

PLANNING, DESIGN AND ACCESS STATEMENT

Redevelopment of EMI Warehouse

At Dawley Road, Hayes

On behalf of PROLOGIS UK Limited

JPW2011
Planning Statement
2.0
July 2022

PLANNING, DESIGN AND ACCESS STATEMENT

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APPENDIX A - EMI TRUST LETTER

1 INTRODUCTION

- 1.1 RPS Group has been instructed by Prologis to submit a planning application for the following development:

Demolition of the single storey building and glazed link, in connection with the formation of a service yard and alterations to the warehouse building, including the insertion of loading bays and formation of parking for HGV's and cars.

- 1.2 The planning application comprises the following:

- Application Form
- Planning, Design and Access Statement (this document)
- Transport Statement
- Workplace Travel Plan
- Delivery and Servicing Plan
- Construction Logistics Plan
- Surface and Foul Water Drainage Strategy
- Phase 1 Environmental Site Assessment
- Air Quality Assessment
- Noise Assessment
- Ecological Assessment
- Sustainability and Energy Statement
- Landscape Design Statement
- Soft Landscape Works Maintenance and Management Plan
- Dawley Road – Proposed Landscaping
- Drawings:
 - Site Location Plan – Drg No. 31515-PL-100
 - Existing Site Plan Drg No. 31515-PL-101
 - Existing Floor Plans Drg No. 31515-PL-102
 - Existing Elevations and Sections Drg No. 31515-PL-103
 - Proposed Site Plan Drg No. 31515-PL-104
 - Proposed Floor Plans Drg No. 31515-PL-105
 - Proposed Elevations & Sections Drg No. 31515-PL-106
 - Site Photographs Drg No. 31515-PL-107
 - Proposed Parking & Servicing Yard Area Plan Drg No. 31515-PL-108
 - Tree Constraints Plan Drg No. 2285-22.01 S5
 - Tree Retention, Protection & Removal Plan Drg No. 2285-22.02 S5
 - Landscape Concept Plan & Indicative Cross Sections Drg No. 2285-22.03 S5
 - Urban Greening Factor Plan Drg No. 2285-22.03 S5
 - Drainage Layout and External Levels Drg No. XXXX-HDR-XX-XX-DR-C-300 Rev. P2

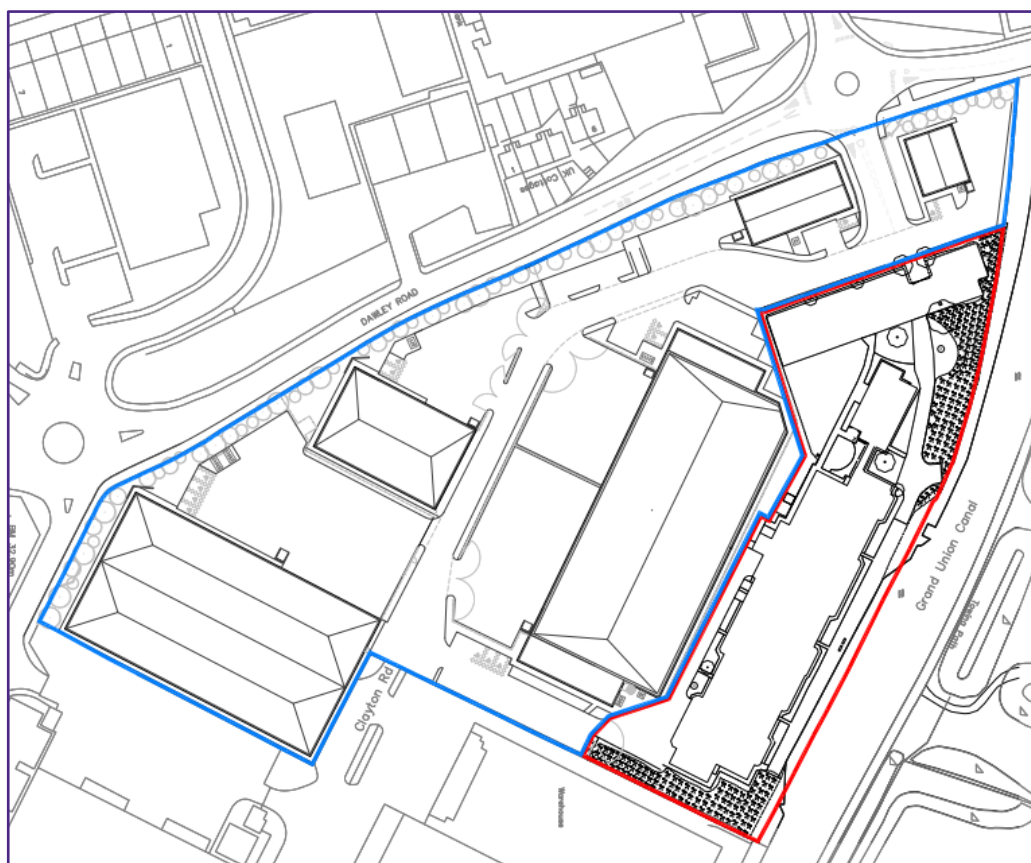
1.3 The structure of this statement is as follows:

- Section 2: details the relevant planning history
- Section 3: provides a review of the pre-application submission
- Section 4: includes details of the development proposals
- Section 5: contains a summary of relevant planning policy against which the proposal will be considered
- Section 6: provides a planning assessment of the proposals
- Section 7: sets out the overall conclusions

2 SITE AND SURROUNDING AREA

EMI Warehouse

- 2.1 The site is located on an industrial estate off Dawley Road and lies in a predominantly commercial area of Hayes; there are a number of existing industrial premises adjacent to and in close proximity to the site.
- 2.2 The EMI site consists of two buildings, which are linked by a single storey glazed corridor. The larger of the buildings occupies the majority of the site. This building has an asymmetric roof constructed out of two mono-pitch roofs, with a northern light along the ridge line. This building has been extended, with the extensions constructed in a similar architectural style to the original building. The second building is significantly smaller than the main building but has a similar architectural style with the asymmetric roof.

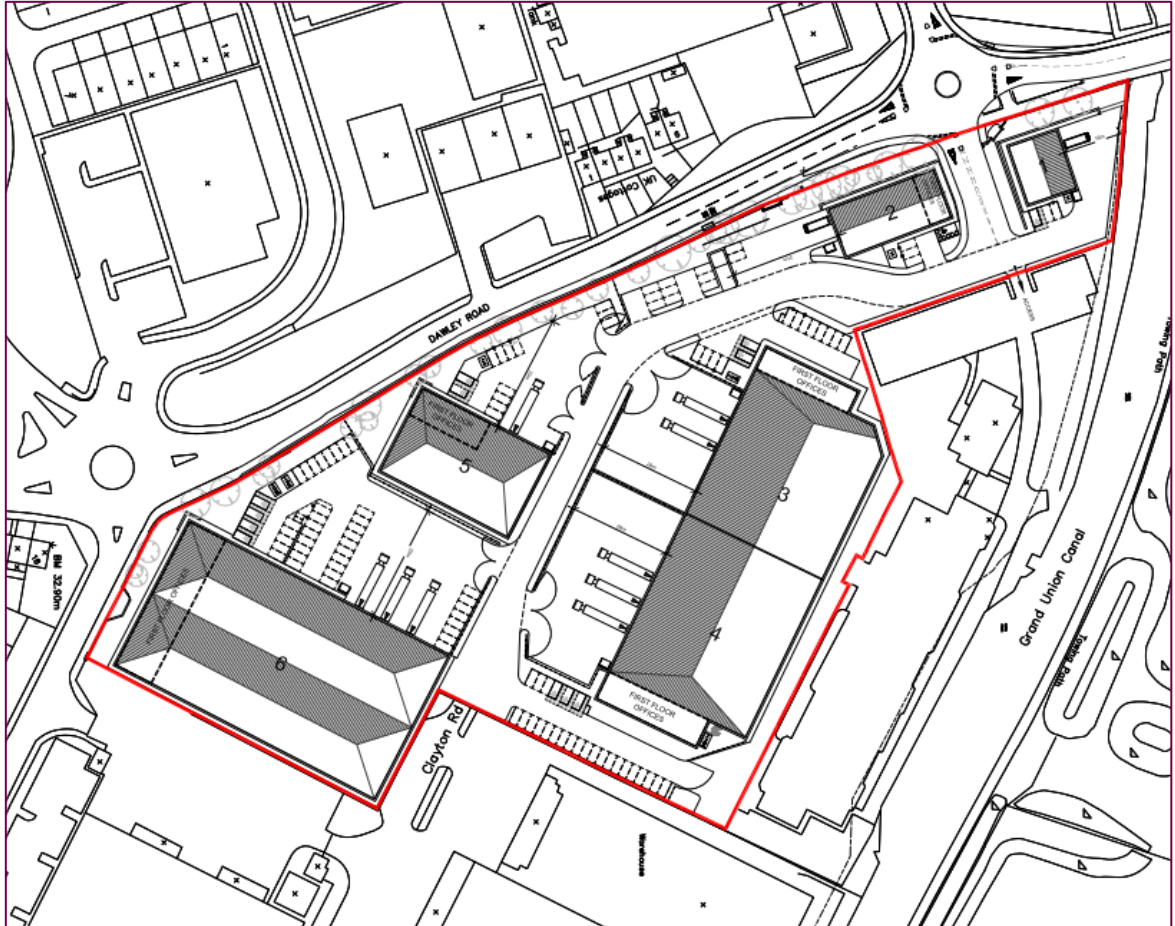


Existing Site Location Plan - EMI Warehouse site edged in red

- 2.3 The external walls to both of the buildings are constructed out of red brickwork, with horizontal banding of buff brickwork. The northern elevation of the larger building adjoins the Grand Union Canal and includes areas of landscaping and a number of trees. The roofs of the building are clad in metal cladding.
- 2.4 Between the existing EMI warehouse building and the Grand Union Canal there is a private footpath, which is accessed from this site.

