

## Report of the Head of Planning, Sport and Green Spaces

**Address** FORMER EMI SITE DAWLEY ROAD HAYES

**Development:** 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.

**LBH Ref Nos:** 8294/APP/2015/1406

**Drawing Nos:** 30034 PL 102  
30034 PL 103  
30034 PL 108  
30034 PL 110  
30034 PL 111  
30034 PL 112  
30034 PL 113  
30034 PL 114  
30034 PL 115  
30034 PL 116  
30034 PL 121  
30034 PL 122  
30034 PL-117  
30034 PL 120  
Design and Access Statemen  
Final Covering Letter  
30034 PL 100  
8721/01  
8721/02A  
Energy and Sustainability Statement, March 201!  
14038/5  
14038/4A  
PM-1501-03 Rev. C  
PM-1501-04 Rev. C  
Transport Assessment dated 14th April 2015 as amended by Revise  
Section 8 and Appendices U and V received on 2/7/15  
Ecological Appraisal, January 201!  
D25935/JM/B  
30034-PL-119  
Habitat Management Plan, March 201!  
Management Strategy and Maintenance Plan, Rev. A, March 201  
Planning Statement, 16 April 201!  
Soft Landscaping Specification, March 201!  
Tree Survey, Part 1  
Unit 1 BREEAM Industrial 2014 (Shell Only) Design Stage Pre-Assessme  
Report - Issue Draft, January 2015  
Unit 6 BREEAM Industrial 2014 (Shell Only) Design Stage Pre-Assessme  
Report - Issue Draft, January 2015  
Units 2 - 5 BREEAM Industrial 2014 (Shell Only) Design Stage Pre  
Assessment Report - Issue Draft, January 2015  
30034-PL-101 B  
Flood Risk Assessmen

Phase I Environment Review, May 2014  
 Supplementary Phase II Environmental Site Assessment, December 2014  
 14-075/300 Rev. P1  
 Archaeological Desk Based Assessment, April 2014  
 Environ letter dated 17/6/15  
 Agent's email dated 17/6/15  
 Delivery Noise Management plan  
 30034-PL-104 A  
 30034-PL-106 A  
 30034-PL-107 A  
 30034-PL-109 A  
 30034-PL-124  
 BREEAM 2014 Assessment  
 Ecological Appraisal and BREEAM Ecology Assessment, March 2014  
 Bird Hazard Management Plan, November 2014  
 Section 106 Draft Heads of Terms, 16 April 2014  
 30034-PL-123  
 Acoustic Planning Report dated 17/4/2014  
 Consideration of Additional Improvements to Improve Capacity at Junction  
 dated 24/6/15  
 Air Quality Assessment Report, April 2014

<b>Date Plans Received:</b>	16/04/2015	<b>Date(s) of Amendment(s):</b>	24/06/2015
<b>Date Application Valid:</b>	20/04/2015		02/07/2015
			16/04/2015
			17/04/2015
			17/06/2015

**1. SUMMARY**

This application seeks full planning permission for the redevelopment of the site to provide 10,728sq metres of Class B1(c), B2 (General Industrial) and B8 (Storage and Distribution) floorspace with associated parking, servicing, access and landscaping.

No objections are raised to the principle of the redevelopment of this site within the Blyth Road and Printing House IBA for Class B1(c) and B2 (General Industrial) and B8 (Storage and Distribution) purposes. The proposal would present an acceptable appearance within the surrounding mainly industrial area and along Dawley Road, by maintaining and enhancing the existing landscape buffer along the site's frontage.

The scheme would not be harmful to the amenities of surrounding residential occupiers, would provide appropriate access and servicing arrangements, including improvements to the access roundabout junction on Dawley Road which would be controlled through a S106/S278 Agreement, together with other appropriate contributions.

The proposal is considered to comply with relevant UDP and London Plan policies and, accordingly, approval is recommended subject to the applicant entering into an agreement with the Council under Section 106/278 Agreement of the Town and Country Planning Act 1990 as amended and relevant conditions.

**2. RECOMMENDATION**

**That delegated powers be given to the Head of Planning and Enforcement to grant planning permission, subject to the following:**

**A) That the Council enter into a Section 106/S278/S38 Agreement or other appropriate legislation to secure:**

- 1. Access junction works to be completed before occupation.**
- 2. Travel Plan, to include a £20,000 bond.**
- 3. Construction Logistics Plan before start of construction.**
- 4. Refuse and delivery management scheme.**
- 5. Energy contribution of £82,800**
- 6. Construction Training: A financial contribution or delivery on site of a construction training scheme (to address training during the construction phase of the development).**
- 7. Air Quality: A financial contribution of £12,500 required for air quality monitoring made necessary by the development.**
- 8. Project Management and Monitoring Fee: in line with the SPD a contribution equal to 5% of the total cash contributions will be sought to enable the management and monitoring of the resulting agreement.**

**B) That the applicant meets the Council's reasonable costs in the preparation of the S106 Agreement and any abortive work as a result of the agreement not being completed.**

**C) That officers be authorised to negotiate and agree the detailed terms of the proposed agreement and conditions of approval.**

**D) That if any of the heads of terms set out above have not been agreed and the S106 legal agreement has not been finalised before the 31st July 2015, or any other period deemed appropriate that delegated authority be given to the Head of Planning and Enforcement to refuse the application for the following reason:**

**'The development has failed to secure obligations relating to highway improvements and transport, construction and employment training, air quality monitoring and project management. Accordingly, the proposal is contrary to policies R17, OE1, AM2 and AM7 of the Hillingdon Local Plan: Part Two Saved UDP Policies (November 2012), the Council's Planning Obligations SPD and Policy EM6 of the Hillingdon Local Plan: Part 1- Strategic Policies (Nov 2012) and Policy 5.12 of the London Plan (March 2015) and the NPPF.'**

**E) That subject to the above, the application be deferred for determination by the Head of Planning and Enforcement under delegated powers, subject to the completion of the legal agreement under Section 106 of the Town and Country Planning Act 1990 and other appropriate powers with the applicant.**

**F) That if the application is approved, the following conditions be attached:-**

**1            COM3            Time Limit**

**The development hereby permitted shall be begun before the expiration of three years from the date of this permission.**

REASON

To comply with Section 91 of the Town and Country Planning Act 1990.

**2 COM4 Accordance with Approved Plans**

The development hereby permitted shall not be carried out except in complete accordance with the details shown on the submitted plans, numbers:-

30034 PL 100, 30034-PL-101 B, 30034 PL 102, 30034 PL 103, 30034-PL-104 A, 30034-PL-106 A, 30034-PL-107 A, 30034 PL 108, 30034-PL-109 A, 30034 PL 110, 30034 PL 111, 30034 PL 112, 30034 PL 113, 30034 PL 114, 30034 PL 115, 30034 PL 116, 30034 PL-117, 30034-PL-119, 30034 PL 120, 30034 PL 121, 30034 PL 122, 30034 PL 120, 30034-PL-123, 30034-PL-124, 14038/4A, 14-075/300 Rev. P1, PM-1501-03 Rev. C and PM-1501-04 Rev. C and shall thereafter be retained/maintained for as long as the development remains in existence.

REASON

To ensure the development complies with the provisions Hillingdon Local Plan: Part Two Saved UDP Policies (November 2012) and the London Plan (2015).

**3 COM5 General compliance with supporting documentation**

The development hereby permitted shall not be occupied until the following has been completed in accordance with the specified supporting plans and/or documents:

Delivery Noise Mitigation [Delivery Noise Management Plan]

Reduction in energy use and renewable technology installation [Energy and Sustainability Statement]

Bird Hazard [Bird Hazard Management Plan]

Landscaping [Soft Landscaping Specification, March 2015]

Thereafter the development shall be retained/maintained and the use managed in accordance with these details for as long as the development remains in existence.

REASON

To ensure that the development complies with the objectives of Policies OE1 of the Hillingdon Local Plan: Part Two Saved UDP Policies (November 2012) and Policies %2 and 5.13 of the London Plan (March 2015).

**4 COM6 Levels**

No development shall take place until plans of the site showing the existing and proposed ground levels and the proposed finished floor levels of all proposed buildings have been submitted to and approved in writing by the Local Planning Authority. Such levels shall be shown in relation to a fixed and known datum point. Thereafter the development shall not be carried out other than in accordance with the approved details.

REASON

To ensure that the development relates satisfactorily to adjoining properties in accordance with policy BE13 Hillingdon Local Plan: Part Two Saved UDP Policies (November 2012)

**5 NONSC Noise rating**

The rating level of the noise emitted from the site shall be at equal to or below the typical background noise level. The noise levels shall be determined at the nearest residential

premises. The measurements and assessment shall be made in accordance with British Standard 4142:2014- Methods for rating and assessing industrial and commercial sound. Where night time operations are likely, the assessment should consider the impact of the operations at night time with residents' bedroom windows open.

#### REASON

To safeguard the amenity of the surrounding area in accordance with policy OE1 of the Hillingdon Local Plan: Part Two - Saved UDP Policies (November 2012).

### **6 COM26 Ecology**

Prior to the commencement of landscaping works, an ecological enhancement plan (based upon the Habitat Management Plan, March 2015 but also having regard to the control measures included within the Bird Hazard Management Plan, March 2015) shall be submitted to and approved in writing by the Local Planning Authority. The plan shall demonstrate the inclusion of specific habitat enhancement areas within the landscaping and also the enhancement measures to be included within the fabric of the building. The development shall proceed in accordance with the approved plan.

#### REASON

To ensure the protection and enhancement of the natural environment, in accordance with policy 7.19 of the London Plan (March 2015) and policy EC5 of the Hillingdon Local Plan: Part Two Saved UDP Policies (November 2012).

### **7 COM29 No floodlighting**

No floodlighting or other form of external lighting shall be installed unless it is in accordance with details which have previously been submitted to and approved in writing by the Local Planning Authority. Such details shall include location, height, type and direction of light sources, intensity of illumination and hours of use. Any lighting that is so installed shall not thereafter be altered other than for routine maintenance which does not change its details.

#### REASON

To safeguard the amenity of surrounding properties in accordance with policies BE13 and OE1 of the Hillingdon Local Plan: Part Two Saved UDP Policies (November 2012); and to protect the ecological value of the adjoining Grand Union Canal in accordance with Policies EC3 and BE32 of the Hillingdon Local Plan: Part Two Saved UDP Policies (November 2012).

### **8 COM30 Contaminated Land**

(i) If during development works, contamination not addressed in the submitted remediation scheme is identified, an updated watching brief shall be submitted and an addendum to the remediation scheme shall be agreed with the LPA prior to implementation; and

(ii) All works which form part of the remediation scheme shall be completed and a comprehensive verification report shall be submitted to the Council's Environmental Protection Unit before any part of the development is occupied or brought into use unless the LPA dispenses with any such requirement specifically and in writing.

(iii) No contaminated soils or other materials shall be imported to the site. All imported soils for landscaping purposes shall be clean and free of contamination. Before any part of the development is occupied, all imported soils shall be independently tested for chemical contamination, and the results of this testing shall be submitted and approved in writing by

the Local Planning Authority. All soils used for gardens and/or landscaping purposes shall be clean and free of contamination.

#### REASON

To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems and the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors in accordance with policy OE11 of the Hillingdon Local Plan: Part Two - Saved UDP) Policies (November 2012).

### **9 NONSC Gas mitigation**

Suitable gas protection measures, on the basis of the site investigations and best practice guidance such as CIRIA 665, shall be implemented at the new buildings to the satisfaction of the LPA.

#### REASON

To protect the new commercial buildings from elevated levels of gas found by monitoring during the site investigations carried out on site, in accordance with Policy OE11 of the Hillingdon Local Plan: Part Two - Saved UDP Policies (November 2012).

### **10 NONSC Secure by Design**

The building(s) shall achieve 'Secured by Design' accreditation awarded by the Hillingdon Metropolitan Police Crime Prevention Design Adviser (CPDA) on behalf of the Association of Chief Police Officers (ACPO). No building shall be occupied until accreditation has been achieved.

#### REASON

In pursuance of the Council's duty under section 17 of the Crime and Disorder Act 1998 to consider crime and disorder implications in exercising its planning functions; to promote the well being of the area in pursuance of the Council's powers under section 2 of the Local Government Act 2000, to reflect the guidance contained in the Council's SPG on Community Safety By Design and to ensure the development provides a safe and secure environment in accordance with Policies 7.1 and 7.3 of the London Plan (July 2011).

