

Report of the Interim Director of Planning, Regeneration & Public Realm

Address SHURGARD HOUSE, WESTMOUNT CENTRE UXBRIDGE ROAD HAYES

Development: Partial demolition and extension to existing building to provide additional self-storage floorspace (Use Class B8) with associated new car and cycle parking, refuse storage, landscaping and other associated works ancillary to the development.

LBH Ref Nos: 49467/APP/2022/2801

Drawing Nos: 21065GA-D-010B
21065GA-D-011B
21065GA-D-012B
21065GA-D-013B
21065GA-D-014B
21065GA-D-015A
SH 103.21 SL-01
21065GA-10-001A
21065GA-10-002A
20165GA-10-003C
21065GA-10-00E
21065GA-10-009A
21065GA-10-010B
21065GA-D-001E
21065GA-D-003A
21065GA-D-004B
21065GA-D-005A
21065GA-D-007A
WLA/2107/03/TSP (Rev. A)
WLA/2107/03/TCP (Rev. A)
Transport Statement (February 2023)
Travel Plan (February 2023)
Drainage Strategy (20-01-23)
Technical Design Note (26 January 2023)
Daylight and Sunlight Report (04-07-22)
Phase I Geo-Environmental Assessment Report (August 2022)
Design and Access Statement (Rev. B)
Air Quality Assessment (Ref: 2203260-03)
Noise Impact Assessment (Ref: 2203260-04)
Planning Statement (23-08-22)
Water Cycle Strategy (22-06-22)
Preliminary Ecological Appraisal (July 2022)
Biodiversity Impact Assessment (July 2022)
Tree Report (03-08-22)
Heritage Impact Assessment (July 2022)

Date Plans Received: 07/09/2022 **Date(s) of Amendment(s):**

Date Application Valid: 07/10/2022

1. SUMMARY

The application site is an existing self-storage facility comprised of a large central building and associated single-storey lock-ups, to the north of Uxbridge Road near the boundary with the London Borough of Ealing. The proposal seeks to demolish some of the single-storey lock-ups to the south of the main building, and erect an extension to the main building of the same height extending 28.5 metres to the south, resulting in an overall uplift of 3980 sqm (assuming five floors internally).

The continuation and expansion of an existing B8 storage facility is considered to be acceptable in principle, and the proposal, whilst large, would not be harmful to the wider character of the area or appearance of the streetscene. The existing parking area could likely accommodate the additional demand from the increased floorspace, and the maximum London Plan parking standards have been applied in any case resulting in one additional space to be provided, for a total of 20 on-site car parking spaces.

There would be no impact to the amenity of neighbouring residential properties, either in terms of daylight and sunlight impacts, or from an increased sense of enclosure or loss of privacy, and the supporting information demonstrates that there would be negligible impacts to noise when background levels are considered.

Overall, the proposal is considered acceptable and generally complies with the London Plan and Hillingdon Local Plan, and is recommended for approval on this basis, subject to the conditions and obligations listed in the report.

2. RECOMMENDATION

That delegated powers be given to the Director of Planning, Regeneration and Public Realm to grant planning permission, subject to the following:

A) That the Council enter into a legal agreement with the applicant under Section 106 of the Town and Country Planning Act 1990 (as amended) or any other legislation to secure the following:

i) A full and detailed Construction and Employment Training scheme in accordance with the Council Planning Obligations SPD with the preference being for an in-kind, on-site scheme to be delivered;

ii) A full Commercial Travel Plan, including a Low Emission Strategy, shall be submitted to and approved in writing by the Local Planning Authority. The Plan will include targets for sustainable travel arrangements, effective measures for the ongoing monitoring of the Travel Plan, and a commitment to delivering the Travel Plan objectives. A £20,000 Travel Plan bond is also to be secured:

iii) A carbon offsetting sum based on an Updated Energy Strategy to be submitted to discharge Condition 5, with the offset calculation based on £95 per tonne of CO2 over a 30 year period;

iv) Air Quality Mitigation Cost of £55,035 to be used by the Council to fund measures to reduce poor air quality within the borough; and

v) A Project Monitoring and Management Fee, equalling 5% of the total financial contributions paid under this agreement.

B) That in respect of the application for planning permission, the applicant meets the Council's reasonable costs in preparation of the Section 106 Agreement and any abortive work as a result of the agreement not being completed.

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

D) That, if the Legal Agreement has not been finalised within 6 months (or such other time frame as may be agreed by the Director of Planning, Regeneration and Public Realm), delegated authority be given to the Director of Planning, Regeneration and Public Realm to refuse planning permission for the following reason:

'The applicant has failed to secure the necessary legal obligations associated with the proposed development and provide contributions towards the improvement of services and facilities as a consequence of demands created by the proposed development (in respect of Construction and Employment Training, Travel Planning, Carbon Offsetting, Air Quality Offsetting and Project Monitoring). The scheme therefore conflicts with Policy DF1 of the London Plan (2021), Policy DMCI 7 of the Hillingdon Local Plan Part 2 (2020) and the Planning Obligations Supplementary Planning Document (2014).'

E) That if the application is approved, the following conditions be imposed:

1 A1 Time Limit

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

21065GA-10-001A,
21065GA-10-002A,
20165GA-10-003C,
21065GA-10-006,
21065GA-10-009A,
21065GA-10-010B,
21065GA-D-001E,
21065GA-D-003A,
21065GA-D-004B,
21065GA-D-005A,
21065GA-D-007A,
21065GA-D-010B,
21065GA-D-011B,
21065GA-D-012B,
21065GA-D-013B,
21065GA-D-014B,
21065GA-D-015A,
SH 103.21 SL-01,
WLA/2107/03/TSP (Rev. A), and
WLA/2107/03/TCP (Rev. A).

And the submitted documents, titled:

Transport Statement (February 2023), Travel Plan (February 2023), Drainage Strategy (20-01-23), Technical Design Note (26 January 2023), Daylight and Sunlight Report (04-07-22), Phase I Geo-Environmental Assessment Report (August 2022), Design and Access Statement (Rev. B), Air Quality Assessment (Ref: 2203260-03), Noise Impact Assessment (Ref: 2203260-04), Planning Statement (23-08-22), Water Cycle Strategy (22-06-22), Preliminary Ecological Appraisal (July 2022), Biodiversity Impact Assessment (July 2022), Tree Report (03-08-22), and Heritage Impact Assessment (July 2022).

REASON

In the interests of proper planning, and to ensure the approved development complies with the provisions of the London Plan (2021), the Hillingdon Local Plan: Strategic Policies (2012), and the Hillingdon Local Plan: Development Management Policies (2020).

3 OM19 Construction Management Plan

Prior to the commencement of the development hereby approved (including demolition), a Demolition and Construction Logistics Plan (DLP/CLP) and a Demolition and Construction Management Plan (DMP/CMP) shall be submitted to, and approved in writing by, the Local Planning Authority, in consultation with the Canal and River Trust, to minimise impacts to the local highway network, to control noise, vibration and air pollutants generated as a result of the construction process, and to avoid or mitigate construction impacts on species and habitats, particularly to the adjacent Grand Union Canal Site of Importance for Nature Conservation (SINC). These documents shall be prepared in accordance with the London Freight Plan, 'The control of dust and emissions from construction and demolition' Supplementary Planning Guidance, BRE Pollution Control Guides 'Controlling particles and noise pollution from construction sites' and 'Controlling particles, vapour and noise pollution from construction sites'.

The DLP/CLP and DMP/CMP shall include details of (but shall not necessarily be limited to):

- (i) a programme of works, including hours of construction;
- (ii) the measures for traffic management and encouragement of sustainable modes of transport for workers, including prohibition of construction vehicles parking on the local highway network within the vicinity of the application site;
- (iii) the haulage routes and details of a vehicle booking system including use of a banksman (if applicable), ensuring construction deliveries are received outside peak hours;
- (iv) any closures of public routes and diversions, demonstrating how time spent closed to the public has been minimised;
- (v) the provision of secured restricted access as the sole means of entry to site for cyclists along with a secured turnstile entrance for pedestrians;
- (vi) a site plan identifying the location of the site entrance, exit, visibility zones, wheel washing, hard standing, hoarding (distinguishing between solid hoarding and other barriers such as heras and monarflex sheeting), stock piles, dust suppression, location of water supplies and location of nearest neighbouring receptors;
- (vii) the loading, unloading and storage of equipment, plant, fuel, oil, materials and chemicals;
- (viii) measures to ensure no materials, machinery, vehicles or works will encroach on the adjacent Grand Union Canal Site of Importance for Nature Conservation (SINC).
- (ix) the means to prevent deposition of mud on the highway and chemical and/or fuel run-off from into nearby watercourse(s);

(x) a dust risk assessment, including means to monitor and control dust, noise and vibrations, following the published guidance by The Institute of Air Quality Management (IAQM) on how to assess impacts of emissions of dust from demolition and construction sites.

(xi) the likely noise levels to be generated from plant and construction works and the precautions set out to eliminate or reduce noise levels where the operational risk levels illustrated within The Control of Noise at Work Regulations 2005 could be exceeded;

(xii) confirmation that a mobile crusher will/won't be used on site and if so, a copy of the permit and intended dates of operation;

(xiii) confirmation of all Non-Road Mobile Machinery (NRMM) to be used, or a statement confirming that NRMM will not be used. All Non-Road Mobile Machinery (NRMM) and plant to be used on site of net power between 37kW and 560 kW shall comply with the emission standards set out in chapter 7 of the GLA's supplementary planning guidance "Control of Dust and Emissions During Construction and Demolition" and must be registered at <http://nrmm.london/>;

(xiv) details of cranes and other tall construction equipment (including the details of obstacle lighting);

(xv) an asbestos survey and management plan; and

(xvi) the arrangement for monitoring and responding to complaints relating to demolition and construction.

and, for the avoidance of doubt:

(i) all Heavy Goods Vehicles associated with the development shall comply with the Direct Vision Standard, with a rating of 3 stars (or more).

(ii) all deliveries to the site, particularly Heavy Goods Vehicles, shall be made using vehicles which have a Class VI mirror fitted in accordance with EU directive 2007/38/EC;

The development hereby approved shall be implemented in accordance with the approved DLP/CLP and DMP/CMP.

REASON

To ensure that the proposed development does not interfere with the free flow of traffic and conditions of safety on the public highway, to ensure the development process does not have a significant adverse impact on the amenities of nearby residential properties and to protect features of biodiversity value, in accordance with Policies DMT 1, DMT 2, DMEI 7 and DMEI 14 of the Hillingdon Local Plan: Development Management Policies (2020) and Policies D14, SI 1, T4, T7, G5 and G7 of the London Plan (2021). Also, to ensure that construction work and construction equipment on the site and adjoining land does not obstruct air traffic movements or otherwise impede the effective operation of air traffic navigation transmitter/receiver systems, in accordance with Policy DMAV 1 of the Hillingdon Local Plan: Development Management Policies (2020).

4 COM30 Intrusive Ground Investigation and Soil Gas Survey

(A) Prior to the commencement of the development hereby approved (including demolition), the applicant shall submit details of an intrusive ground investigation including a soil gas survey in areas of the proposed development, to be approved in writing by the local planning authority. Some of the soil gas tests within the survey shall be conducted below the proposed footprint of any new building.

(B) If unacceptable concentrations hazardous soil gas are detected, the applicant shall submit details of gas protection measures to the local planning authority for approval in writing, and install said measures in accordance with the approved details to prevent gas

ingress to any buildings on the development site.

(C) The installed gas protection system shall be validated and verified by suitably qualified person/s, and a Verification Report shall be submitted to, and approved in writing by the Local Planning Authority to confirm the works have been implemented prior to first use of the development hereby approved.

REASON: The LPA has received details of a phase 1 study which suggest the development site may have Made Ground present. Made Ground could introduce risks associated with possible production and migration of hazardous ground gases into confined spaces within the proposed new structures. An intrusive investigation and soil gas survey is therefore required to clarify that there are no significant soil contamination and/or gas issues which may impact the new development site, in accordance with Policies DMEI 11 and DMEI 12 of the Hillingdon Local Plan: Part 2 (2020).

5 SUS1 Updated Energy Strategy

Prior to commencement of the development hereby approved (excluding demolition), an Updated Energy Strategy shall be submitted to, and approved in writing by, the local planning authority. The Updated Energy Strategy shall include an assessment of the annual baseline regulated energy demand (kwhr) as per 2021 Building Regulations (or subsequent amendments) and associated carbon emissions (kgCO₂ and tCO₂), and shall then set out the measures and technology required to achieve, as far as practicable, the zero carbon and energy efficiency standards of the London Plan and an on-site reduction equal to or greater than 35% in the CO₂ associated with the baseline regulated energy demand.

The Updated Energy Strategy shall clearly define the 'be lean', 'be clean' and 'be green' measures to demonstrate that the development will meet as far as practicable the zero carbon standards of the London Plan and the minimum standards for onsite energy efficiency. Carbon-saving measures must be sufficiently evidenced with corresponding details and specifications including the location of low and zero carbon technology (i.e. roof plans showing the inclusion of PV panels), and the Updated Energy Strategy must clearly set out any annual shortfall (tCO₂) of the zero-carbon requirement.