Prologis Park Dawley Road

- 2.5 Prologis Park Dawley Road includes six 'grade A' industrial buildings ranging in floor area from 267 sq. m to 4,213 sq. m; the buildings include gated and fence secure yard areas.



Prologis Park Dawley Road - edged in red

3 PLANNING HISTORY

- 3.1 The London Borough of Hillingdon's online planning application records have been reviewed, and we have highlighted the following planning permissions:

EMI Warehouse

Application Ref:	Proposal	Date	Decision
8294/APP/2001/556	Extension to Archive Building	18 July 2001	Approved
8294/W/96/0955	Erection of Detached Building	07 August 1996	Approved
8294/L/95/0768	Partial change of use and extension to provide an archive storage facility with ancillary offices.	08 August 1995	Approved
8294/J/87/0242	Section 53 determination - construction of chiller plant housing	18 February 1987	Permitted Development
8294/F/85/0692	Industrial development – 173 sq. m (Full)(P)	27 June 1985	Approved
8294/B/83/1144	Industrial development – 10,272 sq. m (Full)(P)	11 November 1983	Approved

Prologis Park Dawley Road

- 3.2 Prologis Park has an area of approximately 2.6ha and is located on the eastern side of Dawley Road. This site was formally occupied by EMI before part of the site was redeveloped.
- 3.3 Planning permission (Ref: 8294/APP/2015/1406) was granted on 05 October 2015 for the redevelopment of the site to provide 10,728 sq. m of Class B1(c) and B2 (General Industrial) and B8 (Storage and Distribution) floorspace with associated parking, servicing, access and landscaping.
- 3.4 On 27 December 2017 a non-material amendment (Ref: 8294/APP/2017/4276) was granted to planning permission (Ref: 8294/APP/2015/1406) for the redevelopment of the site to provide 10,728sq metres of Class B1(c) and B2 (General Industrial) and B8 (Storage and Distribution) floorspace with associated parking, servicing, access and landscaping), this amendment allowed the installation of ventilation vents and flues at rear of Unit 3 and 4, protruding by 0.5m to 1m from the roof of the building.

4 PRE-APPLICATION

- 4.1 A formal pre-application request (Ref: 8294/PRC2022/7) was made to the London Borough of Hillingdon (LBH) on 13 January 2022 on behalf of Prologis UK Limited (Prologis), in respect of the following:

Demolition of the single storey building and glazed link, in connection with the formation of a service yard and alterations to the warehouse building, including the insertion of loading bays and formation of parking for HGV's and cars.

- 4.2 A Teams meeting was held on the 03 March 2022, in order to discuss the proposed development. The pre-application response (30 March 2022), undertook an assessment of the main issues, which have been summarised below:

Principle of Development

- 4.3 The proposed logistic use is an appropriate use within a SIL, in accordance with Policy E4 of the London Plan (2021) and Policy DME1 of the Local Plan – Part 2 (2020). Furthermore, Policy E4 seeks to safeguard industrial land and premises within SILs and supports proposals for the retention, enhancement and provision of additional industrial capacity.
- 4.4 The proposals would involve the loss of floor space within the SIL, however, as 91% of the floorspace would remain, the loss is considered to be slight. As such, the loss of the smaller building and glazed link would not be significant, particularly as the proposal would permit the formation of a yard area and would allow for the retained floor space, within the larger and more flexible building to be used more efficiently. Therefore, there are no objections in principle to the proposal.

Design

- 4.5 As part of the pre-application, little detail had been provided; however, the Planning Statement advises that there will be only limited alterations to the external appearance of the building. The formation of the two level loading bays in the western end of the warehouse building and provision of a small area of first floor office space would not be likely to raise an objection in principle.
- 4.6 The building works would not be considered to be contentious from a design perspective due to the industrial nature of the wider site and the age of the building, subject to their sensitive design, in accordance with Policy DMHB 11 of the Local Plan - Part 2 (2020).

Landscaping

- 4.7 To support the application an ecology report and tree report will be / have been commissioned to assess the ecological / arboricultural implications of the proposal and recommend mitigation measures.
- 4.8 Due the limited space available to provide replacement planting within the redline boundary, it was advised that the planting along the wider business park boundary was weak in places and there may be opportunities to enhance this and this could be secured with the use of conditions.

Amenity

- 4.9 There are no residential properties within the vicinity of the site that would be affected by the proposal.

Highways

- 4.10 As the London Plan 2021 is silent on parking standards for office and warehousing, reference needs to be taken from Policy DMT 6 of the Local Plan - Part 2, which advises that for a development of this type, the maximum number of parking spaces permitted would range between 28 and 55 spaces and therefore the 26 spaces proposed would be policy compliant and supported by the Highway Authority.
- 4.11 Any forthcoming planning application should be supported by the following documents:
- Transport Statement – to include an audit and appraisal of existing site information and baseline traffic data and details of the development, including proposed means of access, person trip generation and distribution of trips by mode of transport, measure proposed travel patterns to encourage and enable active and sustainable travel, proposed parking and servicing strategy, residual vehicle trip impact and details of the sites current use or an extant planning permission and the net level of change in traffic flows that might arise from the development.
 - Service Delivery Plan – development proposals should "reduce road danger, noise and emissions from freight, such as through the use of safer vehicles, sustainable last miles schemes.
 - Construction Logistics Plan – produced based on the guidance produced by TfL tailored to the development and local circumstances.
 - Plans that include the dimensions parking bays and visibility splays etc and location of cycle stands, disabled parking.
- 4.12 Any works on Council owned highway land would be subject to s.278 of the Highways Act 1980 (as amended) and secured by a s106 agreement of the 1990 Town & Country Planning Act.
- 4.13 Cycle parking should be provided at least in accordance with the minimum standards contained in the published Policy T5 of the London Plan. The proposed development would be required to provide 6 no. sheltered, secure and accessible long stay spaces and 3 no. short stay 'Sheffield Stand' spaces.
- 4.14 In addition, the Highway Authority would welcome consideration be given to providing cycle access through the site from Clayton Road to Dawley Road and providing a 10 no. Santander Bike Hire docking station.
- 4.15 It was considered that if an application were to be submitted as presented, it would be a development that in principle the Highway Authority could support.

Other Considerations

War Memorial

- 4.16 The EMI Group Archive building currently houses a WW1 war memorial plaque, which is on the Council's list of war memorials and is also listed on the Imperial War Museum War Memorials Register as well as the War Memorial Trust websites. The plaque's future location will need to be known so that the relevant registers can be updated.

Crime Prevention

- 4.17 Policy DMHB 15 of the Local Plan – Part 2 advises that the Council require all new development to ensure safe and attractive public and private spaces by referring to the Council's latest guidance on Secured by Design principles.

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- 4.18 Any planning permission would be subject to a secure by design condition being attached to achieve appropriate accreditation.

Contamination

- 4.19 The Council's records indicate that the site has a history of contaminative industrial uses and thereby various plausible pollutant linkages will likely continue to be present particularly in areas of made ground.
- 4.20 The Council will require appropriate details to demonstrate the site has undergone / shall undergo appropriate supplementary and updated risk assessment in terms of land affected by contamination and in accordance with the proposed new site layout plan.

Air Quality

- 4.21 The site is located within an AQMA and the Hayes Air Quality Focus Area, which are areas defined as places where the pollution levels are already elevated and therefore improvements are required. In such cases the extant use in terms of traffic is not considered relevant, the requirement is to assess the total emissions being brought into the Focus Area by the proposed development, and the requirement is to mitigate those associated emissions.
- 4.22 The development will require an Air Quality Assessment, including an Air Quality Neutral assessment, plus demonstration of an Air Quality Positive approach, from design through to operation.
- 4.23 As the proposal is within an Air Quality Focus Area it is not sufficient to just meet the air quality neutral benchmarks. Where, after appropriate on-site mitigation measures have been incorporated, any remaining development emissions will be required to be off-set. This can be provided in total by the developer or in part by providing funds to support off-site measures to improve air quality. The pollution damage costs associated with the emissions from the development will inform the degree of mitigation that is required.

Planning Obligations / CIL (Major and LBH)

S106 Planning Obligations

- 4.24 The provision for s106's is laid out in Policy DMCI 7 of the Local Plan - Part 2, which advises that planning obligations will be sought on a scheme-by-scheme basis, including where a development has infrastructure needs that are not addressed through CIL; and to ensure that development proposals provide or fund improvements to mitigate site specific impacts made necessary by the proposal.
- 4.25 In respect of the proposals, it is considered likely that, at full planning permission stage if recommended for approval, the following planning obligations could be requested:
- S278 / S38 agreement to secure any required highway works;
 - Green Travel Plan, including a £20,000 Travel Plan bond is also to be secured;
 - Air Quality Mitigation Offset contribution (subject to the outcome of the Air Quality Assessment);
 - Canal / Public Open Space financial contribution, and
 - Project Management & Monitoring Fee.

Community Infrastructure Levy

- 4.26 Community Infrastructure Levy (CIL) will be payable on all planning approvals for schemes with a net additional internal floor area of 100 sq. m or more.

Application Submission

- 4.27 It is considered that the planning application would need to include the following documentation:
- Planning Application and CIL Form, and Notices;
 - Site Location Plan;
 - Existing and proposed plans, elevations and sections;
 - Design and Access Statement (including Secured by Design Statement, Accessibility Statement);
 - A tree report and arboricultural implications assessment;
 - An ecological survey, including recommendations for mitigation seeking net gain rather than net loss;
 - Detailed landscape plan and supporting details which incorporate the tree protection measures, tree replacement strategy, and ecological recommendations;
 - Transport Assessment (inc. A TZ Assessment);
 - Travel Plan;
 - Delivery and Servicing Plan, including Refuse Strategy;
 - Construction Logistics Plan;
 - Car Park Management Plan;
 - Demolition and Construction Method Statement;
 - Air Quality Assessment, to include Air Quality Neutral Assessment, plus demonstration of an Air Quality Positive Approach, from design to operation, and
 - Contamination Report.

