

PLANNING STATEMENT ISLAND SITE, ESKDALE ROAD, UXBRIDGE

14 OCTOBER 2024



DOCUMENT CONTROL

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CONTENTS

SECTION 1 INTRODUCTION	4
SECTION 2 BACKGROUND INFORMATION	5
SECTION 3 APPLICATION PROPOSALS	7
SECTION 4 RELEVANT PLANNING POLICY	9
SECTION 5 PLANNING ASSESSMENT	13
SECTION 6 CONCLUSIONS	18

APPENDICES

APPENDIX 1 | PHOTOGRAPHS OF THE SITE

APPENDIX 2 | HISTORIC VIEWS OF SITE

FIGURES

FIGURE 2.1 | AERIAL VIEW OF APPLICATION SITE

FIGURE 2.2 | COMPLETED SCHEME AT THE FORMER TRIMITE SITE

FIGURE 2.2 | COMPLETED SCHEME AT THE BARTON BUILDINGS, ARUNDEL ROAD

FIGURE 3.1 | VISUAL OF PROPOSED FRONT ELEVATION

SECTION 1 | INTRODUCTION

- 1.1 This Planning Statement has been prepared by Firstplan in support of an application by PJN Properties Ltd at the land known as Island Site, Eskdale Road, Uxbridge UB8 2RT.
- 1.2 The application submitted to the London Borough of Hillingdon Council ("the Council") seeks planning permission for the redevelopment of the existing dated commercial buildings on site in its entirety to deliver new high-quality flexible Class E(g)(iii), Class B2 and/or Class B8 commercial floorspace together with ancillary services.
- 1.3 The proposals put forward by this planning application are focused on maximising the efficient use of the site, with the existing buildings having reached the end of their life expectancy. This reflects the guidelines set out in the National Planning Policy Framework (NPPF) which supports the need to deliver high-quality development for employment generating uses in suitable locations.
- 1.4 The scheme would provide a high-quality industrial building comprising two units within the Uxbridge Industrial Estate, a defined Strategic Industrial Location. As submitted it proposes:

"Redevelopment of site to provide new commercial buildings for use within Class E(g)(iii) / B2 / B8 together with associated infrastructure onsite, to include landscaping, access, servicing and parking."

- 1.5 The proposed development will enhance the quality of the commercial accommodation by comprehensively redeveloping the site, introducing two modern and flexible industrial units. This development will provide a 'step change' in the appearance of the Island Site and will enable this key employment location to retain existing occupiers and/or attract new businesses, reinforcing its status as a designated employment area and will increase the range of high-quality employment opportunities, supporting the growth of both established and emerging industries in Uxbridge. It is deemed that the proposals deliver clear economic benefits accordingly.
- 1.6 In order to assist the Council with their assessment of the proposals, technical reports have been enclosed to support the application. These documents have considered the impact of the proposed development and have been considered in further detail at Section 5 of this Statement. These reports confirm that the proposed development can be undertaken without having a detrimental impact on the existing uses in the area.
- 1.7 As evidenced within this Statement, the proposals are deemed acceptable in all regards and are therefore in accordance with adopted local, regional and national planning policy. As such, we respectfully request that planning permission is granted without delay.
- 1.8 This Statement takes the following structure:
 - **Section 2** provides relevant background information, including a description of the site and relevant planning history;
 - **Section 3** sets out the application proposals;
 - **Section 4** outlines the national, regional and local planning policies relevant to the application;
 - **Section 5** assesses the proposed development and demonstrates its acceptability; and
 - **Section 6** draws conclusions.

SECTION 2 | BACKGROUND INFORMATION

a) Site Description

2.1 The site consists of an existing block of single-storey buildings facing onto Eskdale Road. The existing buildings consist of an ad hoc arrangement of dated brick-built warehouse buildings that have come to the end of their working life. Over the years the units have been occupied by a range of commercial operators for uses including offices, light industrial, general industrial and warehousing/distribution.

2.2 The entirety of the site falls within the wider Uxbridge Industrial Estate, which is designated as a Strategic Industrial Location (SIL). Within this it forms an 'Island site' enclosed by Eskdale Road and surrounded by commercial properties of varying designs and massing. The nearest residential properties are understood to be those along Hilton Close, circa 120m to the north-east.