The Updated Energy Strategy shall also provide details of the 'be seen' recording and reporting measures and demonstrate that the 'onsite saving' is being achieved in perpetuity.

The development must proceed in accordance with the approved Updated Energy Strategy.

REASON

In order to deliver the maximum on-site carbon savings in accordance with Policies SI 2 and SI 3 of the London Plan and the GLA's Energy Assessment Guidance (2020).

6 COM15 Sustainable Water Management

Prior to commencement of the development hereby approved (excluding demolition), 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 water is managed and demonstrate ways of controlling the surface water on site by providing information on:

a) Sustainable Drainage:

i. Surface water discharge - the submitted drainage strategy must confirm the proposed method and location of discharging collected surface water from the site in accordance with the hierarchy set out in the London Plan. Where the proposal does not utilise the most sustainable solution, justification must be provided. Any proposal that includes an off-site connection through a private sewer network should provide details of the condition and ownership of the entire drainage route to a public sewer or ordinary watercourse.

ii. SuDS - the submitted drainage strategy should incorporate Sustainable Drainage System (SuDS) elements that are embedded, where practicable, within the landscaping plan for the development. Preference should be given to above-ground SuDS elements that provide wider biodiversity, water quality and amenity benefits.

iii. Infiltration drainage - where infiltration drainage is proposed, a ground investigation must be provided to establish the level of groundwater on the site; to demonstrate the suitability of infiltration techniques proposed on the site by providing the results of infiltration testing in line with BRE Digest 365; and to confirm the suitability of infiltration drainage based on any encountered ground contamination.

iv. Runoff rates - surface water discharge from the site must be no greater than greenfield runoff rates at a variety of return periods including 1 in 1 year, 1 in 30, 1 in 100, and 1 in 100 plus 40% climate change. Any increases above greenfield rates must be adequately justified and may be subject to developer contributions.

v. Drainage calculations - include calculations to demonstrate the volume of storage and size of drainage features provided is adequate to control surface water for a range of storm duration and rainfall intensities for events up to and including the critical 1 in 100 plus 40% climate change rainfall event. The proposed attenuation volume of each feature should be clarified, and these should be incorporated into the MicroDrainage calculations and there should be no flooding in the 1 in 30-year event.

vi. Exceedance routes - provide a plan showing the route surface water will take through the development for rainfall events exceeding the 1 in 100 year event. Where it is intended to store water on the ground surface, the maximum extent of overland flooding should be mapped and include details on flow paths, depths and velocities. The location and extent of the flooding for the 1 in 100-year event should be marked on a drawing. Safe access and egress for the site must be demonstrated.

b) Long-term management and maintenance of the drainage system.

i. Provide a Management and Maintenance Plan for the drainage system that includes clear plans showing all of the drainage network above and below ground, and identifies the responsibility of different parties for each component of the drainage network.

ii. Include details of the necessary inspection regimes, maintenance frequencies and responsible authority (Private Management Company, homeowner, etc.).

iii. Where managed flooding of the ground surface is proposed, the plan should include the appropriate actions for those areas and document the actions required to ensure the safety of the users of the site during a rainfall event.

c) Minimise water use.

i. incorporate water saving measures and equipment.

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

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

REASON

To ensure that surface water run off is controlled to ensure the development does not increase the risk of flooding in accordance with Policy EM6 of the Hillingdon Local Plan Part (2012), Policy DMEI 10 of the Local Plan Part 2 (2020) and Policy SI 12 of the London Plan (2021).

7 OM14 Fire Strategy

(A) Prior to above ground works (excluding demolition), the principles of a Fire Statement shall be submitted to, and approved in writing by, the Local Planning Authority. The statement shall detail how the development will function in terms of:

- (i) the building's construction: methods, products and materials used, including manufacturers' details
- (ii) the means of escape for all building users: suitably designed stair cores, escape for building users who are disabled or require level access, and associated evacuation strategy approach
- (iii) features which reduce the risk to life: fire alarm systems, passive and active fire safety measures and associated management and maintenance plans
- (iv) access for fire service personnel and equipment: how this will be achieved in an evacuation situation, water supplies, provision and positioning of equipment, firefighting lifts, stairs and lobbies, any fire suppression and smoke ventilation systems proposed, and the ongoing maintenance and monitoring of these
- (v) how provision will be made within the curtilage of the site to enable fire appliances to gain access to the building
- (vi) ensuring that any potential future modifications to the building will take into account and not compromise the base build fire safety/protection measures.

B) Prior to first use of the development hereby approved, the final comprehensive Fire Statement shall be submitted to and approved in writing by the Local Planning Authority. This should be accompanied by the Building Control Decision Notice or equivalent. Thereafter the development shall be carried out and maintained in full accordance with the approved details.

REASON

To ensure the safety of all building users in accordance with Policy D12 of the London Plan (2021).

8 NONSC Artificial Lighting

Prior to above ground works (excluding demolition), an external lighting scheme shall be submitted and approved in writing by the Local Planning Authority in consultation with the Canal and River Trust, which shall include measures to ensure that external lights are automatically turned off when the buildings are not in use.

The lighting scheme shall be designed to protect the biodiversity along the Grand Union Canal, and the lighting should use deflectors, be angled downwards, and use a warm white spectrum for all the proposed lights bordering the canal, with light spillage of less than 5 lux into the canal corridor.

The lighting scheme shall be implemented in accordance with the approved details and remain as such for the lifetime of the development.

REASON

To reduce the impact of artificial lighting on the surrounding area, specifically the adjacent Grand Union Canal, in relation to foraging species and light spillage, in accordance with Policy EM7 of the Hillingdon Local Plan: Part 1 (2012).

9 NONSC Pedestrian Vehicle Delineation

Prior to above ground works (excluding demolition), a site wide plan clearly showing the delineated spaces for pedestrians, vehicles and cyclists within the site, including any measures to ensure the site is safe, convenient and easy to use by all, shall be submitted to and approved in writing by, the Local Planning Authority. This plan should identify the key movement routes within the site and demonstrate how pedestrians and vehicles can safely interact, including near the sole access point from Uxbridge Road.

REASON

To ensure the site is safe and convenient for all users in accordance with Policies T2 and D5 of the London Plan (2021).

10 COM7 Materials

Prior to above ground works for the development hereby approved (excluding demolition), details of all materials and external surfaces, including fenestration, boundary treatments and balustrades, shall be submitted to, and approved in writing by, the Local Planning Authority.

Details should include information relating to make, product, type, colour and can include photographs and images.

Thereafter the development shall be constructed in accordance with the approved details and be retained as such.

REASON

To ensure that the development presents a satisfactory appearance in accordance with Policy DMHB 11 of the Hillingdon Local Plan: Development Management Policies (2020).

11 COM9 Landscaping and Ecology

Prior to above ground works for the development hereby approved (excluding demolition), a scheme of landscaping shall be submitted to, and approved in writing by, the Local Planning Authority, in consultation with the Canal and River Trust. The scheme shall include:

A. Details of Soft Landscaping

A.a Planting plans (at not less than a scale of 1:100).

A.b Written specification of planting and cultivation works to be undertaken (with Japanese Rose removed, as this is an invasive species).

A.c Schedule of plants giving species, plant sizes, and proposed numbers/densities where appropriate, to include pollution absorbing trees.

A.d Root barriers to protect the structural integrity of the Canal.

A.e Boundary treatments, including litter shields.

A.f Biodiverse Roofs and other features of ecological value.

B. Details of Landscape Maintenance

B.a Landscape Maintenance Schedule for a minimum period of 5 years.

B.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.

C. Schedule for Implementation.

REASON

To ensure that the proposed development will preserve and enhance the visual amenities of the area and provide appropriate cycling provision in accordance with Policies G5, G6 and G7 of the London Plan (2021) Policies DMHB 11 and DMHB 14 of the Hillingdon Local Plan: Development Management Policies (2020).

12 H14 Cycle Stores

Prior to above ground works for the development hereby approved (excluding demolition), details of 24 long-stay and 12 short-stay covered and secure cycle storage spaces designed in accordance with London Cycling Design Standards, alongside changing facilities, lockers and showers for users of and visitors to the development, shall be submitted to and approved in writing by the Local Planning Authority. The short-stay provision shall include at least 2 cargo-bike spaces. Thereafter, the development shall not be occupied or brought into use until the approved cycling facilities have been implemented in accordance with the approved plan, with the facilities being permanently retained for use by cyclists.

REASON

To encourage an uptake in cycling in accordance with Policy T5 of the London Plan (2021).

13 NONSC Delivery and Servicing Plan

Prior to the first use of the development hereby approved, a Delivery and Servicing Plan, including tracked vehicle movements where necessary, shall be submitted to, and approved in writing by, the Local Planning Authority.

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

REASON

To encourage out of hours/off peak servicing to help mitigate the site's contribution to local congestion levels in compliance with Policy T7 of the London Plan (2021) and Policies DMT 1 and DMT 2 of the Hillingdon Local Plan: Part 2 (2020).

14 A12 Parking Design and Management Plan

Prior to any above ground works for the development hereby approved (excluding demolition), a Parking Design and Management Plan shall be submitted to, and approved in writing by, the Local Planning Authority. It shall include the following:

(i) The arrangements for all on-site parking, and to include provisions for managing, monitoring, enforcement and review. All on-site parking spaces shall be solely for use by the development hereby approved (e.g. staff, visitors) and shall not be used for any other purpose or leased/sub-let.

(ii) Details of 1 wheelchair accessible space, to be permanently retained within the car parking area.

(iii) Details of 6 active electric vehicle charging points.

(iv) Confirmation that no more than 20 spaces are to be provided on site.

The vehicle parking provision and its management, as outlined in the approved Parking Design and Management Plan, shall be fully implemented as approved prior to the first occupation of the development, and the parking area shall not be used for any other purpose for the lifetime of the development.

REASON

To ensure the appropriate operation of the car park in accordance with Policies DMT 1, DMT 2 and DMT 6 of the Hillingdon Local Plan: Development Management Policies (2020) and Policy T6 of the London Plan (2021).

15 COM26 Noise

For the lifetime of the development hereby approved, the rating level of noise caused by the operation of development shall be at least 5 dB below the minimum background noise level, or 35 dB(A), whichever is higher, measured 1 metre outside of any window of any existing dwelling, or similarly noise sensitive premises, determined in accordance with the procedures set out in BS4142:2014 Methods for Rating and Assessing Industrial and Commercial Sound.

REASON

To ensure the operational development does not have an adverse impact on nearby residential properties in accordance with Policy D14 of the London Plan (2021).

16 NONSC Imported Materials

No contaminated soils or other materials shall be imported to the site. All imported soils for ground engineering and/or landscaping purposes shall be clean and free of contamination. All imported soils shall be tested for chemical contamination, and a factual and interpretive report of the results of the testing shall be submitted to the Local Planning Authority for its written approval prior to their use on site.

REASON: To ensure that users of the development are not subject to any risks from soil contamination, in accordance with Policies DMEI 11 and DMEI 12 of the Hillingdon Local Plan: Part 2 (2020).

17 COM31 Secured by Design

The development hereby approved 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 part of the development hereby approved shall be occupied until accreditation has been achieved.

REASON

To ensure the development provides a safe and secure environment in accordance with Policy DMHB 15 of the Hillingdon Local Plan: Development Management Policies (2020) and Policy D11 of the London Plan (2021).

18 OM5 Not a Data Centre

The uses hereby approved under the B8 use class shall not include operation as a Data Centre.

REASON

To ensure that any use as a Data Centre is assessed against development plan policies in place at the time, as they tend to have very high energy demands and much worse impacts on air quality than other B8 uses, and these impacts would likely require assessment against Policies SI1, SI2 and SI3 of the London Plan (2021) and require subsequent mitigation.

19 COM10 Fire Lift

The development hereby approved shall include at least one suitably sized fire evacuation lift, suitable to be used to evacuate people who require level access from the building.

REASON

In accordance with Policy D5 and D12 of the London Plan.

20 COM8 Tree Protection Measures

All trees shown to be retained shall be protected from the impacts of construction through implementation of the tree protection measures outlined in the Tree Report (03-08-22) and Drawing Nos. WLA/2107/03/TSP (Rev. A) and WLA/2107/03/TCP (Rev. A), including, where appropriate, establishing and protecting the relevant Root Protection Areas (RPAs) and Crown Protection Zones (CPZs) of retained trees.

REASON

To protect the verdant character of the area in accordance with Policy DMHB 14 of the Hillingdon Local Plan: Development Management Policies (2020).

21 NONSC Hours of Use

The development hereby approved shall only operate between the hours of 06:00 and 23:00, Monday to Sunday.

REASON

To protect the amenity of nearby residential properties in accordance with Policy DMHB 11 of the Hillingdon Local Plan: Part 2 (2020).

22 NONSC Maximum Internal Floorspace

The development hereby approved shall provide a maximum of 5130 sqm of additional floorspace within the extension, based on 1026 sqm per floor, and a maximum provision of 5 internal floors.

INFORMATIVES

1 I52 Compulsory Informative (1)

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

2 I53 Compulsory Informative (2)

The decision to GRANT planning permission has been taken having regard to the policies and proposals in the Hillingdon Local Plan Part 1 (2012) and Part 2 (2020) set out below, including Supplementary Planning Guidance, and to all relevant material considerations, including The London Plan 2021 and national guidance.