### **11 NONSC Sustainable Water Management**

Prior to commencement, a scheme for the provision of sustainable water management shall be submitted to, and approved in writing by the Local Planning Authority, in consultation with the Canal and River Trust. The scheme shall clearly demonstrate how it:

- a) Manages Surface Water. The scheme shall demonstrate ways of controlling the surface water on site, including any discharge to the canal.
  - i. following the strategy set out in Flood Risk Assessment and Surface Water Drainage Strategy, produced by Bradbrook Consultants dated 27 Jan 2015 rev P
  - ii. incorporates sustainable urban drainage in accordance with the hierarchy set out in Policy 5.15 of the London Plan. Where the proposal does not utilise the most sustainable solution, justification must be provided.
  - iii. provide information on all Suds features including the method employed to delay and control the water discharged from the site to Greenfield run off rates and:
    - a. calculations showing storm period and intensity and volume of storage required to control surface water and size of features to control that volume.
    - b. any overland flooding should be shown, with flow paths depths and velocities identified as well as any hazards, ( safe access and egress must be demonstrated).

- b) Foul water
  - i. The Scheme shall demonstrate capacity in the receiving foul sewer network or provides suitable upgrades agreed by Thames Water.
- c) Ground water
  - i. Where infiltration techniques (soakaway) or a basement are proposed a site investigation must be provided to establish the risk of groundwater flooding on the site, and to demonstrate the suitability of infiltration techniques proposed on the site. (This should be undertaken at the appropriate time of year as groundwater levels fluctuate).
- d) Minimise water use. The scheme shall also demonstrate the use of methods to minimise the use of potable water through water collection, reuse and recycling and will:
  - i. incorporate water saving measures and equipment.
  - ii. provide details of water collection facilities to capture excess rainwater;
  - iii. provide details of how rain and grey water will be recycled and reused in the development.
- e) Long Term Management and Maintenance of the drainage system.
  - i. Provide a management and maintenance plan for the lifetime of the development of arrangements to secure the operation of the scheme throughout its lifetime. Including appropriate details of Inspection regimes, appropriate performance specification, remediation and timescales for the resolving of issues. Where there is overland flooding proposed, the plan should include the appropriate actions to ensure the safety of the users of the site should that be required.
  - ii. Where the maintenance will not be the responsibility of an individual householder, the details of the body legally responsible for the implementation of the management and maintenance plan must be provided.

Thereafter the development shall be implemented and retained/maintained in accordance with these details for as long as the development remains in existence.

#### REASON

To ensure that surface water run off is controlled to ensure the development does not increase the risk of flooding contrary to Policy EM6 Flood Risk Management in Hillingdon Local Plan: Part 1- Strategic Policies (Nov 2012) Policy 5.12 Flood Risk Management of the London Plan (March 2015) and National Planning Policy Framework (March 2012) and the Planning Practice Guidance (March 2014). To be handled as close to its source as possible in compliance with Policy 5.13 Sustainable Drainage of the London Plan (July 2011), and conserve water supplies in accordance with Policy 5.15 Water use and supplies of the London Plan (March 2015).

#### **12 NONSC PV Panel scheme**

Prior to the above ground structural works a final roof plan showing the inclusion of the required PVs set out in the Energy Assessment shall be submitted to and approved in writing by the Local Planning Authority. The development must be completed in accordance with the approved roof plan.

#### REASON

To ensure the roof includes the necessary quantum of PVs to reach the CO2 reduction target set out in the London Plan (Policy 5.2).

#### **INFORMATIVES**

##### **1 I52 Compulsory Informative (1)**

The decision to GRANT planning permission has been taken having regard to all relevant

planning legislation, regulations, guidance, circulars and Council policies, including The Human Rights Act (1998) (HRA 1998) which makes it unlawful for the Council to act incompatibly with Convention rights, specifically Article 6 (right to a fair hearing); Article 8 (right to respect for private and family life); Article 1 of the First Protocol (protection of property) and Article 14 (prohibition of discrimination).

## 2 I53 Compulsory Informative (2)

The decision to GRANT planning permission has been taken having regard to the policies and proposals in the Hillingdon Unitary Development Plan Saved Policies (September 2007) as incorporated into the Hillingdon Local Plan (2012) set out below, including Supplementary Planning Guidance, and to all relevant material considerations, including the London Plan (2015) and national guidance.

NPPF1	NPPF - Delivering sustainable development
NPPF4	NPPF - Promoting sustainable transport
NPPF7	NPPF - Requiring good design
NPPF9	NPPF - Protecting Green Belt land
NPPF10	NPPF - Meeting challenge of climate change flooding coastal
NPPF11	NPPF - Conserving & enhancing the natural environment
LPP 2.7	(2015) Outer London: economy
LPP 2.8	(2015) Outer London: Transport
LPP 2.18	(2011) Green Infrastructure: the multi functional network of open and green spaces
LPP 4.1	(2015) Developing London's economy
LPP 4.3	(2015) Mixed use development and offices
LPP 4.4	(2015) Managing Industrial Land & Premises
LPP 4.12	(2015) Improving opportunities for all
LPP 5.1	(2015) Climate Change Mitigation
LPP 5.2	(2015) Minimising Carbon Dioxide Emissions
LPP 5.3	(2015) Sustainable design and construction
LPP 5.6	(2015) Decentralised Energy in Development Proposals
LPP 5.7	(2015) Renewable energy
LPP 5.9	(2015) Overheating and cooling
LPP 5.11	(2015) Green roofs and development site environs
LPP 5.12	(2015) Flood risk management
LPP 5.13	(2015) Sustainable drainage
LPP 5.14	(2015) Water quality and wastewater infrastructure
LPP 5.15	(2015) Water use and supplies
LPP 5.18	(2015) Construction, excavation and demolition waste
LPP 5.21	(2015) Contaminated land
LPP 6.3	(2015) Assessing effects of development on transport capacity
LPP 6.5	(2015) Funding Crossrail and other strategically important transport infrastructure
LPP 6.9	(2015) Cycling
LPP 6.10	(2015) Walking
LPP 6.12	(2015) Road Network Capacity
LPP 6.13	(2015) Parking
LPP 6.14	(2015) Freight
LPP 7.1	(2015) Lifetime Neighbourhoods
LPP 7.2	(2015) An inclusive environment
LPP 7.3	(2015) Designing out crime



LPP 7.4	(2015) Local character
LPP 7.6	(2015) Architecture
LPP 7.14	(2015) Improving air quality
LPP 7.15	(2015) Reducing noise and managing noise, improving and enhancing the acoustic environment and promoting appropriate soundscapes.
LPP 7.16	(2015) Green Belt
LPP 7.19	(2015) Biodiversity and access to nature
LPP 7.21	(2015) Trees and woodland
LPP 7.24	(2015) Blue Ribbon Network
LPP 7.25	(2015) Increasing the use of the Blue Ribbon Network for passenger and tourism
LPP 7.26	(2015) Increasing the use of the Blue Ribbon Network for freight transport
LPP 7.27	(2015) Blue Ribbon Network: supporting infrastructure and recreational use
LPP 7.30	(2015) London's canals and other rivers and waterspaces
OL5	Development proposals adjacent to the Green Belt
EC1	Protection of sites of special scientific interest, nature conservation importance and nature reserves Replaced by PT1.EM7 (2012)
EC2	Nature conservation considerations and ecological assessments
EC3	Potential effects of development on sites of nature conservation importance
EC5	Retention of ecological features and creation of new habitats
BE13	New development must harmonise with the existing street scene.
BE18	Design considerations - pedestrian security and safety
BE20	Daylight and sunlight considerations.
BE21	Siting, bulk and proximity of new buildings/extensions.
BE24	Requires new development to ensure adequate levels of privacy to neighbours.
BE25	Modernisation and improvement of industrial and business areas
BE32	Development proposals adjacent to or affecting the Grand Union Canal
BE38	Retention of topographical and landscape features and provision of new planting and landscaping in development proposals.
OE1	Protection of the character and amenities of surrounding properties and the local area
OE3	Buildings or uses likely to cause noise annoyance - mitigation measures
OE7	Development in areas likely to flooding - requirement for flood protection measures
OE8	Development likely to result in increased flood risk due to additional surface water run-off - requirement for attenuation measures
OE11	Development involving hazardous substances and contaminated land - requirement for ameliorative measures
LE1	Proposals for industry, warehousing and business development
LE2	Development in designated Industrial and Business Areas
LE3	Provision of small units in designated Industrial and Business Areas
LE7	Provision of planning benefits from industry, warehousing and business development

AM1	Developments which serve or draw upon more than a walking distance based catchment area - public transport accessibility and capacity considerations
AM2	Development proposals - assessment of traffic generation, impact on congestion and public transport availability and capacity
AM7	Consideration of traffic generated by proposed developments.
AM9	Provision of cycle routes, consideration of cyclists' needs in design of highway improvement schemes, provision of cycle parking facilities
AM14	New development and car parking standards.
AM15	Provision of reserved parking spaces for disabled persons
AM18	Developments adjoining the Grand Union Canal - securing facilities for canal borne freight
LDF-AH	Accessible Hillingdon , Local Development Framework, Supplementary Planning Document, adopted January 2010
SPD-NO	Noise Supplementary Planning Document, adopted April 2006
SPD-PO	Planning Obligations Supplementary Planning Document, adopted July 2008
SPG-AQ	Air Quality Supplementary Planning Guidance, adopted May 2002
SPG-CS	Community Safety by Design, Supplementary Planning Guidance, adopted July 2004

### **3            115            Control of Environmental Nuisance from Construction Work**

Nuisance from demolition and construction works is subject to control under The Control of Pollution Act 1974, the Clean Air Acts and other related legislation. In particular, you should ensure that the following are complied with:-

A. Demolition and construction works which are audible at the site boundary shall only be carried out between the hours of 08.00 and 18.00 hours Monday to Friday and between the hours of 08.00 hours and 13.00 hours on Saturday. No works shall be carried out on Sundays, Bank or Public Holidays.

B. All noise generated during such works shall be controlled in compliance with British Standard Code of Practice BS 5228:2009.

C. Dust emissions shall be controlled in compliance with the Mayor of London's Best Practice Guidance' The Control of dust and emissions from construction and demolition.

D. No bonfires that create dark smoke or nuisance to local residents.

You are advised to consult the Council's Environmental Protection Unit ([www.hillingdon.gov.uk/noise](http://www.hillingdon.gov.uk/noise) Tel. 01895 250155) or to seek prior approval under Section 61 of the Control of Pollution Act if you anticipate any difficulty in carrying out construction other than within the normal working hours set out in (A) above, and by means that would minimise disturbance to adjoining premises.

### **4            121            Street Naming and Numbering**

All proposed new street names must be notified to and approved by the Council. Building names and numbers, and proposed changes of street names must also be notified to the Council. For further information and advice, contact - The Street Naming and Numbering Officer, Planning & Community Services, 3 North Civic Centre, High Street, Uxbridge, UB8 1UW (Tel. 01895 250557).

## 5

The applicant is advised that any surface water discharge to the adjoining waterway will require prior consent from the Canal & River Trust. Please contact Nick Pogson from the Canal & River Trust utilities team ([nick.pogson@canalrivertrust.org.uk](mailto:nick.pogson@canalrivertrust.org.uk)).

## 6

Given the nature of the proposed development it is possible that a crane may be required during its construction. We would, therefore, draw the applicant's attention to the requirement within the British Standard Code of Practice for the safe use of Cranes, for crane operators to consult the aerodrome before erecting a crane in close proximity to an aerodrome. This is explained further in Advice Note 4, 'Cranes and Other Construction Issues' (available at <http://www.aoa.org.uk/policysafeguarding.htm>)

## 7

Induction loops should be specified to comply with BS 7594 and BS EN 60118-4, and a term contract planned for their maintenance.

## 8

Care must be taken to ensure that overspill and/or other interference from induction loops in different/adjacent areas does not occur.

## 9

Flashing beacons/strobe lights linked to the fire alarm should be carefully selected to ensure they remain within the technical thresholds not to adversely affect people with epilepsy.

