

Report of the Head of Planning, Transportation and Regeneration

Address GSK, STOCKLEY PARK IRON BRIDGE ROAD WEST DRAYTON

Development: Redevelopment of the site to provide two industrial units providing industrial floorspace (Use Class B1c/B2/B8) and ancillary offices together with associated parking, access arrangements, landscaping and infrastructure (Re-consultation on revised landscaping plan).

LBH Ref Nos: 39207/APP/2020/2188

Drawing Nos: 30928-PL-200
30928-PL-205A
Covering Letter dated 03 July 2020
30928-PL-202A
Energy Statement dated July 2020
30928-PL-209
30928-PL-208
Air Quality Assessment dated October 2020
1982-19-05.dwg 05 Rev.
1982-19-05.dwg 06 Rev. E
1982-19-05.dwg 08 Rev. A
1982-19-05.dwg 09 Rev. A
30928-PL-201D
30928-PL-203C
30928-PL-204D
30928 PL 206C
30928 PL 207D
Planning Statement dated July 2020
Statement of Community Involvement dated July 2020
Transport Assessment dated July 2020
Framework Travel Plan dated July 2020
Flood Risk Assessment dated June 2020
Energy Assessment Rev. 02 dated July 2020
Sustainability and Energy Statement dated July 2020
Heritage Impact Assessment dated September 2020
Property Market Assessment dated June 2020
Covering Letter - Submission of Heritage Impact Assessment dated September 2020
PPWL-RPS-SI-XX-DR-D-1302 Rev. P04
Drainage Design Philosophy dated October 2020
PPWLE-RPS-SI-XX-DR-C-1600 Rev. P04
1982-19-03.dwg Rev. C
30928-PL-211
30928-PL-210
Design and Access Statement dated July 2020
Outline Construction Logistics Plan dated June 2020
Delivery and Servicing Plan dated June 2020
Ecology Assessment dated June 2020
Geo-Environmental - Preliminary Risk Assessment dated June 2020
Landscape and Visual Impact Appraisal
Landscape Design Statement dated June 2020

Landscape Maintenance and Management Plan
Noise and Vibration Assessment dated June 2020
1982-19-05.dwg 07 Rev. C

Date Plans Received:	15/07/2020	Date(s) of Amendment(s):	05/10/2020
Date Application Valid:	23/07/2020		07/10/2020
			29/09/2020
			23/11/2020
			15/07/2020
			24/07/2020
			11/11/2020
			16/07/2020

1. SUMMARY

The application seeks planning permission for the redevelopment of the site to provide two industrial units providing industrial floorspace (Use Class B1c/B2/B8) and ancillary offices together with associated parking, access arrangements, landscaping and infrastructure.

A clear and strong demand for industrial floorspace in this location has been identified that outweighs the loss of the existing office floorspace on this site. The development is located on previously developed land and would not have a greater impact on the openness of the Green Belt compared to the existing development. As such, the development meets the exception test outlined in NPPF paragraph 143 and is therefore appropriate development on the Green Belt.

The site was recently designated a Grade II Registered Park and Garden. It is considered that the loss of the existing offices and their replacement with two large industrial units would result in less than substantial harm to this part of the Grade II Registered Park and Garden as the significant boundary landscaping will be retained and the applicant has maximised opportunities for new landscape planting, furthermore the site is detached from the main office park, such that the proposals have less impact than had they been proposed in part of Stockley park phase 1.

The economic benefits of the proposal would be significant. The proposal would support jobs during construction, and once completed would create up to 450 new Full Time Equivalent (FTE) jobs with the potential to create additional employment opportunities in the future together with a further off-site jobs generating up to a potential 650 FTE; these benefits warrant being given significant weight. The proposal will also result in social benefits from employment generation including security, improved living standards, social cohesion and health benefits.

The NPPF explains that the environmental objective of sustainable development is to contribute to protecting and enhancing the natural, built and historic environment, including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.

The proposal would contribute to protecting and enhancing the natural, built and historic environment. A substantial amount of structural planting is proposed which would mitigate the visual impact of the built form of the proposed development. A package of specific

highways, ecological, and landscaping enhancements is also proposed. The package of ecological and landscaping enhancements which are proposed along with measures to address climate change carry moderate weight in favour of the proposal.

For the reasons outlined within the report, it is considered that overall, the benefits of the proposed development are considered to significantly outweigh the less than substantial harm and the application is recommended for approval, subject to a Section 106 agreement and planning conditions.

2. RECOMMENDATION

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

1. That the application be referred to the Mayor under Article 5 of the Town and Country Planning (Mayor of London) Order 2008.

2. That the Council enter into a legal agreement with the applicant under Section 106/Deed of Variation of the Town and Country Planning Act 1990 (as amended) to secure the following:

i) To secure all necessary highway works including written agreement from the Local Planning Authority; (Section 278) including traffic calming changes along Iron Bridge Road;

ii) A full and formal Travel Plan with associated £20,000.00 bond to include a Sustainable Transport Measures is required to be submitted and agreed in writing by the LPA before occupation of the development. Thereafter, the Travel Plan is required to be reviewed annually to monitor and if required, update and/or amend the document to the satisfaction of the LPA, in order that its aims and objectives are achieved. Travel Plan coordinated as far as reasonably possible with GSK travel plans and Stockley Park travel plans;

iii) Carbon Fund: a contribution of £178,200 for a carbon fund to make up for the shortfall for this development and in order to make the development policy compliant (£1800 for every tCO₂/annum that is below the zero carbon target);

iv) Carbon Reporting Clause: Should the carbon reduction performance of the development fail to meet the required targets (Carbon Reduction Condition) as set out in the reports to the Local Planning Authority (Carbon Reporting Condition) then the building occupier/management company must provide alternative solutions to the Local Planning Authority to ensure the targets are met.

v) Air Quality in line with the SPD and given the site is located in an air quality management area, a contribution in the sum of £206,032;

vi) A contribution of £250,000 towards Sustainable Highways Capacity Improvements;

vii) A contribution of £20,000 for improving access to and the enhancing the routes within Stockley Country Park;

viii) The requirement to prepare and implement a canalside landscaping strategy

and maintenance regime (including details of additional tree planting along the canal as shown on plan ref: 1982-19-05.dwg 05 Rev. I) in agreement with the Canal & River Trust;

ix) The implementation of canal wayfinding and access improvement measures;

x) The retention of, or, relocation of the existing sculpture (At the site entrance on Iron Bridge Road) and off site tree planting in agreement with the Local Planning Authority;

xi) Employment Strategy and Construction Training - either a contribution equal to the formula within the Council Planning Obligations Supplementary Planning Document (SPD) 2014, or an in-kind training scheme equal to the financial contribution delivered during the construction period of the development. Details shall be in accordance with the Council Planning Obligations SPD with the preference being for an in-kind scheme to be delivered. Securing an Employment/Training Strategy Agreement is Council's priority. Financial Contribution will only be accepted in exceptional circumstances; and

xii) Project Management and Monitoring Fee: a financial contribution equal to 5% of the total cash contributions towards the management and monitoring of the resulting agreement.

3) That the applicant meets the Council's reasonable costs in the preparation of the Section 106 agreement/Deed of Variation and any abortive work as a result of the agreement not being completed.

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

5) That if any of the heads of terms set out above have not been agreed and the Section 106 Agreement has not been finalised before within 6 months of the committee meeting, or any other period deemed appropriate that delegated authority be given to the Head of Planning, Transportation and Regeneration to refuse the application for the following reason:

'The development has failed to secure obligations relating to a travel plan, public transport improvements, air quality, canal side improvements, preserving the special interest of Stockley Park and construction training. The scheme therefore conflicts with Policies DMCI 7 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020); the adopted Planning Obligations Supplementary Planning Document (July 2014); Policies 8.2 of the London Plan (March 2016); Policy DF1 of the London Plan - Intend to Publish Version (December 2019); and paragraphs 54-57 of the National Planning Policy Framework (February 2019).'

6) 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: 30928-PL-200, 30928-PL-201D, 30928-PL-202A, 30928-PL-203C, 30928-PL-205A, 30928 PL 206C, 30928-PL-210, 30928-PL-211, 1982-19-03.dwg Rev. C, 1982-19-05.dwg 05 Rev. I, 1982-19-05.dwg 06 Rev. E, 1982-19-05.dwg 07 Rev. C, 1982-19-05.dwg 08 Rev. A, 1982-19-05.dwg 09 Rev. A, PPWLE-RPS-SI-XX-DR-C-1600 Rev. P04, PPWL-RPS-SI-XX-DR-D-1300 Rev. P04 and PPWL-RPS-SI-XX-DR-D-1302 Rev. P04 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 Development Management Policies (2020) and the London Plan (2016).

3 COM5 General compliance with supporting documentation

The development hereby permitted shall not be carried out except in complete with the specified supporting plans and/or documents:

Covering Letter dated 03 July 2020
Design and Access Statement dated July 2020
Air Quality Assessment dated October 2020
Outline Construction Logistics Plan dated June 2020
Delivery and Servicing Plan dated June 2020
Ecology Assessment dated June 2020
Geo-Environmental - Preliminary Risk Assessment dated June 2020
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Property Market Assessment dated June 2020
Landscape and Visual Impact Appraisal dated June 2020
Landscape Design Statement dated June 2020
Landscape Maintenance and Management Plan dated June 2020

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

REASON

To ensure the development complies with the provisions of the Hillingdon Local Plan: Part Two - Development Management Policies (2020) and the London Plan (2016).

4 OM19 Demolition Management Plan

Prior to demolition and construction management plan to the Local Planning Authority for its approval. The plan shall detail:

- (i) The phasing of demolition works.
- (ii) The hours of demolition work;
- (iii) A programme to demonstrate that the most valuable or potentially contaminating materials and fittings can be removed safely and intact for later re-use or processing.
- (iv) Measures to prevent mud and dirt tracking onto footways and adjoining roads (including wheel washing facilities).
- (v) Traffic management and access arrangements (vehicular and pedestrian) and parking provisions for contractors during the demolition process
- (vi) Measures to reduce the impact of the development on local air quality and dust through minimising emissions throughout the demolition and construction process.
- (vii) The storage of demolition/construction materials on site.

The approved details shall be implemented and maintained throughout the duration of the demolition and construction process.

REASON

To safeguard the amenity of surrounding areas and manage highways impacts in accordance with Policies DMHB 11, DMT 2 and DMEI 14 of the Hillingdon Local Plan: Part Two - Development Management Policies (2020).

5 NONSC Construction Logistics Plan

Prior to development commencing, the applicant shall submit a construction management plan to the Local Planning Authority for its approval. The plan shall detail:

- (i) The phasing of development works.
- (ii) The hours during which development works will occur (please refer to informative I15 for maximum permitted working hours).
- (iii) A programme to demonstrate that the most valuable or potentially contaminating materials and fittings can be removed safely and intact for later re-use or processing.
- (iv) Measures to prevent mud and dirt tracking onto footways and adjoining roads (including wheel washing facilities).
- (v) Traffic management and access arrangements (vehicular and pedestrian) and parking provisions for contractors during the development process (including measures to reduce the numbers of construction vehicles accessing the site during peak hours).
- (vi) Measures to reduce the impact of the development on local air quality and dust through minimising emissions throughout the demolition and construction process.
- (vii) The storage of construction materials on site.

The approved details shall be implemented and maintained throughout the duration of the demolition and construction process.

REASON

To safeguard the amenity of surrounding areas and manage highways impacts in accordance with Policies DMHB 11, DMT 2 and DMEI 14 of the Hillingdon Local Plan: Part Two - Development Management Policies (2020).

6 COM10 Tree to be retained

Trees, hedges and shrubs shown to be retained on the approved plan shall not be damaged, uprooted, felled, lopped or topped without the prior written consent of the Local

Planning Authority. If any retained tree, hedge or shrub is removed or severely damaged during construction, or is found to be seriously diseased or dying another tree, hedge or shrub shall be planted at the same place or, if planting in the same place would leave the new tree, hedge or shrub susceptible to disease, then the planting should be in a position to be first agreed in writing with the Local Planning Authority and shall be of a size and species to be agreed in writing by the Local Planning Authority and shall be planted in the first planting season following the completion of the development or the occupation of the buildings, whichever is the earlier. Where damage is less severe, a schedule of remedial works necessary to ameliorate the effect of damage by tree surgery, feeding or groundwork shall be agreed in writing with the Local Planning Authority. New planting should comply with BS 3936 (1992) 'Nursery Stock, Part 1, Specification for Trees and Shrubs'

Remedial work should be carried out to BS BS 3998:2010 'Tree work - Recommendations' and BS 4428 (1989) 'Code of Practice for General Landscape Operations (Excluding Hard Surfaces)'. The agreed work shall be completed in the first planting season following the completion of the development or the occupation of the buildings, whichever is the earlier.

REASON

To ensure that the trees and other vegetation continue to make a valuable contribution to the amenity of the area in accordance with policy DMHB 14 of the Hillingdon Local Plan Part 2 (2020) and to comply with Section 197 of the Town and Country Planning Act 1990.

7 COM8 Tree Protection

No site clearance or construction work shall take place until the details have been submitted to, and approved in writing by, the Local Planning Authority with respect to:

1. A method statement outlining the sequence of development on the site including demolition, building works and tree protection measures.
2. Detailed drawings showing the position and type of fencing to protect the entire root areas/crown spread of trees, hedges and other vegetation to be retained shall be submitted to the Local Planning Authority for approval. No site clearance works or development shall be commenced until these drawings have been approved and the fencing has been erected in accordance with the details approved. Unless otherwise agreed in writing by the Local Planning Authority such fencing should be a minimum height of 1.5 metres.

Thereafter, the development shall be implemented in accordance with the approved details. The fencing shall be retained in position until development is completed.

The area within the approved protective fencing shall remain undisturbed during the course of the works and in particular in these areas:

- 2.a There shall be no changes in ground levels;
- 2.b No materials or plant shall be stored;
- 2.c No buildings or temporary buildings shall be erected or stationed.
- 2.d No materials or waste shall be burnt; and.
- 2.e No drain runs or other trenches shall be dug or otherwise created, without the prior written consent of the Local Planning Authority.

3. Where the arboricultural method statement recommends that the tree protection measures for a site will be monitored and supervised by an arboricultural consultant at key stages of the development, records of the site inspections / meetings shall be submitted

to the Local Planning Authority.

REASON

To ensure that trees and other vegetation can and will be retained on site and not damaged during construction work and to ensure that the development conforms with policy DMHB 14 of the Hillingdon Local Plan Part 2 (2020)

8 COM9 Landscaping (car parking & refuse/cycle storage)

Prior to above ground works, a landscape scheme has been submitted to and approved in writing by the Local Planning Authority. The scheme shall include: -

1. Details of Soft Landscaping
 - 1.a Planting plans (at not less than a scale of 1:100),
 - 1.b Written specification of planting and cultivation works to be undertaken,
 - 1.c Schedule of plants giving species, plant sizes, and proposed numbers/densities where appropriate

2. Details of Hard Landscaping
 - 2.a Refuse Storage
 - 2.b Cycle Storage for 94 spaces including accessible cycle parking spaces and spaces for cargo bikes and shower and changing facilities within the development for staff
 - 2.c Means of enclosure/boundary treatments
 - 2.d Car Parking Layouts (including demonstration that 20% of all parking spaces are served by active EVCP and 80% of all car parking spaces are served by passive EVCP, 22 spaces are reserved for blue badge holders with a further 11 spaces available for brown badge holders) and 11 motorcycle parking spaces with anchor points
 - 2.e Hard Surfacing Materials
 - 2.f External Lighting
 - 2.g Other structures

3. Living Walls and Roofs
 - 3.a Details of the inclusion of living walls and roofs
 - 3.b Justification as to why no part of the development can include living walls and roofs

4. Details of Landscape Maintenance
 - 4.a Landscape Maintenance Schedule for a minimum period of 5 years.
 - 4.b Proposals for the replacement of any tree, shrub, or area of surfing/seeding within the landscaping scheme which dies or in the opinion of the Local Planning Authority becomes seriously damaged or diseased.

5. Schedule for Implementation

6. Other
 - 6.a Existing and proposed functional services above and below ground
 - 6.b Proposed finishing levels or contours

Thereafter the development shall be carried out and maintained in full accordance with the approved details.

REASON

To ensure that the proposed development will preserve and enhance the visual amenities of the locality and provide adequate facilities in compliance with policies DMHB

11, DMHB 14, DMEI 1 and DMT 6 of the Hillingdon Local Plan Part 2 (2020) and Policies 5.11 and 5.17 of the London Plan (2016).

9 NONSC Bird Hazard Management Plan

Development shall not commence until a Bird Hazard Management Plan has been submitted to and approved in writing by the Local Planning Authority. The submitted plan shall include details of:

-management of any flat/shallow pitched/green roofs on buildings within the site which may be attractive to nesting, roosting and "loafing" birds. The management plan shall comply with Advice Note 3 'Wildlife Hazards' (available at <http://www.aoa.org.uk/wp-content/uploads/2016/09/Advice-Note-3-Wildlife-Hazards-2016.pdf>).

The Bird Hazard Management Plan shall be implemented as approved and shall remain in force for the life of the building. No subsequent alterations to the plan are to take place unless first submitted to and approved in writing by the Local Planning Authority.

REASON

To ensure the safe movement of aircraft and the operation of Heathrow Airport in accordance with Policy DMAV 1 of the Local Plan: Part Two - Development Management Policies (2020).

10 NONSC Landscaping - Bird Hazard Management

No development shall take place until the following details have been submitted to and approved in writing by the Local Planning Authority, details must comply with Advice Note 3, 'Potential Bird Hazards from Amenity Landscaping & Building Design' available at www.aoa.org.uk/policy-campaigns/operations-safety). These details shall include:

-'No bird feeding signs' to be installed where the site provides access to the canal edges.

No subsequent alterations to the approved landscaping scheme are to take place unless submitted to and approved in writing by the Local Planning Authority. The scheme shall be implemented as approved.

REASON

To ensure the safe movement of aircraft and the operation of Heathrow Airport in accordance with Policy DMAV 1 of the Local Plan: Part Two - Development Management Policies (2020).

11 NONSC Servicing and Delivery Plan

Prior to the occupation of development details of a Delivery and Servicing Plan which identifies efficiency and sustainability measures to be undertaken once the development is operational shall be submitted to and approved in writing by the Local Planning Authority in consultation with Transport for London. This shall incorporate measures to minimise vehicle deliveries/servicing during am and pm peak hours.

REASON

To encourage out of hours/off peak servicing to help mitigate the site's contribution to local congestion levels in compliance with Policies DMT 1 and 2 of the Hillingdon Local Plan Part 2 (2020).

12 COM26 Ecology

Prior to the above ground works, an ecological enhancement plan shall be submitted to and approved in writing by the Local Planning Authority. The scheme shall include plans

and specifications that demonstrate the incorporation of measures and features within the landscaping and the fabric of the building that support a range of habitats and species, as a minimum it is recommended that living walls/screens, green roofs, bat and bird boxes and artificial refugia will be included.

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 the development incorporates appropriate energy efficiency measures in accordance with Policy 5.2 of the London Plan (2016) and Policy DMEI 2 of the Local Plan: Part 2 - Development Management Policies(2020).

13 NONSC Carbon Reduction

Prior to the commencement of above ground works, full details including specifications of the low and zero carbon technology to be used onsite shall be submitted and approved in writing by the Local Planning Authority. The details shall demonstrate the development will achieve the reduction targets identified in the energy strategy (Yonder, July 2020) and provide the necessary information relating to the type, size and location of the relevant technology. In the case of the PVs, the details shall include a roof plan and elevations showing their inclusion. The development must proceed in accordance with the approved details unless otherwise agreed in writing by the Local Planning Authority.

Reason: To ensure the development contributes to the management of carbon emissions in accordance with London Plan Policy 5.2.

14 NONSC Sustainable Urban Drainage Scheme

Prior to commencement,(excluding demolition and site clearance) 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, manages water and demonstrate ways of controlling the surface water on site by providing information on a scheme shall clearly demonstrate the following:

a) Suds features:

i. A site investigation must be provided to establish the infiltration potential and level of groundwater on the site to determine appropriate SuDs methods (This should be undertaken at the appropriate time of year as groundwater levels fluctuate).

ii. Evaluation of all sustainable urban drainage options in accordance with the hierarchy set out in Policy 5.13 of the London Plan. Where the proposal does not utilise the most sustainable solution, justification must be provided, Living Walls and Roofs and on site vegetation should be integrated in any drainage design Any proposal should use of methods to minimise the use of potable water through water collection, reuse and recycling by:

- incorporating water saving measures and equipment.
- providing details of water collection facilities to capture excess rainwater and or
- providing details of how rain and grey water will be recycled and reused in the development.

iii. calculations showing storm period and intensity and volume of storage required to control surface water and size of features to control that volume to Greenfield run off rates at a variety of return periods including 1 in 1, 1 in 30, 1 in 100, and 1 in 100 year plus Climate change,

iv. Safe access and egress must be demonstrated - any above ground storage and or overland flooding or flows paths should be mapped, (please include depths and velocities

and hazards) above the 100, plus climate change.

v. During Construction i. How temporary measures will be implemented to ensure no increase in flood risk from commencement of construction.

vi. Long Term Management and Maintenance of the drainage system including clear plans showing the responsibility of different parties should be provided, such as the landowner, PMC, sewers offered for adoption and that to be adopted by the Council Highways services. Where it is a PMC the details of the body legally responsible for the implementation of the management and maintenance plan must be provided.

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 DMEI 10 Water Management, Efficiency and Quality in Hillingdon Local Plan Part 2 Development Management Policies (2020), Policies 5.12, 5.13 and 5.15 of the London Plan (2016), National Planning Policy Framework (2019), and the Planning Practice Guidance (Flood Risk and Coastal Change March 2014).

15 NONSC External Lighting

Prior to occupation, an external lighting scheme shall be submitted and approved in writing by the Local Planning Authority. Details shall include measures to ensure that external lights are automatically turned off when the buildings are not in use. The development shall thereafter be completed in accordance with the approved scheme and shall remain in place for the lifetime of the development.

REASON

To protect the biodiversity along the Grand Union Canal in accordance with policies DMHB 1, DMHB 8, DMHB 11 and DMEI 7 of the Hillingdon Local Plan: Part Two - Development Management Policies (2020) and to reduce energy demands in accordance with Policy 5.2 of the London Plan (2016).

16 NONSC CRT Risk Assessment and Method Statement

Prior to the commencement of the development (other than demolition and site clearance), a Risk Assessment and Method Statement shall be submitted to and approved in writing by the Local Planning Authority in consultation with the Canals and Rivers Trust. The Risk Assessment and Method Statement shall identify risks to the stability of canal infrastructure, the waterway environment and the health, safety and enjoyment of canal users during demolition and construction phases. It shall demonstrate that such risks have been adequately avoided, mitigated or managed through the method statement. Once approved, development shall be carried out in accordance with the Risk Assessment and Method Statement.

REASON

To ensure the development does not have an adverse impact on the structural integrity of waterway assets, the environment of the Grand Union Canal and its users in accordance with Policies DMHB 11 and DMEI 7 of the Hillingdon Local Plan: Part Two - Development Management Policies (2020).

17 NONSC Low Emissions Strategy inc Boilers

The development shall not be occupied until a low emissions strategy has been submitted to and approved in writing by the LPA. The low emission strategy shall include:

1. Fleet composition - to include a quantified baseline for the current fleet, with targets set for the continued use of lower emission vehicles. This should be reviewed on annual basis

- to demonstrate continual improvement from this source of emissions, with a view to move towards a Euro VI fleet as soon as practicable;
2. Traffic management schemes - to include the enforcement of no-idling practices; and
 3. Emissions from energy plant - to include the use of low NOx boilers.

The approved details shall be implemented and maintained throughout the duration of the demolition and construction process.

REASON

To ensure the development complies with Policy EM8 of the Hillingdon Local Plan: Part 1 - Strategic Policies (November 2012), Policy 7.14 of the London Plan (2016) and paragraph 124 of the National Planning Policy Framework.

18 NONSC Non Road Mobile Machinery

All Non Road Mobile Machinery (NRMM) used on major development sites within the London Borough of Hillingdon are required to meet Stage IIIA of EU Directive 97/68/EC and the development site must be registered online on the NRMM website at <http://nrmm.london/>.

REASON

To ensure the development complies with Policy EM8 of the Hillingdon Local Plan: Part 1, Policy 7.14 of the London Plan (2016) and paragraph 124 of the National Planning Policy Framework.

19 NONSC Carbon Reporting

Prior to occupation of development, a scheme for the recording, monitoring and reporting of the carbon emissions performance of the development shall be submitted to and agreed in writing by the local planning authority. The scheme shall set out the methods for measuring carbon performance, how the savings identified in the energy assessment will be recorded and the mechanisms and timings for reporting such data to the Local Planning Authority. The development must be operated in accordance with the approved scheme.

Reason: To ensure the development continues to contribute to the management of carbon emissions in accordance with London Plan Policy 5.2.

20 NONSC Restriction of Uses

The development hereby permitted, shall only be occupied by uses falling within Class E (Research and Development/Industrial), Class B2 or Class B8 as defined by the Town & Country Planning (Use Classes) Order 1987, notwithstanding the changes to the Use Classes Order in relation to Use Class E. No other 'E' use class is permitted without seeking full planning permission.

REASON

To enable the Local Planning Authority to assess all the implications of the development and in accordance with policies DME 1 of the Local Plan: Part Two Development Management Policies (2020).

21 COM13 Restrictions - Enlargement of Industrial/Warehouse Buildings

Notwithstanding the provisions of Part 7, Schedule 2 of the Town and Country Planning (General Permitted Development) Order 2015 (or any order revoking and re-enacting that Order with or without modification), the buildings shall not be extended without the prior written consent of the Local Planning Authority.

REASON

To enable the Local Planning Authority to assess all the implications of the development and in accordance with policies DMHB 11 of the Local Plan: Part Two Development Management Policies (2020).

22 COM14 No additional internal floorspace

Notwithstanding the provisions of Section 55 of the Town and Country Planning Act 1990 (or any others revoking and re-enacting this provision with or without modification), no additional internal floorspace shall be created in excess of that area expressly authorised by this permission.

REASON

To enable the Local Planning Authority to assess all the implications of the development and to ensure that adequate parking and loading facilities can be provided on the site, in accordance with Policy DMT 1 and DMT 2 of the Local Plan: Part Two Development Management Policies (2020).

23 NONSC Parking Allocation Scheme

The development hereby approved shall not be occupied until a parking allocation scheme has been submitted to, and approved in writing by, the Local Planning Authority should the development be subdivided. The parking allocation scheme shall, as a minimum, include the appropriate level of provision for each use class and dedicated in such a manner for the life-time of the development.

REASON

To ensure that an appropriate level of car parking provision is provided on site in accordance with Policy DMT 6 of the Hillingdon Local Plan: Part Two - Development Management Policies (2020) and Chapter 6 of the London Plan (2016).