Conclusion

- 4.28 The EMI Group Archive building currently houses a WW1 war memorial, which is on the Council's list of war memorials and is also listed on the Imperial War Museums Memorials Register as well as the War Memorial Trust websites. The plaque's future location will need to be known so that the relevant registers can be updated.
- 4.29 Subject to the comments and recommendations made in the Council's pre-application report, the scheme is generally one that officers should be able to support. It could provide wider benefits for the Prologis Business Park which can hopefully be explored as part of any future planning application.

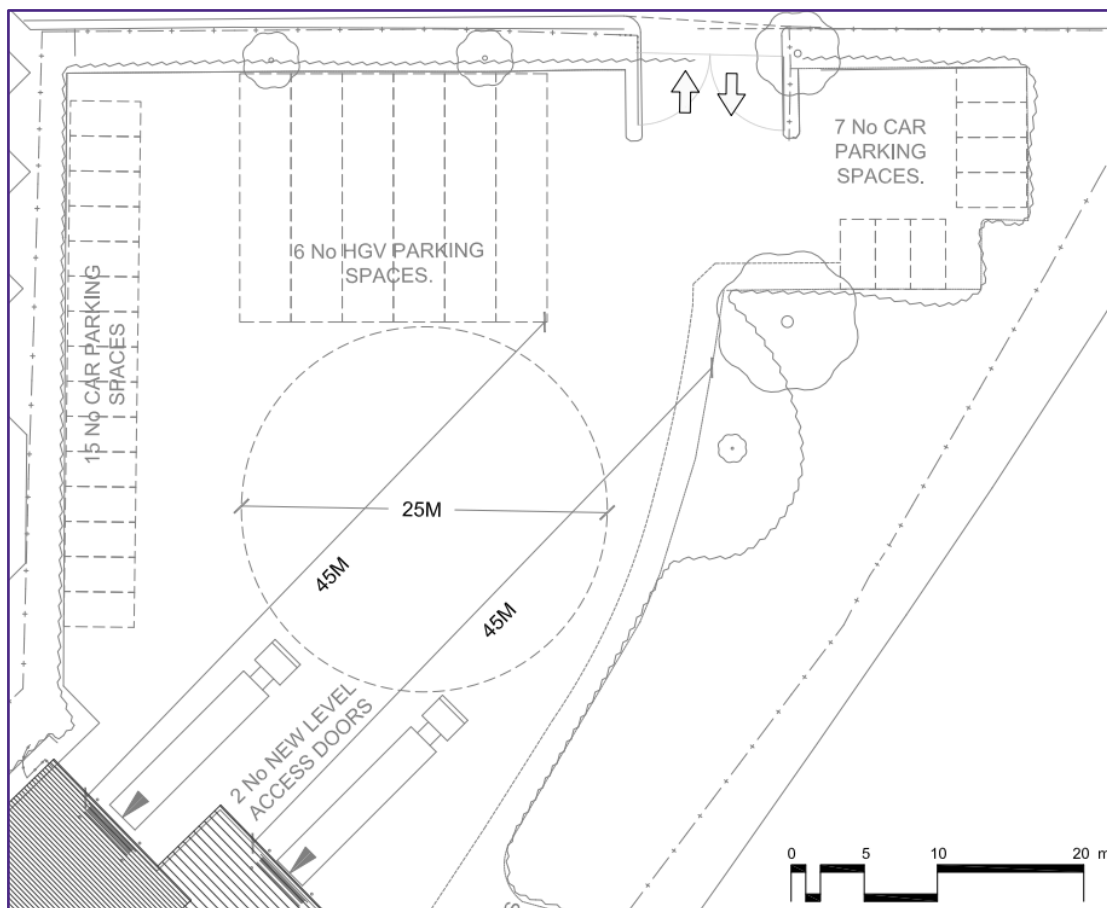
Subsequent Comment from the Planning Officer

- 4.30 A subsequent email was sent to the planning officer, requesting clarification that as the proposals would not involve an increase in floorspace, in fact there would be a reduction with the loss of single storey building and glazed link, and as there would be no change of use, that the development would be considered to be a minor planning application?
- 4.31 In their email response dated 10 June 2022, the planning officer confirmed that as the area of the site is 0.89 ha, the application would be considered to be a minor planning application.

5 THE PROPOSAL

5.1 The proposed development, which is the subject of this application, is for the:

Demolition of the single storey building and glazed link, in connection with the formation of a service yard and alterations to the warehouse building, including the insertion of loading bays and formation of parking for HGV's and cars.



Proposed Parking and Servicing Area

5.2 Particular details of the site and the proposed development include the following:

- The site has an area of approximately 0.9 hectares.
- Floorspace:
 - Existing – 2,888 sq. m
 - Proposed – 2,365 sq. m (2,134 sq. m of B8 accommodation and 231sq. m ancillary offices)
- The building was formerly occupied by EMI and used as an archive for long term storage. EMI are relocating this part of their business and we are proposing to refurbish the building to create a modern logistics operation that should create additional employment.
- The exiting site is surrounded by mature landscaping and the proposed scheme retains the majority of this to protect the views, maintain the quality green space and biodiversity habitat. Any existing green space that needs to be removed will be appropriately mitigated.

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- The site access arrangements will remain as existing, but the proposals will improve the on-site servicing by providing a larger service yard, more suitable for a logistics operation. The impact of the proposals on traffic generation are considered to be negligible but we will have a full transport assessment carried out by our consultants.
 - The parking /servicing at the northern end of the building will provide parking for 22 no. cars, and 6 no. HGVs; there will also be a cycle stand. At the southern end of the building there would be an area of car parking for 4 no. car parking spaces, including 2 no. disabled spaces.
 - The warehouses associated office (231 sq. m) will be provided on the ground floor in the southeast corner of the building

6 PLANNING POLICY CONTEXT

6.1 The relevant development plans include:

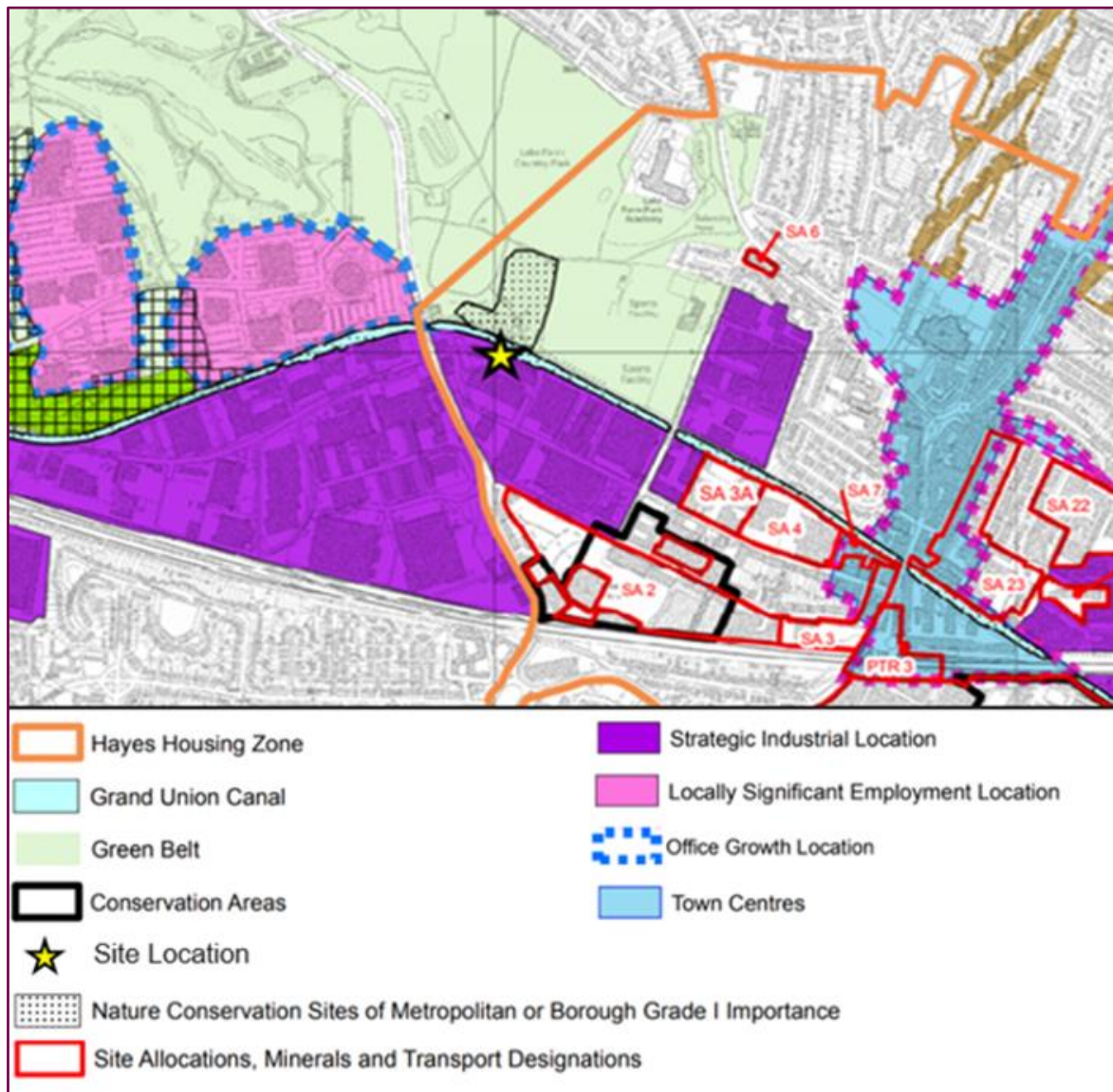
- London Plan (March 2021)
- Hillingdon Local Plan Part 1 (Strategic Policies) (November 2012)
- Hillingdon Local Plan Part 2 (Development Management, Site Allocations and Proposals Map) (January 2020)

6.2 The National Planning Policy Framework (NPPF) was revised in July 2021. This document sets out the Government's overarching planning policies for England and how these are expected to be applied. The National Planning Practice Guidance (NPPG), which is an online source.