## 10

In terms of condition 10, the Secure by Design Officer advises:-

Monitored Central Station alarm: The monitored security system should be equipped with a signal terminating at a recognised Alarm Receiving Centre (ARC), comply with the current version of the EN 50131-1 standard and be eligible for a "Level 1 status" police response as defined by the ACPO Policy on Police Response to Security Systems.

Consideration should be given to protecting the communication path between the alarm and the ARC should a landline be cut. E.g. dual communication.

Vehicle Access Doors:

Roller shutter vehicle access doors should be tested and certificated to LPS 1175 Security Rating 2 or equivalent (Minimum). If the Roller shutter vehicle access door is vulnerable to a 'ram-raid' attack it should be further protected by a security gate, barrier or bollard(s). All such products should be certified to BS PAS 68: 2007 'Specification for vehicle security barriers' or Sold Secure Gold.

Doors:

Doorsets offering pedestrian access to commercial units should be certified to LPS 1175 security rating 2 or equivalent (minimum). All glazing in and adjacent to doors shall include one pane of laminated glass to a minimum thickness of 7.5mm and securely fixed in accordance with the manufacturers specifications.

Windows:

Window apertures should be protected by a shutter, grille or certified secure window, or combination thereof. Any one of which shall have been successfully tested and certificated to the Loss Prevention Certification Board Standard LPS 1175 Security Rating 2 or equivalent (minimum).

(If this is not the case then Ground floor windows and those easily accessible above ground floor, must be Certificated (BSI Kitemark or similar) to PAS 24: 2012 or Loss Prevention Certification Board standard LPS 1175 Security Rating 1 and include one pane of laminated glass to a minimum thickness of 7.5mm.)

#### Graffiti

Exposed areas of commercial buildings would benefit from graffiti coating, I suggest consultation with LBE enviro-crime unit as to type used. This enables graffiti to be easily and, importantly, quickly removed to deter further attacks.

#### Smoke Generating Device

If premises include the storage of high value / desirable items then consideration should be given incorporating an artificial smoke generating device into the intruder alarm system.

#### Secure Storage

Consider creating a secure storage area inside the premises to provide a delay before intruders can reach their target. This assists the Intruder alarm / Smoke generating device in providing a suitable deterrent or reduces the amount of loss before they feel pressured into leaving.

#### 11

This permission is liable for a contribution under the Community Infrastructure Levy (CIL) and a separate CIL liability notice will be provided for your consideration.

### **3. CONSIDERATIONS**

#### **3.1 Site and Locality**

The site has an area of approximately 2.6ha and is located on the eastern side of Dawley Road (a London Distributor Road), opposite Swallowfield Way.

The site was formally used by EMI, before part of the site was redeveloped to provide office and research accommodation for Scipher.

To the north, the site backs onto a retained EMI archive building (outside the application site) and the Grand Union Canal. The opposite side of the canal is designated as Green Belt, and part of this area forms the Lake Farm Country Park, a Borough Grade 1 Site of Importance for Nature Conservation.

On the opposite side of Dawley Road, midway along the length of the site, there is a row of six residential properties with the Industrial and Business Area. To the north of these residential properties is a three-storey factory building, and to the south are two two-storey factory buildings. To the east of the site is a large scale storage building which has a 150m frontage to Blyth Road and a two-storey office building on Clayton Road.

At the time of the original application, the site comprised two office buildings, the octagonal

two storey CRL building and the predominantly one and part two storey Mermaid building which is made up of a series of interlinked octagonal units. These buildings have since been demolished. The buildings were previously used for light industrial, research and development and associated office uses. The area where the buildings were located is currently used as a car park.

The site and surrounding area is designated as an Industrial and Business Area (IBA) in the UDP. The surrounding large scale office, industrial and warehousing development reflects this designation.

### **3.2 Proposed Scheme**

Full planning permission is sought for a total of six employment units on the site, accommodated within five detached modern industrial buildings of varying size and bulk, with a total gross external floorspace of 11,338sq.m.

The proposed area schedule is as follows:

Unit 1 - 270sq.m  
Unit 2 - 581sq.m  
Unit 3 - 2,305sq.m  
Unit 4 - 2,636sq.m  
Unit 5 - 1,275sq.m  
Unit 6 - 4,271sq.m

The smaller units tend to be sited towards the front of the site, adjoining Dawley Road with the larger units sited towards the rear, adjoining the site's north eastern and south eastern boundaries.

Units 1 and 2 would align with and be set back from Dawley Road at the northern end of the site either side of the access road, units 5 and 6 would be angled to the road frontage at the southern end of the site and units 3 and 4 would occupy a single block towards the rear of the site at 90 degrees to units 5 and 6.

Given the speculative nature of the proposal a flexible planning permission, in terms of land use, is sought to ensure that the units can be marketed to the widest possible market. Specifically, the ability to occupy any of the units within use classes B1(c) (Business), B2 (General Industrial) and B8 (Storage and Distribution) is sought.

All the units, (with the exception of unit 1), incorporate a first floor mezzanine for ancillary office space (and as such, this floorspace will not fall into use Class B1(a)).

The buildings would incorporate shallow pitched roofs, largely concealed behind parapet walls on all the building elevations to give the impression of flat roofed structures. The height of the buildings to the top of the parapet walls would range from 8.7m on the smaller units to 12.6m on the larger units. The buildings would have a modern industrial design, with glazing to the ancillary mezzanine office elements with the elevations using contrasting grey coloured profiled and plain cladding, with a green coloured horizontal highlight band some two thirds up the building elevations.

Pedestrian and vehicular access will be obtained from the existing access to the site at the roundabout at the junction of Dawley Road and Swallowfield Way. Pedestrian access will

also be provided to Clayton Road. Inside the site, a central spine access road will feed into the units, which will all have their own dedicated parking and service areas.

Overall, the development will accommodate 114 parking spaces, of which 13 would be disabled spaces and 35 would provide electric vehicle charging. In addition, 4 motorcycle spaces and cycle parking spaces in accordance with relevant standards would be provided

### **3.3 Relevant Planning History**

#### **Comment on Relevant Planning History**

Full planning permission was granted for redevelopment of the site in 2005 (ref: 8294/APP/2005/952) for "The redevelopment of the site to provide Class B1(b) and B1(c) (business) and B8 (Storage and Distribution) uses including some trade counter uses with associated parking, servicing, access and landscaping", and subsequently extended on 30 March 2012 (planning permission ref: 8294/APP/2010/867) for a further 3 years.

The total gross external floorspace of the above proposal was 11,088sq.m, broadly similar to that proposed within this application.

The above permissions were not implemented, albeit the permissions confirm that the proposal is acceptable, in principle, relative to the proposed land uses and the broad quantum of floorspace.

## **4. Planning Policies and Standards**

### **UDP / LDF Designation and London Plan**

The following UDP Policies are considered relevant to the application:-

Part 1 Policies:

- PT1.E1 (2012) Managing the Supply of Employment Land
- PT1.E7 (2012) Raising Skills
- PT1.BE1 (2012) Built Environment
- PT1.EM1 (2012) Climate Change Adaptation and Mitigation
- PT1.EM2 (2012) Green Belt, Metropolitan Open Land and Green Chains
- PT1.EM3 (2012) Blue Ribbon Network
- PT1.EM6 (2012) Flood Risk Management
- PT1.EM7 (2012) Biodiversity and Geological Conservation
- PT1.EM8 (2012) Land, Water, Air and Noise
- PT1.CI1 (2012) Community Infrastructure Provision

Part 2 Policies:

- NPPF1 NPPF - Delivering sustainable development
- NPPF4 NPPF - Promoting sustainable transport

NPPF7	NPPF - Requiring good design
NPPF9	NPPF - Protecting Green Belt land
NPPF10	NPPF - Meeting challenge of climate change flooding coastal
NPPF11	NPPF - Conserving & enhancing the natural environment
LPP 2.7	(2015) Outer London: economy
LPP 2.8	(2015) Outer London: Transport
LPP 2.18	(2011) Green Infrastructure: the multi functional network of open and green spaces
LPP 4.1	(2015) Developing London's economy
LPP 4.3	(2015) Mixed use development and offices
LPP 4.4	(2015) Managing Industrial Land & Premises
LPP 4.12	(2015) Improving opportunities for all
LPP 5.1	(2015) Climate Change Mitigation
LPP 5.2	(2015) Minimising Carbon Dioxide Emissions
LPP 5.3	(2015) Sustainable design and construction
LPP 5.6	(2015) Decentralised Energy in Development Proposals
LPP 5.7	(2015) Renewable energy
LPP 5.9	(2015) Overheating and cooling
LPP 5.11	(2015) Green roofs and development site environs
LPP 5.12	(2015) Flood risk management
LPP 5.13	(2015) Sustainable drainage
LPP 5.14	(2015) Water quality and wastewater infrastructure
LPP 5.15	(2015) Water use and supplies
LPP 5.18	(2015) Construction, excavation and demolition waste
LPP 5.21	(2015) Contaminated land
LPP 6.3	(2015) Assessing effects of development on transport capacity
LPP 6.5	(2015) Funding Crossrail and other strategically important transport infrastructure
LPP 6.9	(2015) Cycling
LPP 6.10	(2015) Walking
LPP 6.12	(2015) Road Network Capacity
LPP 6.13	(2015) Parking
LPP 6.14	(2015) Freight
LPP 7.1	(2015) Lifetime Neighbourhoods
LPP 7.2	(2015) An inclusive environment
LPP 7.3	(2015) Designing out crime
LPP 7.4	(2015) Local character
LPP 7.6	(2015) Architecture
LPP 7.14	(2015) Improving air quality
LPP 7.15	(2015) Reducing noise and managing noise, improving and enhancing the acoustic environment and promoting appropriate soundscapes.

LPP 7.16	(2015) Green Belt
LPP 7.19	(2015) Biodiversity and access to nature
LPP 7.21	(2015) Trees and woodland
LPP 7.24	(2015) Blue Ribbon Network
LPP 7.25	(2015) Increasing the use of the Blue Ribbon Network for passengers and tourism
LPP 7.26	(2015) Increasing the use of the Blue Ribbon Network for freight transport
LPP 7.27	(2015) Blue Ribbon Network: supporting infrastructure and recreational use
LPP 7.30	(2015) London's canals and other rivers and waterspaces
OL5	Development proposals adjacent to the Green Belt
EC1	Protection of sites of special scientific interest, nature conservation importance and nature reserves Replaced by PT1.EM7 (2012)
EC2	Nature conservation considerations and ecological assessments
EC3	Potential effects of development on sites of nature conservation importance
EC5	Retention of ecological features and creation of new habitats
BE13	New development must harmonise with the existing street scene.
BE18	Design considerations - pedestrian security and safety
BE20	Daylight and sunlight considerations.
BE21	Siting, bulk and proximity of new buildings/extensions.
BE24	Requires new development to ensure adequate levels of privacy to neighbours.
BE25	Modernisation and improvement of industrial and business areas
BE32	Development proposals adjacent to or affecting the Grand Union Canal
BE38	Retention of topographical and landscape features and provision of new planting and landscaping in development proposals.
OE1	Protection of the character and amenities of surrounding properties and the local area
OE3	Buildings or uses likely to cause noise annoyance - mitigation measures
OE7	Development in areas likely to flooding - requirement for flood protection measures
OE8	Development likely to result in increased flood risk due to additional surface water run-off - requirement for attenuation measures
OE11	Development involving hazardous substances and contaminated land - requiremer for ameliorative measures
LE1	Proposals for industry, warehousing and business development
LE2	Development in designated Industrial and Business Areas
LE3	Provision of small units in designated Industrial and Business Areas
LE7	Provision of planning benefits from industry, warehousing and business development
AM1	Developments which serve or draw upon more than a walking distance based catchment area - public transport accessibility and capacity considerations
AM2	Development proposals - assessment of traffic generation, impact on congestion and public transport availability and capacity



AM7	Consideration of traffic generated by proposed developments.
AM9	Provision of cycle routes, consideration of cyclists' needs in design of highway improvement schemes, provision of cycle parking facilities
AM14	New development and car parking standards.
AM15	Provision of reserved parking spaces for disabled persons
AM18	Developments adjoining the Grand Union Canal - securing facilities for canal borne freight
LDF-AH	Accessible Hillingdon , Local Development Framework, Supplementary Planning Document, adopted January 2010
SPD-NO	Noise Supplementary Planning Document, adopted April 2006
SPD-PO	Planning Obligations Supplementary Planning Document, adopted July 2008
SPG-AQ	Air Quality Supplementary Planning Guidance, adopted May 2002
SPG-CS	Community Safety by Design, Supplementary Planning Guidance, adopted July 2004

## 5. Advertisement and Site Notice

5.1 Advertisement Expiry Date:- **20th May 2015**

5.2 Site Notice Expiry Date:- Not applicable

## 6. Consultations

### External Consultees

38 neighbouring residential and commercial properties have been consulted on the proposals and the application has been advertised in the local press on 6/5/15. No comments have been received.