24 NONSC Contaminated Land

(i) Prior to commencement, other than demolition a scheme to deal with contamination shall be submitted to the Local Planning Authority (LPA) in accordance with the Supplementary Planning Guidance Document on Land Contamination, and approved by the LPA. All works which form part of the remediation scheme shall be completed before any part of the development is occupied or brought into use unless the Local Planning Authority dispenses with any such requirement specifically and in writing. The scheme shall include all of the following measures unless the LPA dispenses with any such requirement specifically and in writing:

(a) A further programme of targeted soil and groundwater sampling, monitoring and testing, together with reporting of the results of analysis and Detailed Quantitative Risk Assessment, shall be carried out by a suitably qualified and accredited consultant/contractor. The report should also clearly identify all risks, limitations and recommendations for remedial measures to make the site suitable for the proposed use; and

(b) A written method statement providing details of the remediation scheme and how the completion of the remedial works will be verified shall be agreed in writing with the LPA prior to commencement of each phase, along with the details of a watching brief to address undiscovered contamination. No deviation shall be made from this scheme without the express agreement of the LPA prior to its implementation.

(ii) If during remedial or development works contamination not addressed in the submitted

remediation scheme is identified an addendum to the remediation scheme shall be agreed with the LPA prior to implementation; and

(iii) Upon completion of the approved remedial works, this condition will not be discharged until a comprehensive verification report has been submitted to and approved by the LPA. The report shall include the details of the final remediation works and their verification to show that the works for each phase have been carried out in full and in accordance with the approved methodology.

(iv) 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 DMEI 12 of the Local Plan: Part Two - Development Management Policies (2020).

25 NONSC Fire Strategy

The principles of the submitted Fire Strategy Report shall be implemented on site in conjunction with a suitably qualified consultant. Thereafter the development shall not be carried out other than in accordance with the approved details.

REASON

To ensure that the development meets Fire Safety Standards in accordance with policy D12 of the draft London Plan (Intend to Publish version 2019).

26 COM31 Secured by Design

The application site 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 ensure the development provides a safe and secure environment in accordance with Hillingdon Local Plan Part 2 policy DMHB 15 and London Plan (2016) Policies 7.1 and 7.3.

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).

2 153 **Compulsory Informative (2)**

The decision to GRANT planning permission has been taken having regard to the policies and proposals in the Hillingdon adopted Local Plan (2012 and 2020), including Supplementary Planning Guidance, and to all relevant material considerations, including the London Plan (2016) and national guidance.

DMAV 1	Safe Operation of Airports
DMCI 7	Planning Obligations and Community Infrastructure Levy
DME 1	Employment Uses in Designated Sites
DMEI 1	Living Walls and Roofs and Onsite Vegetation
DMEI 10	Water Management, Efficiency and Quality
DMEI 11	Protection of Ground Water Resources
DMEI 12	Development of Land Affected by Contamination
DMEI 13	Importation of Material
DMEI 14	Air Quality
DMEI 2	Reducing Carbon Emissions
DMEI 7	Biodiversity Protection and Enhancement
DMEI 8	Waterside Development
DMEI 9	Management of Flood Risk
DMHB 11	Design of New Development
DMHB 12	Streets and Public Realm
DMHB 14	Trees and Landscaping
DMHB 15	Planning for Safer Places
DMHB 8	Registered Historic Parks, Gardens and Landscapes
DMT 1	Managing Transport Impacts
DMT 2	Highways Impacts
DMT 3	Road Safeguarding
DMT 4	Public Transport
DMT 5	Pedestrians and Cyclists
DMT 6	Vehicle Parking
LPP 1.1	(2016) Delivering the strategic vision and objectives for London
LPP 2.13	(2016) Opportunity Areas and Intensification Areas
LPP 2.17	(2016) Strategic Industrial Locations
LPP 2.18	(2016) Green Infrastructure: the multi functional network of open and green spaces
LPP 2.7	(2016) Outer London: Economy
LPP 2.8	(2016) Outer London: Transport
LPP 5.1	(2016) Climate Change Mitigation
LPP 5.10	(2016) Urban Greening
LPP 5.11	(2016) Green roofs and development site environs
LPP 5.12	(2016) Flood risk management
LPP 5.13	(2016) Sustainable drainage
LPP 5.21	(2016) Contaminated land
LPP 5.3	(2016) Sustainable design and construction
LPP 6.10	(2016) Walking
LPP 6.11	(2016) Smoothing Traffic Flow and Tackling Congestion
LPP 6.12	(2016) Road Network Capacity
LPP 6.13	(2016) Parking

LPP 6.9	(2016) Cycling
LPP 7.14	(2016) Improving air quality
LPP 7.15	(2016) Reducing and managing noise, improving and enhancing the acoustic environment and promoting appropriate soundscapes.
LPP 7.4	(2016) Local character
LPP 7.5	(2016) Public realm
LPP 7.6	(2016) Architecture
LPP 8.1	(2016) Implementation
LPP 8.2	(2016) Planning obligations
LPP 8.3	(2016) Community infrastructure levy
LPP 8.4	(2016) Monitoring and review
NPPF- 11	NPPF-11 2018 - Making effective use of land
NPPF- 12	NPPF-12 2018 - Achieving well-designed places
NPPF- 15	NPPF-15 2018 - Conserving and enhancing the natural environment
NPPF- 16	NPPF-16 2018 - Conserving & enhancing the historic environment
NPPF- 2	NPPF-2 2018 - Achieving sustainable development
NPPF- 4	NPPF-4 2018 - Decision-making
NPPF- 6	NPPF-6 2018 - Building a strong, competitive economy
NPPF- 9	NPPF-9 2018 - Promoting sustainable transport

3 170 LBH worked applicant in a positive & proactive (Granting)

In dealing with the application the Council has implemented the requirement in the National Planning Policy Framework to work with the applicant in a positive and proactive way. We have made available detailed advice in the form of our statutory policies from Local Plan Part 1, Local Plan Part 2, Supplementary Planning Documents, Planning Briefs and other informal written guidance, as well as offering a full pre-application advice service, in order to ensure that the applicant has been given every opportunity to submit an application which is likely to be considered favourably.

4 115 Control of Environmental Nuisance from Construction Work

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, and by means that would minimise disturbance to adjoining premises. For further

information and advice, contact the Environmental Protection Unit, 3S/02 Civic Centre, High Street, Uxbridge, Middlesex UB8 1UW (tel. 01895 250155).

5

In dealing with the application the Council has implemented the requirement in the National Planning Policy Framework to work with the applicant in a positive and proactive way. We have made available detailed advice in the form of our statutory policies from the Local Plan Part 1 and Local Plan Part 2, Supplementary Planning Documents, Planning Briefs and other informal written guidance, as well as offering a full pre-application advice service, in order to ensure that the applicant has been given every opportunity to submit an application which is likely to be considered favourably.

6 I60 **Cranes**

Given the nature of the proposed development it is possible that a crane may be required during its construction. The applicant's attention is drawn 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 www.aoa.org.uk/publications/safeguarding.asp)

7

Wind Turbines can impact on the safe operation of aircraft through interference with aviation radar and/or due to their height. Any proposal that incorporates wind turbines must be assessed in more detail to determine the potential impacts on aviation interests. This is explained further in Advice Note 7, 'Wind Turbines and Aviation' available at <http://www.aoa.org.uk/policy-campaigns/operations-safety/>

8 I23 **Works affecting the Public Highway - Vehicle Crossover**

The development requires the formation of a vehicular crossover, which will be constructed by the Council. This work is also subject to the issuing of a separate licence to obstruct or open up the public highway. For further information and advice contact: - Highways Maintenance Operations, 4W/07, Civic Centre, Uxbridge, UB8 1UW.

9 I23B **Heavy Duty Vehicle Crossover**

Prior to work commencing, you are advised to submit an application for a Heavy Duty Vehicle Crossover to Highways Maintenance, 4W/07, Civic Centre, Uxbridge, UB8 1UW to prevent damage to the highway from construction vehicles entering and leaving the site.

10

The proposed development is located within 15 metres of Thames Waters underground assets and as such, the development could cause the assets to fail if appropriate measures are not taken. Please read our guide 'working near our assets' to ensure your workings are in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures. <https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Working-near-or-diverting-our-pipes>. Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk Phone: 0800 009 3921 (Monday to Friday, 8am to 5pm) Write to: Thames Water Developer Services, Clearwater Court, Vastern Road, Reading, Berkshire RG1 8DB.

11

A Groundwater Risk Management Permit from Thames Water will be required for

discharging groundwater into a public sewer. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures he will undertake to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 020 3577 9483 or by emailing trade.effluent@thameswater.co.uk. Application forms should be completed on line via www.thameswater.co.uk. Please refer to the Wholesale; Business customers; Groundwater discharges section.

12

The applicant is advised to review the Canal and River Trust's 'Code of Practice for Works affecting the Canal and River Trust and contact the Trust's Works Engineer (John.Pryer@canalrivertrust.org.uk) in order to ensure that any necessary consents are obtained and that the works are compliant. (<https://canalrivertrust.org.uk/business-and-trade/undertaking-works-on-ourpropertyandour-code-of-practice>).

The applicant/developer is advised that any oversail, encroachment or access to the waterway requires written consent from the Canal & River Trust, and they should contact the Canal & River Trust regarding the required access agreement.

The application site includes land over which the Trust has a freehold interest. The developer/applicant is advised to contact the Trust's Estates Team on 0303 040 4040 or email Bernadette.McNicholasa@canalrivertrust.org.uk in order to ensure that any necessary consents are obtained.

3. CONSIDERATIONS

3.1 Site and Locality

The application site measures approximately 6.3 ha in size and comprises a broadly rectangular in shape. The application site currently comprises 3 office buildings totalling approx. 31,575 sq.m of Class B1(a) floorspace. The buildings are surrounded by a substantial amount of ancillary surface level car parking. In the south eastern corner of the site there is also a large multi-storey car park associated with the GSK offices.

The site lies to the west of Stockley Road and to the north of Iron Bridge Road. The site is bound by Horton Road to the north and Ironbridge Road North runs along the western boundary of the site. Stockley Park Country Park and Golf Course, an extensively landscaped public park provided on a historic landfill site, is situated to the north of the site, across Horton Road. To the south, the site is bound by the Grand Union Canal and towpath which is managed by the Canal and River Trust.

The site forms part of the wider well-established Stockley Park commercial area and is located to the west of the development known as Prologis Park West London (formerly known as Stockley Park Phase 3). This site is characterised by large industrial buildings, currently occupied by a data centre operator. To the east, beyond Stockley Road, the Stockley Park office campus, largely characterised by a range of large low density office buildings ranging from two to four storeys, set within extensive landscaping and car parking.

The site is bound by land within the Green Belt. Some existing hardstanding areas and part of the existing multi-storey car park in the south-eastern corner of the site encroach into the

Green Belt. The site is bordered by trees and landscaping along each of the site boundaries, helping to screen it from the surrounding highways and from the canal. The site is currently accessed from one combined vehicular and pedestrian access on Ironbridge Road.

The site is located within Flood Zone 1 and is not located within a conservation area and there are no listed buildings on or within the vicinity of the site. On 18 August 2020, Stockley Park: Business park Phases I and II, country park and golf course was registered as a Grade II listed Park and Garden, the site forms part of the listing. Green Chains run on a north-south axis to the east and west of the site. A public footpath (Y27) runs along an east west axis of the canal towpath. To the south of the site, the Grand Union Canal is designated as a Grade I Nature Conservation Site of Metropolitan Importance.

3.2 Proposed Scheme

The application is seeking planning permission for the "redevelopment of the site to provide two industrial units providing industrial floorspace (Use Class B1c/B2/B8) and ancillary offices together with associated parking, access arrangements, landscaping and infrastructure."

Use

The proposals seek the comprehensive redevelopment of the site to deliver 30,627 sqm (GIA) of new flexible industrial floorspace (Class B1c, B2 and B8 uses), the proposal also includes two small offices which are proposed to be ancillary to the main industrial use.

It should be noted that the application was submitted on 15 July 2020. From 1 September 2020, for purposes of Use Class, A1/2/3 & B1 have been redefined as Class E. A condition is proposed to be secured with the consent requiring the development to be used as industrial uses with an ancillary office only.

Amount and Layout

The development will comprise two buildings. Unit 1 is proposed to be 17,673 sq.m and Unit 2 is proposed to be 12,954 sq.m. Each building will include an associated ancillary office element, service yard with loading and delivery bays and areas for staff car parking. The main building would be located within the central portion of the site

Unit 1, which is the larger of the two, will be located on the southern part of the site, nearest to the Grand Union Canal. Unit 2 will be located on the northern part of the site, adjacent to Horton Road. The building will be set back from Horton Road with hard and soft landscaping.

The height of the buildings extend up to a maximum of 18.10m for unit 1 and 17.80m for unit 2 to external ridge. The office space provided remains ancillary to the main distribution and industrial functions of the operation.

It is noted that the existing sculpture at the existing site entrance would be relocated within Stockley Park, the Applicant has committed to a Section 106 HoT to ensure the sculpture is relocated within Stockley Park before the development is completed.

Access

The existing main access to the site is via Iron Bridge Road to the west of the site. Iron Bridge Road is a two way single carriageway road running in an north-south direction from Horton Road.

The main HGV access into the site will be provided from Ironbridge Road. Two additional vehicular access will be provided from Ironbridge Road to each unit proposed, providing access to staff and visitor car parking only. All vehicles will therefore access the site from Ironbridge Road, via Horton Road, with no direct access proposed from Stockley Road (A408).

Car Parking

The Site currently includes three office buildings. The buildings are surrounded by surface level car parking, providing approximately 885 parking spaces, and a multi-storey car park in the south-eastern corner of the Site, with approximately 350 parking spaces (1,235 car parking spaces across the site).

217 car parking spaces, including disabled spaces and electric vehicle parking, will be provided, as well as spaces for HGV's. A total of 94 cycle parking spaces will be provided across the site.

20% of car parking spaces will be provided with active EVCP and the remaining 80% will be provided with passive provision. Additionally, all parking spaces for operational vehicles will be provided with active EVCP.

10% of employee car parking spaces will be designed under accessible standards.

Motorcycle Parking

11 motorcycle parking spaces will be provided of which 7 motorcycle parking spaces would be allocated for Unit 1 and 6 spaces for Unit 2 will be provided respectively.

Cycle Parking

94 cycle parking spaces will be provided which includes 31 short stay cycle parking spaces and 61 long stay cycle parking spaces.

3.3 Relevant Planning History

39207/A/96/0024 Unit A Stockley Works Horton Road Yiewsley

Formation of additional offices on ground and first floor in the main warehouse area, external alterations to building with additional car parking and landscaping

Decision: 17-04-1996 Approved

39207/APP/2012/2327 Unit 1a Horton Road Yiewsley

Installation of a security barrier, turnstile, security fencing, CCTV and other associated works in an existing car park.

Decision: 22-11-2012 Approved

39207/APP/2013/258 Unit 1a Horton Road Yiewsley

Reduction in parking spaces from 65 to 64 spaces; additional dropped kerb detailing; security card reader and intercom detailing; and a decrease in height of the boundary fence from 2.8m to 2.73m (Application for a non-material amendment to Planning Permission Ref: 39027/APP/2012/2327)

Decision: 20-02-2013 Approved

39207/APP/2016/4611 1-3 Iron Bridge Road West Drayton Stockley Park

Continued use of the site as an office use (Use Class B1(a)) (Application for a Certificate of Law Development for an Existing Development)

Decision: 15-02-2017 Approved

Comment on Relevant Planning History

Relevant planning history is set out above.

4. Planning Policies and Standards

Development Plan

Planning law requires that applications for planning permission be determined in accordance

with the development plan, unless material considerations indicate otherwise.

The Development Plan for the London Borough of Hillingdon currently consists of the following documents:

- The Local Plan: Part 1 - Strategic Policies (2012)
- The Local Plan: Part 2 - Development Management Policies (2020)
- The Local Plan: Part 2 - Site Allocations and Designations (2020)
- The West London Waste Plan (2015)
- The London Plan - Consolidated With Alterations (2016)

Material Considerations

The National Planning Policy Framework (NPPF) (2019) is also a material consideration in planning decisions, as well as relevant supplementary planning documents and guidance.

Emerging Planning Policies

Paragraph 48 of the National Planning Policy Framework (NPPF) 2019 states that 'Local Planning Authorities may give weight to relevant policies in emerging plans according to:

(a) the stage of preparation of the emerging plan (the more advanced its preparation, the greater the weight that may be given);

(b) the extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given); and

(c) the degree of consistency of the relevant policies in the emerging plan to this Framework (the closer the policies in the emerging plan to the policies in the Framework, the greater the weight that may be given).

Draft London Plan (Intend to Publish Version, December 2019)

The GLA consulted upon a draft new London Plan between December 2017 and March 2018 with the intention of replacing the previous versions of the existing London Plan. The Plan was subject to examination hearings from February to May 2019, and a Consolidated Draft Plan with amendments was published in July 2019. The Panel of Inspectors appointed by the Secretary of State issued their report and recommendations to the Mayor on 8th October 2019.

The Mayor has considered the Inspectors' recommendations and, on 9th December 2019, issued to the Secretary of State his intention to publish the London Plan along with a statement of reasons for the Inspectors' recommendations that the Mayor did not wish to accept. The Secretary of State responded on the 13th March 2020 and stated that he was exercising his powers under section 337 of the Greater London Authority Act 1999 to direct that modifications are required. These are set out at Annex 1 of the response, however the letter does also state that if the Mayor can suggest alternative changes to policies that would address the concerns raised, these would also be considered.

More limited weight should be attached to draft London Plan policies where the Secretary of State has directed modifications or where they relate to concerns raised within the letter. Greater weight may be attached to policies that are not subject to modifications from the Secretary of State or that do not relate to issues raised in the letter.

UDP / LDF Designation and London Plan

The following Local Plan Policies are considered relevant to the application:-

Part 1 Policies:

- PT1.EM1 (2012) Climate Change Adaptation and Mitigation
- PT1.EM11 (2012) Sustainable Waste Management
- PT1.EM3 (2012) Blue Ribbon Network
- PT1.EM4 (2012) Open Space and Informal Recreation
- PT1.EM6 (2012) Flood Risk Management
- PT1.EM8 (2012) Land, Water, Air and Noise
- PT1.HE1 (2012) Heritage

Part 2 Policies:

- DMAV 1 Safe Operation of Airports
- DMCI 7 Planning Obligations and Community Infrastructure Levy
- DME 1 Employment Uses in Designated Sites
- DMEI 1 Living Walls and Roofs and Onsite Vegetation
- DMEI 10 Water Management, Efficiency and Quality
- DMEI 11 Protection of Ground Water Resources
- DMEI 12 Development of Land Affected by Contamination
- DMEI 13 Importation of Material
- DMEI 14 Air Quality

DMEI 2	Reducing Carbon Emissions
DMEI 7	Biodiversity Protection and Enhancement
DMEI 8	Waterside Development
DMEI 9	Management of Flood Risk
DMHB 11	Design of New Development
DMHB 12	Streets and Public Realm
DMHB 14	Trees and Landscaping
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DMT 2	Highways Impacts
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LPP 1.1	(2016) Delivering the strategic vision and objectives for London
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LPP 2.17	(2016) Strategic Industrial Locations
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LPP 2.8	(2016) Outer London: Transport
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LPP 6.9	(2016) Cycling
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LPP 7.15	(2016) Reducing and managing noise, improving and enhancing the acoustic environment and promoting appropriate soundscapes.
LPP 7.4	(2016) Local character
LPP 7.5	(2016) Public realm
LPP 7.6	(2016) Architecture

LPP 8.1	(2016) Implementation
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NPPF- 11	NPPF-11 2018 - Making effective use of land
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NPPF- 2	NPPF-2 2018 - Achieving sustainable development
NPPF- 4	NPPF-4 2018 - Decision-making
NPPF- 6	NPPF-6 2018 - Building a strong, competitive economy
NPPF- 9	NPPF-9 2018 - Promoting sustainable transport

5. Advertisement and Site Notice

5.1 Advertisement Expiry Date:- **26th August 2020**

5.2 Site Notice Expiry Date:- **26th August 2020**

6. Consultations

External Consultees

The application was advertised between 05-08-20 and 26-08-20.

No comments or objections were received from neighbouring or nearby occupants.

NATS

The proposed development has been examined from a technical safeguarding aspect and does not conflict with our safeguarding criteria. Accordingly, NATS (En Route) Public Limited Company ("NERL") has no safeguarding objection to the proposal.

HEATHROW AERODROME SAFEGUARDING

We have now assessed the above application against safeguarding criteria and we will need to object to these proposals unless the conditions within the attached response letter are applied to any planning permission.

Officer comment: The recommended condition has been included in the list of conditions.

THAMES WATER

There are public sewers crossing or close to your development. If you're planning significant work near our sewers, it's important that you minimize the risk of damage. We'll need to check that your development doesn't limit repair or maintenance activities, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes. <https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Working-near-or-diverting-our-pipes>.

The proposed development is located within 15 metres of our underground waste water assets and as such we would like the following informative attached to any approval granted. "The proposed development is located within 15 metres of Thames Waters underground assets and as such, the development could cause the assets to fail if appropriate measures are not taken. Please read our guide 'working near our assets' to ensure your workings are in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures.<https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Working-near-or-diverting-our-pipes>. Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk Phone: 0800 009 3921 (Monday to Friday, 8am to 5pm) Write to: Thames Water Developer Services, Clearwater Court, Vastern Road, Reading, Berkshire RG1 8DB

With regard to SURFACE WATER drainage, Thames Water would advise that if the developer follows the sequential approach to the disposal of surface water we would have no objection. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required. Should you require further information please refer to our website. <https://developers.thameswater.co.uk/Developing-a-large-site/Apply-and-pay-for-services/Wastewater-services>

We would expect the developer to demonstrate what measures will be undertaken to minimise groundwater discharges into the public sewer. Groundwater discharges typically result from construction site dewatering, deep excavations, basement infiltration, borehole installation, testing and site remediation. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. Should the Local Planning Authority be minded to approve the planning application, Thames Water would like the following informative attached to the planning permission: A Groundwater Risk Management Permit from Thames Water will be required for discharging groundwater into a public sewer. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures he will undertake to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 020 3577 9483 or by emailing trade.effluent@thameswater.co.uk. Application forms should be completed on line via www.thameswater.co.uk. Please refer to the Wholesale; Business customers; Groundwater discharges section.

Thames Water would advise that with regard to WASTE WATER NETWORK and SEWAGE TREATMENT WORKS infrastructure capacity, we would not have any objection to the above planning application, based on the information provided.

GLAAS

Thank you for your consultation dated 24 July 2020. The Greater London Archaeological Advisory Service (GLAAS) gives advice on archaeology and planning. Our advice follows the National Planning Policy Framework (NPPF) and the GLAAS Charter.

NPPF section 16 and the Draft London Plan (2017 Policy HC1) make the conservation of archaeological interest a material planning consideration.

Having considered the proposals with reference to information held in the Greater London Historic Environment Record and/or made available in connection with this application, I conclude that the proposal is unlikely to have a significant effect on heritage assets of archaeological interest.

The site does not lie in an Archaeological Priority Area or Zone. Historic maps show it being quarried for brickearth in the early 20th century so it is unlikely that significant archaeological remains will

survive. No further assessment or conditions are therefore necessary.

NATURAL ENGLAND

Natural England raised no objection to the application. The amendments have no significantly different impact on the natural environment than the original proposal.

CANALS AND RIVERS TRUST

The Trust is disappointed to note that the development proposals would see a service yard and car parking along the canal frontage, with the prospect of HGVs parking close to the site boundary. Whilst, for a significant proportion of the site, the existing vegetation between the canal and the site would appear to screen this area from view, near the ramp down from the Iron Bridge Road, where the vegetation is less dense, we anticipate, from the limited information available, that the servicing yard, the paladin fence and gate that controls access to the servicing yard, and possibly the car park, will be visible. We suggest that this is not consistent with policy DMHB 11 of the Council's Local Plan, which requires development to harmonise with the local context by taking into account the impact on neighbouring open spaces and their environment, or policy DMEI 8, which requires development adjacent to watercourses to demonstrate a high quality design which respects the character of the waterway.

Whilst we welcome the intention to include an area of office accommodation on the south-western elevation, this will be set back significantly from the canal. As a result, we are doubtful that the office accommodation will have any beneficial impact on passive surveillance over the canal. Taking this into account, we suggest that the most appropriate strategy to make the application compliant with DMHB 11 and DMEI 8 would be to increase the screening provided by the canalside landscaping, preferably by additional planting on the site but alternatively additional planting on the existing area of vegetation between the site and the canal. We note, however, that, whilst there is a landscaping strategy proposed for it, the existing area of vegetation between the site and the canal has not been included within the site application boundary. As a result, one of the following options would need to be taken - the improvements would need to be secured by condition on the site, which would require amendments to the site layout; the site boundary would need to be amended so that the issue can be addressed by condition; or a planning obligation for additional planting and management off-site will be required.

Given our concerns about the visual impact of the development, we are unlikely to support the removal of trees from the canalside landscaped area (as proposed in the submitted Landscape Strategy) without evidence of the impact of this on views from the canal and consideration of the biodiversity impacts. We also would not support non-native planting in this area.

We would suggest that the issue of landscaping is discussed further with the applicant. However, if no changes to the layout or site boundary are proposed then we would welcome further discussions with the Council about the terms of an appropriate planning obligation.

We note that the Landscape Strategy proposes the management of landscape immediately adjacent to the towpath to reduce overshadowing and improve forward visibility. As noted, this area sits outside of the planning application site boundary at present. If this proposal was to form part of the application, then we would need to see further details of the vegetation management envisaged in order that we could reach a judgement on the acceptability of it from biodiversity and landscaping perspectives. The Trust would be happy to discuss this proposal further with the applicant outside of the planning process.

The impact on the structural integrity of waterway infrastructure

The Grand Union Canal sits within a cutting through this part of the borough. Part of the embankment that forms this cutting sits immediately adjacent to the site. The Trust is concerned that the demolition of the existing building closest to the canal could, if not carried out appropriately, undermine the canal embankment and result in land instability. In accordance with paragraphs 170 and 178 of the NPPF, it is the role of the planning system to prevent surrounding land from being placed at risk of land instability as a result of development. We suggest that a Risk Assessment and Method Statement is required by condition in order that the developer can demonstrate to the satisfaction of the council, in consultation with the Trust, how this risk will be managed/mitigated. At minimum, this statement should include a method statement for the demolition and cross sections of below ground works and excavations.

We note that the proposed canalside section plan appears to show a retaining wall adjacent at the top of the canal cutting. The submitted plans do not appear to include existing sections and we have been unable to confirm if a retaining wall is currently in place in this location. We would expect to see the Risk Assessment and Method Statement consider the impacts of any changes in the loading that a retaining wall (new or existing) in this location may have on the structural stability of the canal cutting, for example as a result of changes to ground levels. The developer should have regard to the Trust's Code of Practice for Works Affecting the Canal & River Trust and liaise with John Pryer (John.Pryer@canalrivertrust.org.uk) to ensure that the proposed works have the necessary consent.