Site Designations

6.3 On Hillingdon's Policies Map (January 2020) the site falls within a Strategic Industrial Location (SIL) and within the Hayes Housing Zone boundary.

6.4 An extract of the Proposal Map is provided below:



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- 6.5 The site is not located within a Conservation Area and there are not any Statutory Listed Buildings within close proximity to the site.
- 6.6 The site falls within Flood Zone 1 (lowest probability of flooding).
- 6.7 The areas adjacent / near to the site include the following designations:
- Grand Union Canal – located to the north of the site
 - Nature Conservation Site Grade I Importance – located to the north of the canal
 - Green Belt – designation to the north of the canal
 - Office Growth Location – located north west of the site
 - Locally Significant Employment Location – north west of the site

Relevant Policies

London Plan (March 2021)

- 6.8 The relevant London Plan policies are listed below:
- Policy D3: Optimising site capacity through the design-led approach
 - Policy E2: Providing suitable business space
 - Policy E4: Land for industry, logistics and services to support London's economic function
 - Policy E5: Strategic Industrial Locations
 - Policy E7: Industrial intensification, co-location and substitution
 - Policy G5: Urban greening
 - Policy G6: Biodiversity and access to nature
 - Policy G7: Trees and woodlands
 - Policy SI17: Protecting and enhancing London's waterways
 - Policy T3: Transport capacity, connectivity and safeguarding
 - Policy T4: Assessing and mitigating transport impacts
 - Policy T5: Cycling
 - Policy T6: Car parking
 - Policy T6.2: Office parking
 - Policy DF1: Delivery of the Plan and Planning Obligations
- 6.9 The key policies of the London Plan are summarised below:
- 6.10 **Policy D3 (Optimising site capacity through the design-led approach)** all development must make the best use of land by following a design led approach that optimises the capacity of sites.
- 6.11 **Policy E4 (Land for industry, logistics and services to support London's economic function)** a sufficient supply of land and premises in different parts of London to meet current and future demands for industrial and related functions should be provided and maintained. This should make provision for the varied operational requirements including amongst other things: storage and logistics / distribution (Use Class B8) including 'last mile' distribution close to central London, and consolidation centres and collection points.
- 6.12 The retention, enhancement and provision of additional industrial capacity should be prioritised in locations that:

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- 1) are accessible to the strategic road network and / or have potential for the transport of goods by rail and / or water transport.
 - 2) provide capacity for logistics, waste management, emerging industrial sectors or essential industrial-related services that support London's economy and population.
 - 3) provide capacity for micro, small and medium-sized enterprises.
 - 4) are suitable for 'last mile' distribution services to support largescale residential or mixed-use developments subject to existing provision.
 - 5) support access to supply chains and local employment in industrial and related activities.
- 6.13 **Policy E5 (Strategic Industrial Locations)** the Strategic Industrial Locations (SIL) should be managed proactively through a plan-led process to sustain them as London's largest concentrations of industrial, logistics and related capacity for uses that support the functioning of London's economy.
- 6.14 **Policy G6 (Biodiversity and access to nature)** development proposals should manage impacts on biodiversity and aim to secure net biodiversity gain. This should be informed by the best available ecological information and addressed from the start of the development process.
- 6.15 **Policy SI17 (Protecting and enhancing London's waterways)** development proposals along London's canal network, should respect their local character, environment and biodiversity and should contribute to their accessibility and active water-related uses.
- 6.16 **Policy T3 (Transport capacity, connectivity and safeguarding)** development proposals should support capacity, connectivity and other improvements to the bus network and ensure it can operate efficiently to, from and within developments, giving priority to buses and supporting infrastructure as needed.
- 6.17 **Policy T6 (Car parking)** car parking should be restricted in line with levels of existing and future public transport accessibility and connectivity. Adequate provision should be made for efficient deliveries and servicing and emergency access. A Parking Design and Management Plan should be submitted alongside all applications which include car parking provision, indicating how the car parking will be designed and managed.
- 6.18 **Policy T6.2 (Office parking)** maximum car parking standards are applied to new office development, which for outer London locations (outside Opportunity Areas) is up to 1 space per 100 sq. m (GIA). Car parking provision for Class B8 (storage or distribution) should have regard to these office parking standards and take account of the significantly lower employment density in such developments. A degree of flexibility may also be applied to reflect different trip-generating characteristics. In these cases, appropriate provision for electric or other Ultra-Low Emission vehicles should be made.
- 6.19 Operational parking requirements should be considered on a case-by-case basis. All operational parking must provide infrastructure for electric or other Ultra-Low Emission vehicles, including active charging points for all taxi spaces.
- 6.20 **Policy DF1 (Delivery of the Plan and Planning Obligations)** development proposals should provide the infrastructure and meet the other relevant policy requirements necessary to ensure that they are sustainable and to support delivery of the Plan.

Hillingdon Local Plan

6.21 The relevant Local Plan policies are listed below:

Hillingdon Local Plan Part 1 (Strategic Policies)

- Policy E1: Managing the Supply of Employment Land
- Policy E2: Location of Employment Growth
- Policy BE1: Built Environment
- Policy EM3: Blue Ribbon Network
- Policy EM7: Biodiversity and Geological Conservation
- Policy T1: Accessible Local Destinations

Hillingdon Local Plan Part 2 (Development Management Policies)

- Policy DME1: Employment Uses on Designated Employment Sites
- Policy DMHB 11: Design of New Development
- Policy DMHB 14: Trees and Landscaping
- Policy DMEI 1: Living Walls and Roofs and on-site Vegetation
- Policy DMEI 2: Reducing Carbon Emissions
- Policy DMEI 6: Development in Green Edge Locations
- Policy DMEI 7: Biodiversity Protection and Enhancement
- Policy DEMI 11: Protection of Ground Water Resources
- Policy DEMI 12: Development of Land Affected by Contamination
- Policy DMCI 7: Planning Obligations and Community Infrastructure Levy
- Policy DMT 1: Managing Transport Impacts
- Policy DMT 2: Highways Impacts
- Policy DMT 5: Pedestrians and Cyclists
- Policy DMT 6: Vehicle Parking
- Policy DMT 7: Freight

6.22 The key policies of the Local Plan are summarised below:

6.23 **Policy E1 (Managing the Supply of Employment Land)** the Council will protect Strategic Industrial Locations (SILs), Locally Significant Industrial Sites (LSIS) and Locally Significant Employment Locations (LSEL).

6.24 **Policy BE1 (Built Environment)** all new development will be required 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.

6.25 **Policy EM7 (Biodiversity and Geological Conservation)** Sites of Importance for Nature Conservation will be protected and enhanced. Sites with Metropolitan and Borough Grade 1 importance will be protected from any adverse impacts and loss. Borough Grade 2 and Sites of Local Importance will be protected from loss with harmful impacts mitigated through appropriate compensation.

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- 6.26 **Policy T1 (Accessible Local Destinations)** the Council will steer development to the most appropriate locations in order to reduce their impact on the transport network. All development should encourage access by sustainable modes and include good cycling and walking provision.
- 6.27 **Policy DME1 (Employment Uses on Designated Employment Sites)** specifies that Preferred Industrial Locations (PILs) are suitable for general industrial, light industrial, storage and distribution, waste management, recycling, some transport related functions and other industrial related uses (i.e. generally Use Classes B1 (c), B2 and B8).
- 6.28 **Policy DMHB 11 (Design of New Development)** all development, including extensions, alterations and new buildings will be required to be designed to the highest standards and incorporate principles of good design. Development proposals should not adversely impact on the amenity, daylight and sunlight of adjacent properties and open space.
- 6.29 In addition, development proposals should: ensure that the design safeguards the satisfactory re-development of any adjoining sites which have development potential and make sufficient provision for well-designed internal and external storage space for general, recycling and organic waste, with suitable access for collection.
- 6.30 **Policy DMHB 14 (Trees and Landscaping)** developments will be expected to retain or enhance existing landscaping, trees, biodiversity or other natural features of merit. Development proposals will be required to provide a landscape scheme that includes hard and soft landscaping appropriate to the character of the area, which supports and enhances biodiversity.
- 6.31 **Policy DMEI 6 (Development in Green Edge Locations)** new development adjacent to the Green Belt, Metropolitan Open Land, Green Chains, Sites of Importance for Nature Conservation, Nature Reserves, countryside, green spaces or the Blue-Ribbon Network should incorporate proposals to assimilate development into the surrounding area by the use of extensive peripheral landscaping to site boundaries.
- 6.32 **Policy DMEI 7 (Biodiversity Protection and Enhancement)** developments on or near to a site considered to have features of ecological or geological value, the application must include appropriate surveys and assessments to demonstrate that the proposed development will not have unacceptable effects. The development must provide a positive contribution to the protection and enhancement of the site or feature of ecological value. In addition, 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.
- 6.33 **Policy DMEI 8 (Waterside Development)** development on sites that adjoin or include a watercourse should amongst other things: not extend within 8 metres of the top of the bank of a main river or 5 metres either side of an ordinary watercourse or an appropriate width as may be agreed by the Council; and where feasible, secure the implementation of environmental enhancements to open sections of river or watercourse. All development alongside or that benefits from a frontage on the Grand Union Canal will be expected to contribute to the improvement of the Canal.
- 6.34 **Policy DMCI 7 (Planning Obligations and Community Infrastructure Levy)** to ensure development is sustainable, planning permission will only be granted for development that clearly demonstrates there will be sufficient infrastructure of all types to support it. Infrastructure requirements will be predominantly addressed through the Council's Community Infrastructure Levy (CIL). Planning obligations will be sought on a scheme-by-scheme basis.
- 6.35 **Policy DMT 1 (Managing Transport Impacts)** development proposals will be required to meet the transport needs of the development and address its transport impacts in a sustainable manner.
- 6.36 **Policy DMT 2 (Highways Impacts)** development proposals must ensure amongst other things that: safe and efficient vehicular access to the highway network is provided; they do not contribute to the deterioration of air quality, noise or local amenity or safety of all road users and residents; and

impacts on local amenity and congestion are minimised by routing through traffic by the most direct means to the strategic road network, avoiding local distributor and access roads.

