimise energy performance.

3.2.2. Key Drivers

3.2.2.1. National Policy Context

Ministry of Housing, Communities and Local Government, National Planning Policy Framework (NPPF), dated December 2023, Section 14 -Meeting the challenge of climate change, flooding and coastal change says new development should be planned for in ways that can help to reduce greenhouse gas emissions, such as through its location, orientation, and design.

The scheme must comply with the guidelines set out in HM Government Building Regulations, Conservation of fuel and power, Approved Document L[7].

3.2.2.2. Local Policy Context

Hillingdon Local Plan Part 1: Strategic Policies, dated November 2012, Policy EM1 Climate Change Adaptation and Mitigation, says the Council will ensure that climate change mitigation is addressed at every stage of the development process.

Hillingdon Local Plan Part 2: Development Policies, dated January 2021, Policy DMEI2 Reducing Carbon Emissions says, all major development proposals must be accompanied by an energy assessment showing how carbon dioxide emissions have been minimised in line with London Plan targets.

Hillingdon Local Plan Part 2: Development Policies, dated January 2021, Policy DMEI3 Decentralised Energy, says all major developments are required to be designed to be able to connect to a Decentralised Energy Network (DEN).

3.2.3. Sustainability Considerations

[7] HM Government, 2021. The Building Regulations 2010 Conservation of Fuel and Power Approved Document L, 2021. Available at: chrome-extension://efaidnbmnnnibpcajpcglclefindmkaj/https://assets.publishing.service.gov.uk/media/662a2e3e55e1582b6ca7e592/Approved_Document_L__Conservation_of_fuel_and_power__Volume_1_Dwellings__2021_edition_incorporating_2023_amendments.pdf

The energy assessment presented in the Ramboll Energy Strategy (May 2025) demonstrates a comprehensive approach to reducing carbon emissions associated with the proposal.

3.2.3.1. Energy Hierarchy Results

An Energy Strategy was developed by Ramboll in May 2025 to support the Proposal, utilising Part L 2021 to assess the Proposal's carbon emission reduction performance.

To achieve compliance with local and national policy, the following design measures have been incorporated as part of the applied energy hierarchy with the results outlined in Table 4-1.

Be lean.

Carbon savings have been achieved for the Proposed Development through careful design of the building envelope with a high thermal performance. The M&E equipment has also been selected to meet high levels of efficiencies exceeding the requirements of the Part L regulations. By incorporating the Be Lean measures, the Proposed Development is anticipated to achieve 6.4% reduction in carbon emissions beyond the Baseline Part L 2021 scheme.

Be Clean.

The potential for connection to nearby existing low carbon heat distribution networks (DH) has been investigated. Based on the information gathered to date there are no existing DH schemes within the vicinity of the Site to make connection feasible. Thus, the strategy of connection to DH networks is discounted from the development.

An on-site Combined Heat and Power (CHP) option has also been investigated but was not proposed due to the concerns relevant to this technology in combination with low heat demand for the building type. Furthermore, CHP systems are regarded in general as not appropriate for this development due to poor carbon reduction and adverse air quality impacts.

However, the proposed site wide energy centre will be future proofed to allow connectivity to an area wide heating network if one becomes available in the future.

Be Green.

In the "Be Green" stage, the feasibility of using low and zero carbon (LZC) technologies for the development were investigated. It was deemed that heat pump (VRF) and solar photovoltaic panels were considered the most appropriate technologies to provide green energy for the Proposed Development. Following the adoption of heat pump and approximately 365sq.m of PV panels, the Proposed Development is anticipated to achieve a further 94.7% reduction in carbon emissions when compared to the Be Lean scheme.

Overall, it is anticipated that the Proposed Development can achieve 101.1% reduction in CO2 emissions beyond the Baseline Part L 2021 scheme, therefore a zero-carbon development is attained. It has therefore been demonstrated that compliance with Part L 2021 Criterion 1 can be achieved with compliance margins of BER vs. TER and BPER vs. TPER achieved.

In addition, these measures will enable nine BREEAM Ene 01 credits to be awarded, meeting local policy requirements and the mandatory level of performance required to achieve a BREEAM 'Excellent' rating. The energy strategy results are shown are presented in Tables 4-1 and 4-2.

Table 3.2-1 Part L 2021 regulated carbon emissions savings after each stage of the energy hierarchy

Part L 2021 regulated carbon emissions savings after each stage of the energy hierarchy		
	Carbon Emissions [Tonnes CO2/annum]	
	Regulated	Unregulated
Building Regulations Part L 2021 Compliant Development	8.2	26

After Be Lean	7.7	26
After Be Clean	7.7	26
After Be Green	-0.1	26

Table 3.2-2 Part L 2021 regulated carbon emissions savings after each stage of the energy hierarchy

Part L 2021 regulated carbon emissions savings after each stage of the energy hierarchy		
	Total Regulated Carbon Emissions Savings	
	[Tonnes CO2/annum]	%
Be Lean: Savings from energy demand reduction	0.5	6.4%
Be Clean: Savings from heat network	0.0	0.0%
Be Green: Savings from renewable energy	7.8	94.7%
Cumulative on-site savings	8.3	101.1%

3.2.4. Conclusion

The Ramboll Energy Strategy demonstrates that Proposal has taken account of carbon emissions within the design in the following ways:

- The building envelope includes high thermal performance and efficient MEP systems; and
- The recommended option adopts ASHP with Variable Refrigerant Flow (VRF) to office space heating and cooling, and ASHP with radiant panels to warehouse space heating.
- A substantial PV array is proposed to generate renewable electricity.

The energy strategy for the Proposed Development meets and exceeds Part L 2021 of the Building Regulations targets and achieves the zero carbon (100%) reduction in regulated carbon emissions beyond building regulation Part L 2021 baseline as per Policy DMEI 2 of the London Borough of Hillingdon Local Plan and Policy SI 2 of the London Plan for all options proposed.