The impact on use of the canal as a sustainable transport corridor

We welcome the wayfinding improvement proposals set out in the application documents and suggest that these should be secured through a planning obligation, given that they relate to land outside of the site boundary. We suggest that canal access improvements could be extended to include improvements to the access path and steps from the Old Stockley Road bridge.

The Trust as landowner

The developer should note that the freehold of part of the site is held by the Canal & River Trust. The applicant should consider the details of any conditions on the leasehold agreement.

Obligations, Conditions and Informatives

Should planning permission be granted on the basis of the current plans, we request that planning obligations include:

- The requirement to prepare and implement a canalside landscaping strategy and maintenance regime in agreement with the Canal & River Trust.
- The implementation of canal wayfinding and access improvement measures.

We request that the following planning conditions be imposed:

Lighting

No external lighting related to the development hereby approved 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 and intensity of illumination. Any lighting that is so installed shall not thereafter be altered.

Reason: In the interests of the protection of the biodiversity of the Grand Union Canal.

Risk Assessment and Method Statement

Prior to the commencement of the development hereby permitted, a Risk Assessment and Method Statement shall be submitted to and approved in writing by the Local Planning Authority. The Risk Assessment and Method Statement shall identify risks to the stability of canal infrastructure, the waterway environment and the health, safety and enjoyment of canal users during demolition and construction phases. It shall demonstrate that such risks have been adequately avoided, mitigated or managed through the method statement. Once approved, development shall be carried out in accordance with the Risk Assessment and Method Statement.

Reason: To ensure the development does not have an adverse impact on the structural integrity of waterway assets, the environment of the Grand Union Canal and its users. This condition seeks to prevent harm to the canal during the demolition and construction phases and is therefore required prior to commencement.

It is our understanding that the developer will need to agree to the imposition of any pre-commencement conditions in advance. Should the developer not be willing to do so, we would be grateful if the Council could notify us as we will need to consider whether the only course of action available to us is to object to the development on these grounds until the information and guarantees requested above are provided.

Should planning permission be granted, we request that the following informatives appended to the decision notice:

The applicant is advised to review the Canal and River Trust's 'Code of Practice for Works affecting the Canal and River Trust and contact the Trust's Works Engineer (John.Pryer@canalrivertrust.org.uk) in order to ensure that any necessary consents are obtained and that the works are compliant. (<https://canalrivertrust.org.uk/business-and-trade/undertaking-works-on-ourpropertyandour-code-of-practice>).

The applicant/developer is advised that any oversail, encroachment or access to the waterway requires written consent from the Canal & River Trust, and they should contact the Canal & River Trust regarding the required access agreement.

The application site includes land over which the Trust has a freehold interest. The developer/applicant is advised to contact the Trust's Estates Team on 0303 040 4040 or email Bernadette.McNicholasa@canalrivertrust.org.uk in order to ensure that any necessary consents are obtained.

For us to monitor effectively our role as a statutory consultee, please send me a copy of the decision notice and the requirements of any planning obligation.

MINISTRY OF DEFENCE

The proposed development site occupies the statutory height safeguarding zone which ensures air traffic approaches are not impeded.

The airspace above and around aerodromes is safeguarded to maintain an assured, obstacle free environment for aircraft manoeuvre. Having reviewed the proposal, I can confirm the MOD has no concerns regarding the height of the proposed development. However Within this zone, the principal concern of the MOD is the creation of new habitats may attract and support populations of large and / or flocking birds close to aerodromes. The principal concern of the MOD with this development is the proposed gently curved roofs with valleys between, which would be attractive to hazardous large breeding gulls to tuck their nests into. These roofs have the potential to attract and support breeding large gulls, therefore the MOD recommend a Bird Hazard Management Plan (BHMP) be put in place to prevent the breeding of large gulls.

It is important that the conditions requested in this response are included in any planning permission granted. As per Planning Circular 01/03: Safeguarding Aerodromes, Technical Sites and Military Explosives Storage Areas, if London Borough of Hillingdon Council decides to grant planning permission contrary to our advice then we must be notified 28 days prior to a decision being made.

HISTORIC ENGLAND

Thank you for your letter of 25 August 2020 regarding the above Planning application. On the basis of the information available to date, in our view you do not need to notify us of this application under the relevant statutory provisions.

HILLINGDON CANAL PARTNERSHIP

Principle of development

The original concept for Stockley Park was a business park with high quality offices set in a landscaped area along the lines of those in Silicon Valley. Over the years there has been an increase in warehousing and distribution centres and the current application continues that process. It is assumed that these changes have been brought about by economic circumstances and the Partnership sees no relevant planning grounds to object to the proposals in principle. The integration of Stockley Park with the Grand Union Canal was never fully realised from the outset and the Partnership therefore believes that the key issues concerning the current proposals are the quality of the landscaping and the ease of access to and from an improved canal towpath.

Landscaping

The height and density of the vegetation between the towpath and the boundary of the site tend to create a rather off-putting ambience for walkers. Removal of the vegetation would not be desirable from an ecological point of view and would open up the site to an excessive extent. What is needed is a careful balance which creates some natural surveillance from the new buildings while maintaining a degree of screening.

The selection of plants is particularly important in order to retain some cover during the winter months. In discussion with the applicants earlier in the year the Partnership suggested that a gap might be made in the vegetation to open up views of the canal at an appropriate spot and they undertook to consider this idea.

In the light of these comments it is hoped that conditions will be applied to any planning permission so that the applicants are required to reach agreement with the Canal and River Trust on the detailed landscaping proposals. The responsibility for future maintenance should also be clarified.

Towpath improvements

The Partnership is keen to promote greater use of the towpath of the Grand Union Canal throughout the Borough for walking and cycling both for environmental reasons and for the physical and mental health of local residents and people working at adjoining developments. It therefore welcomes the proposals for improving the width and surface of the towpath subject to the detailed specifications of the Trust being met.

Access improvements

Improved access to and from the towpath is also vital in order to achieve the walking and cycling objectives and the developers' proposals are supported.

Signposting and information boards

In our discussions with the applicants we requested that the development should include good signposting to encourage use of the towpath and information boards to explain the history of the Grand Union Canal and its role in the local industrial heritage. This request received a positive response and needs to be formalised in some way.

Old Stockley Road

The land adjoining the site at Old Stockley Road is subject to frequent rubbish dumping and is in a deplorable condition. In the Partnership's discussions with the applicants we suggested that there would be considerable benefit to the community if they were to take over this area and landscape it as part of their development. We undertook to check with the Council that this is currently highway land. That was confirmed and the Council stated that they would be willing to enter into discussions with the applicants about extinguishing the highway rights and transferring the land to them subject to the costs of that process being met. The Partnership requests that provision for this should be made in any Section 106 agreement.

Use of canal during construction works

The close proximity of the canal provides an opportunity for both the removal of demolition waste and the bringing of bulk construction materials to the site. The Partnership requests that this should be considered.

Use of canal water for cooling

Canal water has been used successfully for some years in the cooling systems for adjoining office blocks and this has significant environmental benefits. The issue was not raised in our discussions with the applicants and it is not known how relevant it would be for warehousing and distribution centres but we would like to register it for consideration.

GREATER LONDON AUTHORITY

I refer to the copy of the above planning application, which was received from you on 27 August 2020. On 21 September 2020 the Mayor considered a report on this proposal, reference 2020/6155/S1. A copy of the report is attached, in full. This letter comprises the statement that the Mayor is required to provide under Article 4(2) of the Order.

The Mayor considers that the application does not yet comply with the London Plan and Intend to Publish London Plan for the reasons set out in paragraph 67 of the above mentioned report; but that the possible remedies set out in that report could address these deficiencies.

If your Council subsequently resolves to make a draft decision on the application, it must consult the Mayor again under Article 5 of the Order and allow him fourteen days to decide whether to allow the draft decision to proceed unchanged; or direct the Council under Article 6 to refuse the application; or issue a direction under Article 7 that he is to act as the local planning authority for the purpose of determining the application and any connected application. You should therefore send the Mayor a copy of any representations made in respect of the application, and a copy of any officer's report, together with a statement of the decision your authority proposes to make, and (if it proposed to grant permission) a statement of any conditions the authority proposes to impose and a draft of any planning obligation it proposes to enter into and details of any proposed planning contribution.

Strategic planning application stage 1 referral

Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008.

The proposal

Redevelopment of the site to provide two industrial units providing industrial floorspace (Use Classes B1c/B2/B8) and ancillary offices together with associated parking, access arrangements, landscaping and infrastructure.

The applicant

The applicant is Prologis UK Limited and the architect is Michael Sparks Associates.

Strategic issues summary

Principle of development: The development is located on previously developed land and would not have a greater impact on the openness of the Green Belt compared to the existing development. As such, the development meets the exception test outlined in NPPF paragraph 143 and is therefore appropriate development on the Green Belt. There is a clear and strong demand for industrial floorspace in this location that could outweigh the loss of office floorspace on this site, subject to further information on the marketing of the site and on the heritage impacts of the proposal (paragraphs 18-29).

Urban design: The proposed layout, scale and massing is generally supported. Improvements to the pedestrian routes through the site must be provided. The Council should review the noise assessment and should secure mitigation measures by condition. A fire statement should be provided (paragraphs 30-38).

Heritage: The applicant must provide a heritage assessment to allow officers to assess the impact on the Stockley Park Grade II listed Registered Park and Garden (paragraphs 41-43).

Transport: The proposed amount of parking is unjustified and takes up a significant proportion of the site. Cycle parking is not in line with Policy T5 of the Mayor's intend to publish London Plan. An appropriate Active Travel Zone assessment and agreement over contributions are required, and management plans should be secured by condition (paragraphs 58-63). Further information on inclusive design, air quality, circular economy, energy, water and urban greening is required.

Recommendation

That Hillingdon Council be advised that the application does not yet comply with the London Plan and the Mayor's intend to publish London Plan, for the reasons set out in paragraph 67 of this report; but that the possible remedies set out that paragraph could address these deficiencies.

On 24 July 2020, the Mayor of London received documents from Hillingdon Council notifying him of a planning application of potential strategic importance to develop the above site for the above uses, and on 27 August 2020 the Stage 1 referral was completed. Under the provisions of The Town & Country Planning (Mayor of London) Order 2008, the Mayor has until 8 October 2020 to provide Hillingdon Council with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor's use in deciding what decision to make.

The application is referable under the following Categories of the Schedule to the 2008 Order:

- 1B(c) "Development (other than development which only comprises the provision of houses, flats,

or houses and flats) which comprises or includes the erection of a building or buildings (c) outside Central London and with a total floorspace of more than 15,000 square metres";

- 3D "Development - (a) on land allocated as Green Belt or Metropolitan Open Land in the development plan, in proposals for such a plan, or in proposals for the alteration or replacement of such a plan; and (b) which would involve the construction of a building with a floorspace of more than 1,000 square metres or a material change in the use of such a building"; and
- 3E "Development (a) which does not accord with one or more provisions of the development plan in force in the area in which the application site is situated; and (b) comprises or includes the provision of more than 2,500 square metres of floorspace for a use falling within any of the following classes in the Use Classes Order (vi) class B1 (business); (vii) class B2 (general industrial); (viii) class B8 (storage and distribution)"; and
- 3F "Development for a use, other than residential use, which includes the provision of more than 200 car parking spaces in connection with that use".

Once Hillingdon Council has resolved to determine the application, it is required to refer it back to the Mayor for his decision as to whether to direct refusal; take it over for his own determination; or allow the Council to determine it itself.

Site Description

The 6.3 hectare site is located within the Stockley Park business park, which is designated as a Locally Significant Employment Location and Grade II listed Registered Park and Garden, in the London Borough of Hillingdon. The site is entirely surrounded by, and slightly overlaps with, Green Belt. The Grand Union Canal to the immediate south of the site is a Site of Importance for Nature Conservation (SINC).

The site is currently occupied by offices occupied by GlaxoSmithKline (GSK), which it is understood is in the process of vacating the site. It comprises three low-rise 1990s office buildings located at the centre, northern boundary and south west corner of the site respectively, and a multi-storey car park (MSCP) at the south east corner of the site. The central office building is surrounded by extensive surface car parking that connects the three buildings. The site also includes some soft landscaping in the form of lines of trees and a small lake to the north.

The main entrance to the site is from Iron Bridge Road North, located to the west of the site. A small rectangular lake within the Green Belt separates the road and the site from the completed part of the Prologis Business Park to the west, which comprises large industrial warehouses, as well as a small children's nursery. To the north of the site is Horton Road, which lies within the Green Belt and which meets with the A408 Stockley Road dual carriageway at a junction to the immediate north east of the site. The A408 Stockley Road is to the east of the site, separated by trees within the Green Belt. To the south of the site is the Grand Union Canal, which is separated from the site by trees and other vegetation, also within the Green Belt.

The closest point of the Transport for London Road Network (TLRN) is approximately 2.2 kilometres from the site at the A4020 Uxbridge Road. The site is served by three bus routes (U5, 350 and A10). The nearest bus stop is adjacent to the north of the site on Horton Road. The site records a PTAL of 0-2 on a scale of 0 to 6b, where 6b is the highest. West Drayton rail station is located approximately 1 kilometre walk west of the site, providing services into central London and Reading. This station will also benefit from the Elizabeth Line in the future.

Details of the Proposal

The applicant is proposing a detailed planning application for the redevelopment of the site to provide 30,627 sq.m. (GIA) of flexible industrial floorspace (Use Classes B1c, B2 and/or B8). The proposed floorspace is detailed below:

- Unit 1: 17,673
- Unit 2: 12,954

The development would comprise of two buildings, Unit 1 in the southern portion of the site and Unit 2 to the north. Each building would have an associated element of ancillary office space and a service yard with loading and delivery bays. Staff car parking would comprise 239 spaces and there would be 94 cycle parking spaces. Unit 1 would be separated from the Grand Union Canal by service yards, as well as new landscaping to the immediate south of the site. There would be four access points of access to the site from Ironbridge Road North.

The site would form part of the Prologis Park West London if approved. The business park comprises largely of industrial warehouse buildings to the west of this site. Phase 1 of the business park was approved in December 2015 (LPA reference: 37977/APP/2015/1004) whilst Phase 2 was approved in October 2017 (LPA reference: 37977/APP/2017/3046), and both phases have been constructed.

Case History

On 16 June 2020, a pre-planning application meeting was held virtually with GLA and TfL officers. The proposed redevelopment of the site including the introduction of industrial floorspace was supported in strategic planning terms on the basis of demand and the fact that the development was designed in such a way that it is fit for purpose and does not prejudice the function of existing adjacent businesses and uses. Subject to verification that the Green Belt land concerned can reasonably be considered to be previously developed, GLA officers were satisfied that the proposal may be assessed against the NPPF exceptions test. Urban design, environment and transport matters were also required to be addressed as part of any future application.

On 18 August 2020 Stockley Park (including this site) was designated a Grade II listed Registered Park and Garden.

Strategic Planning Issues and Relevant Policies and Guidance

For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area is the Hillingdon Local Plan Part 1: Strategic Policies (2012), the Hillingdon Local Plan Part 2: Development Management Policies (2020) and the Hillingdon Local Plan Part 2: Site Allocations and Designations (2020) and the London Plan (2016).

The following are also relevant material considerations:

- The National Planning Policy Framework (February 2019);
- National Planning Practice Guidance; and
- The London Plan Intend to Publish version (December 2019).

Principle of Development

Green Belt

The site lies partly within land designated as Green Belt by the Hillingdon Local Plan Part 2: Site Allocations and Designations (2020). London Plan Policy 7.16 and the Mayor's intend to publish London Plan Policy G2, strongly resist inappropriate development of Green Belt. Paragraph 143 of the NPPF states that inappropriate development, is by definition, harmful to the Green Belt and should not be approved except in very special circumstances. The NPPF provides that construction of new buildings should be regarded as inappropriate save for certain limited exceptions set out in paragraph 145:

- Buildings for agriculture and forestry;
- The provision of appropriate facilities (in connection with the existing use of land or a change of use) for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments; as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it;
- The extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building;
- The replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces;
- Limited infilling in villages;
- Limited affordable housing for local community needs under policies set out in the development plan (including policies for rural exception sites); and
- Limited infilling or the partial or complete redevelopment of previously developed sites (brownfield land), whether redundant or in continuing use (excluding temporary buildings), which would; not have a greater impact on the openness of the Green Belt than the existing development; or would not cause substantial harm to the openness of the Green Belt, where the development would re-use previously developed land or contribute to meeting an identified affordable housing need within the area of the local planning authority.

Exception Test

It is noted that the site is entirely surrounded by Green Belt, which slightly intersects with the site boundary and with existing buildings on the site. In particular, the existing MSCP currently extends 291 sq.m. into the Green Belt. It is further noted that the site consists of a significant amount of hard standing as car parking. As such, most of the site can be considered previously developed land.

The applicant is proposing two warehouse buildings on the site. It is noted that Unit 1 would extend into the Green Belt by 158 sq.m. at the south east corner of the site. This extension would be on the same part of the site as currently occupied by the MSCP. It is important to note that the height of the proposed building would be around 18 metres high, which is likely to be similar to the height of the existing buildings and MSCP; this should be clarified by the applicant. The remainder of Unit 1 and the rest of the development would fall outside of the Green Belt.

As much of the site that intersects with the Green Belt is previously developed, it is necessary to consider whether NPPF exception (g) applies here. As no affordable housing is proposed only the first part of exception (g) could apply. The applicant is proposing to develop only on previously developed land within the Green Belt. Unit 1 would have a 46% smaller footprint within the Green Belt compared to the existing MSCP. Furthermore, the proposed development, whilst larger in terms of building footprint, would be of a similar height to the existing buildings. The applicant has carried out a landscape and visual impact assessment (LVIA). This finds that the development would have a minor adverse impact, but this is largely in relation to the proposed footprint intrusion into the Green Belt, which as detailed above would be on previously developed land. In terms of visual impact, the LVIA notes that the development would be obscured by surrounding retained vegetation. It is also noted that much of the Green Belt to the east and south of the site is inaccessible. From the more accessible Green Belt to the north and west the proposed warehouse buildings would not be out of context for the area given the recently completed warehouse buildings to the west of the site, which are also next to the Green Belt. As such, and having regard to the urban design assessment below, the development is considered to not have a greater impact on the openness of the Green Belt compared to the existing development. As such, the development meets the exception test outlined in paragraph 143 (g) of the NPPF and is therefore appropriate development on the Green Belt.

Change of Use

London Plan Policy 2.13 and the Mayor's intend to publish London Plan Policy SD1 provide that

proposals in Opportunity Areas should seek to maximise density and contain a mix of uses. The site lies within the emerging Heathrow Opportunity Area in the Mayor's intend to publish London Plan, which has an indicative capacity for 13,000 new homes and 11,000 new jobs.

The site is currently occupied by 31,575 sq.m. of office floorspace. London Plan Policies 4.2 and 4.3 and the Mayor's intend to publish London Plan Policy E1 state that the office stock at business parks, including Stockley Park, should be renewed and modernised. Further to this, Policy E1 states that office space in outer London should be consolidated in town centres and other existing office clusters, such as Stockley Park, and should be extended where viable. It is noted that Stockley Park is also locally designated as a Locally Significant Employment Location, where the provision of B1(a) office floorspace is prioritised, in the Hillingdon Local Plan Part 2: Site Allocations and Designations (2020).

However, London Plan Policy 4.2 and the Mayor's intend to Publish London Plan Policy E1 also support the redevelopment of surplus office space to other uses. Policy E1 requires that there is evidence of no reasonable prospect of it being used for business purposes before the loss of office space can be accepted. This evidence should include strategic and local assessments of market demand and supply, including evidence of vacancy and marketing (at market rates suitable for the type, use and size for at least 12 months).

London Plan Policy 4.4 and the Mayor's intend to publish London Plan Policy E4 seek to ensure that there is a sufficient stock of industrial land to meet the current and future needs of different types of industrial and related functions in different parts of London. London Plan Policy 4.4 states that in Hillingdon there should be limited release of industrial land. However, the Mayor's intend to publish London Plan Policy E4 sets Hillingdon a revised policy to retain capacity for industrial floorspace. The Land for Industry and Transport SPG indicates that there is projected additional demand for over 329 hectares of land for warehousing and logistics functions in London between 2011 and 2031. The SPG further states that most of this additional demand is anticipated in the outer East, West, and North sub-regions and identifies Heathrow as a principal property market for industry and logistics in London for the reason that London's airports are important drivers of demand for warehousing and other high value-added business space on industrial land.

The Mayor's intend to publish London Plan Policy E4 supports the provision of industrial capacity in locations with access to the strategic road network which provide capacity for logistics and other industrial sectors, provide capacity for SMEs, are suitable for 'last mile' distribution services and support access to supply chains and local employment in industrial and related activities. The Mayor's intend to publish London Plan Policy E7 also supports proposals to intensify B1c light industrial, B2 general industrial and B8 storage uses.

The applicant has provided a market assessment, which finds that the current availability within Stockley Park is between 26% and 32%, excluding the subject site. As such, it estimates that 158,000 sq.m. (1.7 million sq.ft.) of office floorspace will be surplus to demand over the next three years. It is understood that GSK are in the process of vacating the site, and that it will be fully vacant by January 2021. The applicant should provide evidence of marketing to demonstrate that there is no demand for the office space on this specific site, in line with the Mayor's intend to publish London Plan Policy E1.

The site is well-suited for industrial development, located adjacent to and with easy access to the A408 and the wider strategic road network, the M4 and the M25, as well as being located within the emerging Heathrow Opportunity Area. The market assessment notes that the Heathrow industrial market is characterised by the limited availability of large high quality industrial premises and this development would help to meet demand for such premises. The availability rate for industrial floorspace in the area is 6.7%, which officers agree means that there is not a sufficient range of premises to meet demand in line with the Land for Industry and Transport SPG. It is further noted

that the availability of units above 9,000 sq.m. (100,000 sq.ft.) is particularly limited at 2.3%, which this development could help to address. As such, the market assessment predicts a 111,500 sq.m. (1.2 million sq.ft.) deficit of industrial floorspace over the next three years, demonstrating a clear demand for this floorspace.

Officers consider that there is a clear and strong demand for industrial floorspace in this location that could outweigh the loss of office floorspace on this site, subject to further information on the marketing of the site. In addition, the applicant must address heritage concerns given that the existing office buildings may have historic significance within the Stockley Park Grade II listed Park and Garden.

Urban Design

London Plan Policies 7.1 and 7.4 and the Mayor's intend to publish London Plan Policies D1, D3 and D4 seek to ensure that new developments are well-designed and fit into the local character of an area. New buildings and spaces should respond to the form, style and appearance to successfully integrate into the local character of an area, with a positive relationship with the natural environment and respect and enhancement of the historic environment. London Plan Policy 3.4 and the Mayor's intend to publish London Plan Policy D3 also seek to optimise the potential of sites, having regard to local context, design principles, public transport accessibility, and capacity of existing and future transport services.

Layout, scale and massing

The general layout is supported including the decision to set Unit 1 back from the SINC and southern boundary of the site. The applicant is proposing an active frontage along the northern frontage of Unit 2 and the western frontage of Unit 1 by locating the ancillary office space in these locations. This will ensure that Horton Road and Iron Bridge Road North are overlooked, improving the perception of safety along these roads. The buildings would be screened by trees and landscaping along most frontages. The building heights are in line with the existing built context and do not raise any strategic concerns.

Landscaping and public realm

The applicant has prepared a Landscape Design Statement that sets out clear objectives for the design of the landscaping. These objectives include retaining and protecting existing trees and hedges, providing buffer planting, improving habitat biodiversity and improving the amenity value of the site. The proposed approach would largely enhance or retain the greening located in the Green Belt surrounding the site, which also forms an important feature of the Grade II listed Registered Park and Garden. Notably, the applicant would retain the existing buffer between the site and the Grand Union Canal, enhancing it with soft landscaping to improve pedestrian permeability and accessibility, which is strongly supported. The applicant has proposed a Landscape Maintenance and Management Plan, which should be reviewed by the Council and secured by condition.

The applicant should provide a drawing that clearly shows the location of pedestrian routes through the site. Where pedestrian routes cross vehicle routes, a vehicle-free alternative route and/or a crossing point should be provided to ensure inclusive and safe pedestrian access. In this respect, it is not currently clear how pedestrians entering the site would access Unit 1 from Iron Bridge Road North without passing through car parking. Furthermore, officers are concerned that the proposed access route for Unit 2 would be unsafe for pedestrians leaving the site, as it would be on the inside corner of the road within the site.

Industrial unit design and layout

The proposed industrial units would include significant areas of yard space, HGV delivery bays and docks and ancillary office spaces with shower and toilet facilities. The warehouses would be up to 18 metres tall. As such, the industrial units would be capable of accommodating a wide range of B1(c), B2 and B8 uses.

Agent of Change

In line with the Mayor's intend to publish London Plan Policy D13, the applicant must consider and mitigate for existing noise and other nuisance generating uses in a sensitive manner in new development under the agent of change principle. Paragraph 3.13.4 states that other nuisances such as dust, odour, light and vibrations can be considered under this policy particularly when considering the intensification of industrial estates. London Plan Policy 7.15 and the Mayor's intend to publish London Plan Policy D14 further require the mitigation and minimisation of the existing and potential adverse impacts of noise.

The surrounding context is characterised by similar large warehouse buildings, a dual carriageway and other roads. The nearest sensitive residential receptors are at Emden Close, approximately 130 metres to the south of the site. However, it is noted that the development is next to a children's nursery to the south west, which has the potential to be negatively affected by noise generated by the development.

The noise assessment concludes that the development would have a significant adverse impact on noise during the day and an adverse impact at night. However, it is important to note that this is compared to an existing office use that generates very little operational noise. As such, taking account of the surrounding industrial context, officers agree that the noise levels are likely to be similar to existing levels. The applicant proposes a range of mitigation measures to address the noise levels including switching engines off and quiet working practices. Furthermore, it is noted that the impact of road traffic on noise is likely to be negligible. As such, given that the nursery already operates within this industrial context, further mitigation is not required. The applicant's noise assessment concludes that for residential receptors the level of noise would be below guideline levels, even at night with the windows open. As such the noise assessment does not raise any strategic concerns. The Council should review the noise assessment and should secure mitigation measures by condition.

Fire safety

In accordance with Policy D12 of the Mayor's intend to publish London Plan, the applicant must submit a fire statement, produced by a third party suitably qualified assessor. This must provide details of: the construction methods, products and materials; the means of escape for all building users; features which reduce the risk to life, including sprinklers in all apartments; access for fire service personnel and equipment; access for fire appliances; and how future modifications to the building will not compromise the base build fire safety and protection measures. This should be provided before the application is referred back to the Mayor at Stage 2.

Inclusive Design

London Plan Policy 7.2 and the Mayor's intend to publish London Plan Policy D3 seek to ensure that proposals achieve the highest standards of accessible and inclusive design (not just the minimum). Any application should ensure that the development can be entered and used safely, easily and with dignity by all; is convenient and welcoming with no disabling barriers, providing independent access without additional undue effort, separation or special treatment; is designed to incorporate safe and dignified emergency evacuation for all building users; and as a minimum at least one lift per core should be a fire evacuation lift suitable to be used to evacuate people who require level access from the building.