- 6.37 **Policy DMT 6 (Vehicle Parking)** development proposals must comply with the specified parking standards in order to facilitate sustainable development and address issues relating to congestion and amenity. The Council may agree to vary these requirements when: the variance would not lead to a deleterious impact on street parking provision, congestion or local amenity; and / or a transport appraisal and travel plan has been approved and parking provision is in accordance with its recommendations.
- 6.38 **Policy DMT 7 (Freight)** 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 that: 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.

Supplementary Planning Guidance

- 6.39 In addition to the planning policy documents set out above, the following Supplementary Planning Guidance documents are considered to be relevant:

London Plan

- **London Plan Land for Industry and Transport SPG (September 2012)** – provides further guidance on the requirements of industrial land and emphasis on the importance of good design in industrial development to address the Mayor's broader concerns around the overall quality of London's environment.
- **London Plan Practice Note on Industrial Intensification (November 2018)** – the London Plan 'Practice Note on Industrial Intensification' sets out good practice principles for industrial intensification.
- **London Plan 'Green infrastructure and Open Environments: The All-London Green Grid SPG (March 2012)** – provides further guidance for designing and managing green and open spaces.

London Borough of Hillingdon

- **Hillingdon Planning Obligations SPD (July 2014)** – provides guidance on the use of planning obligations in Hillingdon for those involved in the submission and determination of planning applications.

7 PLANNING ASSESSMENT

- 7.1 This section of the report considers the proposed developments compliance with the relevant planning policy framework.

Principle of Development

- 7.2 The EMI warehouse is located in a Strategic Industrial Location (SIL), which is identified as a Preferred Industrial location (PIL). Policy E4 of the London Plan advises that these locations are London's main reservoir for general industrial, light industrial, storage and distribution, waste management, recycling, some transport related functions and other industrial related uses (i.e. generally Use Classes B1 (c), B2 and B8). In addition, Policy E5 of the London Plan, requires that SILs should be managed proactively through a plan-led process to sustain them as London's largest concentrations of industrial, logistics and related capacity for uses that support the functioning of London's economy.
- 7.3 Hillingdon Local Plan (HLP) Policy E1 seeks to accommodate growth by the protection of SILs, and Policy DME1 specifies that PILs are suitable for general industrial, light industrial, storage and distribution, waste management, recycling, some transport related functions and other industrial related uses (i.e. generally Use Classes B1 (c), B2 and B8).

Assessment

- 7.4 Given the consistent policy position in the London Plan and the Hillingdon Local Plan, this site is protected for industrial use, which can include Use Classes B1c, B2 and B8, together with related industrial uses as outlined in Policy E4 of the London Plan.
- 7.5 Therefore, it is considered that the refurbishment of the building in connection with its continued use for storage and distribution would be considered to be appropriate and accord with the relevant policies of the London Plan and the Hillingdon Local Plan and would be in line with the objectives of the NPPF of better utilising sustainable locations.

Design

- 7.6 Policy D3 of the London Plan advises that development must make the best use of land by following a design led approach that optimises the capacity of sites, by ensuring that development is of the most appropriate form and land use for the site.
- 7.7 HLP Policy BE1 states that all new development will be required to improve and maintain the quality of the built environment. This is reinforced by HLP Policy DMHB 11, which also advises that development proposals should not adversely impact on the amenity, daylight and sunlight of adjacent properties and open space.

Assessment

- 7.8 The existing building consists of two elements; a single storey office to the front of the site with a link to a single storey warehouse to the rear. The external walls are finished in a red / brown brick with contrasting bands in buff. There are a number of steel doors, both personnel and loading. Aluminium glazing in a grey finish is present in the office area only.
- 7.9 The office element has a mono pitch roof with a standing seam profile, while the warehouse has a double mono pitch at varying heights in the same finish. There are also two flat roof zones on the warehouse as a consequence of the plant areas finished in a waterproof membrane. The roof areas are finished with a deep zinc style verge flashing.
- 7.10 There are a number of brick projections along the elevations which finish above the edge of the roof providing a small brick parapet. In between these projections are timber pergola's which support existing landscaping.

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- 7.11 To the north of the building is an existing footpath that leads from the car park to the rear of the building. Along this footpath is a well-established landscaping belt which breaks the elevation of the warehouse. To the south is a service road with planting beds supporting landscaping.
- 7.12 At the entrance of the site is a tarmac car park with grassed areas leading to the office building and warehouse. There is a well-established landscape buffer which sits between the canal and the site which also ties into an existing hedge row that runs along the perimeter of the car park.
- 7.13 The proposed development seeks to remove the office building, while retaining the larger warehouse element. The car park and associated grassed areas will be converted to form an open service area which can cater for cars and delivery vehicles.
- 7.14 Two new loading doors are proposed to the west elevation to facilitate access from the warehouse to the service area. The material and finish of the doors will be to a high performance criterion, typical of our clients' aspirations.
- 7.15 The existing landscaping to the perimeter of the site will remain along with the existing landscaping in the planting beds and pergola areas.
- 7.16 The elevations and roof areas to the warehouse will remain largely as existing, preserving its current appearance. An addition of a new ground floor office area will sit within the existing footprint of the warehouse, accessed via the footpath adjacent to the canal. A new glazed entrance is proposed to service the office element. This will be an aluminium system providing double glazed units and full height entrance doors. Again the finish and quality will be to a high performance criterion, typical of our clients' aspirations.
- 7.17 It is considered that the proposed development seeks to subtly modify the existing building to offer a modest warehouse facility which will meet the requirements of a new occupier.

Heritage

- 7.18 The EMI warehouse site is not located within a conservation area and does not contain any statutory or locally listed buildings, nor are there any in the immediate vicinity.
- 7.19 However, the EMI Group Archive building included a WW1 war memorial plaque, which is on the Councils list of war memorials and is also listed on the Imperial War Museum War Memorials Register as well as the War Memorial Trust websites.

Assessment

- 7.20 In respect of the WW1 war memorial plaque in their letter of 27 May 2022 the EMI Archive Trust (**Appendix A**), advise that the memorial had originally been mounted to a Gram. Co. building on Blyth Road, Hayes. When the building was demolished EMI Group sent the memorial to Hayes Archive the then main repository for the EMI Archive Trust collection.
- 7.21 The Hayes Archive site on Dawley Road, was built in the early 1990s, and held no connection to the original Gram. Co. site where the memorial once stood. The war memorial was simply kept at Hayes Archive as the main storage facility for the EMI Archive Trust collection and has now been safely moved to our new repository. The EMI Archive Trust have advised that the Imperial War Museum and local council have been informed on our new address. They go on and state that, as custodians, the EMI Archive Trust continue to care for the memorial under strict museum standards.
- 7.22 Therefore the war memorial plaque has been relocated from the site by EMI Archive Trust and the appropriate bodies have been advised.

Landscape and Ecology

- 7.23 The site's northern boundary fronts onto the Grand Union Canal, which is a nature conservation area, in addition on the opposite side of the canal, there is a further nature conservation area, within the adjacent Green Belt.



Northern boundary, fronting onto Grand Union Canal

- 7.24 HLP Policy EM7 states that Hillingdon's biodiversity and geological conservation will be preserved and enhanced, with particular attention given to the protection and enhancement of all Sites of Importance for Nature Conservation, the protection and enhancement of populations of protected species, priority species and habitats, appropriate contributions from developers to help enhance Sites of Importance for Nature Conservation in close proximity to development, the provision of biodiversity enhancements within developments where feasible, the provision of green roofs and living walls and the use of sustainable urban drainage systems to promote ecological connectivity.
- 7.25 HLP Policy DMHB 14 advises that developments will be required to retain or enhance existing landscaping, trees, biodiversity, or other natural features of value. Proposals will also be required to provide a landscape scheme which includes character appropriate landscaping, which supports and enhances biodiversity and amenity. Where trees are proposed for removal, proposals for replanting of new trees on-site should be provided, or else include contributions to offsite provisions.
- 7.26 LHP Policy DMEI 7 states that the design and layout of new development should retain and enhance any existing features of biodiversity or geological value within the site. Where loss of a significant existing feature of biodiversity is unavoidable, replacement features of equivalent biodiversity value should be provided on-site. Where development is constrained and cannot provide high quality biodiversity enhancements on-site, then appropriate contributions will be sought to deliver off-site improvements through a legal agreement.

Assessment

Landscape

- 7.27 In support of the application a Landscape Design Statement and Soft Landscape Works Maintenance and Management Plan have been prepared by BCA Design Ltd.
- 7.28 The Landscape Design Statement advises that landscaping will be used to soften and break up the appearance of proposed buildings. Where possible existing vegetation will be retained and incorporated into the proposed development. A robust scheme of landscaping accompanies the application, and this has been developed through careful consideration of the site's sensitivities which have informed both the layout of the building as well as the soft landscape treatment. The landscape proposals have two key purposes:
- Assisting the integration of the proposed development into the receiving landscape and visual environment; and
 - Creating a high-quality setting in which to work.
- 7.29 It is noted that the existing Site has a well maintained shrub beds and dense native planting at either end of the site. There is a number of amenity grass areas between the existing car park and the built form. The existing frontage to Vinyl Place is mature dense vegetation providing security and seclusion within the site. With the exception of part of the northern boundary there is a good amount of on-site visual mitigation to the current development on the site. The aspiration is to retain as much of the existing vegetation as possible; with some areas need refreshing and, in some areas, thinning to allow key specimens to fully grow into their natural form and shape.
- 7.30 The landscape strategy for the site seeks to retain as much of the existing established vegetation. The majority of the existing vegetation is to the periphery of the site focused on east and western sides. The western vegetation extends part-way along the northern boundary with Grand Union canal.
- 7.31 A break in the vegetation on the northern boundary provides the site with open views over the Grand Union canal and can be enjoyed from a generous amenity space leading users toward the proposed offices. Along the northern elevation of the building and providing the backdrop to the canal side amenity space is the largest planting bed with three large pergolas. The planting along this elevation will be reviewed and good quality shrubs will be retained.
- 7.32 To activate the canal side space a number of specimen trees have been proposed enclosed with curved benches providing opportunities for informal seating under shade next to the water's edge. The new office entrance guides users / visitors alongside the canal and will be indicated with raised planters and medium sized specimen shrubs on either side.
- 7.33 Species selection on site will be sympathetic to location and local environment. The retention of existing vegetation under-going typical maintenance regimes provides a well-established appearance from day one.
- 7.34 Overall, it is considered that the landscape proposals, are considered to be appropriate for the setting and suitable for this location. This has been achieved by creating a balance between the visual amenity, habitat creation and biodiversity net gain.
- 7.35 The maintenance and management regime is specified in the accompanying Soft Landscape Works Maintenance and Management Plan

Ecology

- 7.36 The planning application is accompanied by an Ecological Assessment (EA) that has been prepared Ecology Solutions. The EA assesses the ecological interest of the application site as a whole; the importance of the habitats present is evaluated with regard to current guidance.