As a result of the measures proposed, the Proposal can enable nine BREEAM ENE01 credit to be awarded, meeting the mandatory level of performance required to achieve a BREEAM 'Excellent' rating, and can achieve an overall 101.1% reduction in CO2 emissions beyond the Baseline Part L 2021 scheme, therefore a zero-carbon development is attained.

3.3. Materials

3.3.1. Introduction

The use of construction products leads to a wide range of environmental and social impacts across the life cycle through initial procurement, wastage, maintenance and replacement. Taken together, construction products make a highly significant contribution to the overall life cycle impacts of a building. Selecting materials at an early stage can therefore be crucial in reducing the embodied carbon of a building or development.

In addition to selecting materials with low environmental impacts (where possible), materials can also be sourced using manufacturers/suppliers with responsible sourcing certification. Responsible sourcing of construction products takes a holistic approach to sustainability by considering the way in which the materials are mined/harvested, manufactured, processed and recycled.

3.3.2. Key Drivers

3.3.2.1. National policy context

Ministry of Housing, Communities and Local Government, National Planning Policy Framework (NPPF), dated December 2023, Section 17 - Facilitating the sustainable use of minerals says it is essential that there is a sufficient supply of minerals to provide the infrastructure, buildings, energy and goods that the country needs. Since minerals are a finite natural resource, and can only be worked where they are found, best use needs to be made of them to secure their long-term conservation.

3.3.2.2. Local policy context

Hillingdon Local Plan Part 1: Strategic Policies, dated November 2012, Policy EM11: Sustainable Waste Management says the Council will promote using waste as a resource and encouraging the re-use of materials and recycling.

3.3.3. Sustainability Considerations

3.3.3.1. Design Stage Considerations

Exposed elements of a building or landscaping are at risk of damage through impact or wear and tear. This can result in significant and unnecessary materials use and waste generation across the life of a building. This can be minimised by risk areas being identified and designed out, and suitable protection measures being provided.
As the design develops, measures will therefore be incorporated into the building's design and construction in accordance with the BREEAM Mat05 credit:

- Prevent negative impacts of high user numbers in relevant areas of the building (e.g., corridors, lifts, stairs, doors etc.);
- Prevent damage from any vehicle or trolley movements within 1 m of the internal building fabric in storage, delivery, corridor and kitchen areas;
- Prevent external building fabric damage by vehicles. Protection where parking or manoeuvring areas are within 1 m of the building façade and where delivery areas or routes are within 2 m of the façade, i.e. specifying bollards or protection rails; and
- Prevent potential malicious damage to building materials and finishes, in public and common areas where appropriate.

3.3.3.2. Construction Stage Considerations

Most construction products involve long and complex supply chains that result in a wide range of impacts locally and globally. These

might include environmental (e.g., toxicity or biodiversity), economic (e.g. corruption) or social (e.g. slave labour, equality) issues and can occur during the extraction, processing, manufacturing or supply chain stages. The increasing globalisation of supply chains increases the difficulty of tracing the supply chain and mitigating negative impacts caused by it.

Credible certification schemes exist to increase confidence to specifiers that risks are being minimised or avoided and their use ensures that specifiers are able to demonstrate the responsible nature of their selection decisions.

As part of the BREEAM assessment, 100% of timber and timber-based products used on the Site will be 'legal' and 'sustainable' as per the UK Government's Timber Procurement Policy[8]. In addition, a documented sustainable procurement plan will be produced to guide the specification towards sustainable construction products. The Principal Contractor will be required to source materials from suppliers, where feasible, which have responsible sourcing accreditation, such as BES 6001 and ISO 14001 in order to achieve a minimum of 20% of the responsible sourcing points available in BREEAM.

Materials with an Environment Product Declaration (EPD) and/or are extracted or manufactured within the UK or EU will be prioritised where feasible.

3.3.4. Conclusion

The design team has considered design options to identify those with a low environmental impact, and in order to reduce it as far as possible, consideration has been given to the embodied carbon within the development. Furthermore, to reduce the need to repair and replace materials resulting from damage to exposed elements of the building and landscape the specified materials will be resilient.

The Principal Contractor will be required to source products in accordance with the sustainable procurement plan for the development. Where feasible, responsible sourcing certification will be required on products used throughout construction. All timber, and timber-based products, will be sourced in accordance with the UK Government Timber Procurement Policy.

[8] Department for Environment, Food & Rural Affairs, 2013. Timber Procurement Policy (TPP). Available: https://www.gov.uk/guidance/timber-procurement-policy-tpp-prove-legality-and-sustainablity

3.4. Pollution

3.4.1. Introduction

Pollution is the process of making land, water, air or other parts of the environment dirty, unsafe or unsuitable for use. Any substance that is not naturally found in an environment could cause environmental pollution. A significant issue with environmental pollution is that the effects are not always immediate or completely understood, furthermore, mitigation measures are not always completely effective. The prevention of environmental pollution should therefore always be considered rather than mitigation.

3.4.2. Key Drivers

3.4.2.1. National Policy Context

Ministry of Housing, Communities & Local Government, National Planning Policy Framework (NPPF), dated December 2024, Section 15 – Conserving and enhancing the natural environment says planning policies and decisions should prevent new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality.

3.4.2.2. Local Policy Context

Hillingdon Local Plan Part 1: Strategic Policies, dated November 2012, Strategic Objective SO10: Improve and protect air and water quality, reduce adverse impacts from noise including the safeguarding of quiet areas and reduce the impacts of contaminated land.

Hillingdon Local Plan Part 1: Strategic Policies, dated November 2012, Policy EM8: Land, Water, Air and Noise, says all major development within the Air Quality Management Area (AQMA) should demonstrate air quality neutrality where appropriate.

Hillingdon Local Plan Part 1: Strategic Policies, dated November 2012, Policy EM8: Land, Water, Air and Noise, says the Council will ensure that noise sensitive development and noise generating development are only permitted if noise impacts can be adequately controlled and mitigated.

Hillingdon Local Plan Part 1: Strategic Policies, dated November 2012, Policy EM8: Land, Water, Air and Noise, says the Council will expect proposals for dev elopement on contaminated land to provide mitigation strategies that reduce the impacts on surrounding land uses.