2.3 The application site and its surrounding context is shown in the aerial photograph provided at Figure 2.1 below, with photographs provided at [Appendix 1](#).

Figure 2.1 Aerial view of application site



2.4 The site is not listed nor located within a conservation area. The Environment Agency's Flood Map for Planning confirms that it sits within Flood Zone 1. Parking for occupiers is provided onsite and on local roads, with the closest bus stop identified as along St John's Road (circa 8min walk). This supports the Nos. 3 & 583 bus routes.

b) Relevant Planning History

i) The site

2.5 There is no planning history relevant to the site available online. As detailed by the historic images at [Appendix 2](#) the existing buildings have been present onsite for a significant period of time.

ii) Surrounding area

2.6 The following permissions for the redevelopment of plots on the Uxbridge Industrial Estate are considered of relevance to this application:

- Consent granted in 2010 at Unit 2 Eskdale Road (ref: 62875/APP/2010/681) to support the demolition of an existing factory to support a single-storey factory building.
- Consent granted in 2014 at Unit 5B Eskdale Road (ref: 70339/APP/2014/3543) to allow the demolition of an existing factory to support a two-storey factory.
- Consent granted in 2016 at Units 3a & 4 Eskdale Road (ref: 71691/APP/2016/975) to allow the erection of a replacement two-storey industrial unit and first floor rear extension.
- Consent granted in 2016 at the former Trimite Site (ref: 9117/APP/2016/278) for the redevelopment of the site to deliver three industrial/warehouse units (Use Class B1c/B2/B8) with a total floorarea of 16,178sqm. The scheme approved, which backs onto Eskdale Road opposite the application site, has been built out as shown at Figure 2.2 below. The ridge height of the approved building is 16m.

Figure 2.2. Completed scheme at the former Trimite Site (Google Maps)



- Consent granted in 2021 at the Barton Buildings, Arundel Road (ref: 74891/APP/2021/2071) to allow the redevelopment of the site to provide a new industrial unit for continued Class E(g)(ii), E(g)(iii), B2 and B8 use. The scheme has been built out, as shown at Figure 2.3 below.

Figure 2.3. Completed scheme at the Barton Buildings, Arundel Road (Google Maps)



2.7 The planning history of the surrounding area demonstrates that large scale redevelopments of the plots within the Uxbridge Industrial Estate have sought to enhance the commercial provision on the estate are considered entirely appropriate for this location by the Council.

SECTION 3 | APPLICATION PROPOSALS

3.1 This application seeks planning permission for the redevelopment of the site to provide new commercial floorspace suitable for modern business needs.

3.2 The application proposals are detailed on the submitted architectural plans, prepared by the Ratcliffe Groves Partnership (RGP), which should be reviewed in conjunction with this Planning Statement and the Design and Access Statement. As submitted the application seeks consent for the following development:

"Redevelopment of site to provide new commercial buildings for use within Class E(g)(iii) / B2 / B8 together with associated infrastructure onsite, to include landscaping, access, servicing and parking."

3.3 The proposed scheme will result in a total of 2,850sqm GEA modern floorspace for use within Class E(g)/B2/B8. This will be delivered through the creation of two equally sized warehouse-style units with mezzanine levels.

3.4 The new buildings will be located in the northern area of the plot, with the frontages facing south. The forecourt will be subdivided to provide dedicated servicing and parking areas for the two units in the southern area.

3.5 The proposed development is expected to support up to 114 employment roles across the two units. In addition to this, the proposed development will have further economic benefits for the locality, to include the provision of new multi-functional commercial floorspace suitable for modern business practices to add to the existing stock in the industrial estate and improved parking arrangements for occupiers.

3.6 The buildings will be contemporary in style, with a modern appearance achieved through the use of glazing and cladding panels. The buildings will have a two-tone finish that has been designed to correspond with that present in the surrounding industrial estate. The proposed height, extending to 11.5m, will also accord with similar developments in the locality. The outcome of this will be visually complementary to the surroundings and reflect to the site's commercial character. This is depicted at Figure 3.1 below.