#### GLAAS:

Although we were not formally consulted on this application, we have seen the assessment and confirm that it is a very thorough and informative report that complies with relevant standards and guidance. Having reviewed the assessment, I concur that archaeological survival within the site is likely to have been heavily compromised by 19th century quarrying and subsequent building phases and that any archaeological remains will be extremely fragmentary. I am therefore happy to recommend the assessment for approval and that no further archaeological works will be required.

#### BAA SAFEGUARDING:

Thank you for sending me the Bird Hazard Management Plan. I have reviewed the BHMP against safeguarding criteria and can confirm that this meets our requirements for the management of the roof structure/s. I can therefore amend my original response dated 28th April 2015 and supersede it with the following response.

We have now assessed the application against safeguarding criteria and can confirm that we have no safeguarding objections to the proposed development. However, we would like to make the following observation:

#### Cranes

Given the nature of the proposed development it is possible that a crane may be required during its construction. We would, therefore, draw the applicant's attention to the requirement within the British

Standard Code of Practice for the safe use of Cranes, for crane operators to consult the aerodrome before erecting a crane in close proximity to an aerodrome. This is explained further in Advice Note 4, 'Cranes and Other Construction Issues' (available at <http://www.aoa.org.uk/policysafeguarding.htm>)

#### CANALS & RIVER TRUST:

After due consideration of the application details, the Canal & River Trust has no objection to the proposed development, subject to the imposition of suitably worded condition.

#### Surface Water

The Trust notes that the applicant intends to discharge surface water to the canal. There is currently no agreement or licence currently in place for this. The Trust requests that the following condition is placed upon the planning permission:

Details of the proposed surface water run-off and ground water discharge to the canal shall be submitted to and agreed in writing by the Local Planning Authority in consultation with the Canal & River Trust prior to the commencement of development, and thereafter implemented in accordance with the agreed details unless otherwise agreed in writing.

Reason: To determine the potential for pollution of the waterway and likely volume of water. Potential contamination of the waterway and ground water from wind blow, seepage or spillage at the site, and high volumes of water should be avoided to safeguard the waterway environment and integrity of the waterway infrastructure.

If the Council is minded to grant planning permission, it is requested that the following informative is attached to the decision notice:

The applicant is advised that surface water discharge to the waterway will require prior consent from the Canal & River Trust. Please contact Nick Pogson from the Canal & River Trust utilities team ([nick.pogson@canalrivertrust.org.uk](mailto:nick.pogson@canalrivertrust.org.uk)).

In addition, in order for the Canal & River Trust to effectively monitor our role as a statutory consultee, please send me a copy of the decision notice and the requirements of any planning obligation.

#### INLAND WATERWAYS ASSOCIATION (MIDDLESEX BRANCH):

We have no particular objection to this application but we would wish to ensure that the existing soft landscaping on the narrow strip of land between the service yard of Unit 1 and the canal is retained or enhanced. This land would appear to be outside the application site boundary but it is not clear whether the construction of the development will impact on the canal side landscaping.

#### **Internal Consultees**

##### HIGHWAY ENGINEER:

##### Site and Transport Network

The site is located to the east of the A437 Dawley Road with access off the existing Dawley Road / Swallowfield Way roundabout. The site is bounded to the west by Dawley Road, to the south-west by Blyth Road and to the south-east by the existing employment / industrial development on Clayton Road and to the north-east by the existing EMI archive site.

In terms of the road network in proximity to the site, to the west is Dawley Road, which is a Classified Road (A437) and is also designated as a Borough Main Distributor Road within the Hillingdon Local Plan Part-2. It is a 7.3m wide single carriageway with a 30mph speed limit and has footpaths on both

sides.

The site has a PTAL rating of 2 (poor), which is estimated to increase to 3 (good) in future once the Crossrail route is in operation.

#### Traffic Impact

Three junctions in the vicinity of the site were subject to detailed capacity analysis.

- a. A447 Dawley Road / Swallowfield Way / Site Access roundabout.
- b. A437 Dawley Road / Blythe Road / Betam Road/ Kestrel Way roundabout.
- c. A437 Dawley Road / A437 North Hyde Road/ Bourne Avenue / Millington Road roundabout.

The transport assessment included allowance for traffic generation from committed development in the wider area and for traffic growth to 2021 before adding the traffic generation (worst case) from the current proposals as follows:

Time period:	Arrival	Departure	Two Way
AM PEAK	48	9	57
PM PEAK	17	48	65

The results of traffic modelling indicate that the performance of the Dawley Road / site access junction will be significantly improved (ie. experience reduced delays and queuing from that which would otherwise be experienced with the just the committed developments), following the implementation of proposed development and junction improvements. With the improved access junction operating at capacity rather than over-capacity, the impact of the proposed development has been mitigated albeit that some congestion will continue to be experienced at peak periods.

The other two junctions listed above are subject to improvements proposed as part of the approved development at The Old Vinyl Factory, off Blythe Road, Hayes. However, the transport assessment for the current proposal has identified minor modifications that could further improve performance of the Dawley Road / North Hyde Road / Bourne Avenue / Millington Road roundabout.

Notwithstanding the above, in future the A437 Dawley Road will experience an increase in congestion over current conditions due to the cumulative impact of developments in the area.

#### Accident Analysis

An analysis of the recorded road accidents over a period of 5 years to end of 2013 indicated there were a total of 7 slight PIAs in the study area. This analysis did not identify any specific location where there was a particularly high incident of accidents.

#### Parking

The proposed car parking provision is 115 spaces including 13 disabled spaces. A total of 20% active and 10% passive electric vehicle charging points are proposed, which is considered in line with London Plan 2015 requirements.

Provision for cycle parking spaces is presently based on use of B8 standards (1/250sqm), with a commitment to increase provision upto B1(c) / B2 use standards (1/75sqm) to reflect actual mix of future use / occupiers of the units. The proposed cycle parking provision is considered acceptable.

Motorcycle parking proposed in line with Hillingdon's Local Plan part 2 motorcycle parking should be provided at the rate of 1 space per 20 car parking spaces.

#### Access and Layout

The site will be served by an improved existing roundabout at Dawley Road / Swallowfield Way. The improvements include widening of the site access road approach, provision of pedestrian refuge island and realignment of Dawley Road. These proposals are considered acceptable subject to safety audits prior to implementation. The new pedestrian island and the adjacent footways will be dedicated as highway via a s106 agreement.

Vehicular swept path have demonstrated large articulated goods vehicles can satisfactorily enter and exit the service yards and site in forward gear.

#### Construction Traffic

In case of any permission, a Construction Logistics Plan can be secured by way of a planning condition or s106 agreement. This should include (but not limited to):

- Construction traffic generation by development;
- Access routes;
- Contractor parking;
- Deliveries to avoid highway network peak hours and traffic sensitive hours;
- Construction staff travel plan
- Measures to manage localised temporary traffic management priorities.

#### Travel Plan

The Council's travel plan officer should be consulted to comment on the travel plan. A full travel plan to take account of any necessary adjustments can be secured and maintained through a planning condition and/or s106 agreement as appropriate.

#### Conditions and S106 Obligations

The highways/transport obligations listed below should be covered within the S106 agreement:-

1. Access junction works to be completed before occupation.
2. Travel Plan.
3. Construction Logistics Plan before start of construction.
4. Refuse and delivery management scheme.

A condition restricting any increase of car parking on site (including within the units). This is required to prevent the adverse traffic impacts of additional traffic movements on the performance of the highway network.

There are no highway objections to the proposed development.

TREE/ LANDSCAPING OFFICER:

INITIAL COMMENTS:

Site description:

- The site is located approximately 1Km west of Hayes Town Centre, between the Old Vinyl Factory complex and Lake Farm Country Park.
- The main access to the 2.6 hectare site is from Dawley Road which defines the south-west boundary.
- The Grand Union Canal defines part of the north-east boundary, with two canalside buildings (formerly EMI) remaining along part of this edge.
- Part of the east boundary can be accessed from the end of Clayton Road, although this access has been unused for some years.
- Roughly triangular in shape, the Dawley Road boundary is defined by an elaborate line of railings

set in panels between brick piers and a brick wall, which was built in the 1990's.

- On the inside of this boundary there is a screen of mixed trees and shrubs within a raised planting bed supported by an inner retaining wall.
- A mature conifer hedge along the eastern boundary was recently removed, together with other trees and shrubs, as part of the site clearance work associated with the removal of the former Thorn EMI office complex.
- The cleared site is generally level, other than the ramped vehicular access up to the Dawley Road, which is some 1.5metres higher than the site.

Landscape Planning designations:

- There are no Tree Preservation Orders and no Conservation Area designations affecting the site.

Landscape constraints / opportunities:

- The existing planting and raised bed along the Dawley Road is a significant landscape feature, albeit in need of some management and restoration.
- The importance of this vegetation screen and the need to retain and enhance it was acknowledged in pre-application discussions.

Proposal:

The proposal is to redevelop 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.

Landscape Considerations:

Saved policy BE38 seeks the retention and utilisation of topographical and landscape features of merit and the provision of new planting and landscaping wherever it is appropriate.

- No more trees or other landscape features of merit will be affected by the proposal. - As noted a valuable evergreen screen of conifers was removed prior to the tree survey.
- The Design & Access Statement, by Michael Sparks Associates confirms (2.6) that the planted green buffer along the Dawley Road will be retained, managed and restored / refreshed with additional planting of trees and ground cover.
- Within the site and on the other boundaries the scope for landscape enhancement is limited due to the density of the built development and the need for associated parking and manoeuvring space.
- An extended Phase 1 Ecological Appraisal by Environ has been submitted.
- The ecological report notes that the Grand Union Canal is a Site of Metropolitan Importance (MSINC). Slightly further away, other designated sites include, Lake Farm Country Park, Bolingbroke Way sunken pasture and Stockley Park Business park lakes and meadows.
- The survey confirms (chapter 6) that the site is of limited nature conservation value.
- In line with national and local policies, the report notes opportunities to enhance the biodiversity through appropriate landscaping, the avoidance of light pollution and the introduction of bird and bat boxes. This should be conditioned.
- A Tree Survey has been prepared Ian Keen, document reference JTK/8721/so, dated February 2015.
- The survey assesses the condition and value of the 33No. trees which were left on site following the site clearance.
- There are no 'A' grade (good condition and value) trees, but there are 12No. 'B' grade (fair) trees: Birch T6, T7, T12, T13, T17, Norway Maple T15, T25, Red Oak T24, T27, T32, Ash T21 and Cherry T30 - whose quality and value merits retention / safeguarding.
- There are two 'U' grade trees: Beech T9 and Crab apple T20, whose poor condition justifies removal.
- The remaining trees are 'C' grade. These trees may collectively have a greater landscape

contribution than their grade implies and should be retained if possible. If they are to be removed they should be replaced.

- According to the Tree Protection Plan, 8No. trees will be removed including one grade B tree and one of the U grade trees.

- It is not understood why the other U grade tree (T20) is being retained given the opportunity to refresh and upgrade the planting stock. In other respects there is no objection to the tree strategy.

- Landscape Plans, ref. PM-1501-03 Rev A and 04 Rev A, by Pauline May show the proposed planting along the Dawley Road boundary.

- 7No. new / replacement trees are indicated on plan but only 6No. appear on the schedule. Additional tree planting is required to fill gaps and mitigate the loss of significant vegetation across the site.

- The boundary planting features large blocks of new ground cover (shrub) planting. Much of this is very low growing and will have little visual impact or screening capacity. - The planting plan should incorporate some taller growing shrubs / hedges.