Hillingdon Local Plan Part 2: Development Management Policies, dated January 2020, Policy DMT 1:Manging Transport Impacts, says developments should have no significant adverse transport or associated air quality impacts on the local and wider environment.

Hillingdon Local Plan Part 2: Development Management Policies, dated January 2020, Policy DMEI 12: Development of Land Affected by Contaminations, says proposals for development on potentially contaminated sites will be expected to be accompanied by at least an initial study of the likely contaminants.

3.4.3. Sustainability Considerations

3.4.3.1. Contaminated Land

A Ground Contamination Assessment Report was issued by Ridge in April 2025, summarising the contamination assessment conducted on the Site to date. This confirmed that the potential risk of contamination for the Site overall is anticipated to be very low or low risk levels.

3.4.3.2. Air Pollution

An Air Quality Assessment (AQA) was produced by Kairus Ltd in May 2025 confirms to assess the potential implications of the Proposed

Development on local air quality. This assessed potential air quality impacts associated with both the construction and operational phases of the Proposed Development. The report has been produced in line with London Plan Policy SI1, as well as Greater London Authority (GLA) London Plan Guidance and guidance set out in the LBH Air Quality Action Plan.

The AQA confirms that following implementation of best practice mitigation measures, emissions from dust soiling and PM_{10} concentrations will be adequately controlled and overall impacts will be negligible. Overall the site is considered to be suitable for employment use and impacts in terms of new exposure would be negligible.

The Air Quality Neutral Assessment has concluded that although the Proposed Development will be air quality neutral in terms of building emissions, operational trips will exceed the Air Quality Neutral Transport Benchmarks. As a result, additional mitigation measures will be incorporated into the scheme which have been outlined within the Air Quality Assessment (Kairus Ltd, 2025). These include the following:

- Site Specific Travel Plan setting out measures to encourage more sustainable travel and reduce single occupancy trips.
- 7no. Electric Vehicle (EV) charging points.
- 16.no secure and covered cycle parking spaces.
- Dedicated pedestrian route linking both units to Horton Road.

As of June 2025, the DEFRA AQMA Mapping tool confirms that the Site is located within an Air Quality Management Area Boundary (Figure 6-1).

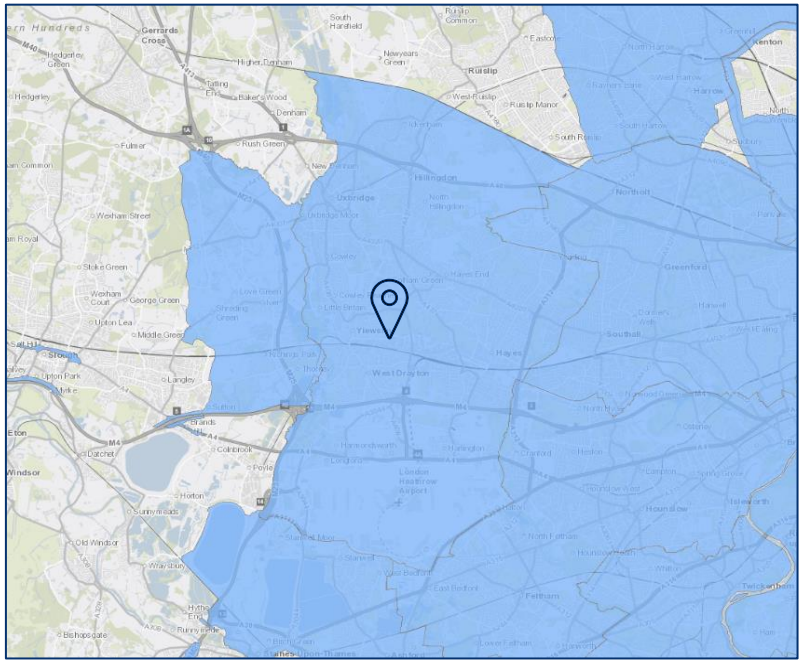


Figure 3.4 -1 Department for Environment Food and Rural Affairs AQMA Interactive Map

3.4.3.3. Noise Pollution

Operational noise

An Environmental Noise Impact Assessment was conducted by Sharps Acoustics in June 2025 to support the planning application. This concluded that noise emanating from the Proposed Development site would have a low impact when assessed in accordance with BS4142:2014 during both the daytime and night-time periods. Furthermore, the site layout has been designed such that noise levels are reduced and any adverse impacts are mitigated, as per national and local noise policy.

As part of the BREEAM assessment for the development, the noise level from the assessed development as measured in the locality of the

nearest or most exposed noise sensitive receptor, will be at least 5dB lower than the background noise throughout the day and night.

As confirmed by the Noise Impact Assessment, the Proposed Development will result in an overall reduction in vehicle movement when compared to the existing occupied site and noise emanating from vehicles. Furthermore, mechanical plant noise limits have been set in line with BS4142:2014.

3.4.3.4. Light Pollution

The external lighting used by buildings can have a detrimental impact on the use and enjoyment of neighbouring properties, and on the mental and physical wellbeing of individuals in them. It also has a significant and often detrimental impact on local wildlife. There are a number of best practice standards which can be implemented into the design of the external lighting strategy which reduce the negative impacts without limiting their functionality.

In accordance with the BREEAM assessment, the following measures will be implemented with regards to the external lighting design:

- The external lighting strategy has been designed in compliance with Table 2 (and its accompanying notes) of the Institution of Lighting Professionals (ILP) Guidance notes for the reduction of obtrusive light, 2011;
- All external lighting (except for safety and security lighting) can be automatically switched off between 23:00 and 07:00;
- If safety or security lighting is provided and will be used between 23:00 and 07:00, this part of the lighting system will comply with the lower levels of lighting recommended during these hours in Table 2 of the ILP guidance notes; and
- Illuminated advertisements are designed in compliance with ILP PLG05 The Brightness of Illuminated Advertisements.