DMAV 1 Safe Operation of Airports

DMCI 7	Planning Obligations and Community Infrastructure Levy
DME 2	Employment Uses Outside of 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 14	Air Quality
DMEI 2	Reducing Carbon Emissions
DMEI 3	Decentralised Energy
DMEI 7	Biodiversity Protection and Enhancement
DMEI 9	Management of Flood Risk
DMHB 1	Heritage Assets
DMHB 11	Design of New Development
DMHB 14	Trees and Landscaping
DMHB 4	Conservation Areas
DMT 1	Managing Transport Impacts
DMT 2	Highways Impacts
DMT 5	Pedestrians and Cyclists
DMT 6	Vehicle Parking
LPP D11	(2021) Safety, security and resilience to emergency
LPP D12	(2021) Fire safety
LPP D13	(2021) Agent of change
LPP D14	(2021) Noise
LPP D3	(2021) Optimising site capacity through the design-led approach
LPP D5	(2021) Inclusive design
LPP DF1	(2021) Delivery of the Plan and Planning Obligations
LPP E4	(2021) Land for industry, logistics and services to support London's economic function
LPP E7	(2021) Industrial intensification, co-location and substitution
LPP G5	(2021) Urban greening
LPP G6	(2021) Biodiversity and access to nature
LPP G7	(2021) Trees and woodlands
LPP GG2	(2021) Making the best use of land
LPP GG5	(2021) Growing a good economy
LPP HC1	(2021) Heritage conservation and growth
LPP SD1	(2021) Opportunity Areas
LPP SI1	(2021) Improving air quality
LPP SI12	(2021) Flood risk management
LPP SI13	(2021) Sustainable drainage
LPP SI16	(2021) Waterways - use and enjoyment
LPP SI2	(2021) Minimising greenhouse gas emissions
LPP SI3	(2021) Energy infrastructure
LPP SI4	(2021) Managing heat risk
LPP SI7	(2021) Reducing waste and supporting the circular economy
LPP SI8	(2021) Waste capacity and net waste self-sufficiency
LPP T1	(2021) Strategic approach to transport
LPP T2	(2021) Healthy Streets
LPP T4	(2021) Assessing and mitigating transport impacts
LPP T5	(2021) Cycling
LPP T6	(2021) Car parking

LPP T6.2	(2021) Office parking
LPP T6.5	(2021) Non-residential disabled persons parking
LPP T7	(2021) Deliveries, servicing and construction

3 I70 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 I72 Section 106 Agreement

You are advised that this permission has been granted subject to a legal agreement under Section 106 of the Town and Country Planning Act 1990.

3. CONSIDERATIONS

3.1 Site and Locality

The application site is located on the north side of Uxbridge Road, approximately 40 metres east of the junction with Delamere Road, and comprises an existing Shurgard self-storage facility (Use Class B8) within a five storey (16.3 metre) building at the northern end of the site alongside external, direct access self-storage units within a series of single storey structures around the remainder of the site. At the southern end of the site is a standalone single-storey building, with a lighthouse folly, which acts as a reception/office area for staff

The surrounding area has a mixed character, with Uxbridge Road to the south acting as a busy arterial route through Hillingdon and into Ealing with numerous commercial, industrial and residential uses present, whereas to the north and west the area is characterised by two-storey semi-detached and terraced houses. Immediately to the east of the site is the Grand Union Canal, and beyond this is the London Borough of Ealing.

The site is identified within the Hillingdon Local Plan Part 2: Site Allocations and Designations as SA 36, and is allocated for a residential redevelopment of approximately 40 units, with the possibility of retaining a B8 use across the southern part of the site. Prior to its allocation for a residential-led development, the site formed part of the wider Hayes Bridge Industrial and Business Area, equivalent to a designated Locally Significant Industrial Site (LSIS), which extended along the western bank of the canal from Uxbridge Road in the south, to Berwick Avenue in the north (and is now occupied by the residential properties on Tollgate Drive).

3.2 Proposed Scheme

The proposal relates to the demolition of 1150 sqm of the single-storey self-storage units to the south of the main building, followed by the erection of a five-storey extension to create a larger B8 unit within the site. This extension would maintain the same height as the existing building, extended southwards, and the proposed floorspace gain is stated as being 1026 sqm per floor, with between three and five internal floors proposed (provided as demountable mezzanines).

The maximum additional floorspace has been assessed under this application so that any adverse impacts identified would represent the "worst case" scenario, and assuming all five floors are to be installed internally, the proposed extension would have a floor area of 5130 sqm (1026 sqm x 5 floors), leading to an overall uplift of 3980 sqm when the demolished single-storey lock-ups are taken into account. Following completion of the development, the site would have a total floorspace provision of 11, 770 sqm.

On-site parking would increase from 19 (4 visitor spaces and 15 customer spaces) to 20 (4 visitor spaces and 16 customer spaces), of which, 1 visitor space would be wheelchair accessible.

3.3 Relevant Planning History

49467/A/95/1230 Block C, Westmount Centre Uxbridge Road Hayes
Change of use from catering and social facilities to Class B8 (Storage and Distribution)

Decision: 22-11-1995 Approved

49467/APP/2001/756 Shurgard, Westmount Centre Uxbridge Road Hayes
ERECTION OF TWO SINGLE STOREY BUILDINGS, LINKED BY A ROOF CANOPY FOR USE
AS EXTENSION TO EXISTING SELF STORAGE FACILITY

Decision: 18-07-2001 Approved

49467/D/99/0537 Westmount Centre Fronting Uxbridge Road Hayes
Change of use of the site to a self-storage facility involving re-cladding and extension of Alpha House, demolition of Bridge House and replacement with two single storey storage units, a single storey office building and a lighthouse and erection of boundary fencing

Decision: 31-01-2000 Approved

49467/E/99/0400 Westmount Centre Fronting Uxbridge Road Hayes
Change of use to self-storage (Class B8)

Decision: 15-09-1999 Approved

Comment on Relevant Planning History

The planning history indicates that the site has operated within the B8 use class (storage and distribution) since the early 2000s.

4. Planning Policies and Standards

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 London Plan (2021)
The West London Waste Plan (2015)

The National Planning Policy Framework (NPPF) (2021), Planning Practice Guidance, as well as relevant supplementary planning documents and guidance are all material consideration in planning decisions.

The proposed development has been assessed against development plan policies and relevant material considerations, discussed below.

UDP / LDF Designation and London Plan

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

Part 1 Policies:

- PT1.BE1 (2012) Built Environment
- PT1.E1 (2012) Managing the Supply of Employment Land
- PT1.EM1 (2012) Climate Change Adaptation and Mitigation
- PT1.EM11 (2012) Sustainable Waste Management
- PT1.EM6 (2012) Flood Risk Management
- PT1.EM7 (2012) Biodiversity and Geological Conservation
- PT1.EM8 (2012) Land, Water, Air and Noise

Part 2 Policies:

- DMAV 1 Safe Operation of Airports
- DMCI 7 Planning Obligations and Community Infrastructure Levy
- DME 2 Employment Uses Outside of 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 14 Air Quality
- DMEI 2 Reducing Carbon Emissions
- DMEI 3 Decentralised Energy
- DMEI 7 Biodiversity Protection and Enhancement
- DMEI 9 Management of Flood Risk
- DMHB 1 Heritage Assets
- DMHB 11 Design of New Development
- DMHB 14 Trees and Landscaping
- DMHB 4 Conservation Areas
- DMT 1 Managing Transport Impacts

DMT 2	Highways Impacts
DMT 5	Pedestrians and Cyclists
DMT 6	Vehicle Parking
LPP D11	(2021) Safety, security and resilience to emergency
LPP D12	(2021) Fire safety
LPP D13	(2021) Agent of change
LPP D14	(2021) Noise
LPP D3	(2021) Optimising site capacity through the design-led approach
LPP D5	(2021) Inclusive design
LPP DF1	(2021) Delivery of the Plan and Planning Obligations
LPP E4	(2021) Land for industry, logistics and services to support London's economic function
LPP E7	(2021) Industrial intensification, co-location and substitution
LPP G5	(2021) Urban greening
LPP G6	(2021) Biodiversity and access to nature
LPP G7	(2021) Trees and woodlands
LPP GG2	(2021) Making the best use of land
LPP GG5	(2021) Growing a good economy
LPP HC1	(2021) Heritage conservation and growth
LPP SD1	(2021) Opportunity Areas
LPP SI1	(2021) Improving air quality
LPP SI2	(2021) Flood risk management
LPP SI3	(2021) Sustainable drainage
LPP SI6	(2021) Waterways - use and enjoyment
LPP SI2	(2021) Minimising greenhouse gas emissions
LPP SI3	(2021) Energy infrastructure
LPP SI4	(2021) Managing heat risk
LPP SI7	(2021) Reducing waste and supporting the circular economy
LPP SI8	(2021) Waste capacity and net waste self-sufficiency
LPP T1	(2021) Strategic approach to transport
LPP T2	(2021) Healthy Streets
LPP T4	(2021) Assessing and mitigating transport impacts
LPP T5	(2021) Cycling
LPP T6	(2021) Car parking
LPP T6.2	(2021) Office parking
LPP T6.5	(2021) Non-residential disabled persons parking
LPP T7	(2021) Deliveries, servicing and construction

5. Advertisement and Site Notice

5.1 Advertisement Expiry Date:- 24th November 2022

5.2 Site Notice Expiry Date:- 28th November 2022

6. Consultations

External Consultees

NEIGHBOUR RESPONSES

Letters dated 07-10-22 were sent to 36 nearby properties on Delamere Road, Tollgate Drive and Uxbridge Road, a site notice was displayed outside the site on 07-11-22, and a press notice was displayed in a local newspaper on 03-11-22.

One response was received raising the following material consideration:

- Increase in noise, especially at night

CANAL AND RIVER TRUST (22-11-22): The main issues relevant to the Trust as statutory consultee on this application are:

- a) The impact on the character, appearance, and heritage of the waterway
- b) The impact on the structural integrity of the canal.
- c) The impact on the biodiversity of the waterway.
- d) Drainage
- e) Sustainable Energy

Based on the information available our substantive response (as required by the Town & Country Planning (Development Management Procedure) (England) Order 2015 (as amended)) is to advise that suitably worded conditions are necessary to address these matters.

The site is located to the west of the Paddington Arm of the Grand Union canal which is part of the designated Ealing Canalside Conservation Area. The existing building is a dominant feature when viewed from the waterway and the proposed extension would be a substantial addition, further increasing its dominance and overall bulk. However, it is positive that overall, the building has now been harmonised in line with the Trust's previous comments and it appears better as a result. It is still disappointing to note though that no new fenestration has been added to the facade, as suggested, to help break down the extent of the large expanse of blank cladding. The improvements to the waterside edge with regards to boundary treatment and planting would aid in enhancing the overall appearance of the site from the waterway, though further consideration of the species selection and measures to mitigate impact on structural integrity are required, please refer to below.

With any development close to the waterway there is the potential for adverse impacts on the infrastructure of the canal in terms of stability, drainage, pollution etc. To protect the structural integrity of the canal some form of root barrier / training will be required for any trees planted as part of the proposed landscaping. This is to prevent any future damage to the waterway wall by roots. This matter could be addressed within a landscaping condition, please see below, and the Trust wish to be consulted on this detail when available.

Further information on foundation details and construction methodology will also be required though considering the set-back from the canal and on the basis that there would appear to be no changes proposed to the existing access road, the Trust are satisfied that in this instance these details could be addressed via the Trust's "Code of Practice for Works affecting the Canal & River Trust ". The

applicant/developer should contact our Works Engineer to discuss this further and contact details are as per an informative.

The waterways have a rich biodiversity, with many areas benefiting from SSSI, SAC, SLINC or CWS designations. Developments can have an adverse impact on the ecology of the waterways. The proposed landscaping enhancements to the canal boundary are positive, as is the biodiverse 'brown' roof. The hedge and tree species proposed overall are generally British native with a good diversity of species included. However, Japanese Rose and *Brachyglottis* spp are listed in the 'native shrub planting species' list, though these are not a native species. Japanese rose is also considered to be an invasive species as it grows in dense thickets and outcompetes other native species. It would therefore be preferable if these were replaced in favour of British native species e.g. Dog rose rather than Japanese rose.

In addition, the fencing will affect the ability of the applicant/developer to maintain the vegetation from their site and further consideration needs to be given as to how the future maintenance of the landscaping will be managed. The fence should also incorporate a litter shield to prevent rubbish being blown into the vegetation line. This matter along with a revised landscaping schedule and maintenance/ management regimes and responsibilities could be addressed by condition. The Trust wish to be consulted on these details when available.

Site investigations should be undertaken to determine the extent of any contamination on the site and the outcome of these and any remediation ground reports submitted for consideration. Potential contamination of the waterway and ground water from wind blow, seepage or spillage at the site should be avoided and details of pollution prevention measures provided. The submitted Construction and Environmental Management Plan (CEMP) is lacking some detail on these matters, for example it does not include details on the control of surface water during construction, use and storage of fuel/oil. Further detail for demolition and asbestos dust mitigation and a pollution prevention and response plan is also required. A more detailed site-specific CEMP to address these matters should therefore be submitted for consideration. This could be addressed by the submission of a revised CEMP which could be secured by planning condition.