The proposed circulation spaces are sufficiently generous and inclusive and access to the buildings is level. The applicant should provide measures to ensure that disabled visitors and staff are able to easily and safely access the site, including segregated pedestrian routes, clearly marked crossings and tactile paving. The applicant should also provide measures to protect pedestrians from HGVs accessing the site from Iron Bridge Road.

Heritage

The proposal is located within the Stockley Park Grade II Registered Park and Garden. The site is not located near to any other conservation areas or listed buildings. The Planning (Listed Buildings and Conservation Areas) Act 1990 sets out the tests for dealing with heritage assets in planning decisions. In relation to listed buildings, all planning decisions "should have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses". If harm is identified, it should be given considerable importance and weight.

The NPPF states that when considering the impact of the proposal on the significance of a designated heritage asset, great weight should be given to the asset's conservation and the more important the asset, the greater the weight should be. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. Significance is the value of the heritage asset because of its heritage interest, which may be archaeological, architectural, artistic or historic, and may derive from a heritage asset's physical presence or its setting. Where a proposed development will lead to 'substantial harm' to or total loss of the significance of a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss. Where a development will lead to 'less than substantial harm', the harm should be weighed against the public benefits of the proposal, including securing its optimum viable use. Paragraph 197 of the NPPF also states that effect of an application on the significance of a non-designated heritage asset should be considered, with a balanced judgement made on the scale of any harm or loss and the significance of the heritage asset. Policy HC1 'Heritage conservation and growth' of the Mayor's Intend to Publish London Plan, as well as London Plan Policy 7.8, states that development should conserve heritage assets and avoid harm, which also applies to non designated heritage assets.

It is noted that Stockley Park was only listed on 18 August 2020, after this application was submitted. As such, given the absence of any other nearby heritage assets, the applicant has not provided a heritage assessment. Historic England records that Stockley Park was listed for reasons of: its historic interest as a pioneering business park and for its reuse of contaminated land; its design interest, as a collaboration between designers, engineers and landscape architects, its award-winning design and its integration of business park, golf course and public park elements; and its survival, including the preservation and maintenance of the original design. Officers now need to consider whether the loss of the existing office buildings on the site (including the loss of the existing pattern of development) could result in a loss of significance, and thereby result in harm to the Registered Park and Garden. However, it is not possible to assess the degree of harm without understanding the contribution the site currently makes to the significance of the Registered Park and Garden. The applicant must provide a heritage assessment to allow officers to assess the degree of harm caused to the Grade II listed Registered Park and Garden. The applicant should also consult with and provide GLA officers with the responses from the Gardens Trust and Historic England.

Air quality

The application is for a major development within an Air Quality Management Area. As such, in accordance with London Plan Policies 3.2, 5.3 and 7.14 and the Mayor's Intend to Publish London

Plan Policy SI1, an Air Quality Assessment has been provided. Policy SI1 states that this should take an air quality neutral approach.

The assessment has concluded that the development is not air quality neutral due to exceedances of the transport emissions benchmark (TEB). However, the calculation of transport emissions appears to have included all vehicle trips. The GLA Air Quality Neutral Planning Support Update guidance states (paragraph 3.22) to only include car trips in the calculation of the development transport emissions. A revised calculation should therefore be submitted. If the development continues to exceed the TEB, a scheme of mitigation must be proposed to be compliant with London Plan Policy 7.14 and the Mayor's intend to publish London Plan Policy SI1 The dispersion modelling assessment requires further clarification or amendment before the results can be supported. Further technical information is provided in an appendix to this memo. At present, it cannot be concluded whether the development complies with London Plan and the Mayor's intend to publish London Plan air quality policies.

It is also noted that an assessment of gas-fired energy plant (boilers) has not been carried out. It is considered, given the distance of sensitive receptors from the site, and the nature of the proposed development, that significant impacts will be avoided by adhering to the minimum standard of the GLA's Sustainable Design and Construction SPG.

A condition is required in relation to the gas-fired boiler plant to ensure it meets the minimum emissions standards in Section 4.3 and Appendix 7 of the Mayor's Sustainable Design and Construction SPG. In addition, conditions are recommended in relation to the Non-Road Mobile Machinery Low Emission Zone for London and to control emissions of dust and PM10 during construction and demolition.

Circular economy

The Mayor's intend to publish London Plan Policy GG5 states that those involved in planning and development should recognise and promote the benefits of transition to a circular economy as part of the aim for London to be a zero-carbon city by 2050. Policy D3 further states that the principles of the circular economy should be taken into account in the design of development proposals in line with the circular economy hierarchy. The Mayor's intend to publish London Plan Policy SI7 requires major applications to develop circular economy statements. The pre-consultation draft of the Circular Economy Statements Guidance (March 2020) provides further information on how to prepare a Circular Economy Statement.

The applicant should provide a circular economy statement. This should follow the criteria set out in the Mayor's intend to publish London Plan Policy SI7 and the Circular Economy Statements Guidance.

Energy

In accordance with the principles of London Plan Policy 5.2 and Policy SI2 of the Mayor's intend to publish London Plan, the applicant has submitted an energy statement, setting out how the development proposes to reduce carbon dioxide emissions. The energy hierarchy has been followed; the proposed strategy is generally supported; however, the applicant should submit additional information to ensure compliance with the London Plan policies. The development would achieve a 53% saving in regulated carbon dioxide emissions compared to 2013 Building Regulations. The carbon dioxide savings exceed the minimum target within Policy 5.2 of the London Plan and the Mayor's intend to publish London Plan Policy SI2. The applicant is required to provide further information on the energy efficiency measures, carry out a dynamic overheating analysis, demonstrate that opportunities for connection to a district heating network have been explored, investigate an alternative low carbon solution to the proposed gas boiler system and provide further

details on the proposed PV and solar thermal. The applicant should note that on final publication of the Mayor's intend to publish London Plan a zero-carbon target shall apply to major non-residential development. Once all on-site opportunities for carbon dioxide savings have been exhausted, any residual shortfall would need to be met via a carbon offset contribution.

Urban greening

London Plan Policy 5.10 and the Mayor's intend to publish London Plan Policy G5 state that developments should provide new green infrastructure that contributes to urban greening. Policy G5 also sets out a new Urban Greening Factor (UGF) to identify the appropriate amount of urban greening required in new developments.

The proposed development is Category B2/B8 use and therefore is not required to meet the UGF target of 0.3 for predominantly commercial development set by Policy G5 of; however, with reference to paragraph 8.5.5 of the Mayor's intend to publish London Plan the applicant should still prepare and submit a UGF calculation and supporting drawing showing surface cover types. The UGF submission should set out what measures have been taken to achieve urban greening on site. The applicant should review additional green infrastructure and urban greening measures on site such as providing green roofs, and green walls or facades.

Biodiversity

London Plan Policy 7.19 and the Mayor's intend to publish London Plan Policy G6 state that proposals that create new or improved habitats that result in positive gains for biodiversity should be considered positively. Policy G6 further states that development proposals should aim to secure net biodiversity gain.

The application site adjoins the London Canals SINC. The ecological assessment sets out that the proposed development would not adversely impact the SINC subject to best practice construction methods to prevent encroachment and run-off. A Construction Environment Management Plan setting out measures to protect the SINC should be conditioned subject to any grant of planning consent.

The applicant should provide evidence the proposed development secures a net biodiversity gain in accordance with Policy G6 of the Mayor's intend to publish London Plan. If biodiversity net gain is not achievable on the site the applicant should review opportunities for biodiversity offsetting in consultation with the Council.

Trees

London Plan Policy 7.21 and the Mayor's intend to publish London Plan Policy G7 are clear that development proposals should ensure that wherever possible existing trees of value are retained. The proposed development will result in the removal of a significant number of trees, many of which are Category B. Trees of value should be retained where possible and where trees are removed there should be adequate replacement provided. The applicant should provide a CAVAT assessment of the existing trees in the site boundary, the value of the trees removed, and the value of the trees proposed to demonstrate that adequate replacement is being provided.

Walking and cycling

The applicant has not provided an Active Travel Zone (ATZ) assessment has been provided. An ATZ assessment will need to be undertaken and should cover key routes in the wider area, such as routes to the nearest rail station(s), bus stops, parks, schools, hospitals and amenities, and must

identify deficiencies that will need to be addressed. An appropriate assessment should be provided, and agreement over funding of improvements should be negotiated with the Council.

The cycle parking proposed does not meet the required quantum as set out in the Mayor's intend to publish London Plan Policy T5. The minimum cycle parking standards are required to be met. Furthermore, there should be a commitment to provide measures to support cyclists, including lockers and showers.

Vehicle Parking

A total of 239 parking spaces are proposed, taking up a significant proportion of the site contrary to the Mayor's intend to publish London Plan Policy D3. Contrary to preapplication advice, no substantive justification for this number has been provided. Robust evidence should be provided for why the number of car parking spaces proposed are required.

The Mayor's intend to publish London Plan allows for up to 1 space per 600 sq.m for B1 office use in this area and states that B8 uses should have regard to B1 office standards, taking into account the significantly lower employment density in such developments. In order to further reduce the dominance of vehicles on London's streets, whether stationary or moving, the applicant should aim to provide car parking significantly below the Mayor's intend to publish London Plan maximum. A reduction in parking would support the Mayor's targets for mode shift to active and sustainable travel. Furthermore, motorcycle parking is not required and should be removed from the proposals.

A Car Parking Design and Management Plan should be secured by condition including ensuring the disabled parking is used only by Blue Badge holders and arrangements for meeting any future demand for such provision. The Plan should also set out how and when passive charging facilities would be brought into use.

Management plans

Draft Travel, Construction Logistics, Delivery & Servicing and Parking Design & Management Plans should be appropriately secured.

TRANSPORT FOR LONDON

Active Travel Zone

No Active Travel Zone assessment has been provided. An Active Travel Zone Assessment (ATZ) will need to be undertaken. This will need to cover key routes in the wider area, such as routes to the nearest rail station/s, bus stops, parks, schools, hospitals and amenities, and must identify deficiencies that will need to be addressed. Policy T2 requires that, among other things, "development proposals should: demonstrate how they will deliver improvements that support the ten Healthy Streets Indicators in line with TfL guidance..." This therefore meets the first of the NPPF Paragraph 56 tests. An appropriate assessment should be secured, and agreement over funding of improvements should be negotiated with the Council as LPA.

Car parking

A total of 239 parking spaces are proposed, taking up a significant proportion of the site contrary to Policy D3. Contrary to pre-application advice, no substantive justification for this number has been provided. Robust evidence should be provided for why the number of car parking spaces proposed are required.

The Intend to Publish London Plan allows for up to 1 space per 600m² for B1 office use in this area

and states that B8 uses should have regard to B1 office standards, taking into account the significantly lower employment density in such developments. In order to further reduce the dominance of vehicles on London's streets, whether stationary or moving, the applicant should aim to provide car parking significantly below the Intend to Publish London Plan maximum allowed provision for development at this location. A reduction in parking would help to restrain car trip generation and promote sustainable travel, helping toward the Mayor's targets for active travel, together with supporting Healthy Streets aims including reduced traffic impact, maintaining good air quality in the area, and Vision Zero objectives.

Furthermore, motorcycle parking is not required and should be removed from the proposals. A Car Parking Design and Management Plan (CPDMP) should be secured by condition including ensuring the disabled parking is used only by Blue Badge holders and arrangements for meeting any future demand for such provision. The Plan should also set out how and when passive charging facilities would be brought into use.

Cycle parking

The proposed quantum of cycle spaces meet the minimum Intend to Publish London Plan standards. London Design Cycling Standards (LCDS) requires a minimum five per cent Sheffield stands on wider stands (1.8m recommended) for larger/wider cycles such as cargo cycles, cycle trailers and cycles constructed for disabled riders.

Furthermore, shower and changing facilities should also be provided for staff. These should be secured by condition.

Travel Planning

TfL welcomes the submission of the outline Travel Plan, which aims to promote sustainable travel to and from the site. TfL understands that mode shift targets are still to be set once baseline surveys are undertaken within six months of occupation.

TfL supports the proposed additional initiatives in the Travel Plan to encourage and secure a high PT, Walking and Cycling mode share. Furthermore, these initiatives and this objective will be undermined if a large number of employees have access to a car parking space. The Travel Plan and all agreed measures therein should be secured, enforced, monitored and reviewed as part of the s106 agreement.

Construction Logistics Plan

TfL welcomes the submission of an outline construction logistics plan; however, would expect the applicant to provide a detailed construction logistics plan (CLP) including routes used to and from the site, hours of operation, expected number of vehicles and general good practice.

The detailed CLP should be secured by condition, in line with Intend to Publish London Plan policies T4 and T7. Specific TfL advice can be found here: <http://content.tfl.gov.uk/construction-logistics-plan-guidance-for-developers.pdf> .

Delivery and Servicing Plan

TfL also welcome the submission of an outline delivery and servicing plan that provides an indicative idea of how the development would operate. A full delivery and servicing plan should be secured by condition. We suggest that you allow for 24/7 deliveries or at least more than the average due to this being an industrial area.

Community Infrastructure Levy (CIL)

It is noted that the proposed development is within LB Hillingdon, where the MCIL2 Charging Schedule applies £60 per square metre for eligible new development.

Summary

In summary, the following outstanding transport issues should be resolved prior to determination:

- An appropriate ATZ assessment is required to be submitted by the applicant. This will need to cover key routes in the wider area, such as routes to the nearest rail station/s, bus stops, parks, schools, hospitals and amenities, and must identify deficiencies that will need to be addressed. Subsequently an appropriate package of interventions must be secured.
- TfL would encourage the applicant to reduce the car parking provision significantly in order to encourage guests to use more sustainable modes to travel to and from the site. Robust justification for the amended proposed level of parking should also be provided.
- It should be ensured that 5% of the cycle spaces are spaced at 1.8m to cater for larger cycles.

GARDENS TRUST (REVISED COMMENTS OCTOBER 2020):

We are grateful for the opportunity to comment on this application, which has a material impact on the significance of Stockley Park, a historic designed landscape which is Registered by Historic England at Grade II. The inclusion of this site on the national register is a material consideration.

We object to this application in its current form, as it will lead to substantial harm to designated heritage asset Stockley Park.

We write as the Planning & Conservation Working Group of the London Gardens Trust (LGT). The LGT is affiliated to The Gardens Trust (formerly the Garden History Society and the Association of Gardens Trusts), which is a statutory consultee in respect of planning proposals affecting sites included in the Historic England (English Heritage) Register of Parks and Gardens of Special Historic Interest. The LGT is the Gardens Trust for Greater London and makes observations on behalf of the Gardens Trust in respect of registered sites, and may also comment on planning matters affecting other parks, gardens and green open spaces, especially when included in the LGT's Inventory of Historic Spaces (see www.londongardenstrust.org/conservation/inventory/ - Stockley Park entry pending) and/or when included in the Greater London Historic Environment Register (GLHER). For further information, we refer you to the list entry for Stockley Park (<https://historicengland.org.uk/listing/the-list/list-entry/1466074>) and the Gardens Trust publication *The Planning System in England and the Protection of Historic Parks and Gardens* (2019), which is available online at www.thegardenstrust.org

We have previously objected to this application on the basis that it needs to be accompanied by a heritage impact assessment. We thank you for your email of 30/9/20 in which Savills have responded with an HIA. We strongly disagree with Savill's statement that 'the proposed development will not result in any material harm to the heritage asset' as even a limited understanding of the site and its significance demonstrates that the proposal will lead to substantial harm. We appreciate that the timeline of the application's submission alongside the Stockley Park's designation as a heritage asset meant that the HIA has been written after the proposals were drafted. We urge the applicants to revise their proposals now that they can gather a proper understanding of the site as a heritage asset and so that this can inform the development of their proposals rather than have to retrospectively justify them.

As point of reference, Savills say 'It is important to note that Historic England responded to the consultation period with no comments to make on the proposals.' You will be aware that this is

because Historic England limit their involvement on planning consultations to landscapes that are registered at Grade I and II*, whereas Stockley Park is II. Their lack of comment should not be used to infer that the proposal is acceptable. This proposal will lead to substantial harm to the heritage asset. The existing Registered design has 3 buildings positioned carefully to create court-like spaces, in which car parking spaces are integrated as an striking landscape features amongst formal tree planting. The site arrangement makes noticeable use of geometric angular shapes and axial devices. This provides a clever contrast with the generous planting belts around the perimeter.

The proposal replaces this sophisticated and landscape-focussed design with a basic layout in which 2 large buildings are wedged side by side with the minimal landscaping necessary for screening and habitat. The proposal also involves removing part of the iconic lime avenue plantings in order to provide vehicular access. The loss of quality in this part of the designated heritage asset will be substantial and create a noticeably different landscape style to the rest of the site. There is national and local policy of relevance to this application. At a national level, we refer you to NPPF 195, which is clear that 'Where a proposed development will lead to substantial harm to ... a designated heritage asset, local planning authorities should refuse consent.' The harm set out in the previous paragraph clearly constitute substantial harm to this designated heritage asset.

Locally, Local Plan policy HE1.1 is relevant to this proposal in its commitment to 'Conserve and enhance Hillingdon's distinct and varied environment, its settings and the wider historic landscape, which includes Registered Parks and Gardens'. For the reasons set out above, this proposed development most certainly does not conserve and enhance Stockley Park, and rather destroys some historic features, as set out above. We object to this application in its current form and ask that the application review its development proposals in light of the recent designation of Stockley Park as. Grade II Registered historic designed landscape and refreshed understanding of its significance.

The LGT objects to this planning application on the following grounds:

- loss of high-quality buildings carefully set within the designated landscape
- The height, bulk and outline of the proposed buildings will have a harmful impact on the designated character of the park and the coherent design and detailing of the remaining original estate.
- loss of hundreds of plants and mature trees and the pond
- destruction of the sophisticated, landscape-focussed design designated Grade II
- negative impact on the quality and coherence of the rest of the listed park and country park beyond
- negative impact on the setting of the canal and the natural habitat beyond which is of local importance

REVISED COMMENTS - SUMMARY (NOVEMBER 2020)

The Gardens Trust acknowledged the modest improvements made to the scheme however maintained their objection to the proposal.

Internal Consultees

ACCESS OFFICER

This application has been assessed against London Plan Policy 3.1 and 7.2, and the Hillingdon Local Plan (Part 2) Policy DMT 6.

In line with the Councils parking standards 10% bays should be designated for Blue Badge holders, with a further 5% bays for Brown Badge holders. In terms of the proposed buildings, no accessible concerns are raised. However, the following informative should be attached to any grant of planning permission: 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.

AIR QUALITY OFFICER

The road traffic associated with the operation of the proposed development will affect the air quality within the LBH Air Quality Management Area (AQMA) and the West Drayton / Yiewsley and the Hayes Focus Areas both during its construction and operation phases. In particular, the proposed development, during its operation phase, due to the uses proposed and location, will add to current exceedances of the nitrogen dioxide annual mean limit value within these sensitive areas as a result of traffic emissions.

The Transport Assessment submitted to support the planning application has established that the proposed development is envisaged to generate 3,508 two-way daily vehicular trips that are forecasted to be comprised of 1,164 LGVs, 925 HGVs, and 1,419 cars and motorcycles two-way movements over the course of a typical day. This equates to 26.4% movements associated with HGVs.

As per the London Plan Intent to Publish (December 2019) and LBH Air Quality Action Plan 2019-2024, Developments need to be at least air quality neutral and contribute actively to reduce pollution in sensitive areas. The proposed development will generate additional two-way 1695 vehicular trips daily, which is a considerable burden to the local network, not being air quality neutral.

Damage Costs and Mitigation Measures

The level of mitigation required associated with the operation phase of the proposed development is calculated using Defra's Damage Cost Approach.

The level of mitigation required to the proposed development for traffic emissions is £316,972.

The mitigation measures proposed were evaluated in terms of likely emission reductions onto local air quality. Wherever quantifiable, these are calculated and subtracted from the overall value due. When no quantification is possible, a flat rate discount is applied.

Once all deductions were applied, the remaining value of mitigation due is £206,032. Flat rate deductions applied are as follow: Travel Plan (15%) Green Measures (5%) Strategic Multi-Modal Shift (15%).

Therefore, a section 106 agreement with the LAP of £206,032 is to be paid for Hillingdon to deliver its air quality local action plan and or implement specific measures on/along the road network affected by the proposal that reduce vehicle emissions and or reduce human exposure to pollution levels.

It is noted that whereas the Transport Assessment indicates additional two-way 1695 vehicular trips daily, to align the damage cost calculations with other similar planning applications in the area, only a 1 in 4 of the traffic flows reported were accounted for in the damage cost calculation.

In addition, a condition requiring a Travel Plan and reducing emissions from demolition and construction.

SUSTAINABILITY OFFICER

There are no objections to the proposed development with regards to Energy subject to the following.

The details are sufficient to satisfy that the strategic approach to carbon reduction is policy compliant. However, further detailed work is required to understand what will be delivered as part of the final proposals. In particular with regards to the low and zero carbon technology to be used.

Further detail is also required as to how the carbon reduction will be monitored and reported back to the Council (otherwise known as the 'be seen' policy requirement set out in the latest London Plan - Intend to Publish Version).

Finally, the energy strategy sets out a requirement for an offsite contribution which needs to be captured in the S106. Conditions are recommended on carbon reduction and carbon reporting.

Section 106

Carbon Reporting Clause

Should the carbon reduction performance of the development fail to meet the required targets (Carbon Reduction Condition) as set out in the reports to the Local Planning Authority (Carbon Reporting Condition) then the building occupier/management company must provide alternative solutions to the Local Planning Authority to ensure the targets are met.

The solutions can be modifications to the existing development, new interventions within the development or offsite contributions to the Council as agreed.

Carbon Offset Contribution

As set out in the energy strategy, a contribution of £178,200 is required to make up for the shortfall in CO2 reductions onsite.

ECONOMIC DEVELOPMENT OFFICER

The application from Prologis to create an extension to their successful Prologis Park West London is welcomed from an Economic Development perspective.

Whilst it is disappointing to see a major commercial concern like Glaxo Smith Klien leave the borough it is pleasing to see the immediate acquisition of the site by Prologis. It is also encouraging to note that Prologis have been quick to bring forward a flexible, commercially viable scheme for the site.

In assessing the potential impact of the application, it is worth noting the impact of first phase of the Prologis development on Stockley Park, which successfully delivered a construction training / local employment scheme during the construction phase of the development. The completed development has delivered flexible employment units that have all been occupied by a range of commercial concerns from Data centre operator Virtus and mail / parcel distributor Royal mail and a range of other logistics operators.

Like phase one, the new application looks to provide flexible employment space offering a range of opportunities for commercial operators. Prologis advise that they are in discussion with a range of operators but at this point no contracts have been signed. If as is likely, that phase two of the development provides similar facilities to phase one the development will provide a range of employment opportunities. These will potentially include jobs in the logistics sector and warehouse and delivery/ driving positions are most welcome at this time. The decline in operations at Heathrow continues to have a detrimental impact on airport and airport associated employment. There have been significant redundancies in the service, transport and logistics sectors and the

furloughing of workers continues to be a challenge. Whilst it will be at least a year before the buildings are handed over to the end user employers, the impact of the economic downturn at Heathrow will have long term implications. Therefore, the future jobs the site will provide are useful in the medium / long term.

Prologis have advised that they would be willing to work with local partners such as JCP / College to support local employment, where the opportunity presented. This commitment is welcomed.

During the construction phase a construction training / employment scheme will serve to ensure that local residents are both employed and trained on the site. Negotiations have started and Prologis are keen to replicate a scheme similar to the one successfully delivered in phase one.

Prologis have also indicated that they would be willing to support the new Hillingdon Chamber of Commerce initiative, which looks to support smaller local businesses gain access to contracts in major development schemes. Whilst most of these opportunities relate to the construction phase of a development, there are some elements of a scheme, such as maintenance and grounds maintenance that will be required on an ongoing basis.

COUNCIL LANDSCAPE ARCHITECT

This office site was developed on restored land as part of the Stockley Park (Phase 2) Business Park, in the late 1990's. It was, until recently, occupied by Glaxo Smithkline. It is located to the south-west of the junction of Stockley By-Pass and Horton Road. The wooded cutting and towpath of the Grand Union Canal form the southern boundary. To the east of Iron Bridge Road a new data centre has recently been completed on land formerly known as Stockley Park (Phase 3). There are no TPO's or Conservation Area designations affecting the site, however, the site lies within a well-established / maturing setting of tree-lined car parks, wooded boundaries (north, south and east) and the lime necklace (an avenue of pleached Broad-leaved limes, (*Tilia platyphyllos*). A signature landscape feature which lines the key routes through Stockley Park. After 20(+) years the boundary planting effectively conceals or, at least, filter views of the built development within the site.

LOCAL DESIGNATIONS

The site is surrounded by Green Belt which excludes the central built-up / developed area, Green Chains run on a north -south axis to the east and west of the site. A public footpath (Y27) runs along an east west axis of the canal towpath.

TREE STRATEGY (Removal / retention / replacement)

A tree survey, by BB Trees, ref. 389/18 Rev 0, dated August 2019, has been submitted. The report has identified and assessed the condition and value of 15 individual trees, 55 tree groups and 30 hedges. The survey includes off-site woodland groups G82 (London planes in the Horton Road central reserve), G98 (eastern boundary), G99 and G100, off-site trees on the southern boundary associated with the canal - which were all planted contemporaneously with the on-site planting, as part of a comprehensive masterplan.

Three groups; G1 (lime avenues), G82 (Horton Road planes) and G89 (dense mixed woodland, Stockley Road boundary) are rated 'A' grade with no individual trees achieving this status.

An arboricultural impact assessment, ref. 389-20 Rev 0, by BB Trees, dated June 2020 confirms (section 3.0) that all existing buildings are to be demolished and two replacement units constructed, one to the northern side of the existing entrance off Iron Bridge Road and one to the south. All of the existing trees within the central core of the site and car park will be removed to facilitate the development, however, the built development has been set back from existing boundaries to ensure that all existing structure planting around the boundaries will be retained and gaps re-planted where space permits.

TREE PROTECTION & ARBORICULTURAL METHOD STATEMENT

Details of tree protection fencing (to BS5837:2012) have been submitted and a 'preliminary' arboricultural method statement provided in Appendix 1. A full arb method statement will be required to be submitted for approval prior to the commencement of any demolition or construction work on site.

OFF-SITE TREES

Off-site trees, including the London planes and underplanting on Horton Road, the lime necklace on Horton Road / Ironbridge Road and the wooded canal embankment have been surveyed and assessed. A Canal Interface Improvement Concept has been prepared. Prologis agreed in principle to maintain and enhance the canalside planting and also to adopt the management / maintenance of the Horton Road and Ironbridge Road landscape which forms a distinctive approach to the site. These details need to be legally grossed within a S. 106 agreement.

LANDSCAPE & VISUAL APPRAISAL

A landscape and visual impact appraisal has been prepared by Barry Chinn Associates with reference to the Guidelines for Landscape and Visual Impact Appraisal, Third edition (GLVIA3), 2013. The assessment has established the value and condition of the baseline landscape and considered it against an assessment of landscape and visual effects post-development.