3.4.4. Conclusion

The Proposed Development has taken into consideration land, air, noise and light pollution from the Proposed Development.

Sources of pollution have been considered for the operational stages of the development to ensure any potential impact on the environment, as well as to existing third parties, is reduced as far as practicable.

An assessment has demonstrated that noise from new building services plant will be controlled to suitable environmental noise limits in line with BS4142:2014.

3.5. Land Use and Ecology

3.5.1. Introduction

Land is a finite resource, and is required by all aspects of every-day life, i.e., housing, agriculture, parks etc. Therefore, one of the most widely agreed land-use planning principles is encouraging the effective use of land by reusing land that has been previously developed (brownfield land).

Biodiversity can be defined as the variety of species of plants, animals and microorganisms that exist on the earth. A healthy biodiversity could provide a number of natural services for everyone, ranging from ecosystem services such as pollution breakdown and soil formation, to biological resources such as providing food, medicinal resources and pharmaceutical drugs, wood products and social benefits such as research and education, recreation and tourism and cultural values.

3.5.2. Key Drivers

3.5.2.1. National Policy Context

Ministry of Housing, Communities & Local Government, National Planning Policy Framework (NPPF), dated December 2024, Section 11 – Making effective use of land says planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions.

Ministry of Housing, Communities & Local Government, National Planning Policy Framework (NPPF), dated December 202, Section 13 – Protecting Green Belt land says Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.

Ministry of Housing, Communities & Local Government, National Planning Policy Framework (NPPF), dated December 2024, Section 15 – Conserving and enhancing the natural environment says planning policies and decisions should minimise impacts on and provide net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures, as well as remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.

3.5.2.2. Local Policy Context

Hillingdon Local Plan Part 1: Strategic Policies, dated November 2012, Policy EM7 Biodiversity and Geological Conservation, says the Council preserve and enhance biodiversity and geological conservation.

Hillingdon Local Plan Part 2: Development Management Policies, dated January 2020, Policy DMEI7 Biodiversity Protection and Enhancement, says the design and layout of new development should retain and enhance any existing features of biodiversity or geological value within the site. Where appropriate, the Council will require the use of the approved DEFRA biodiversity impact calculator (as updated) to inform decisions on no net loss and net gain.

3.5.3. Sustainability Considerations

Existing Site

A Preliminary Ecological Appraisal was produced for the development in October 2024 by Applied Ecology Ltd to support the Proposed Development. This concluded that the site is not covered by any statutory or non-statutory designated sites and does not support ancient woodland.

The Site falls within the SSSI (Site of Special Scientific Interest) Impact Risk Zone (IRZ) relating to Wraysbury Reservoir SSSI, located 5.75km south-west of the Site.

The PEA confirms the Site is located in a highly urbanised part of the London Borough of Hillingdon and is relatively isolated from semi-natural habitats that could support protected faunal species.

Proposed Development

As detailed within the PEA produced by Applied Ecology Ltd in October 2024, the following ecology measures have been recommended:

- A Construction Environmental Management Plan (CEMP) is produced and implemented detailing how construction will avoid any harm to the Grand Union Canal Site of Metropolitan Importance.
- The two on-Site trees are retained and protected as part of development planning.
- The clearance of all suitable bird nesting habitat must take place outside of the bird breeding season.

The design team are committed to enhancing the existing biodiversity on site in line with local and national policy requirements. As such, a suitably qualified ecologist will be appointed to provide advice on the following issues in line with the BREEAM requirements:

- Effective implementation of ecological improvements
- Confirm all applicable UK ad EU legislation relating to the protection and enhancement of ecology is complied with throughout the design and construction phases
- Produce a habitat and landscape management plan in line with BS 42020:2013 Section 11.1, covering at least the first five years after project completion

Biodiversity Net Gain

As outlined in the Biodiversity Net Gain Plan produced by Applied Ecology in June 2025, the Proposal will lead to a net gain of 307.68% in biodiversity at the Application Site based on the habitats provided. The proposed development can, therefore, deliver an overall net gain in line with local and national planning policy.

3.5.4. Conclusion

The ambition for the Proposal is to protect and enhance the existing ecology and biodiversity of the Application Site in line with local and national policy requirements.

To this end, measures will be implemented throughout the design and construction periods to ensure all relevant UK and EU legislation is adhered to, and to ensure biodiversity protection and enhancement measures are implemented in line with best practice requirements.

The overall enhancement measures proposed for the site results in a biodiversity net gain of 307.68%, therefore complying with local and national policy.

3.6. Transport

3.6.1. Introduction

Transport relates to around a quarter of UK greenhouse gas emissions and affects air quality. The UK government have therefore committed to reducing emissions by promoting public transport choices, supporting the market for innovative forms of transport, and encouraging the move to cleaner and lower carbon vehicles.

3.6.2. Key Drivers

3.6.2.1. National Policy Context

Ministry of Housing, Communities and Local Government, National Planning Policy Framework (NPPF), dated December 2023, Section 9 - Promoting sustainable transport says transport issues should be considered from the earliest stages of plan-making and development proposals, so that:

1) The potential impacts of development on transport networks can be addressed;

2) Opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised – for example in relation to the scale, location or density of development that can be accommodated;

3) Opportunities to promote walking, cycling and public transport use are identified and pursued;

4) The environmental impacts of traffic and transport infrastructure can be identified, assessed and considered – including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains; and

5) Patterns of movement, streets, parking and other transport considerations are integral to the design of schemes and contribute to making high quality places.

3.6.2.2. Local Policy Context

Hillingdon Local Plan Part 1: Strategic Policies, dated November 2012, Policy T1 Accessible Local Destinations, says all development should encourage access by sustainable modes and include good cycling and walking provision.

Hillingdon Local Plan Part 2: Development Management Policies, dated January 2020, Policy DMT 5 Pedestrians and Cyclists, says development proposals will be required to ensure that safe, direct and inclusive access for pedestrians and cyclists is provided on the site connecting it to the wider network.