The Trust advise that waterside lighting affects how the waterway corridor is perceived, particularly when viewed from the water, the towpath and neighbouring land, for example waterside lighting can lead to unnecessary glare and light pollution if it is not carefully designed. Any external lighting should be angled downwards, and light directed into the site, and it should not provide flood lighting to the canal corridor to show consideration for bats and other nocturnal species. The details of any external lighting proposed could be addressed by condition and the Trust wish to be consulted on this information when available.

The drainage methods of new developments can have significant impacts on the structural integrity, water quality and the biodiversity of waterways. It is therefore important to ensure that no contaminants enter the canal from surface water drainage. The submission indicates that surface water drainage would be to the existing mains drain. The drainage strategy should be addressed by condition and include details on future maintenance to ensure the system continues to operate as intended.

The Trust wish to highlight the potential of the canal for heating & cooling of the proposed development. To discuss the options in relation to this and any commercial agreements that would be required please contact our representative.

HEATHROW AIRPORT SAFEGUARDING (02-11-22): We have now assessed the above application against safeguarding criteria and can confirm that we have no safeguarding objections to the proposed development.

LONDON BOROUGH OF EALING (16-11-22): No Objection.

NATIONAL AIR TRAFFIC SERVICE (31-10-22): 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.

TRANSPORT FOR LONDON (18-11-22): The site is located on Uxbridge Road, which forms part of the Strategic Road Network (SRN). The closest section of Transport for London Road Network (TLRN) is the A312 The Parkway, located approximately 800m to the west of the site. TfL is the highway authority for the TLRN and is therefore concerned about any proposals which could impact on the safety and/or function of the A312.

All development proposals should support the deliver against the Healthy Streets criteria, in line with Policy T2. From the plans provided, it does not appear that any clear and delineated space for pedestrians and cyclists to access the proposed development and cycle parking provision has been provided, or from the site entrance to the main buildings. This raises concerns about pedestrian and cyclist safety. This should be addressed prior to the determination of this application.

To support achieving a strategic modal shift in line with Policy T2, it should be ensured that the routes to public transport facilities, such as that of the bus stop in proximity of the site, is of high-quality.

It is understood that vehicular access to the site will only be via the existing junction onto Uxbridge Road. All vehicles, including customer, staff and servicing vehicles, are to access the proposed development via this junction. The plan included within the Transport Assessment also indicates that this site can be accessed from the north, via Tollgate Drive.

Pedestrian and cyclist access will also be via the existing access junction.

A total of 10 cycle parking spaces is provided, which is below the minimum standards identified within the London Plan. To comply with Policy T5, 24 long-stay and 12 short-stay cycle parking spaces should be provided. It is noted that the applicant is providing two cargo bike spaces.

It should be ensured that cycle parking has been designed in line with London Cycle Design Standards (LCDS), which is referred to within Policy T5. Based on the information provided, cycle parking provision at this site is not in line with LCDS with key areas of non-compliance being:

- Currently, the spacing between the Sheffield stands is 0.75m. As identified within the LCDS, to accommodate standard cycles spacing between Sheffield stands should be 1.2m preferred, 1.0m minimum.
- To accommodate larger and adapted cycles, at least 1.8m between Sheffield stands should be provided.

Long-stay cycle parking is best located in a building. From the plans provided, it appears that all cycle parking provision is located outside. Has the option to provide cycle parking within the building been explored? Where it has been demonstrated that this is not possible, bespoke shelters area an option, but consideration needs to be given to planning requirements. Cycle parking outside of buildings should be:

- Sited in locations that are clearly visible and well overlooked with high-levels of natural surveillance, and CCTV where necessary
- Designed with consideration of sight lines into and out of the cycle cages, compounds or secure store

· Adequately lit and overlooked, particularly at night-time or where parking is under cover

TfL would question whether certain cycle parking locations are achieving the above.

Appropriate end of users facilities, such as lockers, changing areas and showers, should be provided to support an uptake in this mode.

It is understood that the proposed development will provide a total of 39 car parking spaces, of which one will be for disabled person parking provision. The site is, however, located within an Outer London Opportunity Area, as such applying these standards a total of 20 parking spaces should be provided. A reduction in the quantum of parking proposed is therefore required.

It is useful to highlight that the applicant has undertaken an assessment of parking demand for this site, which indicates that the maximum parking demand at any one time for the proposed development is expected to be 17 vehicles around 13:30 to 14:15 on a Sunday, and 10 on an average weekday. As such, the provision of 39 car parking spaces appears to be excessive.

It is understood that access to the site will be via the existing priority junction onto Uxbridge Road, with no vehicular or pedestrian access available via Tollgate Drive to the north, as per the existing situation.

It is understood that six of the car parking spaces will have active electric vehicle charging provision

The applicant has provided a vehicular trip assessment of the proposed development. It is noted that the applicant undertook a survey of the existing self-storage site between 01/07/2022 and 08/07/2022. This survey recorded all vehicles accessing/egressing the site classified by vehicle type. This data has been utilised to identify the existing trip attraction of the site, and the likely trip attraction of the proposed extension.

Based on this data, it has been estimated that the proposed development will generate an additional 14 vehicle trips during the PM peak period, with only 1 trip during the AM peak. Noting the level of vehicle movement anticipated, it is not considered that this development will have a significant impact on the surrounding strategic highway network.

No multi-modal trip generation assessment has been provided, as such TfL is unable to assess the impact of the proposed development on the public transport network.

It is noted that delivery and servicing will take place on site, which is in line with Policy T7 of the London Plan. Swept path analysis has also been provided showing that a refuse vehicle can enter and exit the site in a forward gear.

In line with Policy T7, a full Delivery and Servicing Plan (DSP) should be secured through condition. A Construction Management Plan has been provided to support this planning application. In line with Policy T7, a full Construction Management Plan should be secured through condition. This should be prepared in line with TfL guidance.

The applicant should focus on promoting modes of sustainable and active travel to this site, rather than that of vehicle. It is noted that the applicant has stated that cycle parking spaces will be provided. It should also be ensured that there is sufficient end of user facilities i.e. lockers and changing areas, to support an uptake in this mode.

The applicant should confirm that construction vehicles will enter and exit this site in a forward gear. A neighbourhood-level map has been provided on the proposed construction vehicle routing. The Council should confirm the acceptability of this vehicle routing, particularly noting that the secondary

vehicular route appears to travel through residential areas.

A Travel Plan has been provided to support this application. No targets have been identified within the submitted Travel Plan - this should be updated. Targets should be in line with the Mayor's strategic mode shift target. Additional measures may be required to support achieving the targets identified.

To conclude, a reduction in the quantum of parking is required and an increase in cycle parking. Safe and clearly delineated space should be provided for pedestrians and cyclists. Design amendments are also required to cycle parking provision at this site. A CLP, Travel Plan and Delivery and Servicing Plan should be secured through condition.

Internal Consultees

AIR QUALITY OFFICER (17-01-23): The proposed development is located within the Hays Focus Area, bringing additional traffic emissions which will add to current likely exceedances and contribute to poor local air quality. As per the London Plan, developments need to be neutral as minimum and positive in Focus Areas, contributing to the reduction of emissions in these sensitive areas.

LBH requires new developments to incorporate air quality positive design measures from the outset and suitable mitigation measures to reduce pollution, especially in areas where the air quality is already poor (LBH Air Quality Local Action Plan 2019-2024), namely Focus Areas. Furthermore, policy DMEI 14 of the emerging London Borough of Hillingdon Local Plan (part 2), requires active contribution towards the continued improvement of air quality, especially within the Air Quality Management Area. Finally, the London Plan (March 2021) requires development to be air quality positive specially within focus areas, actively contributing to reduce pollutant emissions to the atmosphere.

According to LBH Local Action Plan, proposed development within Focus Areas (or with impacts on FAs) needs to be Air Quality positive and further action is required to reduce total emissions produced by its operation. Therefore, the total emissions associated with these activities need to be mitigated.

Mitigation measures to reduce emissions can be applied on-site or off-site. Where this is not practical or desirable, pollutant off-setting will be applied. The level of mitigation required associated with the operation phase of the proposed development is calculated using Defra's Damage Cost Approach.

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. Table 1 and 2 summarise the aspects of air quality and planning requirements for the proposed development.

The total level of mitigation required to the proposed development for traffic emissions is £61,150. Once all deductions were applied, the remaining value of mitigation due is £55,035. Flat rate deductions applied are as follow: Travel Plan (10%), Green Sustainable Measures (0%), contribution to long term LBH strategic long-term strategies (e.g. multimodal shift) (0%), totalling a reduction of £6,115.

Therefore, if no further mitigation is offered by the applicant, a section 106 agreement with the LAP of £55,035 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.

In addition, Air Quality conditions are required to manage operation and construction emissions as

required by the Mayor of London.

BIODIVERSITY OFFICER (06-02-23): The site is of little biodiversity value and although next to a Metropolitan Site of Importance for Nature Conservation, the impacts are minimal. The proposed addition of a green roof is supported and should be specifically identified as a positive of the scheme. Consequently, it would be inappropriate for a developer to seek to remove this element of the design at a later date.

CONTAMINATED LAND OFFICER (15-10-22): I have reviewed a copy of the following report submitted in support of the application. The report represents a detailed phase 1 study which includes an initial Conceptual site Model (CSM) and Preliminary Risk Assessment (PRA).

The CSM outlines some previous developments, at or near to the site, as contaminative uses and the PRA classifies the identified plausible pollutant linkages as Moderate / Low risks to Human Health.

It is considered probable that made ground is present at the site, therefore the report recommends suitable exploratory ground investigations to be conducted at the site.

Notwithstanding the acceptable recommendations for further work which should be implemented accordingly, as outlined in section 7.3 of the submitted phase 1 report, I further recommend two conditions relating to intrusive ground investigations and imported materials, alongside a proposed asbestos informative, which should be applied if planning permission is granted.

ENERGY OFFICER (06-02-23): The energy assessment provides an insufficient baseline on which to determine the starting point for assessing reductions. The baseline indicates that the proposals would have a carbon footprint of just 4tCO₂ per annum. For context, this is a third of the annual average tCO₂ of one person in the UK.

However, the test at this stage of the planning process is to understand whether any concerns could reasonably be resolved through the use of a planning condition. Given the type of development, B8 use with a reduced carbon footprint (not necessarily as low as presented) and available roof space for PVs, then the proposals could reasonably be expected to achieve the required zero carbon standard, subject to a condition.

FLOOD AND DRAINAGE OFFICER (28-10-22): This application has not sufficiently demonstrated the use of the London Plan's drainage hierarchy and is proposing the following key items:

- Type of development: Partial demolition and extension to existing building to provide additional self-storage floorspace with associated new car and cycle parking, refuse storage, landscaping, and other associated works ancillary to the development.
- Flood risk: No surface water, tidal or groundwater flood risk to the site (Flood Zone 1).
- Types of conveyance / attenuation features: Underground attenuation tank and green roof.
- Runoff rate restriction (l/s): 15.2 l/s for the 1 in 100 yr event which does not achieve a restriction to greenfield rates.
- Runoff attenuation volume (m³): 48
- Maintenance plan: Maintenance to be undertaken by a private maintenance company with tasks and frequencies outlined for the underground cellular systems and other drainage items. No maintenance tasks have been outlined with frequencies for the green roof.

We object to the application for the following reasons:

- The application does not comply with the London Plan Policy SI 13.
- The drainage drawing does not include all of the SuDS features.

- The proposed run-off rates are not the greenfield rates. The hydro-brake device which is proposed on the drainage figure has not been included in the calculations.
- Greenfield, existing and proposed run-off volume amounts have not been provided, which does not comply with S5 and S6 of the Defra Non-Statutory Technical Standards for Sustainable Drainage Systems.
- Flooding is predicted on site for the 1 in 30 year event which does not comply with S7 of the Defra Non-Statutory Technical Standards for Sustainable Drainage Systems. The location of the flooding in the 1 in 100 year event has not been shown.
- The maintenance schedule does not include the proposed green roof or provide the maintenance owner.

To address the above, please can the applicant submit information which:

- It should be clarified why discharge to a watercourse has been discounted, as the site is adjacent to the Grand Union Canal.
- The proposed SuDS features should be marked on the drainage drawing.
- The proposed runoff rate should be reduced so it is as close to the greenfield runoff rate as possible and it should be confirmed how this restriction will be achieved.
- The greenfield, existing and proposed runoff volumes should be provided. The proposed attenuation volume of each feature should be clarified and these should be incorporated into the MicroDrainage calculations.
- The calculations should be amended so there is no flooding in the 1 in 30 year event. The location and extent of the flooding for the 1 in 100 year event should be marked on a drawing. The whole site area has not been included within the calculations. Exceedance flow routes should be marked on the drawing.
- Updating of the maintenance plan to include the green roof and the maintenance owner.