- The planting proposals are supported by a Soft Landscape Specification, and a Management Strategy and Maintenance Plan, which sets out the management objectives and operations and makes provision for the replacement of any plants which fail.

- Michael Sparks drawing No. 30034-PL-120, Site Boundary Conditions, clearly shows the existing / proposed boundary treatments. The Dawley Road boundary will be retained and an old / disused entrance blocked off with matching materials. New fencing is specified as Paladin welded mesh panels, illustrated in green. Either green or black (visually recessive) will be acceptable.

- A Bird Hazard Management Plan, by Environ, has been submitted which includes a number of design / management proposals and a licence from Natural England to kill (or take) specific wild birds to preserve air safety.

- A Habitat Management Plan, by Environ, details the objectives and specific measures to enhance biodiversity on the site. (Some of the objectives are incompatible with the Bird Hazard Management Plan.)

- If the application is recommended for approval, landscape conditions should be imposed to ensure that the proposals preserve and enhance the character and local distinctiveness of the surrounding natural and built environment.

#### Recommendations:

This application has been subject to a pre-application meeting and the proposed tree retention and landscape proposals only partly reflects the outcome of the landscape discussions.

No objection, subject to the above observations and COM9 (part 1).

#### COMMENTS ON AMENDED PLANS:

Further to the submission of Pauline May's amended drawing Nos. PM\_1501\_03 Rev B and 04 Rev B, (amended 16/06/2015) I confirm that additional planting has been incorporated into the scheme, in response to my comments of 4th June (see below). The landscape proposals are now acceptable.

#### ENVIRONMENTAL PROTECTION OFFICER (NOISE):

I refer to the above application for redevelopment of the site to provide 10,728sqm of class B1(b) and B2 (general Industrial) and B8 (Storage and Distribution) floorspace with associated parking, servicing, access and landscaping.

My comment on noise issues are given below. I have considered the acoustic planning report prepared by WSP dated 17 April 2015.

#### Industrial units noise

The noise assessment was carried out as per the British Standard 4142: 2014, however as the industrial units are not yet operating, details of specific sound level is not available. However, a range

of activities could be carried out including:

- vehicle movements at the yards outside the proposed buildings, including loading / unloading;
- fixed mechanical plants;
- vehicles entering / exiting the staff car parks

Both long and short term noise measurements were undertaken. Table 5 shows the typical background sound levels at the nearest residential properties (1-6 UK Cottages and 18 Orchard Cottages) and table 8 states the rating level limits for sound of an industrial nature. The rating level following any correction for the characteristic features of the sound is then compared with the background sound level. According to BS4142, if the rating level is +10 above background level then there is likely to be an indication of significant adverse impact, a +5dB above is adverse impact and where the rating level does not exceed the background level then this is indication of specific source having a low impact. In making an assessment the site context needs to be taken into account i.e. is it in a mainly residential/industrial area, next to a busy road etc..

The proposed rating levels in table 8 are equal to background levels in table 5, however, these are not the corrected levels for any acoustic features such as tonality or impulsivity as stated in paragraph 6.2.6 of the report. According to this para a 5dB correction could apply to the rating levels in table 8 which would mean the rating level could be +5B above background levels and therefore according to BS4142 an indication of adverse impact.

I have no objection to the corrected rating level being equal to the background level in the context of this site being in a mainly industrial site, although I would recommend the rating level should be below the background level. As such I recommend the following condition:

Condition

The rating level of the noise emitted from the site shall be at equal to or below the typical background noise level. The noise levels shall be determined at the nearest residential premises. The measurements and assessment shall be made in accordance with British Standard 4142:2014- Methods for rating and assessing industrial and commercial sound. Where night time operations are likely, the assessment should consider impact of the operations at night time with residents' bedroom windows open.

REASON

To safeguard the amenity of the surrounding area in accordance with policy OE1 of the Hillingdon Unitary Development Plan.

In addition I recommend the following condition to minimise delivery noise:

Condition - Delivery management plan

The development shall not begin until a delivery management plan which specifies the provisions to be made for the control of noise from delivery, loading and unloading activities at the industrial units has been submitted to and approved in writing by the Local Planning Authority. The delivery management plan shall include such combination of physical, administrative and other measures as may be approved by the Local Planning Authority. Thereafter, the scheme shall be implemented and maintained in full compliance with the approved measures.

REASON

To safeguard the amenity of the surrounding area in accordance with policy OE1 of the Hillingdon Unitary Development Plan.

#### Road traffic noise

A road traffic noise assessment was not carried out as part of this report. A full assessment should be undertaken to determine the impact of any change in road traffic noise at nearby residential premises.

#### Construction noise

In order to control environmental problems during demolition and construction, I recommend use of the following informative.

#### Informative - construction

Nuisance from demolition and construction work is subject to control under the Control of Pollution Act 1974, the Clean Air Act 1993 and the Environmental Protection Act 1990. You should ensure that the following are complied with:

- (i) Demolition and construction works should only be carried out between the hours of 0800 and 1800 on Monday to Friday and between the hours of 0800 and 1300 on Saturday. No works should be carried out on Sundays, Public or Bank Holidays;
- (ii) All noise generated during such works should be controlled in compliance with British Standard 5228, and use "best practicable means" as defined in section 72 of the Control of Pollution Act 1974;
- (iii) Measures should be taken to eliminate the release of dust, odours and other emissions caused by the works that may create a public health nuisance. Guidance on control measures is given in "The control of dust and emissions from construction and demolition: best practice guidelines", Greater London Authority, November 2006; and
- (iv) No bonfires that create dark smoke or cause nuisance to local residents should be allowed at any time.

You are advised to consult the Council's Environmental Protection Unit to seek prior approval under Section 61 of the Control of Pollution Act 1974 if you anticipate any difficulty in carrying out the works other than within the normal working hours set out above. For further information and advice, contact the Environmental Protection Unit, 3S/02 Civic Centre, High Street, Uxbridge, Middlesex UB8 1UW (tel. 01895 250155).

Provided the conditions and informatives as above are applied, I have no objection to the proposal on noise grounds.

#### FURTHER COMMENTS:

The delivery management plan was developed in discussion with EPU and I have no further comments/observations.

#### ENVIRONMENTAL PROTECTION OFFICER (CONTAMINATED LAND):

##### Initial comments:

The site has been subject to a number of investigations for contamination in the past by different consultants, particularly Waterman Environmental and QDS Environmental. The work has been updated by Environ who have investigated more land on the site and provided reports based on their work and earlier reports.

The first report is an updated desk study (Phase 1). This draws together the work by other consultants on the site and assesses the potential pollutant pathways from the past use as a gramophone factory and brick field. The site has a potential for contamination in the soil and ground water. In the past there was also a turpentine factory either on site or at the border to the site. The Phase 1 is comprehensive and provided the basis for the Phase II investigation of the identified issues which included solvents and gas as well as soil and water contamination.



The supplementary investigation has assessed the soil contamination, gas and vapour issues and controlled waters contamination in sufficient detail. Some hydrocarbon smearing perhaps diesel was found in the soils. Chlorinated Solvents (Acronyms PCE, TCE and VC) were found in the south eastern part of the site. The risk from solvent vapour was assessed and some compounds would be a risk for residential properties if built at the site. There would be exceedances of target levels for a residential use. However since this is a commercial development the risk is not thought significant. It was also concluded by Environ there was also no risk to the off site residential housing. Other contaminants in soil do not seem to have been exceeded for a commercial use. Gas has also been assessed and the conclusions in the reports were that a membrane on top of the solid slab to CIRIA Characteristic 2 protection standards is required. A 1200 gauge is proposed by Environ at present. Gas may be due to the breakdown of the solvents in the groundwater as well as made ground gas.

Controlled waters have been assessed for this development by Environ in their Phase II report. The conclusions are that remediation is not required as the solvent contamination is contained within the south east part of the site. It is indicated that the containment by a clay depression will stop any migration to the aquifer. This is really a matter for the Environment Agency to assess and agree with Environ and I do not think they have commented yet.

Some informal discussions with the EPU were carried out by Environ after the Phase 2 report was written. These mainly centred on gas and vapour risks. In the Phase 2 Environ carried out supplementary gas and vapour monitoring. A letter was sent to the EPU and the assessment seemed comprehensive. The letter is attached below, and should be submitted formally to the planning officer. The letter concludes that the basic gas protection by a gas membrane on the slab is required but there is no risk to indoor air from vapours. No enhanced protection from vapours is proposed after the Environ assessment.

I would conclude that the information submitted is sufficient to support the application and that the reports are comprehensive for the Phase 1 Desk study and Phase 2 Supplementary Site Investigation. I think remediation will be required on landscaping and some further contamination in the old industrial ground is always possible. Therefore our land contamination condition must be attached. Parts a and b would be complied with using the desk study and investigations to date. I would also attach a gas condition to ensure the Characteristic 2 measures are employed as proposed (solid slab plus 1200 gauge membrane currently) as indicated vapour is not taken into account in the protection measures.

Further comments:

I refer to your e mail of 2 July 2015 and my previous consultation e mail to Matt Kolaszewski dated 29 May 2015. The e mail was prior to the letter of 17 June from Environ, environmental consultants to the developer. I can comment as below.

Environ continued the work previously carried out at the site by two other consultants. Environ have carried out a preliminary desk study followed by a Phase 2 Site Investigation dated June 2014. The main report is the Supplementary Phase 2 Site investigation dated December 2014. Separate letters were sent to the EPU on 11 March 2014 (regarding vapour and gas protection) and the aforementioned letter dated 17 June (outlining the measures at the site to be undertaken to make the site suitable for use but confirming there is no stand alone remediation strategy necessary). One report is missing, the Phase 2 report that is incorporated into the Supplementary Phase 2, could we have this to complete the Environ reports on the website for the site. I have attached the letter of 11 March 2015 which is not on the website.

It would appear from Environ's recent letter, investigations and risk assessment that remediation is not

required of the contamination on human health grounds for this commercial use. The levels found would require remediation for a residential use especially with respect to volatiles, but fall below the target levels for a commercial use.

After reviewing the reports it would appear that Environ have completed sufficient site investigatory work upon which to base their human health risk assessment in the Phase 2 Supplementary Report (December 2014). However I do not discount the possibility of unknown contamination as the site is industrial and covers a significant area.

I would not object to the pre commencement part of the condition (parts (i) a, b and c) being left out up to the unknown contamination. The verification part should also be kept. Therefore Condition (ii) (unknown), Condition (iii) (Verification) and Condition (iv) (imported soil tests) should all be retained. If necessary you could add an informative clarifying the verification condition (iii) and what is required to comply in the verification letter or report. This would basically be 'On completion of the development the verification report should include the details of any unknown contamination if found during the site works and verification of the remediation of the affected soil, water or other materials, gas protection details on the buildings, and the testing of imported soils and other materials'. This is confirmed in the letter of 17 June to which you could refer. The recommended gas condition should be retained to confirm that the membrane above the slab has been installed.

As regards the Environment Agency Environ did contact them in January 2015 and I have attached the e-mail trail. There are some solvents and hydrocarbons on the site. Environ have proposed that the remediation of groundwater is not required at the site in the Supplementary Site Investigation (paragraph 6). The key area as in my e-mail to the case officer is in the SE corner of the site. Although I am not anticipating problems from this solvent affected groundwater to the buildings it is a matter for the Agency as regards protection of the groundwater body. They would need to approve the technical assessment in Paragraph 6. I am not sure what can be done about this as it appears the site is not a priority.

#### FLOOD AND WATER MANAGEMENT OFFICER:

There are no objections to the proposed development following the submission of the FRA.

However the Flood Risk Assessment proposes to reduce the surface water flows off site by only 20% and not the minimum of 50% required. Although a drainage plan has been produced the FRA states that this plan will be subject to the detailed design as options of infiltration methods such as permeable paving are further investigated.

In order to discharge the following condition requested as final details of the drainage design are to be provided, it should be demonstrated that greenfield run off rates are aimed for.