The summary table (Table 2) of landscape effects of the development considers 7 key receptors. The highlighted sensitivities range between low / low - medium / medium and medium-low. The magnitude of change ranges between no change / low / low-medium and the residual impact (year 15) spans minor beneficial / negligible / minor adverse./

GROUND LEVELS / BUILDING HEIGHTS

The site is all built, or planted on restored / man-made ground and soils. The successful establishment of the existing structure planting is a testament to the quality of soil forming and land restoration. Due to the soil and sub-soil constraints the site will be re-developed with limited re-modelling of the existing site topography. The finished floor levels will be 34.940 AOD, with eaves at 51.260m AOD and a ridge height at 52.940m AOD. The new units will be similar to the recently completed data centre to the west in terms of scale, materiality and heights (typically eaves at 15.0m - ridge 18.0m above GL).

SITE ENTRANCES

The existing Iron Bridge Road site entrance will be re-purposed for the service yard access to unit 2. Three new vehicular access points will be created to serve the new buildings, resulting in localised tree loss from the lime avenue (G1). Infill tree planting will be maximised to re-inforce G1 using semi-mature nursery stock (25-30cm stem girth). Due to the length of the avenue, it is considered that the overall visual integrity of the group will be maintained in the long term.

LANDSCAPE DESIGN STATEMENT

The brief for the landscape masterplan and cross-sections has been informed by Barry Chinn's Landscape Design Statement which sets out clear analysis of the site and identifies clear design objectives.

LANDSCAPE MAINTENANCE & MANAGEMENT

A draft landscape maintenance and management plan by Barry Chinn Associates sets out the key objectives for the establishment and maintenance of the site in the interests of both visual amenity and biodiversity. The report includes a 10 year management matrix of operations and frequencies. The text does not specifically refer to the long term adoption of off-site trees on Horton Road or the canal embankment. (Refer to off-site trees, above)

RECOMMENDATION

No objection subject to clarification / legal agreements regarding the adoption of 'off-site' planting for the purpose of ongoing maintenance. Pre-commencement condition COM8 is required - to include on site monitoring / supervision by an arboricultural consultant. Conditions should include COM 9 (parts 1,2,3,4,5 and 6) and COM 10.

REVISED COMMENTS - NOVEMBER 2020

I refer to the amended drawings and new information submitted on 06/11/2020, 11/11/2020 and 16/11/2020 - and a site inspection with Barry Chinn Associates on 19/11/2020. While the tree loss from the existing car parks cannot be underestimated, substantial mitigation in the form of landscape proposals and wider environmental benefits is proposed. 1. Green Walls A green wall system, by Mobilane, is now proposed to articulate the building facades. This is a well-proven, structural (steel-framed) system which will be attached to, but stand proud of, the building facade. Pre-grown planters containing ivy (evergreen) are attached to the support structure. Each container has integral irrigation and a drainage system and is replaceable should maintenance require it. The green wall will constitute an aesthetic improvement to the appearance of the buildings and the efficient use of the vertical surfaces - and will help mitigate the limited opportunities for ground level planting. The green wall will also encourage biodiversity and has the capacity to reduce sub-micron particle pollution, thereby improving air quality. Full details of the product and future management and maintenance should be conditioned. 2. Green roof A green roof has been proposed, albeit a relatively modest area. The loading on the larger roof spans precludes the installation of additional green roofs. Full details to be conditioned. 3. Additional tree planting at ground level. Additional tree planting within the car parks along the west boundary and in the south-west is welcomed. This has been achieved at the expense of car parking. Additional tree planting proposed along the southern boundary is off-site at the top of the canal embankment. These will be planted below the 3 metre high steel sheet pile retaining wall - proposed to reduce the disturbance of the canal side planting. This proposal is indicative at this stage because the planting will concentrate on areas of thin / weaker vegetation cover and seek to fill gaps which will best be assessed following installation of the retaining wall. Additional tree planting along the eastern (Green Belt) boundary is indicative at this stage. Minor incursions are anticipated along this boundary when kerbing / existing fencing is removed and levels adjusted to suit the site and new drainage provision. Localised vegetation removal is anticipated along the existing planted edge. As with the canalside boundary, final / optimum planting locations will be confirmed as the project progresses. Full details to be conditioned. 4. GSK sculpture I haven't found this detail on the file but Officers confirmed that there is a proposal to re-locate the sculpture (and commemorative plaque) to the north of the lakes between Ironbridge Road and the data centre. A location to the north of the weir and close to the Horton Road / Ironbridge has been suggested - from where it will be visible from the road.

PLANNING POLICY OFFICER

Designations
Locally Significant Employment Location
Office Growth Location

Principle of Development

The proposed development is for the demolition of an existing E class office and its replacement with flexible E class (light industrial)/ B2/ B8 warehousing. The current level of office provision is 31,500sqm arranged over three buildings, with the site forming part of the wider Stockley Park office park. The applicant has confirmed that the office currently remains in operational use by GSK but that it is gradually being vacated as the lease comes to an end and GSK consolidates on an alternative site. The proposed redevelopment of the site would deliver approximately 31,000 sq.m of light industrial, general industrial or storage floorspace. The flexibility of use is sought to meet the needs of a range of potential occupiers.

The whole of the site is currently designated as a Local Significant Employment Location and an Office Growth Location. Policy DME1 states that the Council will support light industrial, office and research and development activities (B1 a,b and c) within Locally Significant Employment Locations (criterion C). Proposals for other uses in LSEs will only be acceptable where:

i) there is no realistic prospect of the land being developed in accordance with criterion A, B and C; or

ii) sites have been vacant and consistently marketed for a period of 2 years; and

iii) the proposed alternative use does not conflict with the policies and objectives of this plan. In addition, policy DME3 specifically protects office floorspace in preferred locations requiring the provision of information to demonstrate that a site has been marketed for two years, that it is no longer viable for office use and that the surrounding employment uses will not be undermined.

It should be noted that from September 1st 2020 the Use Classes order has changed and all of the B1 use classes have been subsumed into a new E use class from commercial, business and service uses (previously A1, A2, A3, B1 and D1 health related uses). This means that it would be possible for the site to move to any of these alternate uses without the requirement for planning permission. However, the Council's local plan policy DME3 does specifically seek to protect office floorspace and given the proposed change of use still requires planning permission the criteria in policy DME3 remain relevant to the assessment of this application. The provision of light industrial uses on this site would also be supported by policy DME1 if the requirements of policy DME3 regarding the loss of office floorspace could be satisfied. B2 general industrial and B8 storage uses are not supported in LSEs.

The applicant has not provided specific evidence regarding the marketing of their site as required by policies DME1 and DME3. Instead the evidence provided focuses on the wider property market area as a basis for demonstrating that there is no realistic prospect of the site being re-let or redeveloped for further office use. As highlighted in their planning statement, the applicants have submitted evidence from the Savills Economic Team that there is a strong need for additional B8 floorspace in the local area and no significant need for new office floorspace. It is argued that this evidence is further supported by the large amount of vacant floorspace currently within the wider Stockley Park office park. It is also highlighted that a light industrial use would be compatible with the existing designations of the site and that a development of this scale could generate up to 650 new jobs.

The case is also put forward that this part of Stockley Park to the west of Stockley Road differs in character from that to the east which has a much stronger office character. Much of the land to the west of Stockley Road has already been brought forward as a logistics park and it is argued that the proposed redevelopment of the GSK office site for the same uses would strengthen the function of this area without weakening the office park overall.

The Council does not have its own evidence to verify that put forward by the applicant with regards to the relative demand for office and industrial floorspace in the Stockley Park Property Market Area or the borough more widely. However the Council does view the Park more broadly as one of its main reservoirs of employment land and a key objective underpinning the Local Plan is to retain the employment uses in these locations as the best quality employment land in the Borough. Policies E1 and E2 of the Local Plan Part 1 identify that the Council will accommodate new jobs during the Plan period by protecting Strategic Industrial Locations and Locally Significant Employment and Industrial Sites, as well as identifying Office Growth Locations. This is supported by policies in the current and emerging London Plan which seek the consolidation of existing office clusters and the retention of industrial capacity at a Borough wide level.

Evidence prepared in support of the new London Plan provides the most recent detailed analysis of industrial and office capacity in the Borough (London Industrial Land Supply and Economy Study, GLA 2016). It identifies a vacancy rate within the Council's designated industrial areas of 7%, indicating a good balance of supply and demand on par with other Boroughs in the sub-region and

below the indicative London-wide frictional rate of 8%. There is also evidence presented that Hillingdon has already lost a significantly higher proportion of industrial land than its strategic benchmark indicating a need to protect and promote future supply. In terms of office supply, there has been a net loss of 89,000 sqm approved since April 2014. It should be noted that the majority of this is the result of permitted development rights and not planning decisions made by the Council. However, the Council does not have evidence of how this has impacted overall vacancy rates although there is evidence provided by the applicant that capacity remains in the market despite these losses.

Consequently the assessment of this application comes down to balancing one set of policy objectives in the Local Plan, which is to protect office floorspace in this location, and the overall objective of the Local Plan and London Plan to retain employment capacity and support the local economy. Ideally the applicant would have provided evidence of the marketing of this site for offices in order to demonstrate compliance with all aspects of the policy. However, the combined evidence with regard to the demand for industrial land and the levels of vacancy in the wider Stockley Park campus are considered sufficient in this instance to demonstrate that the site is no longer viable for office use. The change in function of western part of Stockley Park to a mixed industrial use is therefore supported despite being contrary to policy DME1 which does not support B2 and B8 uses in LSEs. This is on the basis that the loss of office in this part of Stockley Park would consolidate and therefore strengthen the remainder of the business park to the east of Stockley Road and that the proposed use would secure the use of the site for employment/ industrial uses through its restricted E, B2 and B8 classification. If the site were to remain as offices then under the revised use class order, there is a chance that it would be lost from employment use anyway through a change to another non-employment E class use.

HIGHWAYS OFFICER

The application site forms part of the wider Stockley Park employment area but is separated from the main park being on the opposite side of the Stockley Road/Horton Road/Bennetsfield Way roundabout. The existing main access to the site is from Iron Bridge Road, this is a two-way single carriageway road running in an north-south direction from Horton Road. Iron Bridge Road has single yellow line parking restrictions along both sides of the carriageway for the full extent of the road operational weekdays 07:00 to 19:00h. There is a pedestrian footway running on the northern and western sides of the site, the eastern boundary is formed by Stockley Road. Stockley Road is a dual carriageway with a posted speed limit of 50mph. It leads south to Junction 4 of the M4. To the north Stockley Road connects to Uxbridge, some 5km away. Approximately 1km to the north, the A408 forms a roundabout junction with the B465 West Drayton Road, which then leads further north joining the A4020 Uxbridge Road.

According to the Transport for London WebCAT service the application site has a PTAL ranking of 1b indicating access to public transport is limited compared to London as a whole suggesting that there would be a strong reliance on the private car for trip making.

Car Parking

The site is currently occupied by three 2-storey vacant office blocks surrounded by approximately 885 surface level car parking spaces and a multi-storey car park comprising 350 car parking spaces (1,235 spaces cumulatively).

Bus routes A10, 350 and U5 serve the application site (bus stop on Iron Bridge Road). The 350 bus route extends into Heathrow Terminal 5. U5 buses travel from Uxbridge Underground Station, through West Drayton to Stockley Park, and then on to Hayes and Harlington Station. The A10 is a dedicated frequent bus link from Heathrow Airport to Stockley Park, and then continues on to Uxbridge Station.

- Route 350 runs every 10-13 minutes
- Route U5 runs every 10-13 minutes
- Route A10 runs every 12-20 minutes

The proposed development seeks to provide 122 car parking spaces for Unit 1 and 95 car parking spaces for Unit 2 (217 car parking spaces cumulatively). Overall there would be a net reduction of 1,018 car parking spaces. The application would provide 54 cycle parking spaces are proposed for Unit 1 and 40 cycle parking spaces for Unit 2. The applicant anticipates that the proposal would be occupied by a business that would operated 24 hours a day 7 days a week.

Access

The applicant has provided drawings showing vehicular movements to access and egress each unit and manoeuvring around the car parks and servicing yards. Access and circulation plans for a Refuse Collection Vehicles and a Fire Tender have also been provided; these have been reviewed and are considered acceptable.

Pedestrians and cyclist would access Unit 1 via Iron Bridge Road North through the staff car parking access. Unit 2 would have a segregated pedestrian and cyclist access which would follow desire lines from/to the bus stops at Horton Road into the site. Access would also be possible from the staff car park entrance. Internally, footpaths are provided around the two buildings which allow for direct access to the entrance of each building. From the cycle parking areas, employees and visitors would be able to walk to the entrance of the buildings along footways away from vehicular traffic. The Highway Authority has raised no objection to the principle of the proposed arrangement, the Greater London Authority has sought further clarity on the pedestrian routes for Unit 1 in particular. A condition securing details of pedestrian routes within the site is requested to ensure conflict between all road users within the site is minimised.

Traffic Calming

Recently traffic calming measures along Iron Bridge Road were implemented including the reducing the speed limit to 20mph, the installation of speed tables and extending double yellow lines to prevent vehicle parking.

The location of the existing speed tables conflict with the planned access points into the proposed development. The applicant is seeking agreement from the Council to replace all of the new speed tables with speed cushions, speed cushions are considered more suitable as the proposed development would generate additional HGV movements. The replacement speed tables would allow larger vehicles to straddle the cushions reducing the impact to trailers. Highway Authority has raised no objection to the proposed works subject to the cost being borne by the Applicant. The alterations to the speed cushions is proposed to be secured as Head of Term in the Section 106 legal agreement if the application is considered acceptable.

Car Parking

The Highways Authority has commented on this application For a development of this type the maximum number of parking spaces permitted is a maximum of 2 spaces plus 1 per 50 - 100 sqm. For both units combined, the application would be expected to provide between 310 and 617 car parking spaces.

The proposed development seeks to provide 122 car parking spaces for Unit 1 and 95 car parking spaces for Unit 2 (217 car parking spaces cumulatively across the site). The applicant anticipates that the proposal would be occupied by a business that would operated 24 hours a day 7 days a week.

The Local Plan (2020) requires that a minimum of 5% of all car parking should be provided with active electric vehicle charging points and a further 5% provided with passive electric vehicle charging points. The applicant proposes that 20% of car parking spaces would have an active electric vehicle charging points would all the remainder having passive provision. Highway Authority welcomes this quantum of electric vehicle charging point provision.

The Local Plan (2020) requires parking for motorcycle, mopeds and scooters should be provided at the rate of 5% of all spaces. Based on the required total of 217 car parking spaces this represents 11 spaces, the Highway Authority require that these spaces are provided with an anchor point.

The Local Plan (2020) requires that 10% of all car parking spaces should be blue badge/wheel chair accessible based on the required total of 217 car parking spaces this equates to 22 spaces in total and 5% spaces for brown badge holders this equates to 11 spaces.

The Greater London Authority has commented on the application requiring justification for the quantum car parking proposed. It is noted that the site is located in an area with a low PTAL rating which means the reliance on car generated trips would be high. Furthermore, whilst the application site is served by 3 bus routes, traffic exiting the main Stockley Park during the afternoon peak is not able to access the A408 southbound as queuing traffic on the elevated section prevents southbound traffic from Stockley Park joining. This causes queues to tail back into Stockley Park. In addition, queued traffic blocking Stockley Park's access to the roundabout prevents traffic wishing to travel north entering onto the roundabout. The bus journey therefore can take a longer time as the buses serving the site use the roundabout.

The quantum of car parking proposed is a balance between addressing aspirations by the London Plan and the requirements of the Local Plan. Whilst the quantum of car parking spaces is below the recommended maximum standard set out in the Local Plan, on the basis of the justification provided within the supporting Transport Assessment, the proposed quantum of car parking is considered acceptable subject to a contribution towards improvement to the capacity of Stockley Park Roundabout that will ease congestion and allow sustainable transport modes become an attractive travel option to the site. Subject to the inclusion of a Head of Term requiring a contribution towards sustainable highways capacity improvements, the proposed quantum of car parking is considered acceptable.

Cycle Parking

The application would provide 54 cycle parking spaces are proposed for Unit 1 and 40 cycle parking spaces for Unit 2. Details of showers and lockers for staff to facilitate cycling and sustainable travel is required by way of condition.

Trip Generation

In order to determine the impact the development would have on the surrounding road network the applicant has prepared a Transport Assessment (WSP, 2020) which considers how the volume of vehicle trips generated by the proposed development would change compared to the site in its existing use. To determine how many vehicle trips the site currently generates manual classified count traffic surveys have been undertaken. However, it should be noted that at the time of the survey the car parking associated with the 3rd office building was in effect being used as a workplace park and ride facility. The staff that had previously worked in the 3rd office building had already been relocated elsewhere; however they would still drive to the Stockley Park office and park as before and then be driven in a minibus to the new office. The applicant suggests that the trips generated by the workplace park and ride facility acts as a proxy for trips generated by that building. To confirm the validity or otherwise of these surveyed trip generation figures using TRICS a sensitivity test was undertaken with all three of the existing buildings in operation.

Of the two sets of results, the manual classified counts showed the lowest number of vehicular trips generated. The applicant has used these manual classified counts as the baseline as this would provide the most robust net change in trip generation when compared to trips generated by the proposed development. To calculate the trip rates for other modes, the applicant has taken the observed vehicle trips and used TRICS to calculate the proportion and number of trips made by other modes.

The manual classified counts showed that the busiest period was the AM Peak 08:00 to 09:00h when 269 arrivals and 14 departures were counted giving a two-way total of 280. In the PM Peak there were 225 two-way movements. Over a 24 hours period 1,813 trips were generated, 906 arrivals and 907 departures.

To determine how trips would assign to the network, Census Travel to Work Data for the Medium Super Output Area within which the site situated has been used, this shows that 89% of vehicles would leave the site and head along Horton Road eastbound towards Stockley Park roundabout. From the Stockley Park roundabout 60% of vehicles would head northbound with the remaining 29% of vehicles heading southbound.

Trip rates for the proposed development have been extracted from a traffic survey undertaken at the nearby Prologis Park Heathrow site in December 2014. This is accepted as the Prologis Park Heathrow and proposal site are comparable in terms of size, land use, location and accessibility. Applying the 2014 trip rates of the Prologis Park Heathrow site to the proposed development forecast that the proposed development would generate 3,508 daily two-way trips. This exercise shows that with the new development there would be a net uplift of 1,695 daily trips.

The busiest period at the Prologis Park Heathrow site is late at night, 23:00 to 00:00h, the applicant anticipates that the proposed development would be occupied by a similar type of business so therefore expects that the busiest time of vehicle movements at the proposed development would also be late at night. On this basis the time during which the application site generates the greatest number would shift from 08:00 to 09:00h to 23:00 to 00:00h with the new development. Consequently the number of trips currently generated in the AM Peak 08:00 to 09:00h would fall from 283no. two-way movements to 94no. movements. Whilst the proposed development would generate more daily trips, most of these movement would take place late at night when background traffic is lowest as opposed to during the AM Peak when it is at its highest.

The trips generated by the proposed development have then been assigned to the network but for this scenario this has been based on the distribution of trips at the Prologis Park Heathrow development. This analysis indicates that at the Stockley Road roundabout 75% of vehicles would head southbound towards the M4 motorway - most of these movements would be taking place late at night.

As discussed above, although the new development would generate more daily trips than the existing use, a total increase of 1,695, this could be absorbed by the surrounding highway network because most of these movements would take place late at night, furthermore trips generated by the new development would head southbound as opposed to the existing situation where they head northbound. The applicant has gone on to assess the impact of the proposed development on the surrounding road network in the AM and PM Peaks. In the AM Peak there would be 189 fewer two-way vehicle movements

However it should be borne in mind that in the future the site could be occupied by another type of B1(C) (Light Industrial), B2 (General Industry) and B8 use (Storage and Distribution) without needing planning permission. The profile of trips generated by this new use could be very different to the profile of trips associated with the proposed 24/7 development. An alternative occupier may generate trips during the day when at times when the network is already at capacity.

The trip generation figures presented in the Transport Assessment correspond with a business that operates 24/7. However, it is not certain what type of business would occupy the proposed development now or in the future, it could be a business that operates 24/7 or it could be a business that works a 12 hour daytime shift. To help understand any change in trip generation between the site in its existing use and a business that operates a 12 hour shift, the Highway Authority have required that the applicant undertakes a sensitivity test that compares trip generated by the existing use, trips generated by the assumed 24/7 occupier and an occupier that works a 12 hour shift.

The results of this work show that an occupier that operates a 12 hour shift would generate slightly more 2-way trips in the AM peak than an occupier that operates 24/7 - the type of occupier that the applicant expects, however, the difference is just 29 trips, 123 trips if a 12 hour shift compared to 94 trips if 24/7 - this is within the variance in daily traffic flows and the impact would be almost undetectable. Most significantly both an occupier that operates 24/7 and an occupier that works a 12 hours shift both generate far fewer AM Peak hour trips that the site does in its current use, 123 trips if a 12 hour shifts occupier (worse case) compared to 283 trips in the current use.

Alongside the planning application the applicant has provided a Framework Travel Plan, an Outline Construction Logistics Plan and an Outline Delivery and Servicing Plan, these have all been assessed and are judged to be satisfactory.

In accordance with the latest Transport for London Healthy Streets Transport Assessment Guidelines the applicant has submitted an Active Travel Zone Transport Assessment

The Highway Authority notes that the assumed 24/7 occupier would generate a greater number of daily vehicular trips compared to the site in its existing use and if the site were to be occupied by a business that works a 12 hour shift. However, analysis of the number of trips being loaded onto the network when it is at its busiest - the 08:00 to 09:00h peak, the anticipated 24/7 occupier generates few trips that the site does currently. Even if the site is occupied by a business that operates a 12 hours shift the number of AM peak hour trips would still be less that the site generates in its current use.

Developer Contributions

Stockley Park Travel Plan bond £20,000

As surety that the Stockley Park Travel Plan would be implemented and targets achieved the Highway Authority requires that the developer provides a £20,000 bond. In the event of the Travel Plan not being delivered the Highway Authority would use this bond to implement the Travel Plan itself. This should be secured by way of a S106 agreement. If the Travel Plan is successful the bond would be returned.

Sustainable Highways Capacity Improvements £250,000

The proposed development would place additional demand for road space on the Stockley Park roundabout. A developer contribution is sought to improve the capacity of this roundabout so it is better able to cater for the uplift in daily vehicle numbers. The previous occupiers of the offices on the application site contacted the Council on several occasions to report instances of cyclists riding around the roundabout being hit by vehicles entering the roundabout failing to give way to cyclists. A scheme has already been designed, a survey of utilities and topographical surveys carried out. A contribution of £250,000 is required to implement a scheme that has already been designed to address this issues.

Improving access to and the enhancing the routes within Stockley Country Park £20,000

To the north of the application site, on the northern side of Horton Road, is Stockley Country Park which is a large area of public open space. Numerous footpaths crisscross this Park providing off-road walking and cycle access to for example Falling Lane and West Drayton Road. A developer contribution is sought to help improve access into the Park and upgrade the various routes across it thereby increasing the attractiveness of walking and cycling to work in turn helping to reduce the volume of car trips that the development generates.

Traffic calming changes along Iron Bridge Road

As mentioned above access to the new development would require the removal of traffic calming speed tables recently provided. The Highway Authority requires the developer to fund in full the cost of replacing these speed tables with a similar traffic calming device.

Subject to all of the above, there are no highway objections to this proposal as it would be in accordance with Hillingdon Local Plan: Part 2 Development Management Policies (2020) Policy DMT 1: Managing Transport Impacts, Policy DMT 2: Highway Impacts and Policy DMT 6: Vehicle Parking. The Highway Authority is satisfied that the development would not present a risk to road safety, hinder the free flow of traffic or lead to parking stress; there are no highway objections to this development.

FLOOD WATER MANAGEMENT OFFICER

More information required on the proposed components of the drainage network. Flood Risk The site is greater than a hectare. A Flood Risk Assessment (WSP report reference 2215-FRA-001 dated June 2020) has been provided to support the application and confirms that the risk of flooding to the site is low from all sources. Drainage The applicant has provided a Drainage Design Philosophy (RPS report reference PPWLE-RPS-XX-XX-RP-C-0300 dated April 2020) to set out the proposed strategy for managing surface water on the site. It is proposed to discharge from the site at 2l/s/ha, with a peak runoff rate of 12.5l/s (7l/s from Unit 1 and 5.5l/s from unit 2). This rate is considered to be acceptable. It is proposed for the drainage network to discharge into the Thames Water surface water sewer in the east of the site. The drainage strategy presented does not set out the reasons for excluding more sustainable drainage approaches, which would have been expected for a development of this scale. Such as the inclusion of blue/green roofs for the flat roof areas of the proposals, the inclusion of rain gardens within the parking area, permeable paving for the car parking bays, inclusion of the pond for attenuation (as required by Part F of DMEI 10). While the drainage strategy meets the quantity requirement in policy, there are concerns that there is not sufficient space within the proposed development for a sustainable drainage system to be constructed if it is left to a details condition. Blue Ribbon Network It is welcomed that a vegetated buffer will be left from the canal. There are concerns with the layout of the access to the south of the site where the HGV entrance so close to the canal. This needs to be coordinated with Landscaping/highways/ecology as it involves all disciplines.

REVISED COMMENTS (OCTOBER 2020)

The applicant has submitted a revised Drainage Design Philosophy (RPS report revision P04 dated 2nd October 2020) following the previous consultation response. The proposed drainage strategy now includes small areas of green roof on both buildings, rain gardens/swales and the incorporation of the existing pond into the drainage system. The design amendments are considered to be the bear minimum but the drainage system does now incorporate some sustainable elements. While we would like the amount of green infrastructure to be expanded on the site, the information is now considered to be policy compliant. The details of the drainage strategy should be secured by way of a condition that ensures the integration of the drainage system into the landscaping plan. Where possible, the extent of green roof should be expanded, which can be incorporated with bird mitigation to prevent nesting should this be an issue.

CONSERVATION AND DESIGN OFFICER

The application seeks permission to redevelop the site to provide two industrial units providing industrial floorspace (Use Class B1c/B2/B8) and ancillary offices together with associated parking, access arrangements, landscaping and infrastructure.

On the 18th August 2020 the Council received notification from Historic England that Stockley Park: Business Park Phases I and II, and Country Park and golf course, to the east and west of Stockley Road, Uxbridge, Hillingdon has been added to the Register of Parks and Gardens of Special Historic Interest in England at Grade II.

The reasons given for designation are:

Historic Interest

- First established in the mid 1980s, it was a pioneering design from the early phase of business park development in England;
- A skilled reuse of highly contaminated land.

Design Interest

- An important collaboration between several prominent late C20 designers, engineers and landscape architects to create a business park in which continues to be held in high regard;
- The overall site has a fully integrated design with a cellular business park contrasting well with the naturalistic and geometric forms of golf course and public park.

Survival

Carefully established and consistent design parameters have made for a unified and consistent landscape and; despite the development of some buildings and modifications to their immediate landscape context, overall the original design is well-preserved.