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- 7.37 The report also sets out the existing baseline conditions for the application site, setting these in the correct planning policy and legal framework and assessing any potential impacts which may occur from the proposed development. Appropriate mitigation where necessary is identified such that it will offset negative impacts of the proposals, and where possible provide for the ecological enhancement of the application site, in accordance with relevant planning policy.
- 7.38 The EA advises that there are no designated sites of nature conservation interest within the application site; however, the application site is situated immediately adjacent to a non-statutory designated site, the London's Canals SMINC.
- 7.39 Given the nature of the proposed development it is considered unlikely that any significant effects would arise, either during the construction or operational phases, when the proposals are considered alone or in combination with other plans and projects. In any event, the adoption of standard engineering protocols and best practice during the construction period would ensure that potential harm and disturbance will be avoided.
- 7.40 The application site primarily comprises hardstanding and existing buildings, with small areas of amenity grassland, scrub, ornamental planting, hedgerows, and trees. The retention and enhancement of the existing habitats within the application site will provide an opportunity to deliver biodiversity enhancements compared to the existing situation and ensure that existing opportunities for faunal groups are retained.
- 7.41 No evidence of roosting bats was recorded during the specific survey undertaken, and buildings present within the application site are not considered to offer suitable opportunities for this group. Through the delivery of new habitat and the provision of new bat roosting boxes, it is considered that adverse effects would be avoided, and enhancements provided. In addition, the provision of bird nesting boxes within the site would deliver improved opportunities for this group post-development.
- 7.42 In conclusion, the development proposals will avoid potential adverse effects and provide opportunities for the delivery of enhancements to biodiversity. On this basis, the development proposals accord with all legislation and planning policy of relevance to ecology and nature conservation.

Transport

- 7.43 The site is currently in storage use, its continued use for storage and distribution would be in keeping with the overall use of the site and SIL designation. Vehicular access to the site would be from the eastern end of the site, off Vinyl Place, a secondary access would be through Prologis Park.
- 7.44 Policy T3 of the London Plan, and HLP Policies T1 and DMT 1 requires an appropriate balance to be struck between promoting new development and preventing excessive car parking provision that would undermine cycling, walking and public transport use.
- 7.45 Furthermore, HLP Policy DMT 2 advises that development proposals must ensure that they provide safe and efficient vehicular access to the highway network and do not have a detrimental impact on other road users.
- 7.46 HLP Policy DMT 6 sets out Hillingdon's specific parking standards and in respect of this site, this would be as follows: B Class Uses (excluding Class B1), 2 spaces plus 1 space per 50-100 sq. m of gross floorspace.

Assessment

- 7.47 WSP have been commissioned by Prologis Ltd to provide transportation and highways advice in respect to the Proposed Development on the former EMI Archives Warehouse and have prepared a Transport Statement, Construction Logistic Plan, Delivery and Servicing Plan and Workplace Travel Plan. The findings of these reports are detailed below:

7.48 The Transport Statement (TS) has been prepared following the submission of a Transport Scoping Letter that was issued as part of the pre-application conversations with LBH, which has been used to define the level of assessment related to transport for the proposed development. As such the TS demonstrates that:

- The accessibility context and potential to optimise the use of sustainable transport modes by occupants of the proposed development have been considered throughout the design process, in which the transport discipline has determined the measures to be implemented to encourage sustainable travel;
- Consideration has also been made to relevant policy at the national, regional and local level, demonstrating the proposed development is policy compliant and follows NPPF, Healthy Streets and LBH's Local Plan requirements and guidelines, and
- A review of the Site's internal layout, immediate surroundings and the adjacent transport network intended to be used by all potential users of the proposed development has been carried out, demonstrating the access strategy, car and cycle parking provision, and design of the service yards align with the infrastructure bordering the Site and will be able to adequately serve all type of expected vehicles, pedestrians and cyclists.

7.49 The TS concludes that the proposed development will not have nil detriment on the highway network or public transport infrastructure. It is considered that the proposed development should not be refused on highways grounds in accordance with NPPF paragraph 111, which 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 would be severe".

Construction Logistics Plan

7.50 A Construction Logistics Plan (CLP) apply to the design and construction phases of developments with the specific aim of improving construction freight efficiency by reducing accidents, carbon dioxide emissions and congestion. The primary aim of any CLP is to: 'To provide the planning authority with the detail of the logistics activity expected during the construction stage of the proposed development'.

7.51 In line with this primary aim, the objectives of the Outline CLP are to:

- Identify surrounding constraints and opportunities for the delivery and operation of freight to the site;
- Identify potential opportunities for reducing, re-timing or combining deliveries;
- Help minimise congestion on the surrounding highway network and ease environmental pressures;
- Improve the reliability of deliveries to the site;
- Reduce the fuel costs of the freight operators;
- Identify the needs of a Detailed CLP; and
- Demonstrate an understanding of the logistical needs of a modular construction project.

7.52 In terms of the implementation of a CLP, it is expected that the following overarching strategy will be adopted; however, the separate phases of the proposed development will provide more detail on their respective units and construction process. This will be confirmed once the Principal Contractor is appointed and as part of the Detailed CLP per development parcel.

7.53 The Principal Contractor will look to nominate a member of staff to be responsible for the day-to-day organisation and monitoring of the construction logistics for the construction Site (i.e. Logistics Manager). The responsibilities of this Logistics Manager role will include the implementation and management of the CLP for the lifetime of the construction project.

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- 7.54 As well as planning and coordinating the day-to-day deliveries, on-site arrangements to accommodate delivery vehicles, and the arrangements for special deliveries, the Logistics Manager will liaise with nominated representatives of other ongoing construction projects in the area to determine the feasibility of consolidation of vehicle activity and other measures to support the running of the CLP where practical to do so. The Logistics Manager will also liaise regularly with key personnel at LBH.
- 7.55 The CLP will be implemented on a phased basis therefore there may be separate CLPs for each phase of development.
- 7.56 LBH will be notified of the nominated individual prior to the commencement of activities during demolition and construction.

Delivery and Serving Plan

- 7.57 A Delivery and Serving Plan (DSP) provides a framework to ensure that freight vehicle activity works effectively for organisations. DSPs specifically help to:
- Proactively manage deliveries to reduce the number of delivery and servicing trips, particularly in the morning and afternoon highway peaks;
 - Identify and promote areas where safe and legal loading can take place; and
 - Select delivery companies who can demonstrate their commitment to following best practices – for example, the Fleet Operator Recognition Scheme (FORS).
- 7.58 The purpose of the submitted Outline DSP is to inform TfL and LBH of the intent of Prologis in managing service vehicle trips to and from the proposed development to minimise the impact of these vehicular trips on the surrounding public highway and residential areas.
- 7.59 It is expected that the occupier(s) of the proposed development will be responsible for informing suppliers of delivery restrictions and implementing the booking / management strategy on-site. Additionally, both Prologis UK Ltd (by design) and the end occupiers (by appropriate maintenance) should ensure the proposed development provides adequate facilities for storage and collection of segregated waste in accordance with the guidance contained in the LFP.
- 7.60 The site management team will be expected to enforce a suitable procurement strategy that demonstrates an awareness of all vehicle activity associated with the proposed development, its impact and appropriate measures to reduce it. It is proposed that the site management team will also be responsible for the promotion of the Freight Information Portal. The Corporate and Social Responsibility benefits associated with using suppliers adopting sustainable freight and servicing practices should also be promoted.
- 7.61 Additionally, it is expected that site management will undertake the Risk Assessment and be responsible for enforcing delivery restrictions to and from the Proposed Development. The site manager/appointed person should also be responsible for monitoring and reviewing deliveries to the Proposed Development.

Workplace Travel Plan

- 7.62 The Workplace Travel Plan (WTP) has been prepared to demonstrate the potential for both phases of the Site to encourage sustainable transport and to set the basis for a future Full Travel Plan, which it is anticipated will be conditioned within the planning permission.
- 7.63 A Travel Plan should establish a structured strategy with clear objectives and targets, supported by suitable policies and quality measures for implementation. Whilst the location of a development, its physical design and proximity to facilities and services create the conditions to make sustainable travel choices a realistic option, communicating these opportunities is also critical to the success of the Travel Plan.