#### Sustainable Water Management

Prior to commencement, a scheme for the provision of sustainable water management shall be submitted to, and approved in writing by the Local Planning Authority. The scheme shall clearly demonstrate how it:

- a) Manages Surface Water. The scheme shall demonstrate ways of controlling the surface water on site.
  - i. following the strategy set out in Flood Risk Assessment and Surface Water Drainage Strategy, produced by Bradbrook Consultants dated 27 Jan 2015 rev P
  - ii. incorporates sustainable urban drainage in accordance with the hierarchy set out in Policy 5.15 of the London Plan. Where the proposal does not utilise the most sustainable solution, justification must be provided.
  - iii. provide information on all Suds features including the method employed to delay and control the

water discharged from the site to Greenfield run off rates and:

a. calculations showing storm period and intensity and volume of storage required to control surface water and size of features to control that volume.

b. any overland flooding should be shown, with flow paths depths and velocities identified as well as any hazards, (safe access and egress must be demonstrated).

b) Foul water

i. The Scheme shall demonstrate capacity in the receiving foul sewer network or provides suitable upgrades agreed by Thames Water.

c) Ground water

i. Where infiltration techniques (soakaway) or a basement are proposed a site investigation must be provided to establish the risk of groundwater flooding on the site, and to demonstrate the suitability of infiltration techniques proposed on the site. (This should be undertaken at the appropriate time of year as groundwater levels fluctuate).

d) Minimise water use. The scheme shall also demonstrate the use of methods to minimise the use of potable water through water collection, reuse and recycling and will:

i. incorporate water saving measures and equipment.

ii. provide details of water collection facilities to capture excess rainwater;

iii. provide details of how rain and grey water will be recycled and reused in the development.

e) Long Term Management and Maintenance of the drainage system.

i. Provide a management and maintenance plan for the lifetime of the development of arrangements to secure the operation of the scheme throughout its lifetime. Including appropriate details of Inspection regimes, appropriate performance specification, remediation and timescales for the resolving of issues. Where there is overland flooding proposed, the plan should include the appropriate actions to ensure the safety of the users of the site should that be required.

ii. Where the maintenance will not be the responsibility of an individual householder, the details of the body legally responsible for the implementation of the management and maintenance plan must be provided.

Thereafter the development shall be implemented and retained/maintained in accordance with these details for as long as the development remains in existence.

## REASON

To ensure that surface water run off is controlled to ensure the development does not increase the risk of flooding contrary to Policy EM6 Flood Risk Management in Hillingdon Local Plan: Part 1- Strategic Policies (Nov 2012) Policy 5.12 Flood Risk Management of the London Plan (March 2015) and National Planning Policy Framework (March 2012) and the Planning Practice Guidance (March 2014). To be handled as close to its source as possible in compliance with Policy 5.13 Sustainable Drainage of the London Plan (July 2011), and conserve water supplies in accordance with Policy 5.15 Water use and supplies of the London Plan (March 2015).

The site lies alongside the Grand Union Canal which is a strategic waterway within the London Borough of Hillingdon, Policy EM3 Blue Ribbon Network in Hillingdon Local Plan: Part 1- Strategic Policies (Nov 2012) states:

The Council will continue to promote and contribute to the positive enhancement of the strategic river and canal corridors

Development located in or adjacent to the Blue Ribbon Network should enhance the waterside environment, by demonstrating high design quality which reflects the character of the waterway and provide access and improved amenity to the waterfront.

In respect of development proposals and in accessing how they can make a positive contribution to the Network as required by Policy EM3 the following considerations will apply:

- 1) For the rivers Colne, Pinn, Crane, Yeading Brook and some minor local tributaries to continue to play their role providing space for water.
- 2). To reduce flood risks to property and road, rail or other infrastructure located in proximity to water courses.
- 3). To make best use of river and canal corridors for active and passive recreation, increasing accessibility as part of a living corridor for people across the Borough, and in promoting its use as a link to recreational spaces.
- 4). To maintain and improve the river and canal corridors links as a linear feature in both town and countryside which serve as an "ecological corridors", as a habitat which enables species to migrate and colonise over wider areas.
- 5). To support the Rivers and Canal Trust aims and ensure that the historic structure of the canals is preserved and support for its continued use as navigable waterways is maintained.
- 6) To promote and develop the Grand Union Canal as a navigational waterway of national significance.

The varying development and land uses along the Blue Ribbon Network need to be understood and balanced in order to have a co-ordinated and cohesive approach to land use planning and other activities with the use of the Blue Ribbon Network. These should be acknowledged within any application within the different elements of a scheme such as within a landscaping plan, considering its location in relation to the river in its treatment of boundary fences and the provision of habitat for wildlife part of the wildlife corridor along the river.

Any application should demonstrate that:

- 1) Development proposals will not prejudice the delivery of the outcomes and targets of the Catchment Management Plans for the River Crane and Colne, and should contribute towards the delivery of the actions identified in the Catchment Management Plans.
- 2) Development proposals should protect and improve the Network Corridors and access points to and along the blue ribbon network and have regard to and if necessary contribute to the Rights of Way and Permissive Route Improvement Plan for Hillingdon.
- 3) Development proposals should seek to address the points above and explain how these elements have been considered either on site or by contribution to off site improvements.

Development that encroaches on watercourses has a potentially severe impact on their ecological value. As stated by the Environment Agency artificial lighting disrupts the natural diurnal rhythms of a range of wildlife using and inhabiting the river and its corridor habitat. Land alongside watercourses is particularly valuable for wildlife and it is essential this is protected.

This is supported by the National Planning Policy Framework (NPPF), paragraph 109 which recognises that the planning system should aim to conserve and enhance the natural and local environment by minimising impacts on biodiversity and providing net gains in biodiversity where possible. The Natural Environment and Rural Communities Act which requires Local Authorities to have regard to nature conservation and article 10 of the Habitats Directive which stresses the importance of natural networks of linked corridors to allow movement of species between suitable habitats, and promote the expansion of biodiversity. Paragraph 118 of the NPPF also states that

opportunities to incorporate biodiversity in and around developments should be encouraged. Such networks may also help wildlife adapt to climate change and will help restore watercourses to a more natural state as required by the Thames River Basin Management Plan.

It is unclear regarding the ownership of the land between the site and the Grand Union canal, however the development site relies on the landscaping outside the site to screen the uses on the site from the Canal. The site should contain some screening of the use of the site from the Canal should the land along the Canal edge be cleared for Canal and River Trust purposes to maintain the Canal, and Canal walls.

#### DISABLED ACCESS

The site is located in Hayes, off Dawley Road which was occupied by offices demolished in circa 2005.

The proposal is to develop a multi-unit scheme, comprising six independent industrial buildings for yet to be identified occupiers. The car park areas would be surfaced in bitumen and block paviers. Accessible parking is proposed for each industrial unit, with the overall percentage in excess of the council's 10% requirement. The Design & Access Statement further reports on a pedestrian environment featuring dropped kerbs and tactile paving in appropriate locations.

Having reviewed the plans, it is noted that only the larger industrial units seem to incorporate a passenger lift to the mezzanine and/or first-floor. Provision should be made within all the units for a wheelchair user to gain access to the first floor where office accommodation and/or meeting rooms are proposed.

The Equality Act 2010 seeks to protect people accessing goods, facilities and services from discrimination on the basis of a 'protected characteristic', which includes those with a disability. As part of the Act, service providers are obliged to improve access to and within the structure of their building, particularly in situations where reasonable adjustment can be incorporated with relative ease. The Act states that service providers should think ahead to take steps to address barriers that impede disabled people.

The following observations are provided:

1. Multi-storey buildings should have at least one lift that is sufficient size to be accessible by wheelchair users and people with mobility difficulties. From a planning perspective however, it would be acceptable in this instance for the design to demonstrate 'capability of adaptation' to allow an enclosed platform lift to be installed should the need arise in future. NB: building control may require a lift to be installed at the construction stage.

#### Recommended Informatives

2. Induction loops should be specified to comply with BS 7594 and BS EN 60118-4, and a term contract planned for their maintenance.

3. Care must be taken to ensure that overspill and/or other interference from induction loops in different/adjacent areas does not occur.

4. Flashing beacons/strobe lights linked to the fire alarm should be carefully selected to ensure they remain within the technical thresholds not to adversely affect people with epilepsy.

#### SUSTAINABILITY OFFICER

I have no objections to the proposed development subject to the following conditions:

#### Energy

The development needs to achieve the London Plan target of 35% reduction of CO2 emissions from 2013 Building Regulations. The development needs to achieve a reduction of 114.6 tCO2 to meet this required target. The energy assessment sets out the broad efficiency measures that will result in a carbon emissions reductions of around 6% (20tCO2). The energy assessment then sets out the measures to achieve the final 94tCO2 reductions.

Half of this has been achieved through the use of PVs and the other half is proposed as an allowable solution (or offsetting contribution).

Therefore in order to make the development policy compliant the applicant needs to provide an offsetting payment of £60 per carbon tonne over the lifetime of the 'carbon' lifetime of the development of 30 years.

Therefore  $46\text{tCO}_2 \times 30\text{years} \times £60 = £82800$

The following condition is also necessary:

Prior to the above ground structural works a final roof plan showing the inclusion of the required PVs set out in the Energy Assessment shall be submitted to and approved in writing by the Local Planning Authority. The development must be completed in accordance with the approved roof plan.

Reason - to ensure the roof includes the necessary quantum of PVs to reach the CO2 reduction target set out in the London Plan (Policy 5.2).

#### Ecology

The development has some ecological value on the site and this value should be retained and enhanced where possible in the final designs. The following condition is therefore necessary:

Prior to the commencement of landscaping works, an ecological enhancement plan shall be submitted to and approved in writing by the Local Planning Authority. The plan shall demonstrate the inclusion of specific habitat enhancement areas within the landscaping and also the enhancement measures to be included within the fabric of the building. The development shall proceed in accordance with the approved plan.

Reason - To ensure the protection and enhancement of the natural environment.

#### CRIME PREVENTION DESIGN ADVISOR METROPOLITAN POLICE

Regarding this application I would encourage the applicant to adopt the physical security standards of Secured By Design, especially as they will be storing items that would be attractive to thieves.

In principle, I have no major objections regarding this development. The Design and Access statement clearly states under points 2.4 and 2.8, that security considerations have been considered already.

However, due to the size of the development and the influence it will have in the local area, I would ask that a condition of Secured by Design is stipulated.

#### Recommendations:

Monitored Central Station alarm: The monitored security system should be equipped with a signal terminating at a recognised Alarm Receiving Centre (ARC), comply with the current version of the EN 50131-1 standard and be eligible for a "Level 1 status" police response as defined by the ACPO Policy on Police Response to Security Systems.

Consideration should be given to protecting the communication path between the alarm and the ARC should a landline be cut. E.g. dual communication.

#### Vehicle Access Doors:

Roller shutter vehicle access doors should be tested and certificated to LPS 1175 Security Rating 2 or equivalent (Minimum). If the Roller shutter vehicle access door is vulnerable to a 'ram-raid' attack it should be further protected by a security gate, barrier or bollard(s). All such products should be certified to BS PAS 68: 2007 'Specification for vehicle security barriers' or Sold Secure Gold.

#### Doors:

Doorsets offering pedestrian access to commercial units should be certified to LPS 1175 security rating 2 or equivalent (minimum). All glazing in and adjacent to doors shall include one pane of laminated glass to a minimum thickness of 7.5mm and securely fixed in accordance with the manufacturers specifications.

#### Windows:

Window apertures should be protected by a shutter, grille or certified secure window, or combination thereof. Any one of which shall have been successfully tested and certificated to the Loss Prevention Certification Board Standard LPS 1175 Security Rating 2 or equivalent (minimum).

(If this is not the case then Ground floor windows and those easily accessible above ground floor, must be Certificated (BSI Kitemark or similar) to PAS 24: 2012 or Loss Prevention Certification Board standard LPS 1175 Security Rating 1 and include one pane of laminated glass to a minimum thickness of 7.5mm.)

#### Graffiti

Exposed areas of commercial buildings would benefit from graffiti coating, I suggest consultation with LBE enviro-crime unit as to type used. This enables graffiti to be easily and, importantly, quickly removed to deter further attacks.

#### Smoke Generating Device

If premises include the storage of high value / desirable items then consideration should be given incorporating an artificial smoke generating device into the intruder alarm system.

#### Secure Storage

Consider creating a secure storage area inside the premises to provide a delay before intruders can reach their target. This assists the Intruder alarm / Smoke generating device in providing a suitable deterrent or reduces the amount of loss before they feel pressured into leaving.