Historic parks and gardens are a fragile and finite resource: they can easily be damaged beyond repair or lost forever. Whether in town or country, such places are an important, distinctive, and much cherished part of our inheritance and we have a duty to care for them.

In order to identify those sites which are of particular historic significance, Historic England was enabled by government to compile the 'Register of Parks and Gardens of Special Historic Interest in England'.

The Register in itself entails no additional statutory controls. The historic interest of a park or garden is, however, established as a material planning consideration, and the Register provides the key means by which sites of special historic interest are identified. It draws attention to the fact that the sites included should receive special consideration if changes or proposals for development are being contemplated. The Council is required to consult Historic England over any planning applications received which may affect sites graded I or II* on the Register. The Council are also directed to consult The Gardens Trust on applications which may affect any site on the Register, regardless of grade. Now that Stockley Park: Business Park Phases I and II, and Country Park and golf course, to the east and west of Stockley Road has been added to the Register of Historic Parks and Gardens by Historic England at grade II it will be necessary for the applicant to submit a heritage impact assessment. Paragraph 189 of the NPPF states that: In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the

proposal on their significance. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary. Where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.

This was requested and was received on the 29 September 2020. This document has now been read and concludes that there would be no harm to the Registered Park and Garden. I understand that the Gardens Trust have already been consulted on this application and have requested further information.

When assessing the application the Council will need to take into consideration paragraphs 189-202 of the NPPF in the same way it does with other heritage assets.

The current landscaping and the size and layout of the existing buildings that occupy the proposed development site take their cues from the rest of the Stockley Park and are sympathetic to it. The relatively low levels of the buildings and the fenestrated designs of the elevations mean that they do not overwhelm the overall landscape design, but rather they work together to create a well-balanced environment which is very much in the spirit of the rest of Stockley Park and the original master plan.

There are concerns that the removal of the existing buildings and landscaping within the site for the construction of two large industrial sheds and large expanses of hard landscaping would sit at odds with the rest of Stockley Park and as a consequence would not respect the Registered Park and Garden.

Following our previous meeting with the applicant there has been no amendments to the design of the buildings to help lessen their impact and they still appear as large monolithic largely windowless structures at odds with the rest of Stockley Park. It is considered that there should be more articulation in the facades and visual interest added to help break up the bulk and mass of the buildings. The buildings would also benefit from being separated more to allow for further planting between in a similar way to other developments within the park. The parking areas also do not show the same level of landscaping to the rest of Stockley Park where rows of parking are broken up by hedging and or trees.

Views also need to be considered from within the site and other areas of Stockley Park including the golf course to the north as well as from Stockley Road that runs adjacent to the site.

The existing sculpture at the entrance to the site is also proposed to be removed. It is unclear if this is to be removed in its entirety or it is to be relocated to another area of the site. This sculpture is mentioned in the designation Advice Report alongside two others within the park which add visual interest to the landscaped design. If this sculpture is proposed to be removed then consideration should be given to its retention or replacement.

The development in its current form is considered to cause harm to the designated heritage asset. The harm identified would be considered 'less than substantial harm' to the Registered Park and Garden. In line with paragraph 196 of the NPPF, the less than substantial harm arising from the impact of the development on the Registered Park and Garden would need to be weighed against the package of public benefits arising from the scheme.

We still need to understand the full impact of the development on the heritage asset and in particular views of the proposed industrial sheds from within the application site and other areas of Stockley Park including the golf course to the north and also from Stockley Road that runs adjacent to the site. It will, therefore, be necessary for the applicant to submit a detailed views assessment so that the full impact of the development can be fully understood. For the above reasons the proposed development is considered to harm the Registered Park and Garden contrary to local plan policies.

CONTAMINATED LAND OFFICER

I have reviewed the following documents relating to the study site known as GlaxoSmithKline (GSK), Stockley Park, Hillingdon:

Report Title: Geo-Environmental - Preliminary Risk Assessment; Ref: 70062215-PRA; Dated June 2020; Prepared by WSP.

Report Title: Phase 2 Geo-Environmental Assessment; Ref: 70062215-P2; Dated June 2020; Prepared by WSP.

The extremely comprehensive and detailed Phase 2 report provides information which indicate concentrations of contaminants are present in made ground materials at site.

Results from chemical analyses were compared with the relevant generic assessment criteria for the current and proposed commercial land use; significantly elevated concentrations of lead were identified at two locations; asbestos was also identified at two locations.

The risk assessment indicated:

"the risk to current and future Site users is considered to be Low, although the risk to future construction workers is considered to be Low to Moderate due to greater potential for direct contact with potentially contaminated soils. The risk from vapours from shallow groundwater and soil is also considered to be Low. It is recommended that the a condition is imposed if planning consent is granted.

Observations:

- Statistical analysis indicated that soils across the entire site were unlikely to be impacted by the reported elevated concentrations of identified contaminants of concern (CoC), because the proposed construction designs incorporate significant expanses of hardstanding and building footprints which would prevent direct contact between contaminants and identified receptors;
- Elevated concentrations of ground gas (methane [$>1\%$] and carbon dioxide [$>5\%$]) were detected at various locations within the site boundary.
- Numerical data from gas monitoring and subsequent calculations identify a Characteristic Situation 2 (low risk) category; requiring,

Based on the results of the ground investigation and assessment the report offers the following recommendations - (I consider these items should be implemented accordingly):

- Additional ground investigation and subsequent monitoring beneath the footprint of existing buildings following demolition;
- The ancillary fuel pipes are decommissioned (unless previously completed at the time of reported UST decommissioning) and the USTs and pipes removed, along with the excavation of visually and olfactory contaminated material and validation sampling;
- Installation of ground gas protection measures in new buildings;
- Provision of a capping layer (minimum 300 mm thick) in areas of soft landscaping;

- Completion of a potable water pipe assessment where pipes are to be laid within Made Ground materials once the development layout has been finalised; and,
- Production of a Remediation Strategy (RS) detailing the above remediation requirements.

7. MAIN PLANNING ISSUES

7.01 The principle of the development

ECONOMY AND EMPLOYMENT

The proposed development is for the demolition of an existing office and its replacement with flexible E class (light industrial)/ B2/ B8 warehousing. The current level of office provision is approximately 31,500 sq.m arranged over three buildings, with the site forming part of the wider Stockley Park office park. The applicant has confirmed that the office currently remains in operational use by GSK but that it is gradually being vacated as the lease comes to an end and GSK consolidates on an alternative site.

The proposed redevelopment of the site would deliver approximately 31,000 sq.m of light industrial, general industrial or storage floorspace. The flexibility of use is sought to meet the needs of a range of potential occupiers.

The site lies within the emerging Heathrow Opportunity Area in the Mayor's intend to publish London Plan, which has an indicative capacity for 13,000 new homes and 11,000 new jobs. The application site is also designated as a Locally Significant Employment Location and an Office Growth Location.

Paragraph 80 of the National Planning Policy Framework (February 2019) emphasises that planning decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future.

Policy 2.13 of the London Plan (2016) and Policy SD1 of the Mayor's intend to publish London Plan (2019) provides that proposals in Opportunity Areas should seek to maximise density and contain a mix of uses.

Policies 4.2 and 4.3 of the London Plan (2016) and Policy E1 of the the Mayor's intend to publish London Plan (2019) state that the office stock at business parks, including Stockley Park, should be renewed and modernised. Further to this, Policy E1 states that office space in outer London should be consolidated in town centres and other existing office clusters, such as Stockley Park, and should be extended where viable. It is noted that Stockley Park is also locally designated as a Locally Significant Employment Location, where the provision of B1(a) office floorspace is prioritised, in the Hillingdon Local Plan Part 2: Site Allocations and Designations (2020).

Policy 4.2 of the London Plan (2016) and Policy E1 of the the Mayor's intend to Publish London Plan (2019) also support the redevelopment of surplus office space to other uses. Policy E1 requires that there is evidence of no reasonable prospect of it being used for business purposes before the loss of office space can be accepted. This evidence should include strategic and local assessments of market demand and supply, including evidence of vacancy and marketing (at market rates suitable for the type, use and size for at least 12 months). Policy 4.4 of the London Plan (2016) and Policy E4 of the Mayor's intend to publish London Plan (2019) seek to ensure that there is a sufficient stock of industrial land

to meet the current and future needs of different types of industrial and related functions in different parts of London.

Policy E4 of the Mayor's intend to publish London Plan (2019) supports the provision of industrial capacity in locations with access to the strategic road network which provide capacity for logistics and other industrial sectors, provide capacity for SMEs, are suitable for 'last mile' distribution services and support access to supply chains and local employment in industrial and related activities. Policy E7 of the Mayor's intend to publish London Plan also supports proposals to intensify B1c light industrial, B2 general industrial and B8 storage uses.

Policies E1 and E2 of the Local Plan: Part One (2012) identify that the Council will accommodate new jobs during the Plan period by protecting Strategic Industrial Locations and Locally Significant Employment and Industrial Sites, as well as identifying Office Growth Locations.

Policy DME 1 of the Local Plan: Part Two (2020) states that the Council will support light industrial, office and research and development activities (B1 a,b and c) within Locally Significant Employment Locations (criterion C). Proposals for other uses in LSELs will only be acceptable where:

- i) there is no realistic prospect of the land being developed in accordance with criterion A, B and C; or
- ii) sites have been vacant and consistently marketed for a period of 2 years; and
- iii) the proposed alternative use does not conflict with the policies and objectives of this plan. In addition, policy DME3 specifically protects office floorspace in preferred locations requiring the provision of information to demonstrate that a site has been marketed for two years, that it is no longer viable for office use and that the surrounding employment uses will not be undermined.

On 1st September 2020, the Use Classes order changed and all of the B1 use classes have been subsumed into a new E use class from commercial, business and service uses (previously A1, A2, A3, B1 and D1 health related uses). This means that it would be possible for the site to move to any of these alternate uses without the requirement for planning permission. Given the proposed change of use still requires planning permission the criteria in Policy DME 3 of the Local Plan: Part Two remain relevant to the assessment of this application. The provision of light industrial uses on this site is supported by policy DME1 if the requirements of policy DME3 regarding the loss of office floorspace could be satisfied.

Policies DME1 and DME3 of the Local Plan: Part Two (2020) requires marketing evidence which has not been provided and this application is nor supported by marketing evidence. However, the application is supported by a Property Market Assessment dated June 2020. The evidence provided focuses on the wider property market area as a basis for demonstrating that there is no realistic prospect of the site being re-let or redeveloped for further office use.

The evidence submitted in support of this application indicates there is a strong need for additional B8 floorspace in the local area and no significant need for new office floorspace. It is understood that the site has been marketed for a freehold sale three times in the last five years by the former occupier (GSK).

- The first marketing process ran from September - December 2016.
- The second marketing exercise then took place June - September 2017.
- The third marketing exercise took place in early 2019, when Prologis (the applicant) acquired the site.

The 2016 and 2017 marketing exercises did not lead to a disposal of the site. The marketing campaigns were aimed at end occupiers and office owners/developers. It is understood there was no interest from end users. The owners/developers that had express an initial interest in the site did not make any formal offers and later expressed concerns around the extent of refurbishment required, costs, levels of demand for office accommodation in this location and the current/future over supply office floorspace at Stockley Park. It was widely suggested that this side of Stockley Park is seen as less suitable for office development.

The Applicant has argued that this evidence is further supported by the large amount of vacant floorspace currently within the wider Stockley Park office park. It is also highlighted that a light industrial use would be compatible with the existing designations of the site and that a development of this scale could generate upto 650 new jobs.

The applicant also argues that this part of Stockley Park, to the west of Stockley Road, differs in character from that to the east which has a much stronger office presence. Much of the land to the west of Stockley Road has already been brought forward as a logistics park and it is argued that the proposed redevelopment of the GSK office site for the same uses would strengthen the function of this area without weakening the office park overall.

The Council does not have its own evidence to verify that evidence produced by the applicant with regards to the relative demand for office and industrial floorspace in the Stockley Park Property Market Area or the borough more widely. However the Council does view the Park more broadly as one of its main reservoirs of employment land and a key objective underpinning the Local Plan is to retain the employment uses in these locations as the best quality employment land in the Borough.

Evidence prepared in support of the new London Plan provides the most recent detailed analysis of industrial and office capacity in the Borough (London Industrial Land Supply and Economy Study, GLA 2016). It identifies a vacancy rate within the Council's designated industrial areas of 7%, indicating a good balance of supply and demand on par with other Boroughs in the sub-region and below the indicative London-wide frictional rate of 8%. There is also evidence presented that Hillingdon has already lost a significantly higher proportion of industrial land than its strategic benchmark indicating a need to protect and promote future supply. In terms of office supply, there has been a net loss of 89,000 sq.m approved since April 2014, majority of this is the result of the change of use through permitted development rights. However, the Council does not have evidence of how this has impacted overall vacancy rates although there is evidence provided by the applicant that capacity remains in the market despite these losses.

In assessing this application, officers have balanced the need to protect office floorspace in this location required by the Local Plan against a wider set of objectives within the Local Plan and the London Plan to retain employment capacity and support the local economy. The combined evidence with regard to the demand for industrial land and the levels of vacancy in the wider Stockley Park campus are considered sufficient in this instance to demonstrate that the site is no longer viable for office use.

The change in function of western part of Stockley Park to a mixed industrial use is therefore supported despite being contrary to policy DME1 of the Local Plan: Part Two (2020) which does not support B2 and B8 uses in LSEs. This is on the basis that the loss of office in this part of Stockley Park would consolidate and therefore strengthen the remainder of the business park to the east of Stockley Road and that the proposed use would secure the use of the site for employment/ industrial uses through its restricted E (light industrial), B2 and B8 classification. The principle of the redevelopment of the site from offices to an industrial use is considered acceptable.

7.02 Density of the proposed development

Not applicable to the consideration of this application.

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

The offices on the existing site are not listed and the application site is not located within a conservation area. The nearest listed buildings are situated 300m to the east of Stockley Road as such the application proposal would not result in harm to the setting of the listed buildings. The application site forms part of the Grade II Registered Park and Garden at Stockley Park.

ARCHAEOLOGY

Policy DMHB 7 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020) states that the Council, as advised by the Greater London Archaeological Advisory Service, will ensure that sites of archaeological interest within or, where appropriate, outside, designated areas are not disturbed. If that cannot be avoided, satisfactory measures must be taken to mitigate the impacts of the proposals through archaeological fieldwork to investigate and record remains in advance of development works. This should include proposals for the recording, archiving and reporting of any archaeological finds.

The Greater London Archaeological Advisory Service (GLAAS) has confirmed the proposal is unlikely to have a significant effect on heritage assets of archaeological interest. The application site does not lie within an archaeological priority area and the site has been heavily disturbed by modern mineral extraction and industrial development indicating low to negligible potential for significant surviving archaeological remains. As such, no further assessment is required and the proposal is not considered contrary to Policy DMHB 7 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020).

REGISTERED PARK AND GARDEN

This application was submitted on 15 July 2020 and registered on 23 July 2020. On 18 August 2020, Stockley Park: Business park Phases I and II, country park and golf course was registered as a Grade II listed Park and Garden as a pioneering suburban business park, established to a master plan of 1984 by Arup Associates and mainly developed from 1985 to 1993 with landscape architects Bernard Ede and Charles Funke.

It is most notable for its pioneering design from the early phase of business park development in England and its skilled reuse of highly contaminated land. It is recognised for its carefully established and consistent design parameters have made for a unified and consistent landscape and, despite the redevelopment of some buildings and modifications to their immediate landscape context, overall the original design is well-preserved and maintained. The application site forms part of the Grade II listed Registered Park and Garden which is a material consideration that applies to the determination of this Application.

Although the inclusion of an historic park or garden on the register in itself brings no additional statutory controls, registration is a material consideration in planning terms, Local Planning Authorities must take into account the historic interest of the site in determining applications.

The application seeks permission to redevelop the site to provide two industrial units providing industrial floorspace (Use Class B1c/B2/B8) and ancillary offices together with car parking, access arrangements, landscaping and associated works.

The application is supported by Heritage Impact Assessment which considers that the western section of Phase 1 of Stockley Park, which includes the application site possesses a differing character to the wider Business Park, located to the east of Stockley Road and which is more uniform in character. The existing buildings within the application site are not in accordance with early designs and the enclosed nature of the site, legible as one whole site, is unlike the character and plots to the east of Stockley Road.

Since the application was submitted and following the listing, extensive discussions have been held between the Applicant and Officers. The application proposal has been revised to introduce more soft landscaping to reflect the character of Stockley Park. The Applicant notes the revised proposal seek to retain the landscaping setting of the site, both along the boundaries and within the site.

As part of the proposal, the avenue of trees to the west of the site would be retained where possible, and reinstated where the existing vehicular access is altered. This element would therefore reflect the character of Stockley Park in terms of planned landscaping with the avenue of lime trees being retained along Iron Bridge Road and Horton Road. The proposal incorporates green walls that would run vertically along the proposed buildings to break up the visual impact of the proposed buildings. Further hedging and tree planting has been introduced around the area of car parking to reflect the pattern of tree and hedge planting across Stockley Park.

The NPPF requires its own exercise to be undertaken as set out in its chapter 16. Conserving and enhancing the historic environment. Paragraphs 184-202 require consideration of the impact of a proposed development on the significance of a designated heritage asset and assessment of the identification of any harm. In particular, where there is harm identified. Paragraph 196 states that "Where a proposal will lead to less than substantial harm to the significance of a heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use".

Policy 7.8 of the London Plan (2016) and Policy HC1 of the Intend to Publish Version of the London Plan (2019) requires development to identify, value, conserve, restore, re-use and incorporate heritage assets, including registered historic parks, where appropriate. Development affecting heritage assets and their settings should conserve their significance, by being sympathetic to their form, scale, materials and architectural detail.

Policy HE1 of the Local Plan: Part One (2012) states the Council will conserve and enhance Hillingdon's distinct and varied environment, its settings and the wider historic landscape, which includes Registered Parks and Gardens and historic landscapes, both natural and designed.

Policy DMHB 1 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020) states:

A) The Council will expect development proposals to avoid harm to the historic environment. Development that has an effect on heritage assets will only be supported where:

- i) it sustains and enhances the significance of the heritage asset and puts them into viable uses consistent with their conservation;
- ii) it will not lead to a loss of significance or harm to an asset, unless it can be demonstrated that it will provide public benefit that would outweigh the harm or loss, in accordance with the NPPF;
- iii) it makes a positive contribution to the local character and distinctiveness of the area;
- iv) any extensions or alterations are designed in sympathy, without detracting from or competing with the heritage asset;
- v) the proposal would relate appropriately in terms of siting, style, scale, massing, height, design and materials;
- vi) buildings and structures within the curtilage of a heritage asset, or in close proximity to it, do not compromise its setting; and
- vii) opportunities are taken to conserve or enhance the setting, so that the significance of the asset can be appreciated more readily.

Policy DMHB 8 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020) requires development within, or adjacent to a registered or historic park, garden or landscape, to respect its special character, environmental quality, important views and vistas. Development proposals should make provision (based on detailed research) for the restoration and long term management of the park, garden or landscape. Applications which impact detrimentally on the significance of a registered park or garden will normally be refused.

The Register provides the key means by which sites of special historic interest are identified. It draws attention to the fact that the site is included and should receive special consideration.

It is considered that the current landscaping and the size and layout of the existing office buildings that occupy the proposed development site take their cues from the rest of the Stockley Park and are sympathetic to it. The relatively low levels of the buildings and the fenestrated designs of the elevations mean that they do not overwhelm the overall landscape design, but rather they work together to create a well-balanced environment which is very much in the spirit of the rest of Stockley Park and the original master plan.

The Conservation Officer has raised concerns relating to the removal of the existing buildings and landscaping within the site for the a construction to two large industrial buildings with a large expanse of hard landscaping. The Conservation Officer considers the proposal would sit at odds with the rest of Stockley Park and considers the development would result in less than substantial harm to the designation to the designated heritage asset.

It is acknowledged that the Parks and Gardens Trust have commented on the application noting the proposal would result in substantial harm to the Registered Park and Garden. Following a review of the designation and the proposal, Officers consider that this proposal would not result in the total loss of the historic interest identified at Stockley Park: Business park Phases I and II, country park and golf course. The harm identified is less than substantial harm to the significance to this part of the Grade II Registered Park and Garden. The Framework's Glossary states that in the context of heritage policy, conservation means the process of maintaining and managing change to a heritage asset in a way that

sustains and, where appropriate, enhances its significance.

Officers note that this part of Stockley Park is of a different character to the wider Business Park which is located to the east of Stockley Road which effectively divides the Park in two and the business park is not legibly seen as one entity. The western part of Phase 1 retains a similarity of character and appearance with the rest of Phase 1 in terms of building scale and the landscape features of tree lined avenues and hedging to screen car parking and define the site. The industrial character of Iron Bridge Road North and Iron Bridge Road South is a major influence on the setting of this part of the Park. The buildings within this part of Phase 1 are all contained within one large plot, unlike those to the east which are distinct buildings with distinct occupants. As a result Officers consider that the harm to this part of the Registered Park and Garden is as a result of the loss of existing offices integrated into a landscaped setting and the loss of landscaping features and their replacement with industrial buildings of a substantial footprint.

The design and the layout of the buildings are surface level seek to achieve an intense use of the site whilst respecting local heritage assets. The design achieves higher employment densities and more productive premises. This outcome is consistent with the aspirations of Policy E4 of the Intend to Publish Version of the London Plan would priorities the intensification of employment land and premises. Logistics operations also typically require service yards of circa. 50m to optimise lorry circulation, parking and efficient movement of goods in to and out of the loading docks.

In line with NPPF (2019) paragraph 196 the identified less than substantial harm, must be weighed against the public benefits of the proposal including where appropriate, securing its optimum viable use.

Historic England Guidance notes that public benefits can cover a wide range of considerations and may go beyond straightforward heritage issues. The Government's Planning Practice Guidance (PPG) states that public benefits can be anything that arises from a development that delivers economic, social or environmental progress, as defined by paragraph 7 of the NPPF (2019).

In terms of the benefits provided by this proposal, the following has been identified:

- The development will deliver a significant amount of new Grade A industrial and logistics floorspace (Class B1c/B2/B8 use) which responds to an identified local need for such uses. The proposed delivery of circa. 31,000 sqm of Grade A industrial and logistics floorspace, which would make an important contribution towards meeting local employment needs;
- Once completed, the development would deliver upto 440 full time jobs with the potential to create an additional 250 full time jobs and a number of part time jobs associated with the site;
- The provision of flexible employment floorspace to ensure that the proposed units are attractive and suitable for a range of occupiers, providing greater choice for the local market;
- The proposal includes soft landscaping along the site's boundaries, improving the appearance of the site, improving the quality of the local environment, including along the Grand Union Canal towpath and the streetscene along Iron Bridge Road;
- The creation of new pedestrian and cycle route along the Grand Union Canal towpath;
- A net improvement in biodiversity to increase the ecological value and benefits of the site in terms of contribution to local biodiversity; and

- Sustainable design and construction measures will be utilised to reduce CO2 emissions, through a combination of fabric performance, energy efficiency and on-site renewables including photovoltaic panels providing an efficient and sustainable development.

The Applicant has also stated that the site has been marketed three times in the last five years and the marketing exercise did not result in the disposal of the site with little interest from end occupiers and office owners/developers. Furthermore, the applicant has provided evidence that there is vacant office space within the main Stockley Park campus to the east of the Stockley Road. In respect of the existing office floorspace in this location, given the current impacts of the Coronavirus pandemic, with an increased number of employees now working from home, and many large companies now considering the need for large scale, fixed office premises.

The Applicant states that the long term protection of this site for office use is not viable and could sterilise the development and use of this site. The proposed development is viable and deliverable, and responds to market demand. It will result in investment in the Borough and creation of a significant number of new jobs. The economic benefits provided by this proposal is given very significant weight. A commitment to deliver additional tree planting along the canal has also been secured as part of this application.

It is noted that the application site was listed as a Grade II Registered Park and Garden after the application had been lodged. Since its listing, the Applicant has engaged positively and proactively with Officers to mitigate against the harm as a result of the proposal. Additional landscaping on the site, including increased tree planting among the surface car parking, to mirror the existing character and appearance of the site is proposed. Key tree planting along Iron Bridge Road, Stockley Road and Horton Road is to be retained.

The proposal includes the re-location of the sculpture (and commemorative plaque) to the north of the lakes between Ironbridge Road and the data centre. A location to the north of the weir and close to the Horton Road and Ironbridge has been suggested from where it will be visible from the road. Plans for the relocation of the sculpture have not been finalised, however the Applicant's commitment to relocating it to a suitable area within Stockley Park is supported and final details would be secured by way of a Section 106 legal agreement.

To conclude, Officers have considered the impact of the proposal on the Grade II listed Park and Garden and identified that the proposal would result in less than substantial harm. For the reasons outlined above, great weight has been attached to the economic benefits which is considered to outweigh the harm identified subject to the inclusion of relevant conditions and legal obligations to deliver enhanced public benefits.

LISTED BUILDINGS AND CONSERVATION AREA

The application site is not located within a conservation area nor are there any statutory listed buildings nearby that could be affected by the proposal.

There are three locally listed buildings within the wider Stockley Park: 5 Longwalk Road, designed by Norman Foster; The Arena, designed by Arup Associates and comprising a polygonal conservatory; and, four buildings within Phase 1 of the business park (those located between Longwalk Road and Roundwood Avenue), acknowledged as the original phase of buildings, with group vale and a landscaped setting.

Given the application site is sited to the west of Stockley Road which is densely vegetated along the Stockley Road boundary, the proposed development would not be visible in the context of the locally listed buildings and would not harm their setting.

7.04 Airport safeguarding

Paragraph 95 of the National Planning Policy Framework requires that planning decisions promote public safety and take into account wider security and defence requirements by:

- a) anticipating and addressing possible malicious threats and natural hazards, especially in locations where large numbers of people are expected to congregate. Policies for relevant areas (such as town centre and regeneration frameworks), and the layout and design of developments, should be informed by the most up-to-date information available from the police and other agencies about the nature of potential threats and their implications. This includes appropriate and proportionate steps that can be taken to reduce vulnerability, increase resilience and ensure public safety and security; and
- b) recognising and supporting development required for operational defence and security purposes, and ensuring that operational sites are not affected adversely by the impact of other development proposed in the area.

Policy DMAV 1 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020) states that:

- A) The Council will support the continued safe operation of Heathrow Airport and RAF Northolt and will consult with the airport operator on proposals in the safeguarded areas. Proposals that may be a hazard to aircraft safety will not be permitted.
- B) In consultation with the Airport Operator, the Council will ensure that:
 - i) areas included in Airport Public Safety zones are protected from development which may lead to an increase in people residing, working or congregating in these zones; and
 - ii) sensitive uses such as housing, education and hospitals are not located in areas significantly affected by aircraft noise without acceptable mitigation measures.

The application site is approximately 3km north of Heathrow Airport. As such, Heathrow Airport Ltd, the National Air Traffic Services and the Defence Infrastructure Organisation (Ministry of Defence) were consulted on this application.