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- 7.64 The Travel Plan should demonstrate a holistic approach by incorporating both 'hard' engineering measures and 'soft' marketing and management measures necessary to address the transport impacts arising from development. It is essentially a 'living document' requiring monitoring, review and revision to ensure it remains relevant to the organisation and those using the Site and provides continuous improvements for its duration.
- 7.65 Prologis fully supports the Travel Plan and appreciates the benefit of using and encouraging greater use of sustainable transport for both people and goods.
- 7.66 A Travel Plan can provide several specific benefits to staff. Some of the benefits that can be achieved will be key drivers of this WTP:
- Improved quality of life for staff through adopting healthier lifestyles, for example replacing short car journeys walking and cycling;
 - Improved air quality through reduced traffic congestion in the community as a result of the use of alternatives to the private car;
 - Less vehicle congestion on local roads because of fewer cars attempting to depart and access the development, and
 - Cost-saving for car shares – by sharing journeys with colleagues, staff can benefit from sharing the financial cost of making those journeys.
- 7.67 Through identifying an appropriate package of measures and ensuring a joined-up approach to the delivery of the WTP, it is possible that all these benefits can be achieved for the proposed development.
- 7.68 Implementation of the WTP will be an important part of the redevelopment process. It must be seen as effortless by the employees and a structure must be in place prior to occupation. Ultimately, 'the owner' (as defined and tied within the s106 Agreement to ensure consistency across all occupiers) will be responsible for implementing, monitoring and reviewing the WTP in consultation with the occupier and LBH.
- 7.69 The WTP will be specific to the occupier and based on employee travel patterns and working hours. As with all plans and associated measures, setting a timescale for implementation and review if necessary. As such, this WTP has set out the measures that are considered appropriate for implementation. However, the end tenant will also review and provide updates as necessary.
- 7.70 A programme for the implementation of the WTP measures is set out in the Action Plan. Individual tasks are set out alongside intended implementation dates and funding sources. It is intended to be a live document that will be updated by the TPC following consultation with LBH once the first multi-modal travel survey has been completed.

Conclusion

- 7.71 The submitted Transport Statement, Construction Logistic Plan, Delivery and Servicing Plan and Workplace Travel Plan demonstrate that the proposed development would provide suitable access and servicing arrangements could be undertaken on site, without adversely affecting the area and the existing highway network.

Access

- 7.72 The proposed development involves minimal changes will be applied to the eastern portion of the buildings. The main changes will be on the western end, where the removal of the smaller unit and glass walkway will occur, which will allow for the creation of a larger yard and parking area.

Assessment

Vehicle Access

- 7.73 Access to the Site is currently via Vinyl Place, which is accessed via the A437 Dawley Road, via a priority roundabout. The proposed development will seek to retain this access as well as provide a secondary access in the south east through the car park of the unit that sits to the south east of the site.
- 7.74 The car parking strategy is defined in accordance with LBH's parking standards for employment uses in consideration with the London Plan requirements, with the proposed development, seeking to deliver:
- 26 car parking spaces (including 2 disabled spaces)
 - 6 HGV parking spaces

Pedestrian and Cycle Access

- 7.75 Pedestrian and cycle access will be obtained via the existing main access gates, as well as the secondary access to the south east. The secondary access will provide an alternative route that avoids the yard and operational area. The access will be gated and secure and will open adjacent to the cycle parking and main entrance to the site.
- 7.76 The proposed development would provide long-stay cycle parking (for employees) and short-stay cycle parking. The long-stay cycle parking will be provided at ground level within dedicated secured cycle storage facilities in close proximity, whilst the short-stay cycle parking provision for visitors will be provided within easy access of the building access. Cycle parking will be designed in accordance with the London Cycling Design Standards.

Building Access

- 7.77 Access to the building, will be provided via
- 2 new HGV level access doors in the western elevation
 - Retention of existing 4 no. level access doors on the south elevation
- 7.78 A new pedestrian door will be created in the northern elevation, which will provide access into the office area; this will have an internal door into to the storage area. The office area will contain male and female, and disabled toilets.

Noise

- 7.79 Policy D14 of the LP summarises national policy objectives for noise, the requirements of the specific policies and adds that noise should be managed by promoting new technologies and improved practices to reduce noise.
- 7.80 HLP DMT 2 requires development proposals to ensure that they do not contribute to the deterioration of air quality, noise or local amenity or safety of all road users and residents.
- 7.81 HLP DMT 7 requires development proposals relating to logistics to demonstrate that there is no deleterious impact on residential areas, local air quality levels, local amenity or the highway network.
- 7.82 Neither of the local policies are very specific with respect to how deterioration or impacts should be assessed, so national and regional policies take precedence in that regard.

Assessment

- 7.83 WSP has been instructed by Prologis UK Limited to undertake an assessment of the potential noise impacts that could result from the operation of a proposed commercial redevelopment of the former EMI music archives.
- 7.84 The closest residential receptors are 1 – 6 UK Cottages which are set back on Dawley Road, are around 85 m to the south-west of the development site. These are well screened from the development site and surrounded by other commercial premises. The next most sensitive residential receptors are at Rostrevor Gardens which are around 330 m to the north-east.
- 7.85 The submitted noise assessment advises that the proposed development, which involves relatively minor changes to an existing commercial building in an established industrial/commercial area.
- 7.86 Noise from the increased service yard activities will not result in any adverse impact at noise sensitive receptors. Increases in road traffic flows are so small that the corresponding increase in road traffic noise would be imperceptible and insignificant.
- 7.87 The noise assessment concludes that there will be no adverse noise impact from the development proposal and noise does not need to be considered in the determination of the application.

Air Quality

- 7.88 WSP has been commissioned to prepare an air quality assessment, in respect of the proposals include the redevelopment of the existing building for B8 use within a unit of approximately 2,365 sq. m.
- 7.89 This Air Quality (AQ) addresses the potential air quality impacts during both the construction and operational phases of the proposed development. For both phases the type, source and significance of potential impacts were identified, and the measures that should be employed to minimise these proposed. The methodology followed in this study was informed through discussion with the Environmental Health Department at the LBH.

Assessment

- 7.90 The assessment of construction phase impacts associated with fugitive dust and fine particulate matter (PM₁₀) emissions has been undertaken in line with the relevant Institute of Air Quality Management guidance. This identified that there is a Medium Risk of dust soiling impacts and a Low Risk of increases in particulate matter concentrations due to construction activities. However, through good site practice and the implementation of suitable mitigation measures, the effect of dust and particulate matter releases would be significantly reduced. The residual effects of the construction phase on air quality are classed as 'negligible' (not significant).
- 7.91 Once operational, the proposed redevelopment will generate road traffic movements on the local road network, notably through the movement of delivery / works vehicles and staff travelling to and from the Site. Whilst it is acknowledged that exhaust emissions associated with these vehicles will have an impact on local air quality (including concentrations of nitrogen dioxide (NO₂) and particulate matter) in the immediate surrounding area and adjacent to those road links used by development traffic, the volume of traffic forecast to be generated by the proposed redevelopment is low.
- 7.92 As the vehicle trip generation on the surrounding road network is predicted to be below relevant assessment screening criteria published by recognised bodies, a detailed air quality assessment has not been undertaken. Instead, qualitative commentary has been provided, which concludes that the proposed redevelopment is unlikely to have any measurable effect on air quality at nearby sensitive receptors. Whilst the assessment considers the total trips generated by the proposed development, the Site does benefit from an extant planning consent for B8 use and is currently operating as an archive facility and therefore will already be generating some traffic movements on the local road

network. If these were to be offset against the forecast total trips for the Proposed Development, the net increase would be lower, as would the associated impacts on the air quality.

- 7.93 In addition, an 'air quality neutral' assessment of transport related emissions has been undertaken in accordance with the requirements of the London Plan. The results of this assessment showed that the Proposed Development will not be air quality neutral thereby requiring mitigation.
- 7.94 Damage cost calculations have been undertaken in accordance with LBH's requirements to calculate the amount of money that should be spent on mitigation, which is currently estimated to be £192,681, however, there are a number of uncertainties inherent in the calculation of this figure which need to be discussed with LBH before a final sum is agreed. A range of mitigation measures are proposed for the development, which will help to promote active and sustainable travel to and from the Site and to reduce development related trips and vehicle emissions. These include implementation of a Workplace Travel Plan, a Delivery and Servicing Plan, provision of on-site cycling parking, a contribution to the local Santander self-service cycle hire-scheme, and provision of electric vehicle charging facilities within the Site. The LBH will review the mitigation measures proposed as part of the development to determine which of these can be deducted from the total cost. However, it is recommended that the air quality neutral and damage cost calculations be reviewed once the final trip rate and number of days of operation have been confirmed.

Ground Conditions

- 7.95 The Council's records indicate that the site has a history of contaminative industrial uses and thereby various plausible pollutant linkages will likely continue to be present particularly in areas of made ground.
- 7.96 HLP Policy DMEI 11, advises that all development proposals within a Source Protection Zone, Safeguard Zone or Water Protection Zone must assess any risk to groundwater resources and demonstrate that these would be protected throughout the construction and operational phases of development.
- 7.97 HLP Policy DEMI 12, states that proposals for development on potentially contaminated sites will be expected to be accompanied by at least an initial study of the likely contaminants. The Council will support planning permission for any development of land which is affected by contamination where it can be demonstrated that contamination issues have been adequately assessed and the site can be safely remediated so that the development can be made suitable for the proposed use.

Assessment

- 7.98 WSP have been instructed to undertake an assessment of geo-environmental liabilities and constraints to support the proposed development of the Site. The key objectives of the assessment are as follows:
- Develop a preliminary Conceptual Site Model in order to identify potential ground related risk associated with the current use and potential redevelopment of the Site;
 - Evaluate the likely exposure and its potential significance on identified receptors and provide risk management advice to support continued commercial use, and
 - To conduct a Phase I ESA that meets the ASTM E1527-13 standard for AAI as far as applicable in the UK.
- 7.99 Based upon the formation contained within the Phase 1 Environmental Site Assessment report (Phase 1 Report) , WSP has made the following conclusions.
- 7.100 Historical mapping indicates that the Site has had a varied history and was listed as brick fields on the earliest maps available (1865). The Site was subsequently being used as a turpentine factory (1913), a gramophone factory and tram sidings (1935) and the EMI music archive storage (1999).