## **7. MAIN PLANNING ISSUES**

### **7.01 The principle of the development**

The site is identified as falling within a designated Industrial and Business Area (IBA) and, in accordance with table 10.1, is part of the Hayes Strategic Employment Site (SES). IBAs are designated for business, industrial and warehousing purposes and appropriate sui generis uses.

The site is identified, within the saved policies of the UDP, as falling within an Industrial and Business Area (IBA). Further, within the Local Plan: Part 1 the site overlaps a Locally Significant Employment Location (LSEL) and a "growth area". Within the London Plan, and confirmed within the emerging local policy, the site is indicated as lying within a Hayes Strategic Industrial Location.

The relevant policies within the UDP are considered to be as follows Policy LE2 of the Local Plan Part 2, states that the Local Planning Authority will not permit development for other uses other than B1, B2, B8 or appropriate sui generis in industrial and business areas unless it is satisfied that:-

- (i) There is no realistic prospect of the land being used for industrial and warehousing purposes in the futures; and
- (ii) The proposed alternative use does not conflict with the policies and objectives of the plan.
- (iii) The proposal better meets the plan's objectives particularly in relation to affordable housing and economic regeneration.

Policy LE3 states that redevelopment in IBAs should, where appropriate and practical, include the provision of small units in designated industrial and business areas.

Hillingdon Local Plan Part 1: Strategic Policies (adopted November 2012) contains the planning vision and strategy for the borough over the next 15 years up to 2026.

The site is located within the Heathrow Opportunity Area, which is a key growth area, and the Hayes and West Drayton Corridor, intended to be a key location for employment growth

In addition, within this document the site overlaps a proposed Locally Significant Employment Location (LSEL). An LSEL is a designated employment area suitable for light industrial, office and research uses.

The relevant policies within the Local Plan Part 1 are considered to be the following:

Policy E1 outlines that the Council will protect Strategic Industrial Locations and the designation of Locally Significant Industrial Sites (LSIS) and Locally Significant Employment Locations (LSEL).

Policy E2 indicates that the Council will promote employment growth and will direct most of this towards suitable sites in the Heathrow Opportunity Area, Strategic Industrial Locations (SILs), Locally Significant Employment Locations, Uxbridge and Hayes Town Centre.

The proposed uses involve a mix of light industrial, warehousing uses and primarily fall within Use Classes B1(c), B2 and B8. The land uses proposed within this development are entirely in accordance with policies relative to the aforementioned designations and as such the proposal is, in principle, in accordance with the Development Plan and emerging policy.

## **7.02 Density of the proposed development**

This is not relevant to non-residential development.

## **7.03 Impact on archaeology/CAs/LBs or Areas of Special Character**

The site is not located within a conservation area or an area of special local character and there are no statutory or locally listed buildings within or close to the site that would be



affected by the proposals.

Although the site does not form part of an Archaeological Priority Area, an Archaeological Desk Based Assessment has been submitted in support of the proposal. This advises that any archaeological remains are unlikely to have survived the 19th quarrying and subsequent building phases on the site so that any remains would be extremely fragmentary. GLAAS advise that the submitted document is very thorough and informative which complies with relevant standards and guidance. Furthermore, they concur with the report's findings and advise that no further archaeological work is required.

#### **7.04 Airport safeguarding**

All relevant authorities have reviewed the application and no objections in relation to airport safeguarding are raised. A recommended informative regarding the use of cranes has been attached.

#### **7.05 Impact on the green belt**

The nearest part of the proposed development to the Green Belt which forms the northern side of the adjoining Grand Union Canal is Unit 1. This is a small building with a maximum height of 8.7m. It would largely be screened from the open Green Belt by the public house which fronts Dawley Road on the northern side of the canal, whilst the rest of the site is screened by the retained EMI archive building immediately adjoining the south side of the canal. As such, the development would not materially impact upon the openness of the Green Belt, in accordance with Policy OL5 of the Hillingdon Local Plan: Part Two - Saved UDP Policies (November 2012).

#### **7.07 Impact on the character & appearance of the area**

The National Planning Policy Framework (NPPF) states at paragraph 64 that "Permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions." London Plan Policy 7.1 sets out a series of overarching design principles for development in London and policy 7.6 seeks to promote world-class, high quality design and design-led change in key locations. In addition to Chapter 7, London Plan policies relating to sustainable design and construction (5.3) are also relevant.

Policy BE13 of the Hillingdon Local Plan states that new development will not be permitted if the layout and appearance fail to harmonise with the existing street scene or other features of the area which the local planning authority considers it desirable to retain or enhance. Policy BE25 also supports the modernisation and improvement of Industrial and Business Areas through the careful design and landscaping of buildings.

As regards the layout, Units 1 and 2 would be adequately set back some 7.0m from the Dawley Road frontage. Whilst at their nearest points, Units 5 and 6 would be sited closer to the road (set back approximately 4.3m), due to their angled orientation, it is only the western corners of these buildings which would project further forward on site, which would not appear unduly prominent, particularly as a good depth of landscaping would be retained along the road frontage which would assist in the screening of the buildings.

The design of the scheme has been determined by the need to make efficient use of this irregular shaped industrial site and the constraints imposed by its defined boundaries. The building containing Units 3 and 4 has been set back from the rear boundary adjoining the retained EMI archive building, a good depth of landscaping would be retained along the Dawley Road frontage and the boundary adjacent to Clayton Road where Units 4 and 6 are proposed has had its screening reduced which will assist in the integration of the built form

and surrounding external areas between this and the adjoining industrial site.

The proposed buildings are of an appropriate size, massing and design for an Industrial and Business Area. Furthermore, the layout allows for car parking and servicing areas to be provided, together with a good landscape buffer at the front of the site and some limited landscaping between the buildings. The scheme is considered to enhance the visual amenity of the area and make an appropriate contribution to the improvement of the IBA, in accordance with Policies BE13 and BE25 of the Hillingdon local Plan: Part Two - Saved UDP Policies (November 2012).

#### **7.08 Impact on neighbours**

Policies BE20, BE21 and BE24 of the Hillingdon Local Plan: Part Two - Saved UDP Policies (November 2012) seek to protect the amenities of surrounding residential properties from new development in relation to loss of sunlight, dominance and loss of privacy respectively.

The nearest residential properties to the application site are Nos. 1 - 6 UK Cottages sited on the opposite side of Dawley Road where the proposed development would have no implications in terms of loss of sunlight. These properties would mainly overlook parking and servicing areas with the nearest proposed building (Unit 2) being sited some 43m from the front elevation of the nearest property (No. 6). Given that this distance greatly exceeds the Council's 15m recommended minimum distance when two or more storied development can appear unduly dominant and the proposed relationship would not encroach upon a 45 degree visibility splay from No. 6's habitable room windows, the development would not appear unduly dominant from its residential neighbours. Similarly, given the separation distances involved, there would be no implications in terms of loss of privacy.

Noise issues are considered in Section 7.18 below.

The proposed development is therefore fully compliant with Policies BE20, BE21 and BE24 of the Local Plan.

#### **7.09 Living conditions for future occupiers**

Not applicable to this commercial development.

#### **7.10 Traffic impact, Car/cycle parking, pedestrian safety**

Policies AM2 and AM7 of the Hillingdon Local Plan: Part Two Saved UDP Policies (November 2012) are concerned with traffic generation, and access to public transport. Policies AM14 and AM15 are concerned with on-site parking.

Pedestrian and vehicular access would be obtained from the existing access to the site at the roundabout at the junction of Dawley Road and Swallowfield Way. Pedestrian access would also be provided to Clayton Road. Inside the site, a central spine access road will feed into the units, which would all have their own dedicated parking and service areas. Overall, the development would accommodate 114 parking spaces, of which 13 would be disabled spaces and 35 would provide electric vehicle charging. In addition, 4 motorcycle spaces and cycle parking spaces would be provided in accordance with standards once the occupiers were known.

A Transport Assessment has been submitted in support of the proposals.

The Council's Highways Engineer has reviewed the application and considers that car parking and bicycle parking provision is acceptable and would satisfy relevant standards. Shower and locker facilities for cyclists within each of the units would be required, which

would be dealt with for each unit in the Travel Plan.

Swept path drawings are included in the Transport Assessment, and these drawings indicate that internal circulation to service all of these units is acceptable. The application has also now been revised and the application now includes the proposed improvement works to the Swallowfield Way/ Dawley Road roundabout to assist articulated vehicles to access the main site entrance.

The improvements include widening of the site access road approach, provision of pedestrian refuge island and realignment of Dawley Road. These proposals are considered acceptable subject to safety audits prior to implementation. The new pedestrian island and the adjacent footways will be dedicated as highway via a s106 agreement. The applicant has reaffirmed that they agree to undertake these works.

The Transport Assessment contains a framework for a future Travel Plan for the site. A legal agreement is recommended requiring the submission and approval of a full travel plan prior to occupation of the development to enable the specifics of the occupiers to be incorporated into the Travel Plan.

No objection is raised to the proposed junction works and the proposed development is not considered to result in detriment to the local highway network. Accordingly, the application is considered to comply with UDP Policies AM2, AM7, AM9, AM14 and AM15 and remains acceptable on this basis.

#### **7.11 Urban design, access and security**

##### URBAN DESIGN

This issue is addressed in Section 7.07 of the report.

##### ACCESS

This issue is addressed in Section 7.12 of the report.

##### SECURITY

The scheme has been designed with regard to Secure By Design principles including access and movement which provides perimeter paladin fencing, secured yards with sliding gates, CCTV and external lighting.

Should approval be granted, a condition would be imposed to ensure security measures meet the Metropolitan Police 'Secure By Design' criteria.

#### **7.12 Disabled access**

Policy 7.2 of the London Plan and guidance within the HDAS- Accessible Hillingdon requires developments to be designed to be fully accessible for wheelchair users. The applicant has confirmed that the development would accord with provisions for inclusive access and fully comply with the requirements of British Standards BS8300, Access for Disabled People.

Level access is proposed to the entrances to the building and disabled car parking is located close to the building entrances. The proposals are therefore considered to accord with the aims of policy 7.2 of the London Plan 2011, the HDAS Accessible Hillingdon SPD and policy AM15 of the Hillingdon Local Plan Part Two Saved UDP Policies (2012).

### **7.13 Provision of affordable & special needs housing**

Not applicable to this type of application.

### **7.14 Trees, landscaping and Ecology**

Trees and Landscaping

Policy BE38 of the of the Hillingdon Local Plan: Saved UDP Policies (November 2012) states that amongst other things, development proposals will be expected to retain and utilise topographical and landscape features of merit.

The Council's Trees and Landscape Officer advises that there are no Tree Preservation Orders or conservation area designations that affect the site. Although a conifer screen was removed prior to the carrying out of the Tree Survey, the officer advises that with the retention, management and restoration of the planted green buffer along Dawley Road, which will be refreshed with additional tree planting and ground cover, no other landscape features of merit would be affected by the proposals. The officer confirms that following his initial comments, additional planting has been incorporated into the scheme and as such, no concerns are raised as regards the landscape layout within the development site, which would provide for an appropriate mix of hard and soft landscaping supplemented by new tree planting mainly along the frontage and main access into the development.

Although the scheme does not provide any additional landscaping along the canal, there is an adjoining landscaping strip of land which is outside of the application site and does provide adequate screening. The development proposals would not affect this land.

Therefore, the Council's Trees and Landscaping Officer advises that the scheme is acceptable, in compliance with Policy BE38 of the Hillingdon Local Plan: Saved UDP Policies (November 2012).

Ecology

An extended Phase 1 Ecological Appraisal has been submitted in support of the proposals, which identifies the site as being of only limited value for nature conservation. The report notes that opportunities should be taken to enhance the biodiversity of the site through appropriate landscaping, the avoidance of light pollution and the introduction of bird and bat boxes. This has been progressed through the submission of a Habitat Management Plan, which details the objectives and specific measures to enhance biodiversity on the site.

A Bird Hazard Management Plan, has also been submitted which includes a number of design / management proposals and a licence from Natural England to kill (or take) specific wild birds to preserve air safety.

The Council's Sustainability Officer advises that as the site has some ecological value, this should be retained and enhanced where possible in the final designs. As part of the officer's recommendation, a condition is recommended.

### **7.15 Sustainable waste management**

London Plan policies 5.16 and 5.17 requires adequate provision of refuse and recycling facilities for new development and for their location to be appropriate in terms of enabling ease of collection from the site.