Whilst no objection was raised to the proposal, Heathrow Aerodrome Safeguarding and the Ministry of Defence noted that if the application is recommended for approval, a planning conditions requiring the submission of a Bird Hazard Management Plan, a landscape scheme designed to decrease the likelihood of bird hazards and a Construction Management Plan which includes details of cranes and any other tall construction equipment. Subject to the inclusion of the conditions, the proposed development would accord with Policy DMAV 1 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020).

7.05 Impact on the green belt

Paragraph 133 of the National Planning Policy Framework (2019) states that the essential characteristics of Green Belts are their permanence and openness. Paragraph 145 of the Framework states that the construction of new buildings in the Green Belt shall be regarded as inappropriate development.

- a) buildings for agriculture and forestry;
- b) the provision of appropriate facilities (in connection with the existing use of land or a change of use) for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments; as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it;

- c) the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building;
- d) the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces;
- e) limited infilling in villages;
- f) limited affordable housing for local community needs under policies set out in the development plan (including policies for rural exception sites); and
- g) limited infilling or the partial or complete redevelopment of previously developed land, whether redundant or in continuing use (excluding temporary buildings), which would:
 - not have a greater impact on the openness of the Green Belt than the existing development; or
 - not cause substantial harm to the openness of the Green Belt, where the development would re-use previously developed land and contribute to meeting an identified affordable housing need within the area of the local planning authority.

Policy 7.16 of the London Plan (2016) and the Mayor's intend to publish London Plan Policy G2 (2019) state that the strongest protection should be given to London's Green Belt, in accordance with national guidance. Inappropriate development should be refused, except in very special circumstances. Development will be supported if it is appropriate and helps secure the objectives of improving the Green Belt as set out in national guidance.

Policy DMEI 4 of the Local Plan: Part Two (2020) states that extensions and redevelopment on sites in the Green Belt and Metropolitan Open Land will be permitted only where the proposal would not have a greater impact on the openness of the Green Belt and Metropolitan Open Land, and the purposes of including land within it, than the existing development, having regard to:

- i) the height and bulk of the existing building on the site;
- ii) the proportion of the site that is already developed;
- iii) the footprint, distribution and character of the existing buildings on the site;
- iv) the relationship of the proposal with any development on the site that is to be retained; and
- v) the visual amenity and character of the Green Belt and Metropolitan Open Land.

The site is surrounded by Green Belt, which slightly intersects with the site boundary and with existing buildings on the site. The existing Multi Storey Car Park on site currently extends 291 sq.m. into the Green Belt. The existing site also consists of a significant amount of hard standing for car parking. The site is therefore considered to be previously developed land.

The applicant is proposing to erect 2 buildings on site with associated landscaping. Unit 1, which is the larger unit situated on the southern part of the site would extend into the Green Belt by 158 sq.m. This encroachment would be on the same part of the site that is currently occupied by the Multi Storey Car Park. The height of the proposed building would be approximately 18 metres, which is similar to the height of the existing office building that are upto 18m in height. The remainder of Unit 1 and the rest of the development would fall outside of the Green Belt designation.

As much of the site that intersects with the Green Belt is previously developed, it is considered the applicant is proposing to develop only on previously developed land within the Green Belt. Unit 1 would have a 46% smaller footprint within the Green Belt compared to the existing Multi Storey Car Park.

Furthermore, the proposed development, whilst larger in terms of building footprint, would be of a similar height to the existing office buildings. The applicant has carried out a landscape and visual impact assessment (LVIA). This finds that the development would have a minor adverse impact, but this is largely in relation to the proposed footprint intrusion into the Green Belt, which as detailed above would be on previously developed land. In terms of visual impact, the LVIA notes that the development would be obscured by surrounding retained vegetation particularly when viewed from Stockley Road.

The proposed units would not be out of context for the area given the recently completed warehouse buildings to the west of the site, which are also next to the Green Belt. As such, the development is considered to not have a greater impact on the openness of the Green Belt compared to the existing built form currently on site. It is considered that the development meets the exception test outlined in paragraph 143 (g) of the NPPF and it is therefore an appropriate development within the Green Belt.

7.07 Impact on the character & appearance of the area

London Plan Policies 7.1 and 7.4 (2016) and the Mayor's intend to publish London Plan Policies D1, D3 and D4 (2019) seek to ensure that new developments are well-designed and fit into the local character of an area. New buildings and spaces should respond to the form, style and appearance to successfully integrate into the local character of an area, with a positive relationship with the natural environment and respect and enhancement of the historic environment. London Plan Policy 3.4 (2016) and the Mayor's intend to publish London Plan Policy D3 (2019) also seek to optimise the potential of sites, having regard to local context, design principles, public transport accessibility, and capacity of existing and future transport services.

Policy BE1 of the Local Plan: Part One (2012) requires all new development to improve and maintain the quality of the built environment in order to create successful and sustainable neighbourhoods, where people enjoy living and working and that serve the long-term needs of all residents.

Policy DMHB 11 of the Hillingdon Local Plan: Part Two (2020) re-emphasises the importance of good design in new development by A) requiring all new buildings and extensions to be designed to the highest standards, which incorporate principles of good design, such as harmonising with the local context by having regard to the scale, height, mass and bulk of surrounding buildings; using high quality materials and finishes; having internal layouts and design which maximise sustainability and the adaptability of the space; protecting features which contribute positively to the area and providing landscaping that enhances amenity, biodiversity and green infrastructure; B) avoiding adverse impacts on the amenity, daylight and sunlight of adjacent property and open space; C) safeguarding the development potential of adjoining sites and D) making adequate provision for refuse and recycling storage.

Policy DMHB 12 re-emphasises the need for new development to be well integrated with the surrounding area and provides design criteria as to how this would be achieved.

The Site is c.6.3ha in size and currently comprises three office buildings with associated surface level car parking and a multi-storey car park structure. It is bound by Iron Bridge Road to the west, Horton Road to the north and Stockley Road to the east. The Grand Union Canal passes to the south of the Site.

The Application seeks to provide a total of 30,627sqm GIA of industrial/storage and distribution floor space within 2 units. The intention of the development is to allow a range

of different building sizes in order to offer opportunities for different business uses and processes.

The height of the buildings extend up to a maximum of 18.10m for unit 1 and 17.80m for unit 2 to external ridge. The office space provided remains ancillary to the main distribution and industrial functions of the operation. Crucially, the overall height is similar to that of the existing offices buildings on site.

Layout, scale and massing

The proposal would setback Unit 1 from the canal embankment by 60m. Along the eastern boundary, the existing embankment would be retained and reprofiled where necessary. The embankment at its narrowest would be between 8m at its narrowest and 15m. Along the north east corner, Unit 2 would be set in from Horton Road by 35m. To the north west corner of the site, Unit 2 would be setback from Horton Road by 25m. Along Iron Bridge Road, Units 1 and 2 would be setback from the road by 25m. The existing avenue of trees along Horton Road and Iron Bridge Road would be retained. A 10m landscaping buffer is proposed along the southern boundary of the site adjoining the canal tow path.

The general layout and the decision to set Unit 1 back from the SINC and southern boundary of the site is considered acceptable. The applicant is proposing an active frontage along the north eastern frontage of Unit 2 and the south western frontage of Unit 1 by locating the ancillary office space in these locations therefore breaking up the massing and providing visual interest in these areas. the proposed office areas will include green roofs. The proposal will provide active surveillance and visual interest where the proposed buildings are visible from the public realm. It would also provide some natural surveillance over these areas, improving the perception of safety along these roads.

The proposed industrial units would include significant areas of yard space, HGV delivery bays and docks and ancillary office spaces with shower and toilet facilities. Within the context of the industrial buildings on the site to the west of Iron Bridge Road, the proposed site layout is considered acceptable.

Landscaping and public realm

The submitted Landscape Design Statement sets out clear objectives for the design of the landscaping. These objectives include retaining and protecting existing trees and hedges, providing buffer planting, improving habitat biodiversity and improving the amenity value of the site. The proposed approach would largely enhance or retain the greening located in the Green Belt surrounding the site, which also forms an important feature of the Grade II listed Registered Park and Garden. Notably, the applicant would retain the existing buffer between the site and the Grand Union Canal, enhancing it with soft landscaping to improve pedestrian permeability and accessibility, which is strongly supported. Matters relating to landscaping is discussed in detail within Section 07.14 of the report.

The proposal is considered to accord with the requirements of Policies DMHB 11 and DMHB 12 of the Local Plan: Part Two (2020).

7.08 Impact on neighbours

Policy DMHB 11 of the Local Plan Part Two (2020) requires that development proposals should not adversely impact on the amenity, daylight and sunlight of adjacent properties and open space.

The nearest residential house is situated approximately 170 m to the south of the site, beyond the canal. The site lies within a commercial area where the majority of the buildings are commercial units and as such, the proposal would not result in harm to the amenities of surrounding properties.

7.09 Living conditions for future occupiers

The application relates to a commercial development with no residential properties proposed. Considerations in relation to residential amenity for future occupiers is not a relevant material consideration for this application.

7.10 Traffic impact, Car/cycle parking, pedestrian safety

Policy DMT 1 of the Local Plan: Part Two (2020) requires development proposals to meet the transport needs of the development and address its transport impacts in a sustainable manner. Policy DMT 2 of the Local Plan: Part Two (2020) notes development proposals must ensure that safe and efficient vehicular access to the highways network is provided to the Council's standards.

Policy DMT 2 of The Local Plan: Part 2 - Development Management Policies (2020) ensures development proposal have safe and efficient vehicular access to the highway network and would provide a safe, secure and convenient access and facilities for cyclists and pedestrian.

Policy DMT 6 of The Local Plan: Part 2 - Development Management Policies (2020) requires development proposal to comply with parking standards unless it would not lead to a deleterious impact on street parking provision, congestion or local amenity.

The application site forms part of the wider Stockley Park employment area but is separated from the main park being on the opposite side of the Stockley Road/Horton Road/Bennetsfield Way roundabout. The existing main access to the site is from Iron Bridge Road, this is a two-way single carriageway road running in an north-south direction from Horton Road. Iron Bridge Road has single yellow line parking restrictions along both sides of the carriageway for the full extent of the road operational weekdays 07:00 to 19:00h. There is a pedestrian footway running on the northern and western sides of the site, the eastern boundary is formed by Stockley Road. Stockley Road is a dual carriageway with a posted speed limit of 50mph. It leads south to Junction 4 of the M4. To the north Stockley Road connects to Uxbridge, some 5km away. Approximately 1km to the north, the A408 forms a roundabout junction with the B465 West Drayton Road, which then leads further north joining the A4020 Uxbridge Road.

According to the Transport for London WebCAT service the application site has a PTAL ranking of 1b indicating access to public transport is limited compared to London as a whole suggesting that there would be a strong reliance on the private car for trip making.

Access

The applicant has provided drawings showing vehicular movements to access and egress each unit and manoeuvring around the car parks and servicing yards. Access and circulation plans for a Refuse Collection Vehicles and a Fire Tender have also been provided; these have been reviewed and are considered acceptable.

Pedestrians and cyclist would access Unit 1 via Iron Bridge Road North through the staff car parking access. Unit 2 would have a segregated pedestrian and cyclist access which would follow desire lines from/to the bus stops at Horton Road into the site. Access would also be possible from the staff car park entrance. Internally, footpaths are provided around

the two buildings which allow for direct access to the entrance of each building. From the cycle parking areas, employees and visitors would be able to walk to the entrance of the buildings along footways away from vehicular traffic. The Highway Authority has raised no objection to the principle of the proposed arrangement, the Greater London Authority has sought further clarity on the pedestrian routes for Unit 1 in particular. A condition securing details of pedestrian routes within the site is requested to ensure conflict between all road users within the site is minimised.

Traffic Calming

Recently traffic calming measures along Iron Bridge Road were implemented including the reducing the speed limit to 20mph, the installation of speed tables and extending double yellow lines to prevent vehicle parking.

The location of the existing speed tables conflict with the planned access points into the proposed development. The applicant is seeking agreement from the Council to replace all of the new speed tables with speed cushions, speed cushions are considered more suitable as the proposed development would generate additional HGV movements. The replacement speed tables would allow larger vehicles to straddle the cushions reducing the impact to trailers. Highway Authority has raised no objection to the proposed works subject to the cost being borne by the Applicant. The alterations to the speed cushions is proposed to be secured in the Section 106 legal agreement if the application is considered acceptable.

Car Parking

For a development of this type the maximum number of parking spaces permitted is a maximum of 2 spaces plus 1 per 50 - 100 sqm in line with Policy DMT 6 of the Local Plan: Part Two (2020). For both units combined, the application would be expected to provide between 310 and 617 car parking spaces.

The proposed development seeks to provide 122 car parking spaces for Unit 1 and 95 car parking spaces for Unit 2 (217 car parking spaces cumulatively across the site). The applicant anticipates that the proposal would be occupied by a business that would operate 24 hours a day 7 days a week.

The Local Plan (2020) requires that a minimum of 5% of all car parking should be provided with active electric vehicle charging points and a further 5% provided with passive electric vehicle charging points. The applicant proposes that 20% of car parking spaces would have an active electric vehicle charging points would all the remainder having passive provision. Highway Authority welcomes this quantum of electric vehicle charging point provision.

The Local Plan (2020) requires parking for motorcycle, mopeds and scooters should be provided at the rate of 5% of all spaces. Based on the required total of 217 car parking spaces this represents 11 spaces, the Highway Authority require that these spaces are provided with an anchor point.

The Local Plan (2020) requires that 10% of all car parking spaces should be blue badge/wheel chair accessible based on the required total of 217 car parking spaces this equates to 22 spaces in total and 5% spaces for brown badge holders this equates to 11 spaces.

The Greater London Authority has commented on the application requiring justification for the quantum car parking proposed. It is noted that the site is located in an area with a low PTAL rating which means the reliance on car generated trips would be high. Furthermore, whilst the application site is served by 3 bus routes, traffic exiting the main Stockley Park during the afternoon peak is not able to access the A408 southbound as queuing traffic on the elevated section prevents southbound traffic from Stockley Park joining. This causes queues to tail back into Stockley Park. In addition, queued traffic blocking Stockley Park's access to the roundabout prevents traffic wishing to travel north entering onto the roundabout. The bus journey therefore can take a longer time as the buses serving the site use the roundabout.

The quantum of car parking proposed is a balance between addressing aspirations by the London Plan and the requirements of the Local Plan. Whilst the quantum of car parking spaces is below the recommended maximum standard set out in the Local Plan, on the basis of the justification provided within the supporting Transport Assessment, the proposed quantum of car parking is considered acceptable subject to a contribution towards improvement to the capacity of Stockley Park Roundabout that will ease congestion and allow sustainable transport modes become an attractive travel option to the site. Subject to the inclusion of a Head of Term requiring a contribution towards sustainable highways capacity improvements, the proposed quantum of car parking is considered acceptable.

Cycle Parking

The application would provide 54 cycle parking spaces are proposed for Unit 1 and 40 cycle parking spaces for Unit 2. Details of showers and lockers for staff to facilitate cycling and sustainable travel is required by way of condition alongside details of accessible cycle parking spaces.

Trip Generation

In order to determine the impact the development would have on the surrounding road network the applicant has prepared a Transport Assessment which considers how the volume of vehicle trips generated by the proposed development would change compared to the site in its existing use. To determine how many vehicle trips the site currently generates manual classified count traffic surveys have been undertaken. However, it should be noted that at the time of the survey the car parking associated with the 3rd office building was in effect being used as a workplace park and ride facility. The staff that had previously worked in the 3rd office building had already been relocated elsewhere; however they would still drive to the Stockley Park office and park as before and then be driven in a minibus to the new office. The applicant suggests that the trips generated by the workplace park and ride facility acts as a proxy for trips generated by that building. To confirm the validity or otherwise of these surveyed trip generation figures using TRICS a sensitivity test was undertaken with all three of the existing buildings in operation.

Of the two sets of results, the manual classified counts showed the lowest number of vehicular trips generated. The applicant has used these manual classified counts as the baseline as this would provide the most robust net change in trip generation when compared to trips generated by the proposed development. To calculate the trip rates for other modes, the applicant has taken the observed vehicle trips and used TRICS to calculate the proportion and number of trips made by other modes.

The manual classified counts showed that the busiest period was the AM Peak 08:00 to 09:00h when 269 arrivals and 14 departures were counted giving a two-way total of 280. In the PM Peak there were 225 two-way movements. Over a 24 hours period 1,813 trips were generated, 906 arrivals and 907 departures.

To determine how trips would assign to the network, Census Travel to Work Data for the Medium Super Output Area within which the site situated has been used, this shows that 89% of vehicles would leave the site and head along Horton Road eastbound towards Stockley Park roundabout. From the Stockley Park roundabout 60% of vehicles would head northbound with the remaining 30% of vehicles heading southbound.

Trip rates for the proposed development have been extracted from a traffic survey undertaken at the nearby Prologis Park Heathrow site in December 2014. This is accepted as the Prologis Park Heathrow and proposal site are comparable in terms of size, land use, location and accessibility. Applying the 2014 trip rates of the Prologis Park Heathrow site to the proposed development forecast that the proposed development would generate 3,508 daily two-way trips. This exercise shows that with the new development there would be a net uplift of 1,695 daily trips.

The busiest period at the Prologis Park Heathrow site is late at night, 23:00 to 00:00h, the applicant anticipates that the proposed development would be occupied by a similar type of business so therefore expects that the busiest time of vehicle movements at the proposed development would also be late at night. On this basis the time during which the application site generates the greatest number would shift from 08:00 to 09:00h to 23:00 to 00:00h with the new development. Consequently the number of trips currently generated in the AM Peak 08:00 to 09:00h would fall from 283no. two-way movements to 94no. movements. Whilst the proposed development would generate more daily trips, most of these movement would take place late at night when background traffic is lowest as opposed to during the AM Peak when it is at its highest.

The trips generated by the proposed development have then been assigned to the network but for this scenario this has been based on the distribution of trips at the Prologis Park Heathrow development. This analysis indicates that at the Stockley Road roundabout 75% of vehicles would head southbound towards the M4 motorway - most of these movements would be taking place late at night.

As discussed above, although the new development would generate more daily trips than the existing use, a total increase of 1,695, this could be absorbed by the surrounding highway network because most of these movements would take place late at night, furthermore trips generated by the new development would head southbound as opposed to the existing situation where they head northbound. The applicant has gone on to assess the impact of the proposed development on the surrounding road network in the AM and PM Peaks. In the AM Peak there would be 189 fewer two-way vehicle movements

However it should be borne in mind that in the future the site could be occupied by another type of B1(C) (Light Industrial), B2 (General Industry) and B8 use (Storage and Distribution) without needing planning permission. The profile of trips generated by this new use could be very different to the profile of trips associated with the proposed 24/7 development. An alternative occupier may generate trips during the day when at times when the network is already at capacity.

The trip generation figures presented in the Transport Assessment correspond with a

business that operates 24/7. However, it is not certain what type of business would occupy the proposed development now or in the future, it could be a business that operates 24/7 or it could be a business that works a 12 hour daytime shift. To help understand any change in trip generation between the site in its existing use and a business that operates a 12 hour shift, the Highway Authority have required that the applicant undertakes a sensitivity test that compares trip generated by the existing use, trips generated by the assumed 24/7 occupier and an occupier that works a 12 hour shift.

The results of this work show that an occupier that operates a 12 hour shift would generate slightly more 2-way trips in the AM peak than an occupier that operates 24/7 - the type of occupier that the applicant expects, however, the difference is just 29 trips, 123 trips if a 12 hour shift compared to 94 trips if 24/7 - this is within the variance in daily traffic flows and the impact would be almost undetectable. Most significantly both an occupier that operates 24/7 and an occupier that works a 12 hours shift both generate far fewer AM Peak hour trips than the site does in its current use, 123 trips if a 12 hour shifts occupier (worse case) compared to 283 trips in the current use.

Alongside the planning application the applicant has provided a Framework Travel Plan, an Outline Construction Logistics Plan and an Outline Delivery and Servicing Plan, these have all been assessed and are judged to be satisfactory.

In accordance with the latest Transport for London Healthy Streets Transport Assessment Guidelines the applicant has submitted an Active Travel Zone Transport Assessment.

The Highway Authority notes that the assumed 24/7 occupier would generate a greater number of daily vehicular trips compared to the site in its existing use and if the site were to be occupied by a business that works a 12 hour shift. However, analysis of the number of trips being loaded onto the network when it is at its busiest - the 08:00 to 09:00h peak, the anticipated 24/7 occupier generates few trips that the site does currently. Even if the site is occupied by a business that operates a 12 hours shift the number of AM peak hour trips would still be less that the site generates in its current use.

Developer Contributions

Stockley Park Travel Plan bond £20,000

As surety that the Stockley Park Travel Plan would be implemented and targets achieved the Highway Authority requires that the developer provides a £20,000 bond. In the event of the Travel Plan not being delivered the Highway Authority would use this bond to implement the Travel Plan itself. This should be secured by way of a S106 agreement. If the Travel Plan is successful the bond would be returned.

Sustainable Highways Capacity Improvements £250,000

The proposed development would place additional demand for road space on the Stockley Park roundabout. A developer contribution is sought to improve the capacity of this roundabout so it is better able to cater for the uplift in daily vehicle numbers. The previous occupiers of the offices on the application site contacted the Council on several occasions to report instances of cyclists riding around the roundabout being hit by vehicles entering the roundabout failing to give way to cyclists. A scheme has already been designed, a survey of utilities and topographical surveys carried out. A contribution of £250,000 is required to implement a scheme that has already been designed to address this issues.

Improving access to and the enhancing the routes within Stockley Country Park £20,000

To the north of the application site, on the northern side of Horton Road, is Stockley Country Park which is a large area of public open space. Numerous footpaths crisscross this Park providing off-road walking and cycle access to for example Falling Lane and West Drayton Road. A developer contribution is sought to help improve access into the Park and upgrade the various routes across it thereby increasing the attractiveness of walking and cycling to work in turn helping to reduce the volume of car trips that the development generates.

Traffic calming changes along Iron Bridge Road

As mentioned above access to the new development would require the removal of traffic calming speed tables recently provided. The Highway Authority requires the developer to fund in full the cost of replacing these speed tables with a similar traffic calming device.

Subject to the above, there are no highway objections to this proposal as it would be in accordance with Hillingdon Local Plan: Part 2 Development Management Policies (2020) Policy DMT 1: Managing Transport Impacts, Policy DMT 2: Highway Impacts and Policy DMT 6: Vehicle Parking. The Highway Authority is satisfied that the development would not present a risk to road safety, hinder the free flow of traffic or lead to parking stress; there are no highway objections to this development.

7.11 Urban design, access and security

Urban Design

Refer to Section 7.03 and 7.07 of this report.

Security

Paragraph 7.13 of the London Plan (2016) requires development proposals to contribute to the minimisation of potential physical risks and include measures to deter crime and anti social behaviour. A secured by design condition has been recommended and therefore the proposal is considered to accord with Policy 7.13 of the London Plan.

7.12 Disabled access

Policy 7.2 of the London Plan (2016) require all new development in London to achieve the highest standards of accessible and inclusive design and supports the principles of inclusive design which seek to ensure that developments:

- a can be used safely, easily and with dignity by all regardless of disability, age, gender, ethnicity or economic circumstances
- b are convenient and welcoming with no disabling barriers, so everyone can use them independently without undue effort, separation or special treatment
- c are flexible and responsive taking account of what different people say they need and want, so people can use them in different ways
- d are realistic, offering more than one solution to help balance everyone's needs, recognising that one solution may not work for all.

The submitted Design and Access Statement confirms that disabled parking spaces will be provided to meet the Council's parking standards. The spaces will be designed in accordance with Approved Document M recommendations and located close to office entrances. The approach route from the designated spaces to the entrance will be level with dropped kerbs. Internally, vertical circulation to the office areas is via stairs and a lift to

suitable for disabled employees.

The stairs from the entrance area are suitable for ambulant disabled use in accordance with Approved Document M recommendations in terms of the appropriate rise and going of each step, visually contrasting nosings and handrails.

A unisex accessible disabled toilet is provided in accordance with Approved Document M recommendations at ground floor. Within the corner of the disabled WC, a level access shower is provided for use only by staff who commute to work by bicycle as part of the green travel plan. Toilets are provided on ground and 1st floors, and will be large enough to accommodate a disabled WC. Grabrails etc. in accordance with Approved Document M can then be fitted by the occupier to suit their staff requirements. The proposal is considered to comply with Policy 7.2 of the London Plan (2016).

7.13 Provision of affordable & special needs housing

The application relates to a commercial development with no residential properties proposed. Considerations in relation to affordable housing provision are not therefore relevant to the application.

7.14 Trees, landscaping and Ecology

Policy 5.10 of the London Plan (March 2016) states that development proposals should integrate green infrastructure to contribute to urban greening, including the public realm.

Policy DMHB 11 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020) also requires that new development is high quality, sustainable, adaptable, and harmonises with the local context. Landscaping and tree planting should also enhance amenity, biodiversity and green infrastructure.

Policy DMHB 14 of the Local Plan: Part Two (2020) notes all developments will be expected to retain or enhance the existing landscape, trees, biodiversity and natural features of merit. Planning applications for proposals that would affect existing trees will be required to provide an accurate tree survey showing the location, height, spread and species of trees.

There are no Tree Preservation Orders affecting the site. In August 2020, Stockley Park: Business park Phases I and II, country park and golf course was registered as a Grade II listed Park and Garden, the site forms part of the listing. As noted above in Section 07.03 of the report, Stockley Park is recognised as a pioneering suburban business park. It is recognised for its carefully established and consistent design parameters have made for a unified and consistent landscape and, despite the redevelopment of some buildings and modifications to their immediate landscape context, overall the original design is well-preserved and maintained. Since the application site was listed, the Trees and Landscaping Officer together with the Conservation Officer has worked closely with the Applicant to ensure the proposed development responds to the character and context of the wider Stockley Park.

The Trees and Landscaping Officer notes the site lies within a well-established and maturing setting of tree-lined car parks, wooded boundaries (north, south and east) and the lime necklace (an avenue of pleached Broad-leaved limes, (*Tilia platyphyllos*)). A signature landscape feature which lines the key routes through Stockley Park. After 20 (+) years the boundary planting effectively conceals or, at least, filter views of the built development within the site.

Tree Strategy: Removal / retention / replacement

The submitted tree survey was reviewed by the Trees Officer who noted the report has identified and assessed the condition and value of 15 individual trees, 55 tree groups and 30 hedges. The survey includes off-site woodland groups G82 (London planes in the Horton Road central reserve), G98 (eastern boundary), G99 and G100, off-site trees on the southern boundary associated with the canal - which were all planted contemporaneously with the on-site planting, as part of a comprehensive masterplan.

Three groups; G1 (lime avenues), G82 (Horton Road planes) and G89 (dense mixed woodland, Stockley Road boundary) are rated 'A' grade with no individual trees achieving this status.