Figure 3.1. Visual of proposed front elevation



- 3.7 The site is located within a designated industrial estate. Nonetheless, consideration has been given to landscaping and biodiversity enhancements onsite to reflect the existing provision. Details of the measures proposed are shown on Plan ref: 11565-P-100. This scheme, which has been informed by ecologists, has been designed to enhance the environment around the site for future occupiers. The development will also seek to achieve the highest standards of sustainability possible, and this will be achieved through the use of modern building practices together with renewable energy sources (air source heat pumps & PV solar).
- 3.8 Parking for 26no. cars and 16no. bicycles will be provided, split between each unit. This will be provided within the forecourt area with ancillary parking to the rear of the proposed buildings. This will include 8no. EV charging stations and 2no. disabled spaces. Sufficient space will also be provided for servicing of the two units. Ingress and egress for both units will be provided from the south, with independent access to both forecourts proposed.
- 3.9 Appropriate refuse and recycling facilities will be provided for each unit in the forecourt area.

SECTION 4 | RELEVANT PLANNING POLICY

- 4.1 The statutory development plan relevant to the application site comprises of the Hillingdon Local Plan Part 1 (2012) and Part 2 (2020) together with the London Plan (2021). The National Planning Policy Framework (NPPF, 2023) is also a material consideration.
- 4.2 Hillingdon Council are in the very early stages of preparing an updated Local Plan, with it projected that an initial public consultation on the document will take place in early 2025. The Government are also in the process of public consultation on changes to the NPPF prior to an updated version being adopted. The relevant policies contained within this draft document have been considered below accordingly.

a) National Planning Policy Framework (NPPF) (2023)

- 4.3 **Paragraph 7** states that the purpose of the planning system is to contribute to the achievement of sustainable development, which can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs.
- 4.4 The overarching objectives of achieving sustainable development are identified at **Paragraph 8** and include (inter alia):
 - Helping to build a strong, responsive and competitive economy;
 - Supporting strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and
 - Making effective use of land.
- 4.5 **Paragraph 11** of the NPPF requires local planning authorities to adopt a positive approach to decision-taking, and to apply a presumption in favour of sustainable development. The NPPF requires that applications which accord with the development plan should be approved 'without delay'. In instances where the development plan is silent, or relevant policies are out of date, the NPPF states that permission should be granted, unless they do not comply with NPPF policies, or the adverse impacts of doing so would significantly outweigh the benefits of the development when assessed against the policies in the NPPF.
- 4.6 **Paragraph 38** encourages local planning authorities to approach decisions on proposed development in a positive and creative way. Decision-makers should approve applications for sustainable development where possible.
- 4.7 In terms of economic development, **Paragraph 85** sets out that:

"Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future. This is particularly important where Britain can be a global leader in driving innovation, and in areas with high levels of productivity, which should be able to capitalise on their performance and potential" (our underlining)

- 4.8 **Paragraph 87** goes on to say that:

"Planning policies and decisions should recognise and address the specific locational requirements of different sectors. This includes making provision for clusters or networks of

knowledge and data-driven, creative or high technology industries; and for storage and distribution operations at a variety of scales and in suitably accessible locations.” (our underlining)

- 4.9 With regards to highways **Paragraph 114** identifies that sustainable transport modes should be promoted and that any significant impact on the transport network is mitigated to an acceptable degree, with **Paragraph 115** going on to say 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.
- 4.10 **Section 11** provides guidance on making effective use of land, with **Paragraph 124** stating that planning policies and decisions should encourage multiple benefits from urban land and give substantial weight to the use of suitable brownfield land.
- 4.11 In respect of design principles, **Paragraph 131** establishes that the creation of high-quality buildings and places is a pivotal component of the planning and development process, with good design forming a central facet of sustainable development. In line with **Paragraph 135**, proposals should: function well and contribute to the overall quality of an area; be visually attractive and responsive to the local character of an area whilst optimising the potential of the site.

i) NPPF proposed changes

- 4.12 In considering the economy, proposed changes to Paragraph 87 will seek to emphasise the aim to provide efficient and reliable handling of goods, especially where this is needed to support the supply chain, transport innovation and decarbonisation.