Hillingdon Local Plan Part 2: Development Management Policies, dated January 2020, Policy DMT6 Vehicle Parking, says development proposals must comply with the parking standards detailed in Appendix C of the Local Plan Part 2.

3.6.3. Sustainability Considerations

3.6.3.1. Pedestrian and cyclist accessibility

A Framework Travel Plan was produced by SLR Consulting Limited in May 2025, in compliance with National and Local Policy requirements, to support the planning application.

This documentation confirms that the Proposed Development provides good pedestrian and cyclist access. Horton Road, to the north of the development, has footways and street lighting along both sides of the carriageway from the site access in each direction allowing for safe pedestrian access. In terms of cycling accessibility, areas within 8km of the application site can be considered accessible by cycling, and whilst there are no segregated cycling facilities in the

immediate vicinity of the site, it is noted that Horton Road forms a local cycle route.

3.6.3.2. Public Transport

A review of the Public Transport Accessibility Level (PTAL) confirms the Site comprises multiple PTAL ratings, with access achieving a PTAL of 3 (Figure 5) which indicates moderate access to public transport. This also confirms an Accessibility Index of 6.65.

Figure 3.6-1 PTAL Score for the Proposed Development

Bus Accessibility

The Application Ste is located within 100m from the Whitethorn Avenue bus stops located along Horton Road. These bus stops operate westbound and eastbound, both served by the 350 bus service, operating between Hayes and Heathrow Terminal 5. A summary of the service is presented in Table 8-1 below:

Table 3.6-1 350 Bus Service Timetable

Service	Route	Days	Timetable Summary		
			First Service	Approx. Frequency	Last Service
350	Millington Road – Heathrow Terminal 5	Mon – Fri	04:10	20 mins	03:40
		Sat	04:09	20 mins	03:39
		Sun	04:09	20 mins	03:39
	Heathrow Terminal 5 – Fairey Corner	Mon – Fri	04:24	20 mins	00:52
		Sat	04:21	20 mins	00:52
		Sun	04:21	20 mins	00:52

Rail Accessibility

The nearest rail station to the Application Site is West Drayton Station, located approximately 800m walking distance to the west. West Drayton Station is served by Great Western Railway and the Elizabeth Line.

A public transport information system will be provided in a publicly accessible area, to allow building users access to up-to-date information on the available public transport and transport infrastructure.

3.6.3.3. Parking

Cycle Parking

High quality cycle parking will be provided as part of the Proposed Development in line with planning policy and guidance. This will include a minimum of six and ten cycle parking spaces to serve Unit 1 and 2, respectively.

In addition changing facilities will be provided for staff within each of the suits, as well as lockers to store cycling equipment / clothing.

Car Parking

As confirmed in the Framework Travel Plan produced by SLR Consulting Limited in May 2025, the Proposed Development will include a total of 32 car parking spaces, including accessible and electric vehicle charging bays.

As part of the planning application a Transport Assessment was produced by SLR Consulting Limited in May 2025. This confirmed that overall, the redevelopment of the site will result in a reduction in vehicle trips attraction on the local highway network. As a result, there are no inherent highway safety concerns on the local highway network that could be exacerbated by the development.

3.6.4. Conclusion

The Application Site has moderate accessibility to the wider public transport network and is located near bus stops and rail networks. The Site also has an Accessibility Index of 6.65.

Sufficient cycle storage spaces have been provided for the predicted building users in line with the Local Planning Policy, and cyclist facilities such as lockers and changing facilities will be provided within the development design.

3.7. Health and Wellbeing

3.7.1. Introduction

It is widely accepted that the environment in which we live and work can have a huge impact on our health, wellbeing, safety and overall comfort.

Visual comfort is an important part of this and in particular productivity and mental wellbeing within a building can be increased where glare, views, daylight and lighting levels have been carefully considered.

Research has also shown that extreme temperatures can have an immediate effect on health and wellbeing through increased risk of illness. Effectively controlling and regulating temperature is therefore crucial in maintaining a healthy and comfortable environment.

Crime and the fear of crime also have a major impact on quality of life, and the wellbeing of building occupants. Enabling building occupants to feel safe and secure is therefore essential to successful, sustainable communities.

3.7.2. Key Drivers

3.7.2.1. National Policy Context

Ministry of Housing, Communities and Local Government, National Planning Policy Framework (NPPF), dated December 2023, Section 8 - Promoting healthy and safe communities says developments should aim to achieve healthy, inclusive and safe places and beautiful buildings which promote social interaction, are safe and accessible and enable and support healthy lifestyles.

3.7.2.2. Local Policy Context

Hillingdon Local Plan Part 2: Development Management Policies, dated January 2020, Policy DMHB15 Planning for Safer Places, says development will be required to comprise good design and create inclusive environments whilst improving safety and security.

3.7.3. Sustainability Considerations

3.7.3.1. Thermal Comfort

Research has shown that extreme temperatures are associated with an increased risk of illness and have an immediate effect on health and wellbeing. It is also recognised that measures taken to improve energy efficiency, such as increased airtightness, thermal insulation levels etc. have the potential to result in more instances of overheating in summer. With a changing climate, both under and overheating are an increasing problem in buildings. Effective temperature regulation is therefore an integral part of ensuring a healthy and comfortable internal environment. Achieving thermal comfort is dependent on the building being designed to allow for seasonal changes and occupier preferences.

As part of the BREEAM assessment, thermal comfort modelling will be carried out for the development in line with CIBSE TM52. This will ensure the summer and winter temperature ranges meet the industry standards. Furthermore, to ensure future temperatures (which are expected throughout the lifetime of the building), are considered, this thermal modelling will ensure an allowance for climate change.

In line with the cooling hierarchy, a number of passive design measures will be incorporated within the development design to prevent overheating. These include the following:

- The general internal layout is designed to provide good daylight access for the majority of occupied spaces.

- High performing engineered façade with optimised U-values have been proposed;
- Air Tightness target of less than 3 m3/hr/m2 @ 50Pa.