The application shows the location of dedicated timber screened waste and recycling

facilities within the servicing yards of each of the units.

The proposals therefore accord with local planning policy requirements.

#### **7.16 Renewable energy / Sustainability**

Policy 5.7 of the London Plan advises that boroughs should ensure that developments will achieve a reduction in carbon dioxide emissions of 40% from on site renewable energy generation (which can include sources of decentralised renewable energy) unless it can be demonstrated that such provision is not feasible. Policy 5.4 of the London Plan requires submission of an assessment of the energy demand and carbon dioxide emissions from proposed major developments, which should demonstrate the expected energy and carbon dioxide emission savings from the energy efficiency and renewable energy measures incorporated in the development.

##### Energy

The development does not meet the 40% energy reduction target of the London Plan 2011. However, the applicant has undertaken best endeavours to reach the target and this approach is broadly accepted.

However, the development is 25 tonnes short of the target and under Policy 5.2 of the London Plan, an offsite contribution is required to enable the Local Authority to make up for the shortfall. The applicant has agreed to provide a contribution to meet this shortfall which be secured through the S106 agreement at this site and therefore the proposals fully accord with the London Plan policy requirements.

#### **7.17 Flooding or Drainage Issues**

Policy OE7 of the Saved Policies UDP seeks to prevent developments in areas liable to flooding unless appropriate flood protection measures are proposed. Policy OE8 seeks to resist developments that would result in an increased risk of flooding elsewhere.

The application is supported by a drainage strategy, which demonstrates that surface water will be controlled on site reducing the flood risk from the site, and it shows the site is not at risk and the occupants will have a suitable safe access.

The Council's Flood and Drainage officer has reviewed the submission and consider that, subject to the imposition of conditions, the development would have an acceptable impact with regard to flood risk and the environment in general.

Overall, it is considered that flood risk has been adequately taken into account within the development proposals and that the development would not give rise to increased risk of flooding elsewhere or result in unacceptable risks for future employees. Subject to conditions the proposal would comply with Policies OE7 and OE8 of the Saved Policies UDP.

#### **7.18 Noise or Air Quality Issues**

##### NOISE

Given that the site sits in a predominantly industrial location the dominant noise source in this area will be vehicular traffic on Dawley Road and Swallowfield Way. The application is accompanied by a detailed noise report and having regard to this information, it is therefore considered that the operations being undertaken by industrial/ warehouse occupiers will not have a detrimental impact on the residential amenity of Dawley Road residents. Although no objection has been raised by the Council's Environmental Protection Unit a condition has been recommended to ensure that noise levels generated from within the site at the nearest

residential window fall below general background noise levels.

In view of this, it is not considered that these properties would be likely to suffer any undue noise and disturbance as a result of the proposals.

#### AIR QUALITY

The application site lies within the south of the borough where air quality is of significant concern and the application has been supported by an Air Quality Assessment. The applicants have agreed to provide a financial contribution of £12,500 towards air quality improvements in the borough.

#### **7.19 Comments on Public Consultations**

No comments to the public consultation have been received.

#### **7.20 Planning obligations**

Policy R17 of the Hillingdon Local Plan (November 2012) states that:

'The Local Planning Authority will, where appropriate, seek to supplement the provision of recreation open space, facilities to support arts, cultural and entertainment activities, and other community, social and educational facilities through planning obligations in conjunction with other development proposals'.

The Council's S106 officer has advised that the S106 needs to cover/seek contributions for the following:-

1. Access junction works to be completed before occupation,
2. Travel Plan, to include a £20,000 bond,
3. Construction Logistics Plan to be agreed before start of construction,
4. Refuse and delivery management scheme,
5. Energy contribution of £82,000
6. Construction Training: A financial contribution or delivery on site of a construction training scheme (to address training during the construction phase of the development).
7. Air Quality: A financial contribution of £12,500 required for air quality monitoring made necessary by the development.
8. Project Management and Monitoring Fee: in line with the SPD a contribution equal to 5% of the total cash contributions will be sought to enable the management and monitoring of the resulting agreement.

The scheme is also Mayoral and Council CIL liable.

#### **7.21 Expediency of enforcement action**

There are no relevant planning enforcement issues raised by this application.

#### **7.22 Other Issues**

Land Contamination

The Council's Environmental Health Officer (Land Contamination) advises that the information submitted with the application is sufficient to support the proposals and that the reports are comprehensive for the Phase 1 Desk study and Phase 2 Supplementary Site Investigation. The officer does advise that a condition will be required to deal with any unknown contamination on site and to ensure that gas membranes are installed within the buildings. These conditions form part of the officer's recommendation.

## **8. Observations of the Borough Solicitor**

### General

Members must determine planning applications having due regard to the provisions of the development plan so far as material to the application, any local finance considerations so far as material to the application, and to any other material considerations (including regional and national policy and guidance). Members must also determine applications in accordance with all relevant primary and secondary legislation.

Material considerations are those which are relevant to regulating the development and use of land in the public interest. The considerations must fairly and reasonably relate to the application concerned.

Members should also ensure that their involvement in the determination of planning applications adheres to the Members Code of Conduct as adopted by Full Council and also the guidance contained in Probity in Planning, 2009.

### Planning Conditions

Members may decide to grant planning consent subject to conditions. Planning consent should not be refused where planning conditions can overcome a reason for refusal. Planning conditions should only be imposed where Members are satisfied that imposing the conditions are necessary, relevant to planning, relevant to the development to be permitted, enforceable, precise and reasonable in all other respects. Where conditions are imposed, the Council is required to provide full reasons for imposing those conditions.

### Planning Obligations

Members must be satisfied that any planning obligations to be secured by way of an agreement or undertaking pursuant to Section 106 of the Town and Country Planning Act 1990 are necessary to make the development acceptable in planning terms. The obligations must be directly related to the development and fairly and reasonably related to the scale and kind to the development (Regulation 122 of Community Infrastructure Levy 2010).

### Equalities and Human Rights

Section 149 of the Equalities Act 2010, requires the Council, in considering planning applications to have due regard to the need to eliminate discrimination, advance equality of opportunities and foster good relations between people who have different protected characteristics. The protected characteristics are age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation.

The requirement to have due regard to the above goals means that members should consider whether persons with particular protected characteristics would be affected by a proposal when compared to persons who do not share that protected characteristic. Where equalities issues arise, members should weigh up the equalities impact of the proposals against the other material considerations relating to the planning application. Equalities impacts are not necessarily decisive, but the objective of advancing equalities must be taken into account in weighing up the merits of an application. The weight to be given to any equalities issues is a matter for the decision maker to determine in all of the circumstances.

Members should also consider whether a planning decision would affect human rights, in particular the right to a fair hearing, the right to respect for private and family life, the protection of property and the prohibition of discrimination. Any decision must be proportionate and achieve a fair balance between private interests and the public interest.

## **9. Observations of the Director of Finance**

## **10. CONCLUSION**

No objections are raised to the principle of the redevelopment of this site within the Blyth Road and Printing House IBA for Class B1(c) and B2 (General Industrial) and B8 (Storage and Distribution) purposes.

The scheme would make a valuable contribution to improving this part of the IBA. The scheme is also acceptable in terms of its impacts upon surrounding residential properties and with junction improvements, on highway grounds.

The proposal is considered to comply with relevant UDP and London Plan policies and, accordingly, approval is recommended subject to the applicant entering into an agreement with the Council under Section 106 of the Town and Country Planning Act 1990 as amended and relevant conditions.

## **11. Reference Documents**

Hillingdon Local Plan: Part One (November 2012)

Hillingdon Local Plan: Part Two Saved UDP Policies (November 2012)

London Borough of Hillingdon's HDAS 'Accessible Hillingdon' Supplementary Planning Document (May 2013)

Planning Obligations Supplementary Planning Document (July 2014)

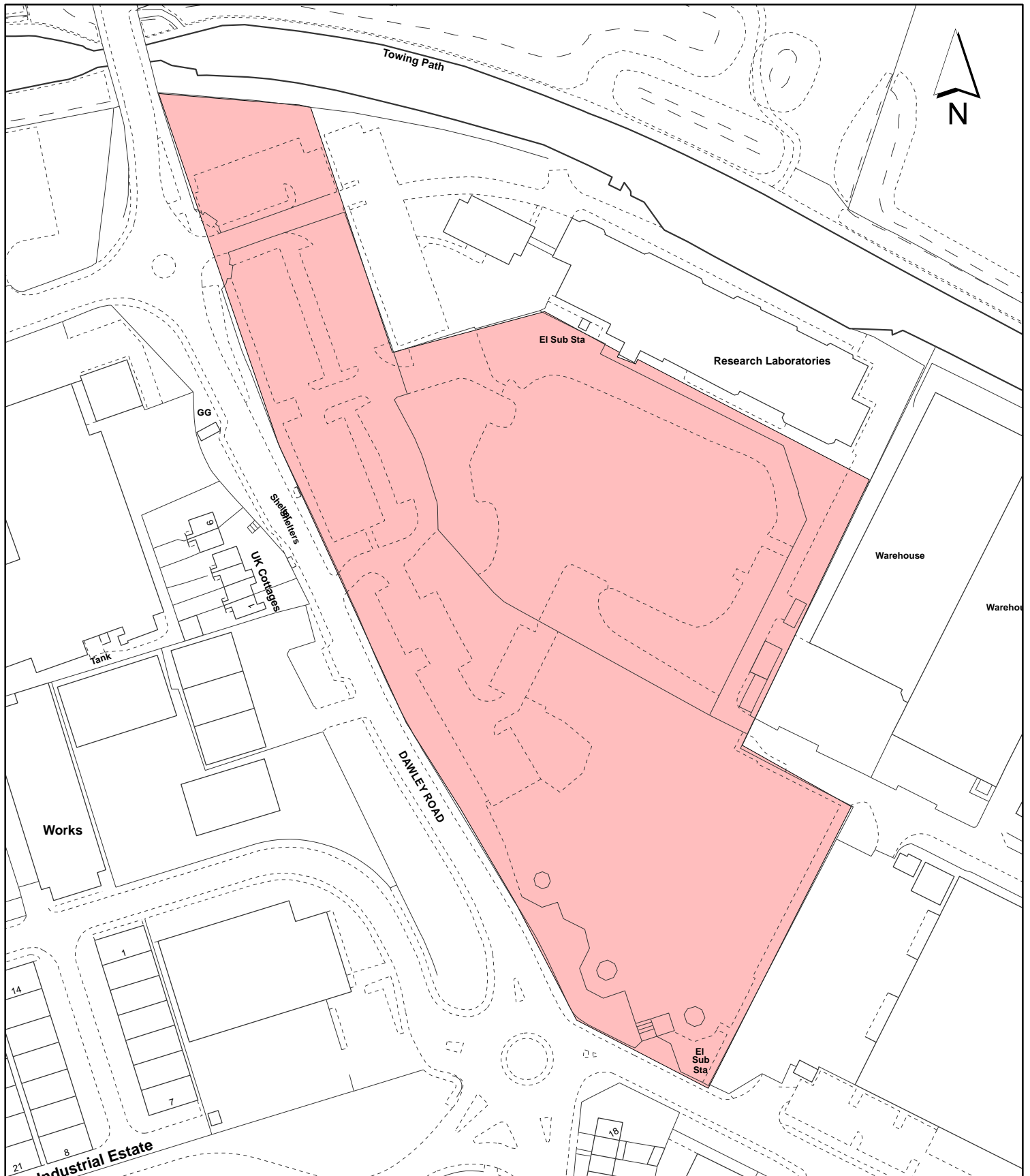
London Plan (March 2015)

National Planning Policy Framework (March 2012)

**Contact Officer:** Richard Phillips

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**Notes:**

 Site boundary

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Site Address:

**Former EMI site  
 Dawley Road  
 Hayes**

**LONDON BOROUGH  
 OF HILLINGDON**  
 Residents Services  
 Planning Section  
 Civic Centre, Uxbridge, Middx. UB8 1UW  
 Telephone No.: Uxbridge 250111

Planning Application Ref:

**8294/APP/2015/1406**

Scale:

**1:1,500**

Planning Committee:

**Major**

Date:

**July 2015**



**HILLINGDON**  
 LONDON