b) London Plan (2021)

- 4.13 **Policy GG1** identifies the need to help deliver strong and inclusive communities within which a wide range of economic and other opportunities continue to be supported. **Policy GG2** goes on to emphasise the need to make the best use of land whilst also maximising the development potential of sites.
- 4.14 **Policy GG5** relates to growing a good economy and identifies the need to plan for sufficient employment and industrial space in the right locations to support economic development.
- 4.15 Design principles are provided at **Policy D4**, with **Policy D5** requiring development to achieve the highest standards of accessible and inclusive design. **Policy D12** requires that all developments ensure the safety of all building users with regards to fire safety.
- 4.16 **Policy D13** relates to the Agent of Change principle, ensuring that new noise and other nuisance-generating development proposed close to residential and noise-sensitive uses should mitigate this impact, with **Policy D14** relating specifically to Noise and requiring development to manage noise in accordance with Policy D13. It too identifies the need to avoid significant adverse noise impacts and mitigate against them where required.
- 4.17 **Policy E2** sets out that the provision of low-cost business space should be supported to meet the needs of micro, small and medium sized enterprises and to support firms wishing to ‘start up’ or expand. The supporting paragraph 6.2.1 sets out that a sufficient supply of business space of different types, uses and sizes will ensure that workspace is available at an appropriate range of rents for SMEs and businesses wishing to start-up or expand and paragraph 6.2.4 confirms that low-cost business space often can include smaller-scale provision in industrial locations.

- 4.18 **Policy E5** states that Strategic Industrial Land (SIL) should be managed proactively, and opportunities should be explored to intensify and make more efficient use of land here. Development proposals within or adjacent to SILs should not compromise the integrity or effectiveness of these locations in accommodating industrial type activities and their ability to operate on a 24-hour basis.
- 4.19 **Policy E7** identifies that development proposals should be proactive and encourage the intensification of business uses in Use Classes E(g)(iii), B2 and B8 occupying all categories of industrial land. This includes the introduction of small units and more efficient use of land.
- 4.20 **Policy SI1** sets out that proposals should be at least air quality neutral and not lead to further deterioration of existing poor air quality.
- 4.21 **Policy T4** identifies the need to consider the impact of development on the local transport network and be supported by a Transport Assessment where relevant. **Policy T5** goes on to require sufficient cycle parking is provided in accordance with Table 10.2, with **Policy T6** identifying the need for car parking to be restricted in line with levels of existing and future public transport accessibility and connectivity. **Policy T7** relates to servicing and requires development to facilitate safe, clean and efficient deliveries and servicing, with deliveries managed to be received outside of peak hours.

c) Local Plan Parts 1 & 2

- 4.22 **Policy E1** sets out that the council will accommodate growth by protecting existing industrial land, including the SILs with **Policy E2** identifying the SILs as one of the key locations for delivering employment growth. **Policy DME1** goes on to say that the council will support employment proposals in SILs in accordance with the London Plan.
- 4.23 **Policy BE1** defines that new development should achieve a high quality of design that reflects the local distinctiveness of the area. **Policy DMHB11** sets out that all development will be required to be designed to the highest standards of design, to include providing sufficient provision for waste and recycling.
- 4.24 **Policy BE1** also identifies a need for development to protect the amenity of surrounding land and buildings, particularly residential properties.
- 4.25 **Policy EM1** sets out that developments need to minimise any potential impact on climate change. Measures to do this include achieving high design standards and using renewable energy sources. **Policy DMEI2** confirms that all major development must be accompanied by an energy assessment showing how carbon dioxide emissions will be minimised.
- 4.26 **Policy DMEI12** relates to contamination and requires that development on potentially contaminated sites will need to be supported by an initial study on the likely contaminants.
- 4.27 With regards to air quality, **Policy DMEI14** identifies that development should seek to reduce emissions where possible and as a minimum show air quality neutrality and include sufficient mitigation measures where necessary.
- 4.28 **Policy EM6** requires all development to use sustainable urban drainage systems (SuDS) unless demonstrated not to be viable. **Policy DMEI9** confirms that development should be located away from vulnerable locations.
- 4.29 **Policy EM7** seeks all development to provide biodiversity enhancements where feasible. **Policy DME17** goes on to emphasise the need to protect biodiversity, with the policy confirming that where features are identified, appropriate surveys and assessments should be provided showing that the development will not have unacceptable impacts and that a positive contribution is being made. **Policy DMHB14** confirms that

developments will be expected to retain or enhance landscaping, trees and biodiversity onsite, with a landscaping plan needed to show all hard and soft landscaping onsite.