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- 7.101 The ground conditions beneath the Site are likely to comprise variable Made Ground, superficial deposits of Lynch Hill Gravel Member, and bedrock of the London Clay Formation. It is anticipated that Langley Silt Member was historically present at the Site, however, was removed when the Site was occupied by brick fields.
- 7.102 The Lynch Hill Gravel Member is listed by the Environment Agency (EA) as a principal aquifer. There is the potential this could facilitate the migration of potential contaminants off Site. The London Clay Formation is listed as an unproductive stratum. The nearest surface water feature is the Grand Union Canal located adjacent the northern boundary of the Site. Based on the information provided within this Phase 1 assessment there appears to be the following Recognized Environmental Conditions (REC) as defined under ASTM International Standard E-1527- 13 Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process ("E-1527- 13") associated with continued use of the Site:
- Made Ground / Brick Fields / Gravel pits;
 - Former turpentine refinery;
 - Former tramway sidings;
 - Two former tanks of unknown content;
 - Gramophone factory; and
 - Electrical substations.
- 7.103 Based on the available information, and with consideration of the Site for continued commercial use, the Site is classified as having an overall *Moderate* risk to identified receptors. There is a *Moderate* risk to maintenance / construction workers undertaking below ground activities from potential contaminants in the Made Ground, however, it is considered that these risks would be mitigated through the use of health and safety measures required by regulations and does not represent a significant ongoing environmental liability.
- 7.104 The Phase 1 Report goes on to advise that the potential geotechnical risks at the Site include:
- Potential for variable on-site made ground of unknown composition and provenance;
 - Shrink swelling properties of on-site clays combined with the presence of high-water demand
 - mature trees/overgrown hedgerow across the site creating the potential for desiccated soils; and
 - Aggressive ground conditions attacking concrete placed into the ground.
- 7.105 Finally in respect of recommendations for continued for continued use, the Phase 1 Reports advises that, the current proposal is for the existing buildings to be retained on Site. Therefore, a ground investigation would only be required to highlight any potential environmental liabilities on the Site. Based on the recent developments of buildings surrounding the Site, a review of information obtained from previous ground investigations is recommended.
- 7.106 The Site is unlikely to be classified as a Site that has significant possibility of significant harm to human health or the environment. However, due to the age of the buildings on site, it is recommended that an Asbestos Survey be undertaken to inform an Asbestos Management Plan for the Site.
- 7.107 It is also recommended that a limited Ground investigation be undertaken in the eastern section of the Site under the footprint of the former turpentine factory to assess vapour risk associated with continued use.

Surface Water and Foul Water Drainage

- 7.108 HDR Consulting were appointed to produce a Surface and Foul Water Drainage Strategy to support the planning application for the demolition of a single storey office space and the development of an external service yard and car park.
- 7.109 The application site is located within an industrial estate south of the Grand Union Canal and the proposed development is surrounded by commercial properties.

Assessment

- 7.110 The surface water drainage strategy for this development is proposed to be managed through a series of drainage channels with all the surface water to be stored in a below ground attenuation tank. The final outfall connects to an existing Thames Water manhole located onsite prior to outfalling into the Grand Union Canal.
- 7.111 The Qbar greenfield run off rate for the site is 0.89l/s. It is proposed that the surface water is discharged at a controlled rate of 5l/s due to possible maintenance issues to the flow control device and limited space for storage on site.
- 7.112 The drainage network has been designed to accommodate runoff from storms of up to 1 in 100 year return period plus a 25% allowance for climate change. There will be no surcharging of storm water sewers during a critical storm event of 1 in 1 years return period and no surface ponding during a critical storm event of 1 in 30 years return period plus a 25% allowance for climate change.
- 7.113 As the proposed development comprise of new external areas only and therefore no new foul connections are required. The existing foul sewers and manholes currently in operation and to remain will be protected during the works.

Sustainability and Energy Efficiency

- 7.114 HLP Policy BE1, 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.
- 7.115 HLP Policy EM1, the Council will ensure that climate change mitigation is addressed at every stage of the development process.
- 7.116 HLP Policy EM8, all new development are required to demonstrate the incorporation of water efficiency measures within new development to reduce the rising demand on potable water. All new development must incorporate water recycling and collection facilities unless it can be demonstrated it is not appropriate.
- 7.117 HLP Policy EM11, all new development are required 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.
- 7.118 HLP Policy DMHB11, all development, including extensions, alterations and new buildings will be required to be designed to the highest standards and incorporate principles of good design.
- 7.119 HLP Policy DMEI2, all developments are required to make the fullest contribution to minimising carbon dioxide emissions in accordance with London Plan targets.

Assessment

- 7.120 This Sustainability and Energy Statement (S&SE) has been prepared by Turley Sustainability, to support the planning application in relation to the demolition of an existing building and development of a service yard at Prologis Park Dawley Road.

7.121 The S&SE has the following structure:

- Chapter 2 – sets out the planning policy context for the proposals in relation to sustainable development at the national and local policy level, in accordance with the HLP for a minor development.
- Chapter 3 – reports the approach the applicant (Prologis) takes to sustainable development at the corporate level and to which the development proposals also respond.
- Chapter 4 – summaries the various sustainability measures that are proposed during construction and operation of the proposed development.
- Chapter 5 – provides a summary of key sustainability performance and how these accord with planning policy.

7.122 The S&SE concludes that Prologis has a proactive approach to sustainable development and takes a holistic view to design to deliver low carbon resource efficient buildings.

7.123 The S&SE has been prepared to demonstrate how the proposed development will deliver a sustainable development in accordance with national and local planning policy.

7.124 Prologis has a proactive approach to sustainability with a range of corporate goals to deliver high quality sustainable development. This whole life cycle approach to development includes assessment of carbon emissions at all stages of the development, reducing emissions, and mitigating emissions through the protection of rain forest through the Cool Earth scheme.

7.125 In this context, the key sustainability measures incorporated into the design of the development include:

- A commitment to deliver sustainable distribution buildings that achieve the BREEAM RFO 2014 'Excellent' environmental assessment rating;
- Contribution to the Cool Earth scheme to protect endangered rainforest, averting emissions equivalent to 5 times of the embodied carbon of the development;
- A reduction in carbon dioxide emissions by at least 69% in line with Policy DMEI2;
- Incorporation of ASHPs to provide a low carbon, energy efficient heating and cooling solution;
- Reduced water consumption in operation through water efficient fittings and suitable metering to achieve a water efficiency standard of 40%;
- A commitment to providing resilience to the effects of climate change through the use of climate change allowances of 25% in the surface water system design;
- Maximise resource efficiency and minimise waste during construction; and
- The provision of ecological mitigation and enhancement measures to support biodiversity and achieve a +7.58% net gain using the Defra Metric 3.1 calculator.

Planning Obligations and CIL

7.126 Policy DF1 of the London Plan advises that development proposals should provide the infrastructure and meet the relevant policy requirements necessary to ensure that they are sustainable and to support delivery of the Plan.

7.127 HLP Policy DMCI 7 highlights that in order to ensure development is sustainable, planning permission will only be granted for development that clearly demonstrates there will be sufficient infrastructure of all types to support it.

7.128 Furthermore, HLP Policy DMEI 8 advises that all development alongside or that benefits from a frontage on the Grand Union Canal will be expected to contribute to the improvement of the Canal.

Assessment

- 7.129 As the proposals would not increase the proposed floor area, in fact there would be reduction of floorspace the development would not be CIL liable.
- 7.130 Turning to financial contributions, as part of this pre-application response it was advised that the following planning obligations could be requested:
- S278 / S38 agreement to secure any required highway works;
 - Green Travel Plan, including a £20,000 Travel Plan bond is also to be secured;
 - Air Quality Mitigation Offset contribution (subject to the outcome of the Air Quality Assessment);
 - Canal / Public Open Space financial contribution, and
 - Project Management & Monitoring Fee.
- 7.131 We await officer's assessment and having considered the proposed development, what contributions would be required.

8 CONCLUSIONS

- 8.1 RPS Group has been instructed by Prologis to submit a planning application for the following development:

Demolition of the single storey building and glazed link, in connection with the formation of a service yard and alterations to the warehouse building, including the insertion of loading bays and formation of parking for HGV's and cars.

- 8.2 The proposed development, which seeks to use the site for storage and distribution, is consistent with the sites lawful use and the established policy position in the London Plan and the Hillingdon Local Plan. In particular, the site is located within a SIL, and its continued storage use would be in keeping with the surrounding area.
- 8.3 The level of car parking spaces provided would accord with Hillingdon's parking standards and the 6 no. HGV parking spaces are directly connected with the use of the building for storage and distribution.
- 8.4 The main changes to the building would occur at the western end of the site and include the formation of the loading bays and associated service yard and parking areas. Given the existing landscaping along the site's northern boundary, these changes would not be visible from the adjacent canal and open space beyond, and as such would maintain the character of these areas.
- 8.5 The proposed development is considered to accord with the relevant planning policies and constitutes sustainable development.
- 8.6 Therefore, in light of the above, there would appear to be no objection for the refurbishment of the existing building, and as such we would request that planning permission is granted.



Appendix A – EMI Trust Letter



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27 May 2022

Dear James,

Re: The Gramophone Company War memorial – EMI Archive Trust catalogue number EMIAT.429

Thank you for reaching out to the EMI Archive Trust, a UK charity set up to preserve the early heritage of The Gramophone Company (Gram. Co.) The Gram. Co. War Memorial forms part of our collection, it was legally gifted into The Trust in 1996 by EMI Group, the successor company of Gram. Co.

This memorial had originally been mounted to an Gram. Co. building on Blyth Road, Hayes. When the building was demolished EMI Group sent the memorial to Hayes Archive the then main repository for the EMI Archive Trust collection.

The Hayes Archive site on Dawley Road, was built in the early 1990s, it holds no connection to the original Gram. Co. site where the memorial once stood. This object was simply kept at Hayes Archive as the main storage facility for the EMI Archive Trust collection and has now been safely moved to our new repository. The Imperial War Museum and local council have been informed on our new address.

Rest assured that, as custodians, the EMI Archive Trust continue to care for the memorial under strict museum standards. Please contact us should the Hayes Council inspectors wish to view the War Memorial and they will be given access to our collection via the Trust's Heritage Curator by appointment.

If you have any further questions, please do not hesitate to contact me.

Kind Regards

Joanna Hughes

Heritage Curator, Manager Historic Collections - EMI Archive Trust