

Report of the Head of Development Management and Building Control

Address:	HAYES BRIDGE RETAIL PARK UXBRIDGE ROAD HAYES
Development:	Demolition of existing buildings and erection of a single commercial building for employment purposes Class E(g)iii, B2 and B8, along with ancillary offices, gatehouse, associated infrastructure including; service yard, car parking, drainage and hard and soft landscaping.
LBH Ref Nos:	1911/APP/2022/1853
Drawing Nos:	Design and Access Statement Addendum 2 (Dated 15th September 2023) 21093-BGL-XX-XX-RP-D-0001 V5 Flood Risk & Drainage Strategy Report (Dated 28th September 2023) 2246-21-RP01C Townscape & Visual Impact Review (Dated 3rd November 2023) P0001 Rev. K P0002 Rev. F P0003 Rev. D P0004 Rev. F P0005 Rev. F P0013 Rev. C P0015 Rev. A 2246-21-02 Rev. E 2246-21-03 Rev. I 2246-21-04 Rev. F 2246-21-05 Rev. G 2246-21-RP02E Landscape Design Statement (Dated 28th September 2023) 2246-21-RP03E Soft Landscape Works Maintenance & Management Proposals (Dated 27th September 2023) AQ051908AQA Air Quality Assessment (Dated 28th September 2023) BD1497 Rev. E Energy Statement ECO02269 BREEAM Landscape and Ecology Management Plan (Dated 2nd October 2023) BREEAM Ecological Value Calculator ECO02269 Biodiversity Net Gain Assessment (Dated 2nd October 2023) ECO02269 Ecology BREEAM Assessment (Dated 2nd October 2023) E001 Rev. 0 Proposed External Lighting Canvassing Report (Dated August 2023) C21035/TN05 Issue 1 Transport Note: Revised Scheme and Further Information for TfL

ML/VL/P21-2485/01 Rev B Wind Assessment (Submitted October 2023)
P0010 Rev. A
P0011 Rev. A
P0012 Rev. A
2246-21-01 Rev. B
BD1497 Utility Statement
P21-1767 PL Planning Statement (Dated May 2022)
Statement of Community Involvement
21.2188/CB/LC Phase 1 Geo-Environmental Risk Assessment (Dated 9th December 2021)
C21096/TA01 Transport Assessment (Dated 9th May 2022)
21048 P0010 Rev. C
M1 Heat Network Planning Drawing
Cover Letter (Dated 24th November 2022)
C21035/TN01 Transport Note: Response to TfL (Dated 22nd November 2022)
C21035/TN02 Transport Note: Further Information for Highway Authority (Dated 22nd November 2022)
TN01 Issue 1 Transport Note: Response to TfL (Dated 7th March 2023)
TN03 Issue 1 Transport Note: Further Information for Highway Authority (Dated 7th March 2023)
21093-BGL-XX-XX-DR-C-00200 Rev. P03
21093-BGL-XX-XX-DR-C-00201 Rev. P03
21093-BGL-XX-XX-DR-C-0250 Rev. P04 Drainage Strategy Plan
C21096/TA02 Transport Assessment Addendum (Dated 19th May 2023)
C21096/TP01 Framework Travel Plan (Dated 19th May 2023)
Cover Letter (Dated 25th May 2023)
ECO02269 Preliminary Ecological Appraisal (Dated May 2023)
A23-0013 Fire Safety Statement (Dated 30th May 2023)
Whole Life Cycle Carbon Emissions Assessment v.3 (Dated 19th May 2023)
Circular Economy Statement v.3 (Dated May 2023)
Whole Life Cycle Carbon Emissions Assessment (Dated May 2023)
P21_1767_R001v3_MAN_EC_NR_RC Rev. 3 Economic Benefits Statement (Dated 18th May 2023)
AQ051908NOI V2 Noise Assessment (Dated 17th May 2023)
21048 Rev. A Design & Access Statement Addendum (Dated 14th April 2023)
665-22 Rev. 0 Pre-Development Tree Survey (Dated 22nd February 2023)
BREEAM Wat 01 Credits Calculator

Date Plans received:	08-06-2022	Date(s) of Amendments(s):	08-06-2022
			24-11-2022
Date Application valid	30-08-2022		09-03-2023

03-07-2023

05-07-2023

02-08-2023

1. SUMMARY

This application seeks permission for the demolition of the existing buildings and erection of a single commercial building for employment purposes Class E(g)iii, B2 and B8, with 16,513m² Gross External Area (GEA) / 16,087m² Gross Internal Area (GIA), alongside associated infrastructure.

The proposed flexible industrial and/or warehousing uses are an appropriate use within a Strategic Industrial Location. The significant uplift in floorspace would ensure the intensification of industrial capacity, which is supported by strategic policies. The proposed office floorspace would be ancillary to the primary industrial use and is therefore considered acceptable in principle.

The economic benefit of commercial development is acknowledged and supported by national, regional and local planning policies. As noted under Paragraph 81 of the National Planning Policy Framework (NPPF) (2023), significant weight should be placed on the need to support economic growth and productivity. The Economic Benefits Assessment submitted demonstrates that there would be economic and employment benefits arising from the proposed development. For balance, it should be noted that the site as it exists could generate a significant number of full time jobs, albeit the existing scenario includes five out of seven vacant units on this site and would indicate that this is not a likelihood.