4.30 **Policy DMT1** requires development to meet the transport needs of the development and address its impacts in a sustainable manner. It goes on to require a Transport Assessment and Travel Plan where the appropriate thresholds are exceeded. **Policy DMT2** sets out that development must ensure safe and efficient vehicular access with **Policy DMT5** requiring that inclusive access for pedestrians and cyclists is provided, with sufficient cycle parking and facilities provided.

4.31 **Policy DMT6** requires development to accord with the Council's parking standards in order to facilitate sustainable development and address issues relating to congestion and amenity. The policy goes on to say that the Council may agree to vary these requirements where the variance would not lead to a deleterious impact on street parking and/or a transport appraisal has been approved demonstrating the acceptability of the provision. It also requires sufficient disabled spaces.

i) Emerging local plan evidence base

4.32 As part of the new local plan process, an Employment Land and Capacity Study was undertaken in 2023 by Avison Young on behalf of the Council. The purpose of this study was to identify the future employment and land need over the new plan period together with whether the current land supply would be sufficient to meet this need.

4.33 Specific reference is made in the summary document to the Uxbridge Industrial Estate being one of the existing employment sites that present intensification opportunities over the new plan period, with it being considered that industrious type uses would be most appropriate. It goes on to consider that areas of the estate offer greater opportunities for re-development and intensification, with specific reference made to the area west of the Grand Union Canal (where the application site is located), where there is an opportunity to develop open storage areas and reconfigure low-quality and old units to realise stronger employment densities.

d) Summary

4.34 Planning policy at all levels seek to promote the efficient use of land. Within London's SILs this means maximising the amount of industrial floorspace to support new job opportunities. The emerging evidence base for the Council's new local plan identifies the western area of the Uxbridge Industrial Estate as a particular area where the redevelopment of sites could help to realise stronger employment densities over the new plan period.

SECTION 5 | PLANNING ASSESSMENT

5.1 This section of the Statement demonstrates the acceptability of the proposals within the context of the relevant planning policies as outlined in Section 4. The main planning issues in relation to these proposals are as follows:

- The principle of the proposed development;
- Design;
- Highways considerations;
- Biodiversity and landscaping;
- Impact on amenity;
- Sustainability; and
- Other matters of note.

a) The principle of the proposed development:

5.2 Policies GG1, GG2 and GG5 of the London Plan identify the need to deliver strong and inclusive communities and maximise the development potential of sites. With regard to the economy, this includes planning for sufficient employment and industrial space within the right locations. Policies E2, E4, E5 and E7 of the London Plan go on to support the intensification of business uses on all categories of industrial land. At a local level, Policy E1 seeks to safeguard SIL locations for industrial purposes and Policies E2 & DME1 set out that employment proposals will be supported in SILs. The evidence base for the new local plan also suggests that the western area of the Uxbridge Industrial Estate, where the site is located, provides opportunities for redevelopment to realise stronger employment densities over the new plan period.

5.3 The proposed development seeks to deliver 2,850sqm modern commercial floorspace for use within Class E(g) / B2 / B8. This will be in the form of 2no. warehouse units designed to enhance the level of accommodation onsite whilst also allowing greater flexibility in floorspace for prospective tenants. It is projected that this will support up to 114no. full time jobs onsite.

5.4 The existing site hosts 3,570sqm commercial floorspace. There will therefore be a reduction in overall floorarea as a result of the proposals. The existing buildings have, however, been developed in ad hoc fashion and have come to the end of their operational life, supporting a low level of employment. The proposed works, which are designed to provide high-quality spaces that reflect the needs of modern businesses and ensure their long-term commercial use, should therefore be considered as an overall enhancement on the existing facilities onsite.