3.7.3.2. Acoustics

To ensure the building is capable of providing an appropriate acoustic environment to provide comfort for building users, an Acoustician will be on board to provide design advice. The development will also be designed to achieve indoor ambient noise levels that comply with the design ranges given in BS 8233:2014.

In addition, a programme of pre-completion acoustic testing will be carried out during construction to ensure the design measures achieve their desired aim. The purpose of this design standard is to minimise disturbances to building occupants from noise transition between spaces and enhance productivity by providing appropriate acoustic environment for the different functions of various buildings and spaces.

3.7.3.3. Safety, Security and Accessibility

The Proposed Development will ensure accessibility for all intended users. The key access provisions detailed within the Design and Access Statement (May 2025) therefore include:

- Accessible secure cycle parking space for building users
- Safe pedestrian access routes with edge protection and adequate lighting
- Well defined routes and wayfinding throughout the development

As part of the BREEAM assessment, a Suitably Qualified Security Specialist has been appointed to conduct an evidence-based Security Needs Assessment, to identify attributes of the proposal, site and surroundings which may influence the approach to security for the development. Following this exercise, the design team will implement security controls and recommendations as identified by the Suitably Qualified Security Specialist. In addition, the Proposed Development will seek to comply with the principles of Secured by Design where feasible.

The Design and Access Statement produced by Michael Sparks Associates in May 2025 confirms the following security measures:

- CCTV ducting, poles and brackets to be installed to allow for future connection
- Fencing to surround particularly vulnerable areas
- External lighting around the site perimeter
- Buildings will be designed using robust principles
- Layout has been designed with the clear definition of private and public spaces and to provide passive surveillance

3.7.3.4. Outside Space

The provision of green recreational space provides numerous benefits to building occupants, and the building's value. It brings an element of biophilia to a building by supporting human interaction with the natural environment. Further to this, green recreational space can promote healthy lifestyles by promoting exercise and reducing stress levels. External landscaping elements have therefore been incorporated within the Proposed Development which include broad planted areas, incorporation of native species and self-sustaining Sedum green roofs.

3.7.4. Conclusion

In order to promote the health and wellbeing of the individuals using the Proposed Development, the design has considered and incorporated measures for each of the following:

- Thermal comfort
- Acoustics
- Accessibility; and,
- Outside space

The safety, security and accessibility of the Site, and access to the natural environment have also been considered. These will ensure that the development has a positive impact on the health and wellbeing of those using and impacted by the development and seek to promote a healthy and positive working environment.

3.8. Waste

3.8.1. Introduction

More than 400 million tonnes of materials get delivered to building sites each year. Of these around 60 million tonnes of UK waste go straight to waste collection facilities due to inappropriate or over-ordering and damage resulting from poor storage. The effects of construction activity on waste production are enormous. The industry produces 109m tonnes of construction waste each year (24% of total waste), of which up to 13% is delivered but unused, it produces on average three times more waste than all UK households combined. Around 25 million tonnes of construction waste are disposed to landfill each year.

3.8.2. Key Drivers

3.8.2.1. Local Policy Context

Hillingdon Local Plan Part 1: Strategic Policies, dated November 2012, Policy EM11: Sustainable Waste Management says the Council will require all new development to address waste management at all stages of a development's life from design and construction through to the end use and activity on site, ensuring that all waste is managed towards the upper end of the waste hierarchy.

Hillingdon Local Plan Part 2: Development Management Policies, dated January 2020, Policy DMHB 11 Design of New Development, says development proposals should make sufficient provision for well-designed internal and external storage space for general, recycling and organic waste, with suitable access for collection.

Hillingdon Local Plan Part 2: Development Management Policies, dated January 2020, Policy DMT7 Freight, says development proposals that generate a high number and/or intensity of transport and movements such as those relating to logistics and distribution or freight will be required to demonstrate they are conveniently located to enable direct routing to the strategic road network; and there is no deleterious impact on residential areas, local air quality levels, local amenity or the highway network.

3.8.3. Sustainability Considerations

3.8.3.1. Circular Economy

Building standards and institutional requirements are often based on standardised, tried and tested, design solutions which can result in significant over specification of elements and hence material use. Some of this is to allow for future flexibility in use that will never in reality be used and more is the result of conservative evaluation of risk. Therefore, optimising material use in the context of a specific project is one of the key resource efficiency goals for any sustainability strategy. This can be achieved through careful consideration of current and future project demands to maximise the efficient use of materials, waste prevention and reduction, minimal damage to the environment and reduced depletion of natural resources.

To avoid unnecessary materials use arising from over specification without compromising structural stability, durability or the service life of the building, consideration will be given at each stage of the building design.

As part of the BREEAM assessment for the development, the design team has reviewed options to maximise material efficiency, prioritising the:

- Reduction of material use in building design;
- Reuse of existing materials;
- Use of materials with higher levels of recycled content; and

- Understanding of, and the performance of, alternative design and construction methods that result in lower material usage and waste levels.

In addition, the adaptability & flexibility of the development has been considered with respect to the potential need for future adaptation due to changing functional demands, as well as the ability to reclaim and reuse materials at the end of the building lifespan. The following issues have been prioritised within the development design:

- Reduction of waste and associated with future refurbishment, fit-out and in demolition;
- The ability to cost-effectively reuse and recycle materials at the end of building life;
- Increased lifetime value of materials and products; and
- Reduced waste associated with the need for future adaptation, demolition and strip-out.

Climate resilience and building longevity has also been considered, in order to minimise building damage and the need for future works to adapt the building to account for more extreme weather resulting from climate change. As such, the following has been considered within the development design:

- Asset resilience when considering the likely impacts of future climate change;
- Reduction of risks relating to safety arising from extreme weather events and climate change; and
- Reducing the need for future adaptation, maintenance and disruption associated with responding to climate change and extreme weather events.

3.8.3.2. Construction waste

As part of the BREEAM Assessment, the Principal Contractor will be required to develop a resource management plan, and meet, or improve upon, the following BREEAM benchmarks for non-hazardous waste.