FLOOD AND DRAINAGE OFFICER (12-12-22): This application has changed from the previous application submitted in the following way(s):

- Type of development: N/A
- Types of conveyance / attenuation features: No change in the features proposed but the drainage diagram was updated to include all proposed features.
- Runoff rate restriction (l/s): N/A
- Runoff rate restriction per hectare (l/s/ha): N/A
- Runoff attenuation volume (m3): The greenfield, existing and proposed runoff volumes have been provided.
- Maintenance plan: The maintenance plan has been updated to include the green roof and a maintenance owner has been named.
- Any other previously identified outstanding matters: A justification has been provided for why discharge to the Grand Union Canal has been discounted. Exceedance flow routes have been drawn on a diagram.

We object to the application for the following reasons:

- The proposed runoff rates are not as close as possible to the greenfield rate nor have they been restricted from the existing runoff rates. This does not comply with London Plan Policy SI 13.
- Flooding is predicted on site for the 1 in 30 yr event which does not comply with S7 of the Defra Non-Statutory Technical Standards for Sustainable Drainage Systems. The location of the flooding in the 1 in 100-year event has not been shown on a diagram.

To address the above, please can the applicant submit information which shows:

- The proposed runoff rate should be reduced so it is as close to the greenfield runoff rate as

possible.

- The proposed attenuation volume of each feature should be clarified, and these should be incorporated into the MicroDrainage calculations.
- The calculations should be amended so there is no flooding in the 1 in 30-year event. The location and extent of the flooding for the 1 in 100-year event should be marked on a drawing. The whole site area should be included within the calculations.

HIGHWAYS OFFICER (17-10-22): There are no highways comments in regard to this proposal.

LAMBERT SMITH HAMPTON (16-11-22): With regards to daylight testing, all windows and rooms pass.

All surrounding windows pass sunlight testing.

All amenity areas at the rear along Delamere Road also meets the target value for overshadowing.

NOISE OFFICER (01-11-22): Sufficient information has been provided by the Applicant to make a recommendation with respect to noise, including a noise impact assessment report. It is recommended that no objection is made on noise grounds subject to the inclusion of a suitable condition which should be met based on the design information provided and considering measurement and prediction uncertainty.

TREE OFFICER (14-12-22): Half of the site is situated within TPO 615 which protects One Willow to the South East of the site behind the security fence. I have no tree concerns about this application and as long as the proposed landscape plan is followed it should increase the tree cover in this area

WASTE STRATEGY OFFICER (31-10-22): Please ensure there is no more than 10 meters pull distance from the bin store to the location where the collection vehicle can safely stop for collection. The London borough of Hillingdon do not collect waste separately and also do not collect from wheelie bins therefore a private contractor may be required to collect in this location.

7. MAIN PLANNING ISSUES

7.01 The principle of the development

The principles of sustainable development are set out in the National Planning Policy Framework (NPPF), and Paragraph 81 sets out that planning decision should create conditions which mean businesses can invest, expand and adapt and 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. Additionally, Paragraph 119 of the NPPF states that planning policies and decisions should promote an effective use of land whilst strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or 'brownfield' land.

Policies GG2 (Making the best use of land) and GG5 (Growing a good economy) of the London Plan reflect these objectives of the NPPF and state that to create successful sustainable mixed-use places, those involved in planning and development must enable the development of brownfield land, particularly on sites within and on the edge of town centres, as well as utilising small sites wherever possible and sites which are well connected by existing or planned public transport. Additionally, boroughs should plan for sufficient employment and industrial space in the right locations to support economic development and regeneration whilst ensuring that physical and social infrastructure is provided to support London's growth.

Specifically, Policy E4 of the London Plan (Land for industry, logistics and services to support London's economic function) requires a sufficient supply of land and premises in different parts of London to meet current and future demands for industrial and related functions to be provided and maintained, making provision for the varied operational requirements of light and general industry (use classes E(g)(iii) and B2), storage and logistics (use class B8) and other uses which would be inappropriate outside of an industrial setting. Policy E4 further states that the retention, enhancement and provision of additional industrial capacity should be particularly prioritised in locations that are accessible to the strategic road network or have potential for the transport of goods by rail or water transport and proposals which seek to provide capacity for micro, small and medium-sized enterprises should be encouraged.

Additionally, Policy E7 of the London Plan (Industrial intensification, co-location and substitution) further supports the intensification of employment uses occupying all categories of industrial land, including through the introduction of small units, multi-storey schemes and basements, whilst also seeking to make more efficient use of land through higher plot ratios having regard to operational yard space requirements, and mitigating impacts on the transport network where necessary.

At a borough level, Policy E2 of the Hillingdon Local Plan: Strategic Policies (Location of Employment Growth) sets out that the Council will accommodate 9,000 new jobs during the plan period, with most of this employment growth directed towards suitable sites in the Heathrow Opportunity Area, SILs, LSELs, LSISs, Uxbridge Town Centre and Hayes Town Centre with a particular focus around transport nodes, however Policy DME 2 of the Hillingdon Local Plan: Development Management Policies (Employment Sites Outside Designated Employment Areas) sets out that the loss of employment land, even outside of designated employment areas, will generally be resisted, unless there is no realistic prospect of land being reused for employment purposes.

In general, the provision of new industrial floorspace in appropriately designated locations, or the intensification of existing industrial uses where this can be supported by local infrastructure, is supported through the development plan. Taking the above into account, it is recognised that the intensification of the site to provide an increase in usable B8 floorspace by replacing existing low-level structures to achieve a higher plot ratio would be fully in line with the intentions of Policies E4 and E7 of the London Plan, and Policy DME2 of the Hillingdon Local Plan Part 2. Whilst it is noted that the site is also allocated for a residential-led, potentially mixed-use development (SA 36), and the proposal would contradict this allocation, it would not be reasonable to resist the continuation of an existing use which is seeking to extend and improve its capacity, which is recognised as providing indirect benefits to the wider business and residential uses locally.

On this basis, the principle of development is considered acceptable.

7.02 Density of the proposed development

Residential density is not relevant to this application.

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

In accordance with the council's statutory duties under sections 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990, it is necessary to have special regard to the desirability of preserving a listed building and its setting and to preserving or enhancing the character or appearance of a conservation area and its setting.

This requirement is borne out through the NPPF, which advises that where a proposed development would lead to substantial harm to (or total loss of significance of) a

designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss.

The NPPF further advises that where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use. Whether a proposal causes substantial harm will be a judgment for the decisionmaker, having regard to the circumstances of the case, relevant local policies and the consideration of the NPPF. Public benefits to offset this harm may follow from many developments and could be anything that delivers economic, social or environmental objectives, and public benefits should flow from the proposed development so that they are of a nature or scale to be of benefit to the public at large and not just of private benefit.

When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation, irrespective of whether any potential harm amounts to substantial harm, total loss, or less than substantial harm to its significance. The more important the asset, the greater the weight should be. As such, any harm to, or loss of, the significance of a designated heritage asset (including from development within its setting), should require clear and convincing justification.

As such, Policy HC1 of the London Plan (Heritage conservation and growth) states that proposals affecting heritage assets and their settings, should conserve their significance by being sympathetic to the assets' significance and appreciation within their surroundings. Proposals should also identify assets of archaeological significance and use this information to avoid or minimise harm through design and appropriate mitigation. Where applicable, development should make provision for the protection of significant archaeological assets and landscapes.

In this regard, heritage 'significance' is defined as the archaeological, architectural, artistic or historic interest of a heritage asset. This may be represented in many ways, in an asset's visual attributes, such as form, materials, architectural detail, design and setting, or through historic associations between people and a place, and where relevant, the historic relationships between heritage assets.

At a borough level, Policy DMHB 1 of the Hillingdon Local Plan: Development Management Policies (Heritage Assets) states that proposals are expected to avoid harm to the historic environment, and proposals which result in harm will only be allowed if it brings an asset back into viable use, it would provide public benefit that would outweigh the harm or loss, and the proposal would relate appropriately in terms of siting, style, scale, massing, height, design and materials.

Whilst not affecting any heritage assets within the London Borough of Hillingdon, the eastern bank of the Canal falls within the London Borough of Ealing's Canalside Conservation Area, which follows the course of the Grand Union Canal along the southern boundary of Ealing to Wolf Fields, and extends north eastwards to follow the course of the canal. As to be expected, the Canalside Conservation Area has a varied character along its length, and the Character Appraisal prepared by the London Borough of Ealing describes this section of the canal as having a mixed character of suburban residential development and light industry (on the Hillingdon side). Importantly, the appraisal identifies a number of key views in the area, none of which include the site, reflecting its less sensitive nature as

part of the wider setting of the Conservation Area.

Nonetheless, as a result of its size, additional bulk and use of external materials, the proposed extension would have a very minor negative impact on the Conservation Area's setting, reinforcing the industrial use of the site and creating a larger blank facade, which would turn its back on the Canal. This minor impact on the setting of the Conservation Area would be less than substantial, and would not affect its significance, and it is further recognised that industrial units of varying designs and types are relatively commonplace along different sections of the Grand Union Canal, both historically and at present, and therefore the presence of an industrial unit adjacent to the Canalside Conservation Area is not objectionable in and of itself.

7.04 Airport safeguarding

Policy DMAV 1 of the Hillingdon Local Plan: Development Management Policies (Safe Operation of Airports) sets out that the council will support the continued safe operation of Heathrow Airport and RAF Northolt and will consult with the relevant airport operator on proposals in the relevant safeguarded areas. In this instance, the requirement to consult on airport safeguarding is for any proposal exceeding 15 metres, 45 metres and 45.7 metres for Heathrow, NATS, and the Ministry of Defence (RAF Northolt) respectively.

The proposal would not increase the height of the pre-existing building, however for completeness, as the building is over 15 metres tall, both Heathrow and NATS have been consulted, and have confirmed they have no objection to the proposal on safeguarding grounds.

7.05 Impact on the green belt

The proposal would not have an impact on the Green Belt or Metropolitan Open Land.

7.07 Impact on the character & appearance of the area

Policy D3 of the London Plan states that all development must make the best use of land by following a design-led approach that optimises the capacity of sites. Optimising site capacity means ensuring that development is of the most appropriate form and land use for the site whilst the design-led approach requires consideration of design options to determine the most appropriate form of development that responds to a site's context and capacity for growth, including existing and planned supporting infrastructure capacity. Higher density developments should generally be promoted in locations that are well connected to jobs, services, infrastructure and amenities by public transport, walking and cycling, in accordance with Policy D2 of the London Plan. In areas of comparatively low densities, incremental densification should be actively encouraged to achieve a change in densities in the most appropriate way.

In addition, Policy BE1 of the Hillingdon Local Plan: Strategic Policies (Built Environment) sets out that, in order to create successful and sustainable neighbourhoods, new development (including new buildings, alterations and extensions) should be of a high quality design which enhances the local distinctiveness of the area and contributes to a sense of place. As such. Proposals should be designed to be appropriate to the context of Hillingdon's buildings, townscapes, landscapes and views, and make a positive contribution to the local area in terms of layout, form, scale and materials.

The existing site comprises of a large warehouse-style building occupying the northern half with a flat roof (excluding the faux corner gables) and finished in beige and red metallic panelling, and with single-storey lock-ups arranged in rows around the remainder of the site. As a result of the generally low-level housing surrounding the site, the main building is relatively prominent in views facing north from Uxbridge Road and south on Tollgate Drive

around the canal, and is glimpsed between properties on Delamere Road to the west, although the main building's prominence from Uxbridge Road is partially reduced as a result of its lower land level and siting within the northern half of the plot.

The proposed extension would significantly increase the bulk of the main building, extending 28.5 metres further south at a height of 16.3 metres, matching the width and parapet height of the existing building, whilst the faux gables would be removed from the roof. The proposed extension would replace some of the existing single-storey lock-ups, however one row would remain to the south of the proposed building whilst the lock-ups to the west of the building would also stay as existing. However, the site is relatively large and can accommodate the increase in size relatively comfortably without appearing overbearing or cramped in its plot.

It is further noted that because the site sits at a lower level than Uxbridge as it rises to cross the canal to the south, the proposed building would appear smaller from this direction, which is the main public view of the site, whilst views from the north on Tollgate Drive would be largely unaffected because of the location of the extension and existing vegetation. When approaching the site from the west along Uxbridge Road, the existing building is not visible from the public realm until the junction with Delamare Road, and only marginal glimpses can be seen through three branches and between buildings, and approaching the site from the east along Uxbridge Road, the building cannot be seen unless on the canal bridge itself, because of the tight-knit pattern of development and existing coverage provided by trees. The proposed extension is unlikely to change these views, as no change in height is proposed, and the main building would still be set substantially far back into the plot, away from Uxbridge Road and thereby reducing its visibility.

The proposed plans show a revised materiality across the whole building, with a more muted silver, white and red facade treatment, in keeping with the Shurgard branding. This is considered an improvement and is likely to age better than the existing mustard and beige external panels and altogether the proposed materials are accepted.

Regard is also had to the need to optimise a site's potential in accordance with Policy GG2 of the London Plan, including the intensification of industrial sites through higher plot ratios in accordance with Policies E4 and E7 of the London Plan, which the proposal achieves, and taken together with the intentions of Policy D3 of the London Plan and Policy BE1 of the Hillingdon Local Plan Part 1, it is considered that the proposed is acceptable in terms of its overall scale and appearance and would have an acceptable impact on the character and appearance of the area.