5.5 The site is located within a designated SIL. Such areas are suitable for intensification and enhancement of land for industrial purposes, with the latest Employment Land and Capacity Study suggesting that this area of the estate would be suitable for redevelopment of existing stock to deliver improved facilities. It is therefore considered that the works will be entirely appropriate in this context.

5.6 Given the above, the proposed works are clearly designed to deliver a high-quality commercial development that is well suited for this designated industrial location, and which will have clear economic benefits for the area. It is therefore fully in accordance with planning policy at all levels.

b) Design

5.7 Careful consideration has been given to the design of the scheme in order to ensure that it makes a positive contribution to views from the local area. In this regard, the site consists of an independent plot located centrally within the Uxbridge Industrial Estate in proximity to a range of commercial buildings of varying age and design.

5.8 The development relates to the construction of two adjoined commercial warehouse buildings in the northern area of the site. The building will measure 11.5m in height, which will only represent an increase in height of 2.75m from the existing ridge height, and face onto the defined forecourt in the southern area of the site.

5.9 The existing buildings onsite appear as piecemeal developments that are dated and have reached the end of their operational life. The proposed development has been designed to replace these with buildings of a high standard as required by Local Policies BE1 and DMHB11. This will be achieved through the delivery of a contemporary design solution that complements the character of the surrounding area, which includes an existing modern warehouse development opposite at the former Trimite Site, which sits at 16m in height. The scale and design of the scheme should be considered acceptable in this context accordingly.

5.10 The siting of the building onsite has been chosen to make the most efficient use of the site and ensure that appropriate parking and servicing can take place onsite.

c) Highways considerations

5.11 The policies contained within the London Plan and Local Policy Framework set out that the impact of development on the local transport network needs to be considered through a Transport Assessment where relevant. Policies T5 and T6 of the London Plan also identify the cycle and car parking standards for developments in the city, with Policy T7 requiring that sufficient arrangements are made to support servicing onsite. The Council also have defined parking standards contained within the adopted local plan, with Policy DMT6 setting out that alternative arrangements could be acceptable where it is demonstrated that this is necessary and will not have a detrimental impact on the locality.

5.12 The proposed development seeks the provision of 26no. parking spaces for use by operators of the site, with this split between the two units. This will continue to represent a provision in line with local standards and include 2no. new disabled spaces and 8no. new EV charging points. Access and egress to this parking will be via Eskdale Road, as depicted on Plan ref: 11565-P-100.

5.13 Sufficient space will be provided in the forecourt for each unit to support servicing. This will include manoeuvring space to ensure that HGVs can arrive and leave in forward gear. Swept path analyses have been provided to demonstrate this.

5.14 In order to facilitate the provision of independent accesses to the forecourts of each new unit, a new access will be required along Eskdale Road. Details of this are provided on Plan ref: 11565-P-100.

5.15 In order to assess the acceptability of the proposed development in highways terms and demonstrate how sustainable travel will be promoted, a Transport Statement and Travel Plan have been prepared by TPP Consulting. The Transport Statement assesses the projected demand for the site together with the existing and proposed arrangements and concludes that:

"The proposals are a scale and type of development which are appropriate in this location which benefits from a good choice of local amenities and access to public transport opportunities. The scheme is consistent with relevant transport planning policy guidance and will not give rise to any material transport related impacts. It therefore meets the test of the NPPF and paragraph 115..."

d) Biodiversity and landscaping

- 5.16 Local Policy EM7 requires that development protects biodiversity and delivers enhancements where possible. Policy DME17 goes on to require that appropriate surveys and assessments are carried out where features are identified, with positive mitigation and contributions demonstrated where relevant.
- 5.17 In accordance with these policies, a Preliminary Ecology Assessment has been prepared by Tyler Grange. This assessment, which includes findings of bat surveys that have been undertaken, has identified that the existing buildings are used for the roosting of soprano pipistrelle bats and therefore any redevelopment of the site will need to undertake to avoid impacting on these identified species. The measures proposed to do this include the preparation of a bat mitigation strategy, to include the installation of bat boxes post-development (see plan ref: 11565-D-100), and appropriate timing of works should a maternity roost be confirmed. It also confirms that a pre-works check for active birds nests should be undertaken where works are carried out during the core nesting season.
- 5.18 In addition, a Biodiversity Net Gain matrix has been completed by Tyler Grange. This identifies there to be a net gain of 0.03 habitat units and 0.15 hedgerow units as a result of the development. This would represent a percentage gain of 40.41%.
- 5.19 In the light of this, the report concludes that:

“in anticipation of the implementation of any necessary mitigation, the proposed development will be compliant with relevant planning policies the NPPF; London Plan Policies: G1, G5 and G6; the Hillingdon Local Plan policies EM1, EM7, DME17, which seek to protect biodiversity, as well as legislation with regard to ecology.”

- 5.20 Furthermore, the site consists of a plot of land predominantly containing existing commercial warehouse buildings with associated forecourts within a defined industrial estate. There are, however, some limited pockets of greenspace around the site and therefore the impact of the proposals on greenspace has been carefully considered in accordance with Policy DMHB14.
- 5.21 The proposed landscaping plan (Plan ref: 11565-P-104) provides details of the proposed landscaping arrangements onsite. This includes the areas of hard and soft landscaping enhancements proposed together with the access routes around the site and seeks to maximise the amount of soft landscaping being retained onsite where possible.

e) Impact on amenity

- 5.22 Local Policy BE1 sets out that development needs to protect the amenity of surrounding land and buildings, particularly any residential properties.
- 5.23 In this regard the site is located centrally within the Uxbridge Industrial Estate, a designated SIL, away from residential properties. Furthermore, there will be no change to the nature of the permitted use onsite, with it continuing to be used within Class E(g)(iii) / B2 / B8. This will therefore continue to reflect the uses in the near vicinity.
- 5.24 In the light of this, it is considered that there will be no impact on the amenity of the local area as a result of the proposed development. In order to demonstrate this, a Noise Impact Assessment has been prepared by Sharps Redmore. This assesses the acceptability of noise with regards to plant and delivery activity and considers that the development would be acceptable with a suitably worded condition restricting plant noise to 50dBA during daytime hours and 45dBA at night. Based on this it concludes:

“...having assessed the noise impact against national design guidance, including BS 4142:2014 and WHO Guidelines for Community Noise, the proposed development would comply with the requirements of paragraph 191 of the National Planning Policy Framework, to avoid significant adverse impact.”

f) Air quality

5.25 London Plan Policy SI1 & DMEI14 require that development demonstrates that it is at least achieving air quality neutral, and not leading to further deterioration in this regard.

5.26 An assessment of the proposed scheme has been carried out by BWB Consulting. This considers the acceptability of the operation in the context of the existing character of the site and its surroundings in order to determine the potential impact. As a result of this it is determined that where the properties are used for industrial purposes then the use would be considered air quality neutral, however office / light industrial and commercial warehouse uses would not be air quality neutral.

5.27 In the light of this, the report concludes that:

“Once the tenant is confirmed, suitable on-site mitigation will need to be agreed with LBH to offset development emissions, where required. If sufficient on-site mitigation cannot be implemented, then off-site mitigation will need to be implemented to offset development emissions. In the event that appropriate mitigation cannot be agreed with LBH appropriate payment based on the calculations in Section 6 will be made.

Based on the assessment results, the impact of the proposed development with regards to the current relevant air quality objectives was considered to be not significant. No mitigation is required but measures included in the development that can be considered beneficial to air quality include the provision of photovoltaic panels, electric vehicle charging points and a Travel Plan resulting in an improved and more sustainable scheme compared to the existing site premises.”

g) Sustainability

5.28 Measures have been incorporated into the design of the scheme to maximise the energy efficiency of the building in line with Local Policies EM1 & DMEI2. This is detailed further in the submitted Energy & Sustainability Statement, prepared by Envision, and includes the use of modern design practices and renewable energy sources (to include 174no. PV panels at roof level).