Table 3.8-1 Amount of waste generated per 100m2 (GIA)

Amount of waste generated per 100m2 (GIA)	
m3	Tonnes
≤13.3	≤11.1

In addition, the Principal Contractor will be required to divert waste from landfill in accordance with the following BREEAM benchmarks.

Table 3.8-2 Diversion from landfill benchmarks

Diversion from landfill benchmarks		
Type of Waste	Volume	Tonnage
Non-demolition	70%	80%
Demolition	80%	90%

3.8.3.3. Operational Waste

The development has been designed to encourage the recycling of operational waste. As part of the BREEAM pre-assessment the development will be provided with a dedicated space for the segregation and storage of operational recyclable waste. This space will be;

- Clearly labelled, to assist with segregation, storage and collection of the recyclable waste streams;
- Accessible to building occupants or facilities operators for the deposit of materials and collections by waste management contractors; and
- Of a capacity appropriate to the building type, size, number of units and predicted volumes of waste that will arise from daily or weekly operational activities and occupancy rates.

The Servicing and Refuse Management Plan produced by SLR Consulting Limited in May 2025, sets out guidance and management and control measures with regards to deliveries and servicing movements, ensuring that sustainable freight is managed. The SRMP confirms facilities will be provided within the Proposed Development for recycling that comply with current guidance and requirements to

maximise segregation of recyclables and food waste from residual waste.

3.8.4. Conclusion

The development has been designed with material efficiency in mind from the outset, with the aim of minimising present and future waste streams associated with construction and demolition stages.

The Principal Contractor is anticipated to implement waste management techniques on site to reduce the amount of construction waste produced, and ensure waste is diverted from landfill. This is in accordance with the waste hierarchy.

The Proposed Development will be provided with sufficient waste storage facilities to encourage recycling through operation.

3.9. Climate Change Adaptation

3.9.1. Introduction

Annual average UK temperature was 0.9°C higher during the period 2005-2014 compared with 1961-1990. Moreover, sea levels around the UK have risen by 15-20 centimetres since 1900. These figures are forecast to continue to change as a result of climate change. At the same time, there are upward trends in rainfall across the UK. Higher levels of winter rainfall have been experienced often in increasingly heavy rainfall events leading to more flooding and damage to buildings and infrastructure. These patterns are consistent with projections of more and heavier rainfall for the UK in a warmer global atmosphere.

These changes increase health and safety risks to people and the built environment, increasing costs and disruption for repair and adaptation. The building stock will largely remain as it currently is for the next 50 to 60 years, given the relatively low levels of replacement that are likely to occur.

Therefore, there is a need for strategies to mitigate the impact of these events on our building stock overall and in particular to ensure that new buildings are designed and constructed to minimise future risks while avoiding over specification and resource use in the meantime.

3.9.2. Key Drivers

3.9.2.1. National Policy Context

Ministry of Housing, Communities and Local Government, National Planning Policy Framework (NPPF), dated December 2023, Section 14 Meeting the challenge of climate change, flooding and coastal change, says new development should be planned for to avoid increased vulnerability to the range of impacts arising from climate change.

3.9.2.2. Local Policy Context

Hillingdon Local Plan Part 1: Strategic Policies, dated November 2012, Policy EM1: Climate Change Adaptation and Mitigation, says the Council will ensure that climate change mitigation and adaptation is addressed at every stage of the development process.

3.9.3. Sustainability Considerations

As discussed in Section 9, a climate change adaptation strategy appraisal will be completed as part of the BREEAM assessment for the development. This will identify the impact of extreme weather conditions arising from climate change on the building over its expected life cycle.

Among the measures considered, this will assess strategies to mitigate against the risks of future warmer and wetter weather, including the use of external shading, green infrastructure and building services capacity.

In addition, exposed elements of a building or landscaping are at risk of damage through impact of a changing environment or wear and tear. This can result in significant and unnecessary materials use and waste generation across the life of a building. This will be minimised by risk areas being identified and designed out, and suitable protection measures being provided.

Adaptability

As discussed in Section 9, designing a space that is truly flexible will extend the building lifespan and extract the full potential of materials that make these elements. By considering building adaptability and also future disassembly early, this allows for easy material separation and reuse. This includes exposed and reversible connections, layer independence and standardisation which can facilitate disassembly.

As part of the BREEAM assessment for the development, a study to explore the ease of disassembly and the functional adaptation potential will be completed, with the aim of incorporating recommendations into the design of the building.

Thermal Comfort

As discussed in Section 8, as part of the BREEAM assessment for the scheme, thermal modelling will be carried out to ensure the summer and winter temperature ranges meet the industry standards. Furthermore, to ensure future temperatures (which are expected throughout the lifetime of the building), are considered. This thermal modelling will ensure an allowance for climate change.

3.9.4. Conclusion

The Proposal is incorporating measures into the design which allow for climate resilience, adaptability and a changing thermal comfort criteria.

A climate change adaption strategy will be developed for the development, and the design team will investigate measures to improve resiliency of the development. In addition, the ease of disassembly and building functional adaptation will be explored. In order to ensure the development is set up to deal with the demands of a future climate, a passive design analysis will be undertaken for the development, as well as thermal modelling.

3.10. Environmental Assessment

3.10.1. Introduction

BREEAM is the world's leading sustainability assessment method for non-residential buildings. The scheme recognises and reflects the value in higher performing assets across the built environment lifecycle. BREEAM does this through third party certification of an asset's environmental, social and economic sustainability performance, using standards developed by the Building Research Establishment. This means BREEAM rated developments are more sustainable environments that enhance the well-being of the people who live and work in them, help protect natural resources and make for more attractive property investments. BREEAM is a holistic approach to sustainability and covers the following categories:

BREEAM is a holistic approach to sustainability and covers the following categories:

- Management
- Health & Wellbeing;
- Energy;
- Transport;
- Water;
- Materials;
- Land use & Ecology;
- Pollution; and
- Innovation.