7.08 Impact on neighbours

Policy DMHB 11 of the Hillingdon Local Plan: Development Management Policies and Policy BE1 of the Hillingdon Local Plan: Strategic Policies both seek to ensure that new development does not adversely impact on the residential amenity of neighbouring properties.

Furthermore, the Mayor's Housing SPG sets out that proposals should limit the harm to neighbouring properties, whilst recognising that to comply with policies seeking the optimal use of land, some development proposals may be allowed even where harm has been identified.

IMPACTS ON NATURAL LIGHT

When assessing impacts related to the loss of natural light, the Mayor's Housing SPG advises that avoiding harm to habitable rooms is the priority, which are usually defined as any room used or intended to be used for sleeping, cooking, living or eating purposes. Enclosed spaces such as bathrooms or toilet facilities, service rooms, corridors, laundries, hallways, utility rooms or similar spaces are excluded from this definition of habitable rooms.

A standardised method of assessment for calculating the level of impact to neighbouring buildings is prescribed within the BRE's guide to good practice, titled 'Site Layout Planning for Daylight and Sunlight' (June 2022). This guidance document discusses various methods of assessing a proposals impact on access to natural light, and sets out a number of thresholds which, if exceeded, would probably have a noticeable impact on natural light to neighbouring properties.

Broadly, BRE guidance recommends that an assessment considers the likely significant effects to daylight for neighbouring buildings in terms of Vertical Sky Component (VSC) and Daylight Distribution (DD) (often referred to as No-Sky Line). An assessment of sunlight should also be undertaken in relation to neighbouring buildings in terms of Average Probable Sunlight Hours (APSH) alongside an assessment of overshadowing.

VSC is a measure of the amount of sky visible from the midpoint of a window, where the area of visible sky is expressed as a percentage of an unobstructed hemisphere of sky. This percentage therefore represents the amount of daylight available for that particular window, and BRE guidance recommends that a VSC of 27% should be maintained, however, this is not always achievable in dense urban environments. In addition to the amount of sky visible, Relative VSC (rVSC) is a measure of the reduction of visible daylight, and BRE guidance recommends that a development proposal would have a negligible impact if the reduction in rVSC is between 0 - 20%, would have minor significance if the reduction is between 21 - 30%, would have moderate significance if the reduction is between 31 - 40% and would have substantial significance if the reduction is above 40%.

Where a proposal would lead to harm of any significance, a No-Sky Line assessment should be carried out. This assessment divides those areas of the working plane (850mm above floor level) which can receive direct skylight, from those which cannot. A room may be adversely affected if, following development, the area of the working plane that can receive direct skylight is less than 0.8 times its former value.

A Daylight and Sunlight Report (4 July 2022) has been submitted in support of the application, and independently reviewed by Lambert Smith Hampton on behalf of the council. The submitted Daylight and Sunlight Report outlines that the impacts to natural light have been tested for the properties on the eastern side of Delamere Road; Nos. 39-63 (odds) and the Army Reserve Centre on the opposite side of the canal. The review carried out by Lambert Smith Hampton agreed with the findings of the report and concludes that the proposed extension would not have a significant impact on natural light for any nearby property, with all windows tested for VSC meeting the target values, alongside overshadowing assessments for the rear gardens.

On this basis, the impacts to neighbours in respect of daylight and sunlight impacts would be negligible.

IMPACTS ON PRIVACY

The supporting text to Policy DMHB 11 sets out that sufficient privacy for existing residents will be protected by resisting proposals which would introduce an unreasonable level of overlooking between habitable rooms of adjacent residential properties, schools or onto private open spaces. To maintain existing levels of privacy, a minimum separation distance of 21 metres between facing habitable room windows of habitable rooms will normally be required, and in some locations, for example where there is a significant difference in ground levels between dwellings, a greater separation distance may be necessary. Moreover, new development proposals must carefully consider their layout and massing in order to ensure development does not result in a significantly increased sense of enclosure or loss of outlook.

As a commercial development, the proposal does not include any windows serving habitable rooms, and having regard to the specific end user as a B8 storage facility where the users would be transient in their use of the building, there would no increase in overlooking as a result of the proposed extension.

7.09 Living conditions for future occupiers

Not relevant to this application.

7.10 Traffic impact, Car/cycle parking, pedestrian safety

TRAFFIC IMPACTS

Policy T1 of the London Plan (Strategic approach to transport) sets a strategic target of 80% of all trips in London to be made by foot, bicycle or public transport by 2041, and ensure that any impacts on London's transport networks and supporting infrastructure are mitigated. To achieve this shift across London, it is expected that outer London boroughs will need to ensure that 75% of trips be made by foot, bicycle or public transport by 2041, compared to 60% (in 2021).

In addition, Policy T4 of the London Plan (Assessing and mitigating transport impacts) states that the proposals should integrate with the current and planned transport network in terms of access, capacity and connectivity, which should be demonstrated through the submission of a Transport Statement or Transport Assessment, to ensure that impacts on the capacity of the transport network (including impacts on pedestrians and the cycle network), at the local, network-wide and strategic level, are fully assessed. This includes the cumulative impacts of development on public transport and the road network capacity including walking and cycling. Where appropriate, mitigation, either through direct provision or through financial contributions, will be required to address adverse transport impacts that have been identified, which could include improvements to public transport, walking and cycling facilities, alongside other necessary highways improvements.

In support of the application, a Transport Assessment (January 2023) has been submitted, which sets out that the existing site generates 2 two-way vehicular movements in the morning peak and 10 two-way vehicular movements in the afternoon peak, based on survey data carried out over a week to establish the baseline (existing) conditions. Despite the fairly significant uplift in floorspace, the proposal is unlikely to lead to a significant number of vehicle movements with a predicted morning peak of 2 two-way trips, and an afternoon peak of 14 two-way trips. This slight increase in vehicle trips (+4 two-way trips in the afternoon) is considered to be negligible in the context of Uxbridge Road and would not have a significant impact on the local traffic or congestion, or lead to a significant increase in vehicle movements in the area. On this basis, traffic impacts associated with the proposal are considered to be low.

VEHICLE PARKING

Policy T6 of the London Plan (Car Parking) states that car parking should be restricted in line with levels of existing and future public transport accessibility and connectivity. Car-free development should be the starting point for all development proposals in places that are (or are planned to be) well connected by public transport, with developments elsewhere designed to provide the minimum necessary parking ('car-lite'). Car-free developments have no general parking but should still provide disabled persons parking.

The maximum car parking standards, disabled persons parking, and the provision of electric or other Ultra-Low Emission vehicles are set out in Policy T6.1 to Policy T6.5, however it should be noted that for all development types in PTAL 5 or 6, or within the Central Activities Zone, proposals are expected to be car-free.

Policy T6.5 (Non-residential disabled persons parking) also sets out that all non-residential elements should provide access to at least one on or off-street disabled persons parking bay. Disabled persons parking bays should be located on firm and level ground, as close as possible to the building entrance or facility they are associated with, and designated bays should be marked up as disabled persons parking bays from the outset.

Policy T6 further states that adequate provision should be made for efficient deliveries and servicing and emergency access. A Parking Design and Management Plan should be submitted alongside all applications which include car parking provision, indicating how the car parking will be designed and managed, with reference to Transport for London guidance on parking management and parking design. Where sites are redeveloped, parking provision should reflect the current approach and not be re-provided at previous levels where this exceeds the standards set out in this policy.

The parking standards outlined Table 1, Appendix C of the Hillingdon Local Plan: Development Management Policies must be complied with as required by Policy DMT 6 of the Hillingdon Local Plan: Development Management Policies (Vehicle Parking). These parking standards facilitate sustainable development and address issues relating to congestion and amenity. Variations to the approved standards may be acceptable if this would not lead to an adverse impact to on-street parking provision, congestion or harm local amenity. Alternatively, a higher or lower provision may be justified through the submission of a transport appraisal and travel plan. The application site has a Public Transport Accessibility Level (PTAL) of 2, on a scale of 0 (worst) to 6b (best), indicating that the proposed development would result in some reliance on the private car for trips to and from the site, although there is a bus stop immediately to the south of the site on Uxbridge Road.

Table 1 of Appendix C to the Hillingdon Local Plan: Development Management Policies sets out that for B use classes (excluding offices), 2 car parking spaces, plus an additional space for every 50-100 sqm of floorspace, should be provided on-site. These local standards should be considered alongside Policy T6.2 of the London Plan (Office Parking), which sets out that car parking provision for B2 (general industrial) and B8 (storage or distribution) employment uses should have regard to the parking standards for offices and take account of the significantly lower employment density in such developments. Policy T6.2 further sets out that a degree of flexibility may also be applied to reflect different trip-generating characteristics, and that provision for electric or other Ultra-Low Emission vehicles should be made. The London Plan standards for offices are up to 1 space for every 100 sqm within Outer London. However, comments from TfL indicate that the site falls within the Heathrow Opportunity Area, where more restrictive parking standards apply, and the maximum provision allowed would be 20 spaces, based on a floorspace of 11, 770

sqm. Whilst designated in 2008, the boundary of the Heathrow Opportunity Area is yet to be defined but was indicatively shown to extend from the south of the borough up to Uxbridge Road, adjacent to the borough boundary with Ealing and the site is therefore either just within or on the boundary of this Opportunity Area.

The updated Transport Statement (February 2023) outlines that based on existing surveys undertaken whilst the site was operating at 92% capacity, the maximum parking demand at any one time was 11 vehicles, which was recorded between 13:30 to 14:15 on a Sunday, whilst the maximum number of vehicles recorded on site during the busiest weekday was 7. Based on an uplift of 3980 sqm, and assuming the site operates at 100% capacity following competition, the maximum parking demand would expect to peak at 17 vehicles on a Sunday and 10 on weekdays.

The proposed number of car parking spaces has been reduced as part of this application, in accordance with comments received from TfL, with 39 initially proposed and 20 currently proposed. Based on the submitted information, which demonstrated a peak demand of 17 vehicles, it is clear that the provision of 39 spaces would have been needlessly high and would have resulted in large parts of the site given over to unnecessary parking, whereas the provision of 20 spaces is both in line with the London Plan standards and is more appropriate given the predicted level of use of the site.

On this basis, the proposed number and layout of parking spaces is considered to be acceptable and would allow for parking demands to be accommodated on site without leading to overspill parking on the surrounding local roads, and without overproviding unnecessary off-street parking spaces which would encourage trips by private car.

CYCLE PARKING

Policy T5 of the London Plan (Cycling) sets out that proposals should help remove barriers to cycling and create a healthy environment in which people choose to cycle. This will be achieved through supporting the delivery of a London-wide network of cycle routes, with new routes and improved infrastructure securing the provision of appropriate levels of cycle parking which should be fit for purpose, secure and well-located.

Developments should provide cycle parking at least in accordance with the minimum standards, ensuring that a minimum of two short-stay and two long-stay cycle parking spaces are provided where the application of the minimum standards would result in a lower provision. Cycle parking should be designed and laid out in accordance with the guidance contained in the London Cycling Design Standards and proposals should demonstrate how cycle parking facilities will cater for larger cycles, including adapted cycles for disabled people.

For B8 uses, the London Plan requires 1 long-stay for every 500 sqm of floorspace and 1 short-stay cycle space for every 1000 sqm of floorspace. As such, based on a maximum floor area of 11, 770 sqm, 24 long-stay spaces ($11,770 / 500 = 23.5$) and 12 short-stay spaces ($11,770 / 1000 = 11.8$) are required to meet the London Plan standards. The submitted Transport Statement (February 2023) correctly identifies the required level of provision, and the plans and supporting information have been amended to show 24 long-stay spaces and 12 short-stay spaces. The provision of cargo-bike spaces within the cycle store is further welcomed and would help to encourage trips to and from the site other than by private car.

In any event, a condition requiring that the proposed cycle spaces meet the London Cycle Design Standards (LCDS) will also be included, including having the appropriate spacing between stands, appropriate shelter and ensuring it is safe, secure, and adequately lit.

On the basis that the provision of cycle parking can be adequately addressed through a condition, it is considered that the proposal would be compliant with Policy T5 of the London Plan.

DELIVERIES AND SERVICING

Policy T7 of the London Plan (Deliveries, servicing and construction) sets out that proposals should facilitate safe, clean, and efficient deliveries and servicing, and include provision of adequate space for servicing and storage, whilst deliveries should be off-street, with on-street loading bays used only where this is not possible.

It is noted that delivery and servicing will take place on site, which is in line with Policy T7 of the London Plan, and swept path analysis has also been provided showing that a refuse vehicle can enter and exit the site in a forward gear.

A full Delivery and Servicing Plan would be secured by way of condition, alongside a construction management and logistics plans to control elements of the build process, however it is considered that the site can accommodate its servicing needs on-site without affecting the free flow of traffic on nearby roads.

HEALTHY STREETS

Policy T2 of the London Plan (Healthy Streets) requires proposal to demonstrate how they will deliver improvements that support the 10 Healthy Streets Indicators in line with Transport for London guidance to reduce the dominance of vehicles on London's streets, whether stationary or moving, and be permeable for pedestrians and cyclists by connecting to local walking and cycling networks, as well as public transport.