An arboricultural impact assessment states that all of the existing trees within the central core of the site and car park will be removed to facilitate the development, however, the built development has been set back from existing boundaries to ensure that all existing structure planting around the boundaries will be retained and gaps re-planted where space permits. The majority of the existing trees along Horton Road, Iron Bridge Road and along the embankment along Stockley Road are being retained.

Tree Protection and Arboricultural Method Statement

Details of tree protection fencing (to BS5837:2012) have been submitted and a 'preliminary' arboricultural method statement provided in Appendix 1. A full arboricultural method statement will be required to be submitted for approval prior to the commencement of any demolition or construction work on site which is secured by way of a condition.

Off-site Trees

Off-site trees, including the London planes and underplanting on Horton Road, the lime necklace on Horton Road / Ironbridge Road and the wooded canal embankment have been surveyed and assessed.

A Canal Interface Improvement Concept has been prepared. The Applicant has agreed in principle to maintain and enhance the canalside planting and also to adopt the management and maintenance of the Horton Road and Ironbridge Road landscape which forms a distinctive approach to the site. These details of off-site trees are required to be required by a Head of Term within the Section 106 legal agreement.

Landscape and Visual Appraisal

A landscape and visual impact appraisal has been submitted in support of the application with reference to the Guidelines for Landscape and Visual Impact Appraisal, Third edition (GLVIA3), 2013. The assessment has established the value and condition of the baseline landscape and considered it against an assessment of landscape and visual effects post-development.

In terms of landscape effects of the development, the report considers 7 key receptors. The highlighted sensitivities range between low / low - medium / medium and medium-low. The magnitude of change ranges between no change / low / low-medium and the residual impact (year 15) spans minor beneficial, negligible or minor adverse. Following a review of the Landscape and Visual Appraisal, a site visit and a review of the proposed plans, it is considered the proposal would not result in a visual harm to the openness of the Green Belt or the surrounding area.

Ground Levels and Building Heights

The site is all built, or planted on restored man-made ground and soils. The successful establishment of the existing structure planting is a testament to the quality of soil forming and land restoration. Due to the soil and sub-soil constraints the site will be re-developed with limited re-modelling of the existing site topography. The finished floor levels will be 34.940 AOD, with eaves at 51.260m AOD and a ridge height at 52.940m AOD. The new units will be similar to the recently completed data centre to the west in terms of scale, materiality and heights (typically eaves at 15.0m - ridge 18.0m above GL). The proposed levels is considered to be similar to that of the existing offices and is considered acceptable.

Site Entrances

The existing Iron Bridge Road site entrance will be re-purposed for the service yard access to unit 2. Three new vehicular access points will be created to serve the new buildings, resulting in localised tree loss from the lime avenue (G1). Infill tree planting will be maximised to re-inforce G1 using semi-mature nursery stock (25-30cm stem girth). Due to the length of the avenue, it is considered that the overall visual integrity of the group will be maintained in the long term.

Landscape Management and Maintenance

A draft landscape maintenance and management plan sets out the key objectives for the establishment and maintenance of the site in the interests of both visual amenity and biodiversity. The report includes a 10 year management matrix of operations and frequencies.

Green Walls

A green wall system, by Mobilane, is now proposed to articulate the building facades. This is a well-proven, structural (steel-framed) system which will be attached to, but stand proud of, the building facade. Pre-grown planters containing ivy (evergreen) are attached to the support structure. Each container has integral irrigation and a drainage system and is replaceable should maintenance require it. The green wall will constitute an aesthetic improvement to the appearance of the buildings and the efficient use of the vertical surfaces - and will help mitigate the limited opportunities for ground level planting. The green wall will also encourage biodiversity and has the capacity to reduce sub-micron particle pollution, thereby improving air quality. Full details of the product and future management and maintenance should be conditioned.

Green Roof

A green roof has been proposed, albeit a relatively modest area. The loading on the larger roof spans precludes the installation of additional green roofs. The landscaping officer has requested full details of the proposed green roof should be subject to a condition.

Additional Tree Planting

The Trees and Landscaping Officer has noted that following the Listing, the Applicant has proposed additional tree planting within the car parks along the west boundary and in the south-west corner of the site which is welcomed.

Additional tree planting proposed along the southern boundary is off-site at the top of the canal embankment. These will be planted below the 3 metre high steel sheet pile retaining wall - proposed to reduce the disturbance of the canal side planting. This proposal is indicative at this stage because the planting will concentrate on areas of thin / weaker vegetation cover and seek to fill gaps which will best be assessed following installation of the retaining wall.

Additional tree planting along the eastern (Green Belt) boundary is indicative at this stage. Minor incursions are anticipated along this boundary when kerbing / existing fencing is removed and levels adjusted to suit the site and new drainage provision. Localised vegetation removal is anticipated along the existing planted edge. As with the canalside boundary, final and optimum planting locations will be confirmed as the project progresses. Full details to be conditioned.

To conclude, following extensive discussions with the Applicant and a review of the submitted Arboricultural Impact Assessment and supporting documents and following a review of the Landscaping and Visual Impact Assessment and Landscaping Strategy, the Trees and Landscaping Officer has raised no objection to the application subject to the inclusion of relevant conditions and Heads of Terms relating to off-site tree planting. The proposal is considered to comply with Policy DMHB 14 of the Local Plan: Part Two (2020).

ECOLOGY

Paragraph 170 of the NPPF (February 2019) states that planning decisions should contribute to and enhance the natural and local environment by: d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures.

Policy 7.19 of the London Plan (March 2016) states that development proposals should wherever possible, make a positive contribution to the protection, enhancement, creation and management of biodiversity.

Policy G5 of the Intend to Publish Version of the London Plan (2019) requires development proposals to contribute to the greening of London by including urban greening as a fundamental element of site and building design, and by incorporating measures such as high-quality landscaping (including trees), green roofs, green walls and nature-based sustainable drainage.

Policy DMEI 7 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020) states that the design and layout of new development should retain and enhance any existing features of biodiversity within the site.

The applicant has provided an Urban Greening Factor Plan. The scheme would score 0.23. This is based on the scheme comprising a landscaped area of 13,941 sqm compared to an overall site area of 63,220 sqm.

Landscaping elements that contribute towards the sites UGF score include the planting that will be retained along the site boundaries, the proposed areas of green roof on the warehouse buildings, the permeable paving across the parking areas and the proposed green screening wall to the rear of unit 1.

The overall score of 0.23 is considered to be acceptable, considering the nature of the

development comprising industrial and logistics use.

The Ecology Officer has commented on the application noting given the position next to both the Grand Union Canal and the River Colne, a robust and comprehensive ecology enhancement plan must be secured within the development. The Ecology Officer has recommended ecological enhancements which have been included in the schedule of conditions.

7.15 Sustainable waste management

Policy 5.17 of the London Plan (2016) requires suitable waste and recycling facilities in all new developments. Policy EM11 of the Local Plan: Part One (November 2012) requires proposed development to address waste management at all stages of a development life.

It is considered that the application site has sufficient capacity for refuse and waste management. The Waste Strategy has raised no objections to this application.

7.16 Renewable energy / Sustainability

Policy 5.2 of the London Plan (2016) development proposals should make the fullest contribution to minimising carbon dioxide emissions in accordance with the following energy hierarchy:

- Be lean: use less energy
- Be clean: supply energy efficiently
- Be green: use renewable energy

Policy EM1 of the Hillingdon Local Plan: Part 1 - Strategic Policies (November 2012) states that the Council will ensure that climate change mitigation is addressed at every stage of the development process. This includes the reduction of carbon emissions through low carbon strategies and encouraging the installation of renewable energy to meet the targets set by the London Plan (2016).

Policy DME1 2 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020) requires that: A) All developments make the fullest contribution to minimising carbon dioxide emissions in accordance with London Plan targets; B) All major development proposals must be accompanied by an energy assessment showing how these reductions will be achieved; C) Proposals that fail to take reasonable steps to achieve the required savings will be resisted. However, if the Council is minded to approve the application despite not meeting the carbon reduction targets, then it will seek an off-site contribution to make up for the shortfall. The contribution will be sought at a flat rate at of £/tonne over the lifetime of the development, in accordance with the current 'allowable solutions cost'.

The Sustainability Officer has commented on the application noting the details are sufficient to satisfy that the strategic approach to carbon reduction is policy compliant. However, further detailed work is required to understand what will be delivered as part of the final proposals. In particular with regards to the low and zero carbon technology to be used.

Further detail is also required as to how the carbon reduction will be monitored and reported back to the Council. The energy strategy sets out a requirement for an offsite contribution which needs to be captured in the S106. The recommended conditions and Heads of Term are secured.

7.17 Flooding or Drainage Issues

Policy 5.13 of the London Plan (2016) states that development proposals should use sustainable urban drainage systems (SuDs) unless there are good reasons for not doing so and that developments should aim to achieve green-field run-off rates. Policy 5.15 goes on to confirm that developments should also minimise the use of mains water by incorporating water saving measures and equipment.

Policy DMEI 10 of the Local Plan: Part Two (2020) requires all major developments in Critical Drainage Areas or an area identified at risk from surface water flooding must be designed to reduce surface water run-off rates to no higher than the pre-development greenfield run-off rate in a 1:100 year storm scenario, plus 30% allowance for climate change for the worst storm duration. The assessment is required regardless of the changes in impermeable areas and the fact that a site has an existing high run-off rate will not constitute justification.

The Flood Water Management Officer has commented on the application noting a revised Drainage Design Philosophy was received following the previous consultation response. The proposed drainage strategy now includes small areas of green roof on both buildings, rain gardens/swales and the incorporation of the existing pond into the drainage system.

The design amendments are considered to be the bear minimum but the drainage system does incorporate some sustainable elements. Following the Officer's comments, the Applicant has amended the proposal to include more green infrastructure across the site.

The recommended condition has been included that ensures the integration of the drainage system into the landscaping plan. Subject to the inclusion of the proposed condition, the proposal is considered to comply with Policy DMEI 10 of the Local Plan: Part Two (2020) and Policies 5.13 and 5.15 of the London Plan (2016).

7.18 Noise or Air Quality Issues

Noise

The National Planning Policy Framework (NPPF) gives the Government's guidance on noise issues. Policy 7.15 of the London Plan (2016) seeks to reduce noise and minimise the existing and potential adverse impacts of noise on, from, within, or in the vicinity of, development proposals.

Policy 7.15 of the London Plan (March 2016) states that development proposals should seek to manage noise by:

- a. avoiding significant adverse noise impacts on health and quality of life as a result of new development;
- b. mitigating and minimising the existing and potential adverse impacts of noise on, from, within, as a result of, or in the vicinity of new development without placing unreasonable restrictions on development or adding unduly to the costs and administrative burdens on existing businesses;
- c. improving and enhancing the acoustic environment and promoting appropriate soundscapes (including Quiet Areas and spaces of relative tranquillity);
- d. separating new noise sensitive development from major noise sources (such as road, rail, air transport and some types of industrial development) through the use of distance, screening or internal layout - in preference to sole reliance on sound insulation;
- e. where it is not possible to achieve separation of noise sensitive development and noise sources, without undue impact on other sustainable development objectives, then any potential adverse effects should be controlled and mitigated through the application of good acoustic design principles;

- f. having particular regard to the impact of aviation noise on noise sensitive development;
- g. promoting new technologies and improved practices to reduce noise at source, and on the transmission path from source to receiver.

Policy EM8 of the Hillingdon Local Plan: Part 1 - Strategic Policies (November 2012) states that the Council will seek to ensure that noise sensitive development and noise generating development are only permitted if noise impacts can be adequately controlled and mitigated.

The Applicant has submitted a Noise Impact Assessment in support of the application. The results of the assessment indicate a significant adverse impact during the day and an adverse impact at night. However, when context is taken into account, the impact is substantially reduced with absolute noise levels below existing levels, the character of the noise similar to existing and external and internal levels below recommended guidelines.

A number of noise minimisation measures are proposed to control noise emissions from the site. Operational noise limits at nearby sensitive receptors have been defined for building services and fixed plant. These noise limits will be adhered to in the design of building services and fixed plant. An assessment of changes to road traffic noise levels along the local road networks has identified that there will be a negligible impact. Given its location adjacent to Stockley Road and an industrial estate to the west, it is considered the subject to Applicant adhering to the recommendations set out in the report, the proposal would not result in an adverse impact to noise sensitive receptors.

Air Quality

Policy 7.14 of the London Plan (2016) requires developments to at least be Air Quality Neutral and not lead to further deterioration of existing poor air quality, particularly in Air Quality Management Areas.

Policy DME1 1 of the Local Plan: Part Two (2020) requires major development in Air Quality Management Areas to provide onsite provision of living roofs and/or walls. A suitable offsite contribution may be required where onsite provision is not appropriate.

The Local Plan recognises that living walls and roofs allow a number of environmental goals to be achieved in a relatively small space. They also remove particulates that improve local air quality. The Council's EPU (Air Quality) Officer has requested that a condition is added to the decision notice to ensure the proposal contributes to air quality enhancements.

Policy DME1 14 of the Local Plan: Part Two (2020) requires development proposals to demonstrate appropriate reductions in emissions to sustain compliance with and contribute towards meeting EU limit values and national air quality objectives for pollutants. Developments are expected to be:

- Air quality neutral;
- Include mitigation to ensure there is no unacceptable risk from air pollution to sensitive receptors; and
- Actively contribute towards the continued improvement of air quality, especially within the Air Quality Management Area.

The Air Quality Officer has commented on the application noting that the road traffic

associated with the operation of the proposed development will affect the air quality within the LBH Air Quality Management Area (AQMA) and the West Drayton / Yiewsley and the Hayes Focus Areas both during its construction and operation phases. In particular, the proposed development, during its operation phase, due to the uses proposed and location, will add to current exceedances of the nitrogen dioxide annual mean limit value within these sensitive areas as a result of traffic emissions.

The Transport Assessment submitted to support the planning application has established that the proposed development is envisaged to generate 3,508 two-way daily vehicular trips that are forecasted to be comprised of 1,164 LGVs, 925 HGVs, and 1,419 cars and motorcycles two-way movements over the course of a typical day. This equates to 26.4% movements associated with HGVs.

As per the London Plan Intent to Publish (December 2019) and LBH Air Quality Action Plan 2019-2024, Developments are expected to be at least air quality neutral and contribute actively to reduce pollution in sensitive areas. The proposed development will generate additional two-way 1,695 vehicular trips and as such, the development is not considered to be air quality neutral.

The Air Quality Officer notes the level of mitigation required associated with the operation phase of the proposed development is calculated using Defra's Damage Cost Approach for the proposed development for traffic emissions is £206,032. Therefore, a Section 106 agreement Head of Terms is required so Hillingdon may deliver its air quality local action plan and or implement specific measures on/along the road network affected by the proposal that reduce vehicle emissions and or reduce human exposure to pollution levels.

7.19 Comments on Public Consultations

No comments received.

7.20 Planning obligations

The Community Infrastructure Levy Regulation 2010 (Regulations issued Pursuant to the 2008 Act) and the NPPF have put three tests on the use of planning obligations into law. It is unlawful (since 6th April 2010) to request planning obligations that do not meet the following tests:

- i. necessary to make the development acceptable in planning terms
- ii. directly related to the development, and
- iii. fairly and reasonable related in scale and kind to the development

The effect of the Regulations is that the Council must apply the tests much more strictly and is only to ask for planning obligations that are genuinely necessary and directly related to a development. Should planning obligations be requested that do not meet the policy tests the Council would have acted unlawfully and could be subject to a High Court challenge.

At a regional level, policy 8.2 'Planning Obligations' of the London Plan (2016) stipulates that when considering planning applications of strategic importance, the Mayor will take into account, among other issues including economic viability of each development concerned, the existence and content of planning obligations. It also states that development proposals should address strategic as well as local priorities in planning obligations.

Policy DMCI 7 of the Local Plan: Part Two (2020) seeks to ensure development is sustainable, planning permission will only be granted for development that clearly demonstrates there will be sufficient infrastructure of all types to support it. Planning obligations are sought on a scheme-by-scheme basis to ensure that development

proposals provide or fund improvements to mitigate site specific impacts made necessary by the proposal.

Relevant Officers have reviewed the proposal, as have other statutory consultees. The comments received indicate the need for the following contributions or planning obligations to mitigate the impact of the development.

i) To secure all necessary highway works including written agreement from the Local Planning Authority; (Section 278) including traffic calming changes along Iron Bridge Road

ii) A full and formal Travel Plan with associated £20,000.00 bond to include a Sustainable Transport Measures is required to be submitted and agreed in writing by the LPA before occupation of the development. Thereafter, the Travel Plan is required to be reviewed annually to monitor and if required, update and/or amend the document to the satisfaction of the LPA, in order that its aims and objectives are achieved. Travel Plan coordinated as far as reasonably possible with GSK travel plans and Stockley Park travel plans;

iii) Carbon Fund: a contribution of £178,200 for a carbon fund to make up for the shortfall for this development and in order to make the development policy compliant (£1800 for every tCO₂/annum that is below the zero carbon target);

iv) Carbon Reporting Clause: Should the carbon reduction performance of the development fail to meet the required targets (Carbon Reduction Condition) as set out in the reports to the Local Planning Authority (Carbon Reporting Condition) then the building occupier/management company must provide alternative solutions to the Local Planning Authority to ensure the targets are met.

v) Air Quality in line with the SPD and given the site is located in an air quality management area, a contribution in the sum of £206,032;

vi) A contribution of £250,000 towards Sustainable Highways Capacity Improvements;

vii) A contribution of £20,000 for improving access to and the enhancing the routes within Stockley Country Park;

viii) The requirement to prepare and implement a canalside landscaping strategy and maintenance regime (including details of additional tree planting along the canal as shown on plan ref: 1982-19-05.dwg 05 Rev. I) in agreement with the Canal & River Trust;

ix) The implementation of canal wayfinding and access improvement measures;

x) The retention of, or, relocation of the existing sculpture and off site tree planting in agreement with the Local Planning Authority;

xi) Employment Strategy and Construction Training - either a contribution equal to the formula within the Council Planning Obligations Supplementary Planning Document (SPD) 2014, or an in-kind training scheme equal to the financial contribution delivered during the construction period of the development. Details shall be in accordance with the Council Planning Obligations SPD with the preference being for an in-kind scheme to be delivered. Securing an Employment/Training Strategy Agreement is Council's priority. Financial Contribution will only be accepted in exceptional circumstances; and

xii) Project Management and Monitoring Fee: a financial contribution equal to 5% of the total cash contributions towards the management and monitoring of the resulting agreement.

Community Infrastructure Levy

In addition to S106 contributions the Council has adopted its own Community Infrastructure Levy (CIL) with a charge of £5 per square metre of gross internal industrial floor area. This application is CIL liable with respect to new floorspace being created.

In addition to the London Borough of Hillingdon CIL, the Mayor of London's Community Infrastructure Levy (CIL) has introduced a charging system within Hillingdon of £60 per square metre of gross internal floor area to be paid to the GLA to go towards the funding of Crossrail. This application is CIL liable with respect to new floorspace being created.

7.21 Expediency of enforcement action

Not applicable to this application.

7.22 Other Issues

Contaminated Land

Policy DMEI 12 of the Local Plan: Part Two (2020) requires proposals for development on potentially contaminated sites to be accompanied by at least an initial study of the likely contaminants. Conditions will be imposed where planning permission is given for development on land affected by contamination to ensure all the necessary remedial works are implemented, prior to commencement of development.

The Contaminated Land Officer has commented on the application noting the comprehensive and detailed Phase 2 report submitted in support of this application provides information which indicate concentrations of contaminants are present in made ground materials at site.

Results from chemical analyses were compared with the relevant generic assessment criteria for the current and proposed commercial land use; significantly elevated concentrations of lead were identified at two locations; asbestos was also identified at two locations.

The risk assessment indicated that the risk to current and future Site users is considered to be Low, although the risk to future construction workers is considered to be Low to Moderate due to greater potential for direct contact with potentially contaminated soils. The risk from vapours from shallow groundwater and soil is also considered to be Low. On this basis, the Contaminated Land Officer has requested a condition to be attached. Subject to the inclusion of the condition, the proposal would comply with Policy DMEI 12 of the Local Plan: Part Two (2020).

Fire Safety

Policy D12 (Fire safety) of the Intend to Publish of the London Plan (2019) states that in the interests of fire safety and to ensure the safety of all building users, development proposals must achieve the highest standards of fire safety.

In this regard a Fire Safety Report has been submitted as part of the application. This report provides a strategy to outline the functional requirements of Part B: Fire Safety to the Building Regulations 2010 (as amended) for the proposed project. The report confirms that the development can be adequately and safely accessed in the event of an emergency. It

is considered that a condition should be added to any permission to secure the implementation of a Fire Strategy for all parts of the development in accordance with draft Policy D12 (Fire safety) of the London Plan - Intend to Publish (2019).

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

Not applicable.

10. CONCLUSION

The application seeks planning permission for the redevelopment of the site to provide two industrial units providing industrial floorspace (Use Class B1c/B2/B8) and ancillary offices together with associated parking, access arrangements, landscaping and infrastructure.

The principle of development is clearly supported as there is a clear and strong demand for industrial floorspace in this location that outweighs the loss of office floorspace on this site. The development is located on previously developed land and would not have a greater impact on the openness of the Green Belt compared to the existing development. As such, the development meets the exception test outlined in NPPF paragraph 143 and is therefore appropriate development on the Green Belt. The loss of the existing offices and their replacement with two large industrial units would result in less than substantial harm to this part of the Grade II Registered Park and Garden.

The NPPF (2019) makes it clear that the purpose of the planning system is to contribute to the achievement of sustainable development, through 3 over-arching and inter-dependent objectives - economic, social and environmental.

The economic benefits of the proposal would be significant. The proposal would support jobs during construction, and once completed would create 450 new full time equivalent (FTE) jobs with the potential to create additional employment opportunities in the future together with a further off-site jobs generating a potential 650 FTE, these benefits warrant being given significant weight. The proposal will also result in social benefits from employment generation including security, improved living standards, social cohesion and health benefits.

The NPPF (2019) explains that the environmental objective of sustainable development is to contribute to protecting and enhancing the natural, built and historic environment, including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.

The proposal would contribute to protecting and enhancing the natural, built and historic environment. A substantial amount of structural planting is proposed which would mitigate the visual impact of the built form of the proposed development. A package of specific highways, ecological, and landscaping enhancements is also proposed. The package of ecological and landscaping enhancements which are proposed along with measures to address climate change carry moderate weight in favour of the proposal.

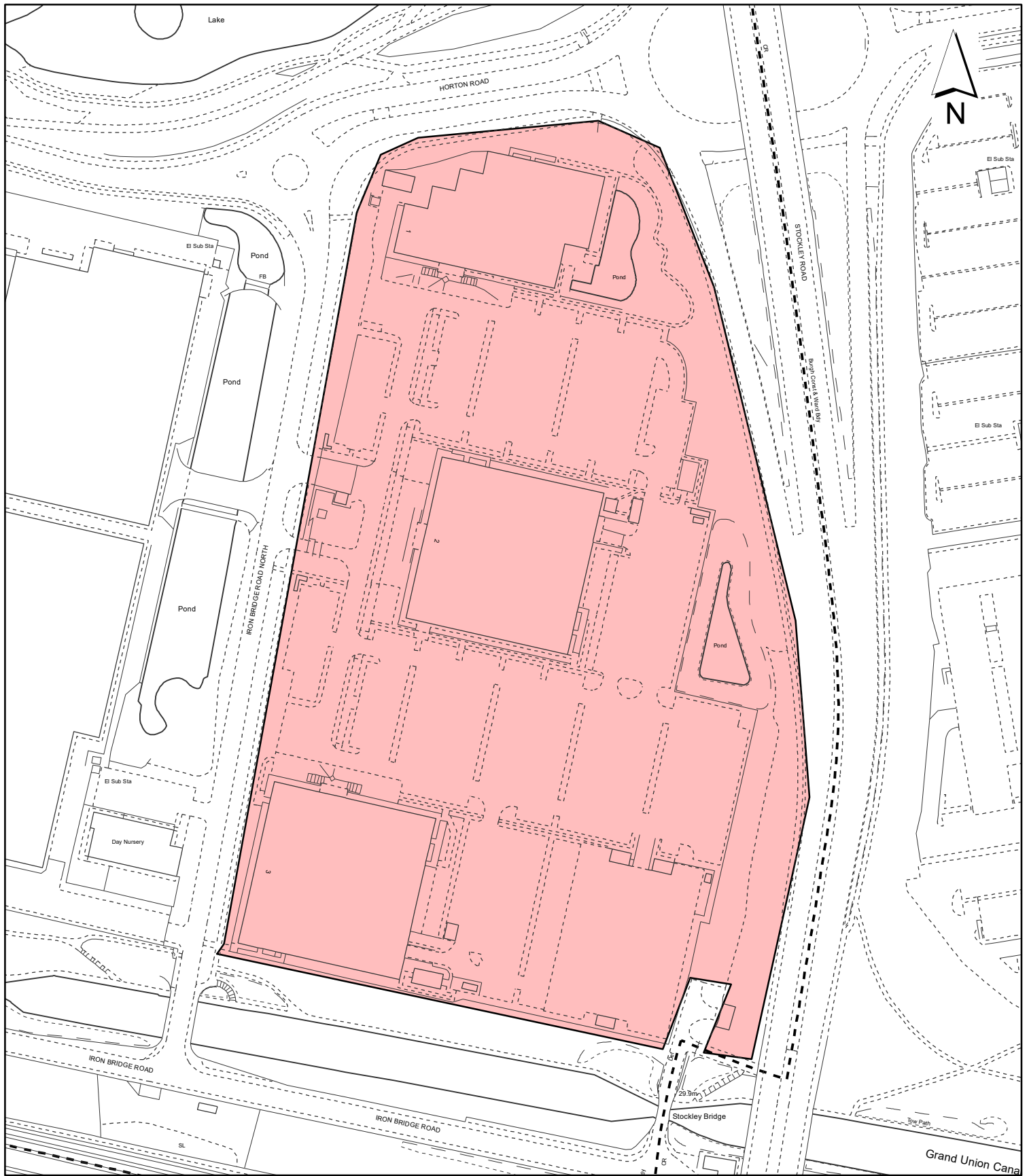
For the reasons outlined within the report, it is considered that overall, the benefits of the proposed development are considered to significantly outweigh the less than substantial harm to the Grade II Registered Park and Garden. The application is recommended for approval, subject to a Section 106 agreement and planning conditions.

11. Reference Documents

Hillingdon Local Plan: Part One - Strategic Policies (November 2012)
Hillingdon Local Plan: Part Two - Development Management Policies (January 2020)
Hillingdon Local Plan: Part Two Policies Map (2020)
The London Plan (2016)
National Planning Policy Framework (2019)
London Plan Intend to Publish Version, December (2019)
The Planning System in England and the Protection of Historic Parks and Gardens:
Guidance for Local Planning Authorities (2016)

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Notes:

 Site boundary

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**LONDON BOROUGH
 OF HILLINGDON
 Residents Services
 Planning Section**

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Planning Application Ref:

39207/APP/2020/2188

Scale:

1:2,000

Planning Committee:

Central & South

Date:

December 2020



HILLINGDON
 LONDON