3.10.2. Sustainability Considerations

A BREEAM pre-assessment has been completed for the development by Ramboll in March 2025, demonstrating that a BREEAM 'Excellent' rating can be achieved for the scheme. A summary of the proposed scores and ratings can be found in the table below. Further details of the BREEAM strategy can be found in the BREEAM pre-assessment report which accompanies the planning application.

Table 3.10-1 Targeted BREEAM credits

Building Type	Overall Score	Target Score	Overall Score % above Target Score
Industrial	73.56%	Excellent – 70%	+3.56%

The targeted credits for the industrial assessment can be seen below in Figure 3.10-1.

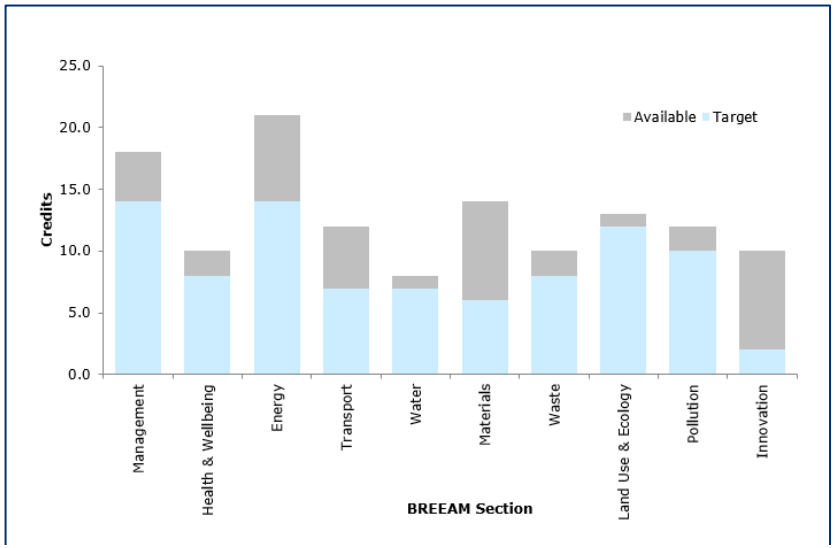
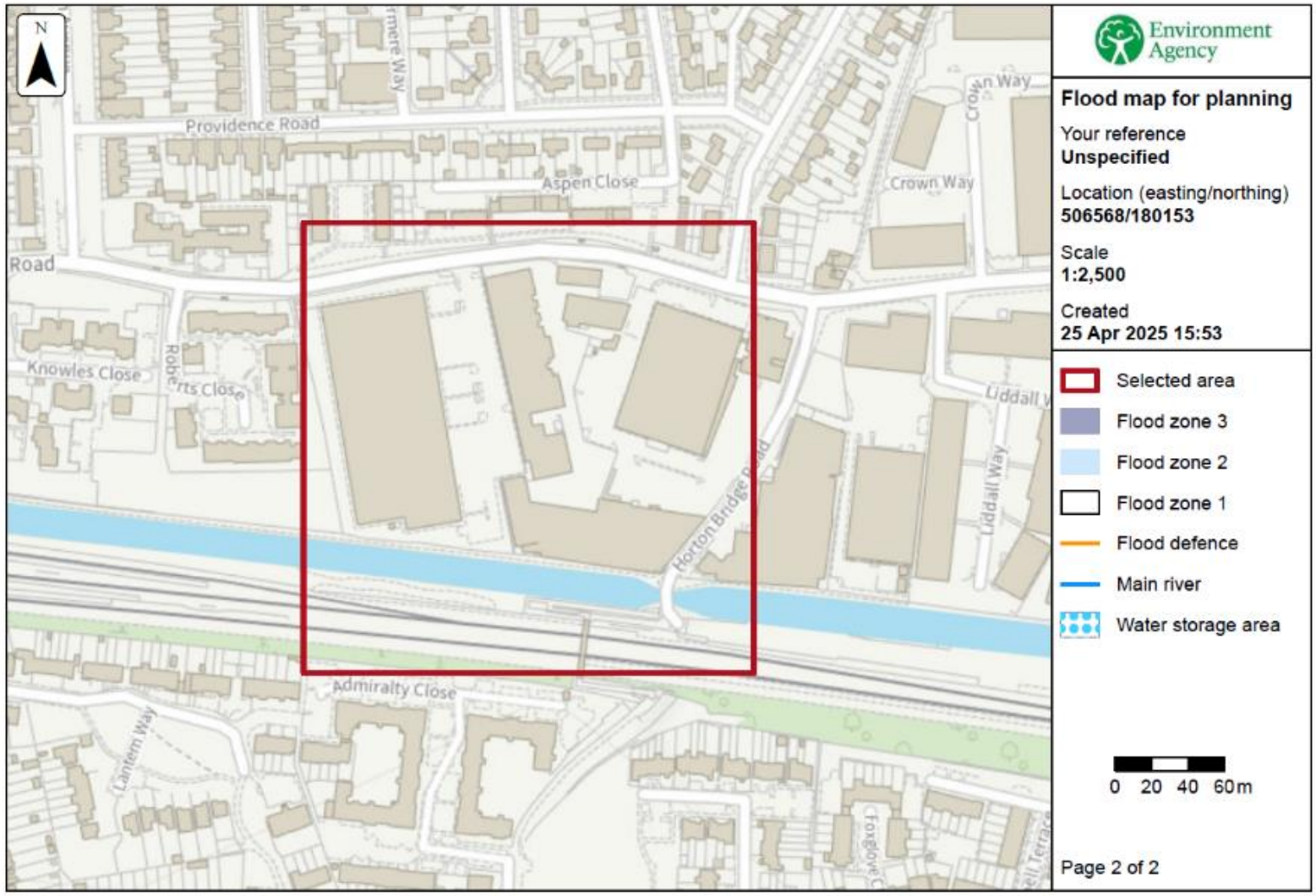


Table 3.10-1 Summary of BREEAM Assessment Score

3.10.3. Conclusion

A BREEAM pre-assessment has been undertaken for the Proposal. This has demonstrated that a BREEAM 'Excellent' rating is achievable for the development.

4. Appendix 1 – Environment Agency Flood Map



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