At present, there is no clear separation of vehicle and pedestrian zones within the site, with road markings indicating the direction of vehicle traffic only. The proposed development would increase the intensity of use of the site, with more vehicles and more users of the facility in general, and on this basis, it is considered appropriate to secure further details of delineated spaces for pedestrians and vehicles by condition, which shall identify the key routes for pedestrians within the site, which will likely be from the site entrance to the reception, cycle stores and entrance to the buildings.

ACCESS

Access arrangements would remain unchanged with customer and staff access from Uxbridge Road to the south, with no vehicular or pedestrian access (apart from emergency access) available via Tollgate Drive to the north.

7.11 Urban design, access and security

Policy D11 of the London Plan (Safety, security and resilience to emergency) sets out that boroughs should work with the Metropolitan Police Service's 'Design Out Crime' Officers to identify the community safety needs and necessary infrastructure to maintain a safe and secure environment and reduce the fear of crime. Proposals should seek to maximise building resilience and minimise potential physical risks, and should include measures to design out crime that deter terrorism, assist in the detection of terrorist activity and help

mitigate its effects. These measures should be considered at the start of the design process to ensure they are inclusive and aesthetically integrated into the development and the wider area. Measures to design out crime, including counter terrorism measures, should be integral to proposals, taking into account the principles contained in guidance such as the Secured by Design Scheme published by the Police.

Policy BE1 of the Hillingdon Local Plan: Strategic Policies (Built Environment) encourages the creation of safe and secure environments that reduce crime and fear of crime, anti-social behaviour and risks from fire and arson, having regard to Secure by Design standards.

As such, a condition requiring the proposed development to achieve secured by design accreditation in consultation with the Metropolitan Police, is included within the decision notice, to ensure the proposal meets the requirements of Policy D11 of the London Plan and Policy BE1 of the Hillingdon Local Plan. On this basis, the proposal is considered acceptable in this regard.

7.12 Disabled access

Policy D5 of the London Plan (Inclusive design) sets out that proposals should achieve the highest standards of accessible and inclusive design by providing high quality people focused spaces that are designed to facilitate social interaction and inclusion, be convenient and welcoming with no disabling barriers, providing independent access without additional undue effort, separation or special treatment, and be able to be entered, used and exited safely, easily and with dignity for all. In all developments where lifts are installed, as a minimum at least one lift per core (or more subject to capacity assessments) should be a suitably sized fire evacuation lift suitable to be used to evacuate people who require level access from the building, and proposals should ensure they are compliant with Policy D12 of the Plan (Fire safety) and place fire resilience central to the proposal's design.

The proposed scheme would ensure there is level access from the dedicated disabled persons

parking space to each entrance door, at an appropriate gradient. All floors within the proposed building would be accessible by lifts (three lifts), with level access on each individual floor, and a condition is included to ensure that at least one of these will be a suitably sized fire evacuation lift.

On this basis, the proposed site-wide accessibility arrangements are considered to be acceptable.

7.13 Provision of affordable & special needs housing

Not relevant to this application.

7.14 Trees, landscaping and Ecology

Policy G5 of the London Plan (Urban Greening) requires major 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 and trees. Policy G6 of the London Plan (Biodiversity and access to nature) further sets out that Sites of Importance for Nature Conservation (SINCs) should be protected and aim to secure net biodiversity gain from major developments.

Additionally, Policy G7 of the London Plan (Trees and Woodlands) seeks to protect and maintain London's urban forest and woodlands, whilst new trees should be planted in appropriate locations to increase the extent of London under the canopy of trees. In practice, this means that wherever possible, existing trees of value should be retained and

if permission is granted that necessitates the removal of trees, there should be adequate replacement based on the existing value of the trees to be removed.

At a borough level, Policy EM7 of the Hillingdon Local Plan Part 1 (Biodiversity and Geological Conservation) sets out that Hillingdon's biodiversity will be preserved and enhanced, resisting adverse impacts particularly to SINC's and the provision of biodiversity improvements from all feasible developments, including green roofs and walls where feasible. In addition, Policy DMEI 7 of the Hillingdon Local Plan Part 2 (Biodiversity Protection and Enhancement) requires the design and layout of new development to retain and enhance any existing features of biodiversity or geological value within the site, and where loss of a significant existing feature of biodiversity is unavoidable, replacement features of equivalent biodiversity value should be provided on-site.

Policy DMHB 14 of the Hillingdon Local Plan Part 2 (Trees and Landscaping) also sets out that all developments will be expected to retain or enhance biodiversity through the protection of existing landscaping, trees and other natural features of merit, and proposals are required to provide a scheme of hard and soft landscaping to demonstrate this. Moreover, the council will seek to protect existing tree and landscape features and enhance open spaces with new areas of vegetation cover (including the linking of existing fragmented areas) for the benefit of wildlife and a healthier lifestyle.

As the proposal is an extension to an existing B8 use, the scheme does not need to demonstrate a Urban Greening Factor (UGF), however in accordance with Policy EM7 and DMEI 7 of the Hillingdon Local Plan, the proposal should demonstrate how it achieves a biodiversity net gain.

At present, the site is dominated by hardstanding and provides very little ecological benefit, despite its proximity to the Grand Union Canal, which is a SINC. The proposal development provides an opportunity to enhance landscape features around the periphery of the site, retaining the trees protected by a Tree Preservation Order in the south-east corner, in addition to the introduction of a biodiverse roof above the extension. These measures combine to result in a fairly significant uplift in ecological value compared to existing conditions, with an uplift of 66% and 100% for broad and hedgerow habitats respectively.

Full details of the landscape scheme and other ecological measures would be secured by way of condition, including impacts of artificial lighting on the canal, and the ongoing management and maintenance responsibilities.

On this basis, it is considered that the proposal complies with the intentions of Policies G5 and G7 of the London Plan and with Policies EM7 and DMEI 7 of the Hillingdon Local Plan in protecting and enhancing ecological assets, and is therefore acceptable in this regard.

7.15 Sustainable waste management

Policy EM11 of the Hillingdon Local Plan: Strategic Policies (Sustainable Waste Management) states that the council will aim to reduce the amount of waste produced in the borough. To achieve this, the council will require all new developments to address waste management at all stages of a development's life from design and construction through to the end use and activity on site.

The Design and Access Statement (Rev. B) outlines that the waste collection strategy will remain as existing, with a collection vehicle entering the site from Uxbridge Road, collecting waste and recycling from the rear of the reception building at the southern end of the site, and circling the reception building in an anti-clockwise direction to ensure that the vehicle

does not need to perform a three-point-turn to exist the site in forward gear. In any event, as a purely commercial development the council would not collect refuse or recycling from the site, which would be managed by a private contractor, and the proposed layout and strategy appear to allow commercial collections in a convenient manner fully within the site so as not to impact traffic on Uxbridge Road.

On this basis, the proposed waste management strategy is considered acceptable, and the proposal is considered to comply with Policy EM11 of the Hillingdon Local Plan.

7.16 Renewable energy / Sustainability

Policy SI 2 of the London Plan (Minimising greenhouse gas emissions) states that major development should be net zero-carbon. This means reducing greenhouse gas emissions in operation and minimising both annual and peak energy demand in accordance with the following energy hierarchy, placing an additional requirement to monitor emissions beyond implementation to determine the effectiveness of the mitigation:

1. be lean: use less energy and manage demand during operation
2. be clean: exploit local energy resources (such as secondary heat) and supply energy efficiently and cleanly
3. be green: maximise opportunities for renewable energy by producing, storing and using renewable energy on-site
4. be seen: monitor, verify and report on energy performance.

Policy SI 2 sets targets for carbon dioxide emission reductions in buildings. These are expressed as minimum improvements over the Target Emission Rate (TER) outlined in national building regulations. The current target for residential and non-residential buildings is zero carbon beyond the current Building Regulations Part L 2013.

Major development proposals should include a detailed energy strategy to demonstrate how the zero-carbon target will be met within the framework of the energy hierarchy and how a minimum on-site reduction of at least 35% beyond Building Regulations will be achieved. Residential development should achieve 10%, and non-residential development should achieve 15% through energy efficiency measures alone. Where it is clearly demonstrated that the zero-carbon target cannot be fully achieved on-site, any shortfall should be provided, in agreement with the borough, either through a cash in lieu contribution to the borough's carbon offset fund or off-site, provided that an alternative proposal is identified and delivery is certain.

Moreover, major development proposals should calculate and minimise carbon emissions from any other part of the development, including plant or equipment, that are not covered by Building Regulations (i.e. unregulated emissions).

The submitted Energy Statement (July 2022) provides an insufficient baseline on which to determine the starting point for assessing reductions as it indicates that the proposals would have a carbon footprint of just 4tCO₂ per year, which is demonstrably false and far too low.

However, given the type of development, the proposals could reasonably be expected to achieve the required zero carbon standard, through, for example PV panels and/or air source heat pumps, and these details can be secured by way of condition. The proposal should seek to be zero-carbon, and any shortfall can be provided as a financial obligation, calculated at the point of commencement based on an updated Energy Strategy. On this basis, the proposal can achieve policy compliance through the use of a condition and

therefore this would not warrant a reason for refusal in and of itself.

7.17 Flooding or Drainage Issues

Policy SI 12 of the London Plan (Flood risk management) sets out that flood risk across London should be managed in a sustainable and cost-effective way in collaboration with the Environment Agency, the Lead Local Flood Authorities and developers where relevant. Proposals should further ensure that flood risk is minimised and mitigated, and that residual risk is addressed. This should include, where possible, making space for water and aiming for development to be set back from the banks of watercourses. Development proposals adjacent to flood defences will be required to protect the integrity of flood defences and allow access for future maintenance and upgrading.

In addition, Policy SI 13 of the London Plan (Sustainable drainage) sets out that proposal should aim to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible.

Policy EM6 of the Hillingdon Local Plan: Strategic Policies (Flood Risk Management) encourages development to be sited away from the areas of highest flood risk (Flood Zones 2 and 3), and all development will be required to use sustainable urban drainage systems (SUDS). The application site is in Flood Zone 1 and is at therefore at the lowest risk of flooding.

In support of the application, a Drainage Strategy (13-07-22), an updated Drainage Strategy (20-01-23), and a Technical Design Note (26-01-23) have been submitted which set out the approach to sustainable drainage and water management. These are sufficient to provide a baseline understanding of the proposed drainage strategy and some further details to be submitted can be secured by way of condition.

7.18 Noise or Air Quality Issues

NOISE

Policy D13 of the London Plan (Agent of Change) sets out that proposals should mitigate and minimise 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 existing noise-generating uses, improving and enhancing the acoustic environment and promoting appropriate soundscapes. Proposals should first seek to separate new noise-sensitive development from major noise sources through the use of distance, screening, layout, orientation, uses and materials, in preference to sole reliance on sound insulation. 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 applying good acoustic design principles, promoting new technologies and improved practices to reduce noise at source, and on the transmission path from source to receiver.

Additionally, Policy D14 of the London Plan (Noise) states that new noise and other nuisance-generating development proposed close to residential and other noise-sensitive uses should put in place measures to mitigate and manage any noise impacts for neighbouring residents and businesses. Development proposals should manage noise and other potential nuisances by ensuring good design mitigates and minimises existing and potential nuisances with necessary and appropriate provisions including ongoing and future management responsibilities, and proposals should seek to separate new noise-sensitive development from existing noise-generating businesses and uses through distance, screening, internal layout, sound-proofing, insulation and other acoustic design measures. It is generally accepted that noise emanating from residential properties is lower than

commercial premises, and industrial uses are associated with the highest noise profile.

A Noise Impact Assessment (July 2022) has been submitted which assesses the impact of vehicles accessing the site in the context of surrounding road networks, as well as the impacts associated with proposed fixed plant and equipment serving the development. The Noise Impact Assessment outlines that the main source of noise in the area is caused by traffic on Uxbridge Road to the south, and that the nearest residential properties are on Delamere Road to the west. The mechanical plant on site would operate throughout the day and night-time periods as required, and a generator would typically operate daytime hours during testing, and the Noise Impact Assessment outlines that plant and equipment should be selected and mitigated to ensure noise levels are not greater than 5dB below the background noise level at the nearest residential receptors.

Comments from the Council's Noise Officer set out that sufficient information has been provided and that no objection should be made on noise grounds subject to the inclusion of a suitable condition which should accord with the design information provided in respect of noise attenuation and mitigation.

On this basis, the proposal is considered acceptable in respect of noise impacts and complies with Policies D13 and D14 of the London Plan.

AIR QUALITY

Policy SI 1 of the London Plan (Improving air quality) states that proposals should not lead to further deterioration of existing poor air quality or create any new areas that exceed air quality limits, or delay the date at which compliance will be achieved in areas that are currently in exceedance of legal limits, so as not to create unacceptable risk of high levels of exposure to poor air quality.

As such, as a minimum, proposals should be at least Air Quality Neutral and should use design solutions to prevent or minimise increased exposure to existing air pollution, whilst making provision to address local problems of air quality in preference to post-design or retro-fitted mitigation measures.