5.29 As part of the proposed parking facilities, 8no. EV charging points will be installed for use by employees of the site.

h) Other matters of note

5.30 Sufficient facilities for the storage of refuse and recycling will be provided onsite in line with Policy DMHB11. The locations of these stores are provided on Plan ref: 11565-P-100.

5.31 The commercial units will host open-plan warehouse floorspace with ancillary mezzanine accommodation that is designed to meet the needs of modern-day commercial operators. Ample natural light will be provided to the space through the use of windows and rooflights.

5.32 A Stage 1 Contamination Assessment has been prepared by Jomas Associates Ltd in accordance with Policy DMEI12. This concludes that there is a ‘moderate’ risk of contamination onsite and therefore it is recommended

that intrusive investigation is undertaken to assess the extent of Made Ground soils at the site together with Soil gas monitoring.

5.33 In accordance with Local Policies EM6 & DME19 a SuDS Strategy and Flood Risk Assessment has been prepared by Furness Consulting Engineers. This confirms that the proposed drainage scheme will consist of a series of symphonic rainwater pipes, linear drains and gullies which feed into a below ground attenuation tank. As a result of this the report concludes that:

"Through the implementation of the tank, and other proprietary systems, the flood risk assessment has concluded that the proposed development neither increases the potential for flood risk or flooding from the site.

The Simple Index Approach analysis concluded that the treatment train proposed for the SuDS strategy is adequate for the pollution hazard indices generated"

5.34 In accordance with Policy D12 of the London Plan a Fire Strategy has been prepared by The Ratcliffe Groves Partnership.

SECTION 6 | CONCLUSIONS

6.1 This Statement has been prepared in support of a full planning application relating to the redevelopment of the land known as '*Island Site, Eskdale Road*' within the Uxbridge Industrial Estate. As submitted it seeks consent for:

"Redevelopment of site to provide new commercial buildings for use within Class E(g)(iii) / B2 / B8 together with associated infrastructure onsite, to include landscaping, access, servicing and parking."

6.2 The existing buildings onsite have reached the end of their operational lifespan and are in urgent need of restoration. The proposed works seek to replace these buildings with high-quality commercial units designed to suit the needs of modern businesses to add to the quality of stock in the industrial estate.

6.3 This Statement has considered the most relevant planning considerations with respect to the proposed development. It has found the development acceptable for the following reasons:

- The development will significantly enhance the quality of commercial floorspace onsite to meet the needs of modern businesses. This is in keeping with the site's location within a defined Significant Industrial Location.
- The design of the scheme will respond successfully to the nature of the surrounding area and will sit comfortably in relation to scale and massing.
- There will be no detrimental impact on the highways network or the amenity of the surrounding area as a result of the proposed development.
- The proposals will achieve a high level of sustainability and ensure that the quality of biodiversity onsite is retained.
- Technical reports have been provided to fully assess the impacts of the proposed scheme. These confirm that the proposed development will be appropriate in all respects.

6.4 In the light of the above, the application proposals are consistent with all the relevant planning policies and guidance at national and local levels. This application should therefore be considered acceptable by the Council, and we respectfully request that planning consent is granted without delay.

APPENDIX 1 | PHOTOGRAPHS OF THE SITE (TAKEN FROM GOOGLE MAPS)

Image 1. View from Eskdale Road looking north-west



Image 2. View from Eskdale Road looking North-east



Image 3. View from Eskdale Road looking South-east



Image 4. View from Eskdale Road looking South-west



Image 5. View looking towards site from along Arundel Road



Image 6. View looking towards site from along Ashley Road



APPENDIX 2 | HISTORIC VIEWS OF SITE (TAKEN FROM GOOGLE MAPS)

Image 1. View from Eskdale Road looking north-west
(2023)



Image 2. View from Eskdale Road looking north-west
(2008)



Image 3. View from Eskdale Road looking North-east
(2020)



Image 4. View from Eskdale Road looking North-east
(2008)



Image 5. View from Eskdale Road looking South-east
(2020)



Image 6. View from Eskdale Road looking South-east
(2008)



Image 7. View from Eskdale Road looking South-west
(2020)



Image 8. View from Eskdale Road looking South-west
(2008)