Major development proposals must be submitted with an Air Quality Assessment. Proposals in Air Quality Focus Areas or that are likely to be used by large numbers of people particularly vulnerable to poor air quality, such as children or older people should demonstrate that design measures have been used to minimise exposure.

Policy EM8 of the Hillingdon Local Plan: Strategic Policies (Land, Water, Air and Noise) requires all developments to not result in the deterioration of local air quality. In addition, all major developments within Air Quality Management Areas (AQMAs) should be air quality neutral whilst actively contributing to the promotion of sustainable transport measures such as vehicle charging points and the increased provision for vehicles with cleaner transport fuels.

In accordance with Policy SI 1 of the London Plan and Policy EM8 of the Hillingdon Local Plan, developments need to be neutral as minimum and positive in Air Quality Focus Areas (AQFAs), contributing to the reduction of air pollutant emissions in these sensitive locations. New developments within the London Borough of Hillingdon are expected to incorporate air quality positive design measures from the outset and suitable mitigation

measures to reduce pollution, especially in areas where the air quality is already poor, namely AQFAs.

The application site falls within the borough's AQMA, and the Ossie Garvin AQFA, and it is therefore expected that the proposal demonstrate an air quality positive approach, including measures to improve local air quality, preferably on-site but off-site or through a financial obligation (offsetting) if necessary. The extension to the building will increase the operational capacity of the site and is likely to result in more vehicle trips to and from the site, which in turn will worsen existing conditions and contribute to poor local air quality, and mitigation will therefore be required.

LBH requires new developments to incorporate air quality positive design measures from the outset and suitable mitigation measures to reduce pollution, especially in areas where the air quality is already poor (LBH Air Quality Local Action Plan 2019-2024), namely Focus Areas. Furthermore, policy DMEI 14 of the emerging London Borough of Hillingdon Local Plan (part 2), requires active contribution towards the continued improvement of air quality, especially within the Air Quality Management Area. Finally, the London Plan (March 2021) requires development to be air quality positive, especially within focus areas, actively contributing to reduce pollutant emissions to the atmosphere.

An Air Quality Assessment (July 2022) has been submitted which concludes that the proposed development would be Air Quality Neutral in terms of building emissions but would not be Air Quality neutral for transport emissions, and that this would require some form of mitigation. Notwithstanding that the development should seek to demonstrate that it is Air Quality Positive, the assessment of impacts within the Air Quality Assessment has been reviewed by the Council's Air Quality Officer and the Air Quality Assessment is considered to be robust and accurately reflects the potential impacts to air quality.

In order to comply with Policy SI 1 of the London Plan and Policy EM8 of the Hillingdon Local Plan, an Air Quality Positive approach is required, and noting the limited opportunities to reduce emissions on site, an off-site financial contribution of £55, 035 is required to offset the impacts to local air quality which would be used to fund initiatives to reduce poor air quality in the borough. This would be secured as a planning obligation within a legal agreement, in addition to conditions securing a low emission strategy and managing impacts during demolition and construction.

On this basis, the proposal is considered acceptable in respect of impacts to air quality.

7.19 Comments on Public Consultations

Letters dated 07-10-22 were sent to 36 nearby properties on Delamere Road, Tollgate Drive and Uxbridge Road, a site notice was displayed outside the site on 07-11-22, and a press notice was displayed in a local newspaper on 03-11-22.

One response was received raising the following material consideration:

- Increase in noise, especially at night

7.20 Planning obligations

Policy DF1 of the London Plan (Delivery of the Plan and Planning Obligations) requires proposals to provide infrastructure and meet the other relevant policy requirements necessary to ensure that they are sustainable and support delivery of the council's strategic objectives. In general, the London Plan sets out that priority should first be applied to securing affordable housing and necessary public transport improvements, and following this, delivering necessary health and education infrastructure, whilst recognising the

importance of securing affordable workspace, and culture and leisure facilities.

At a borough level, Policy DMCI 7 of the Hillingdon Local Plan: Development Management Policies (Planning Obligations and Community Infrastructure Levy) sets out that planning permission will only be granted for development that clearly demonstrates there will be sufficient infrastructure of all types to support it, to ensure that development is sustainable in accordance with the NPPF (2021). Infrastructure requirements will be predominantly addressed through the Council's Community Infrastructure Levy (CIL) and through planning obligations.

Specifically, planning obligations are used to secure the provision of affordable housing in relation to residential development schemes, and where a development has infrastructure needs that are not addressed through CIL to ensure that development proposals provide or fund improvements to mitigate site specific impacts made necessary by the proposal. Applications which fail to include appropriate planning obligations to make the proposal acceptable will be refused. Planning obligations run with the land, are legally binding and enforceable.

The Community Infrastructure Levy Regulations, the NPPF and Planning Practice Guidance have put three tests on the use of planning obligations into law. In this regard, planning obligations must meet the following tests to be lawful:

- necessary to make the development acceptable in planning terms;
- directly related to the development; and
- fairly and reasonable related in scale and kind to the development.

The following Heads of Terms are proposed, to be secured through a section 106 agreement to either ensure policy compliance or to address deficiencies in the scheme which could not be addressed through amendments to the plans:

- i) A full and detailed Construction and Employment Training scheme in accordance with the Council Planning Obligations SPD with the preference being for an in-kind, on-site scheme to be delivered;
- ii) A full Commercial Travel Plan, including a Low Emission Strategy, shall be submitted to and approved in writing by the Local Planning Authority. The Plan will include targets for sustainable travel arrangements, effective measures for the ongoing monitoring of the Travel Plan, and a commitment to delivering the Travel Plan objectives. A £20,000 Travel Plan bond is also to be secured;
- iii) A carbon offsetting sum based on an Updated Energy Strategy to be submitted to discharge Condition 5, with the offset calculation based on £95 per tonne of CO₂ over a 30 year period;
- iv) Air Quality Mitigation Cost of £55,035 to be used by the Council to fund measures to reduce poor air quality within the borough; and
- v) A Project Monitoring and Management Fee, equalling 5% of the total financial contributions paid under this agreement.

The proposal would be CIL liable.

7.21 Expediency of enforcement action

N/A.

7.22 Other Issues

FIRE STRATEGY

In the interests of fire safety and to ensure the safety of all building users, Policy D12 of the London Plan states that all proposals must achieve the highest standards of fire safety and ensure that they identify suitably positioned unobstructed outside spaces for fire appliances to be positioned on, provide suitable access and equipment for firefighting which is appropriate for the size and use of the development, and provides spaces which are appropriate for use as an evacuation assembly point.

Buildings should be designed to incorporate appropriate features which reduce the risk to life and the risk of serious injury in the event of a fire by being constructed in an appropriate way to minimise the risk of fire spread. This should include appropriate fire alarm systems, passive and active fire safety measures, suitable and convenient means of escape and an associated robust evacuation strategy which can be periodically updated and published, and which all occupants can have confidence in. These measures should be set out in a Fire Strategy, prepared by a suitably qualified fire engineer.

In support of the application, a draft Fire Statement Form was submitted, which outlines the basics of fire safety measures, with the knowledge that further details would be secured at detailed design stage. The submission of these additional details would be secured by condition.

LAND CONTAMINATION

Policy EM8 of the Hillingdon Local Plan: Strategic Policies (Land, Water, Air and Noise) states that the council expects proposals for development on contaminated land to provide mitigation strategies that will reduce the impacts on surrounding land uses. Major development proposals will be expected to demonstrate a sustainable approach to remediation that includes techniques to reduce the need to landfill.

A Phase 1 Contaminated Land Study has been submitted which has been reviewed by the Council's Land Contamination Officer who is satisfied with its conclusions and recommends that matters relating to future contamination identification, remediation and subsequent verification be secured by condition. On this basis, the proposal is considered acceptable in respect of contaminated land.

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

N/A.

10. CONCLUSION

The proposed development seeks a relatively large extension to an existing B8 self-storage unit on Uxbridge Road. As a continuation of an existing use, the principle of development is considered acceptable, and it is considered that despite the large increase in massing and floorspace, the proposal would not appear overbearing or harmful to the wider character or appearance of the area.

The transport impacts of the proposal can all be accommodated on site, with the amount of proposed parking reduced following comments from TfL, and all delivery and servicing to take place within the site.

Overall, the proposal is considered to make better use of an existing brownfield site to provide more employment floorspace and this is encouraged by the London Plan and

Hillingdon Local Plan, and the proposal is recommended for approval on this basis, subject to the conditions and obligations listed in this report.

11. Reference Documents

London Plan (2021)

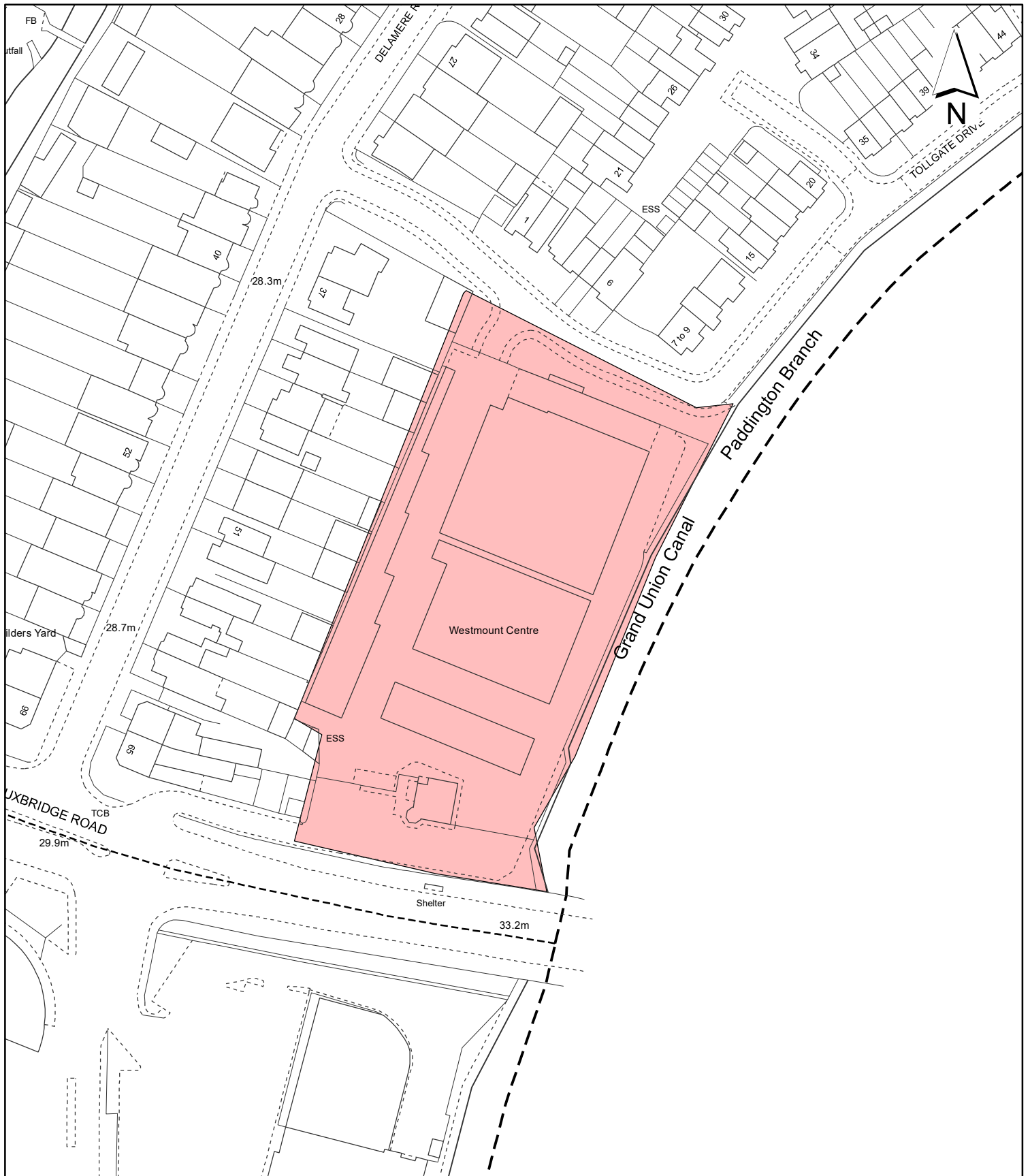
Hillingdon Local Plan: Strategic Policies (2012)

Hillingdon Local Plan: Development Management Policies (2020)

National Planning Policy Framework (NPPF) (2021)

Contact Officer: Andrew Thornley

Telephone No: 01895 250230



Notes:

 Site boundary

For identification purposes only.
 This copy has been made by or with the authority of the Head of Committee Services pursuant to section 47 of the Copyright, Designs and Patents Act 1988 (the Act).
 Unless the Act provides a relevant exception to copyright.
 © Crown copyright and database rights 2020 Ordnance Survey 100019283

Site Address:

Shurgard House

LONDON BOROUGH OF HILLINGDON
 Residents Services
 Planning Section

Civic Centre, Uxbridge, Middx. UB8 1UW
 Telephone No.: Uxbridge 01895 250111

Planning Application Ref:
49467/APP/2022/2801

Scale:
1:1,250

Planning Committee:
Major

Date:
February 2023



HILLINGDON
 LONDON