The proposed building would be of considerable size and scale and as noted in the main body of the report, the siting would not fully respond to the established building lines along Uxbridge Road. Nevertheless, the design would provide visual interest with the sawtooth roof form, the activation of the front elevation and the landscaped buffer which sits on the frontage. Taking into account that alternative options which would bring the building forward in line with established buildings lines (with car parking located to the rear) are not feasible from a highway safety perspective, the siting is justified in this case and it is considered that the proposal would make a positive contribution to the streetscene in the context. Furthermore, the set back of the building line would assist in ensuring an appropriate relationship with residential properties to the north east, enabling a generous separation gap. Based on these considerations, the development is considered to be of appropriate quality and would have an acceptable impact on the character and appearance of the area. This is subject to the recommended conditions which would secure final details of hard and soft landscaping and external finishes.

Subject to the planning conditions and obligations recommended, the proposed development is also considered acceptable with respect to neighbour amenity, the local highway network, accessibility, security, ecology, waste, energy, flood and water management, noise, contaminated land and fire safety.

Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that planning applications should be determined in accordance with the development plan unless material considerations indicate otherwise. For the reasons outlined above and within the main body of the report, this application is considered to comply with the Development Plan and is recommended for approval, subject to securing the necessary planning conditions and a Section 106 legal agreement.

2. RECOMMENDATION

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

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

B) 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) Air Quality Contribution: A financial contribution amounting to £731,228 shall be paid to address the air quality impacts of the proposed development.

ii) Carbon Offset Contribution: Any additional shortfall identified through the ongoing reporting required by Condition 17 shall form a cash in lieu contribution in accordance with Policy SI2 of the London Plan at a rate of £95/tCO₂ annualised for not more than 30 years beginning on the commencement of development. (i.e if a shortfall is first identified after 5 years the cash in lieu contribution is based on a 25 year duration).

iii) Travel Plan: A full Travel Plan shall be submitted to and approved in writing by the Local Planning Authority. The Plan will include such matters as: targets for sustainable travel arrangements; effective measures for the ongoing monitoring of the Travel Plan; and a commitment to delivering the Travel Plan objectives.

iv) Active Travel Zone Improvements: A financial contribution amounting to £21,718.75 shall be paid to the Council to fund the delivery of works to encourage and enable trip making by walking, cycling and public transport in lieu of car parking being provided on-plot.

v) Section 278: Obligation for the developer to enter a 1980 Highways Act s.278 agreement with the Council to make permanent alterations or improvements to the adopted highway. This will include but is not limited to changes to the access into the development site, creation of a straight across toucan crossing (as opposed to a staggered toucan crossing), new/alteration of the signal controls, removal of guardrail between footway and cycleway, removal of centre kerb upstand for a distance of 9m and re-surfacing of the footway and cycleway.

vi) Employment Strategy and Construction Training: Details shall be in accordance with the Council's Planning Obligations SPD with the preference being for an in-kind scheme to be delivered. Securing an Employment/Training Strategy Agreement is the Council's priority. A financial contribution will only be accepted in exceptional circumstances.

vii) Project Management & Monitoring Fee: A financial contribution equal to 5% of the total cash contributions secured from the scheme to enable the management and monitoring of the resulting agreement, is sought.

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 and agree any changes requested by the GLA.

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 Environment), delegated authority be given to the Director of Planning, Regeneration and Environment to refuse planning permission for the following reason:

'The applicant has failed to mitigate the impacts posed by the proposed development (in respect of Air Quality, Carbon Offsetting, Travel Planning, Active Travel, Highways Works, Employment, and Project Management and Monitoring). The scheme therefore conflicts with Policies DMCI 7 of the Hillingdon Local Plan: Part 2 (2020); the adopted Planning Obligations Supplementary Planning Document (2014); Policy DF1 of the London Plan (2021); and paragraphs 55-57 of the National Planning Policy Framework (2023).'

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

1. COM3 Time Limit

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

REASON

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

2. COM4 Accordance with Approved Plans

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

Location Plan:

21048 P0010 Rev. C;

Proposed Site Plan:

P0001 Rev. K;

Proposed Floor Plans:

P0002 Rev. F;

P0003 Rev. D;

P0015 Rev. A;

Proposed Roof Plan:

P0004 Rev. F;

Proposed Elevations:

P0005 Rev. F;

Proposed Section:

P0013 Rev. C;

and shall thereafter be retained/maintained for as long as the development remains in existence.

REASON

To ensure the development complies with the provisions of the Hillingdon Local Plan Parts 1 (November 2012) and 2 (January 2020) and the London Plan (2021).

3. COM5 General compliance with supporting documentation

The development hereby permitted shall be carried out in accordance with the specified supporting plans and/or documents:

21093-BGL-XX-XX-RP-D-0001 V5 Flood Risk & Drainage Strategy Report (Dated 28th September 2023);

BD1497 Rev. E Energy Statement;

665-22 Rev. 0 Pre-Development Tree Survey (Dated 22nd February 2023);

AQ051908NOI V2 Noise Assessment (Dated 17th May 2023);

C21035/TN05 Issue 1 Transport Note: Revised Scheme and Further Information for TfL;

Whole Life Cycle Carbon Emissions Assessment (Dated May 2023);

2246-21-RP02E Landscape Design Statement (Dated 28th September 2023);

2246-21-RP03E Soft Landscape Works Maintenance & Management Proposals (Dated 27th September 2023);

ECO02269 BREEAM Landscape and Ecology Management Plan (Dated 2nd October 2023);

ECO02269 Biodiversity Net Gain Assessment (Dated 2nd October 2023); and

ECO02269 Ecology BREEAM Assessment (Dated 2nd October 2023).

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

REASON

To ensure the development complies with the provisions of the Hillingdon Local Plan Parts 1 (November 2012) and 2 (January 2020) and the London Plan (2021).

4. NONSC Restriction of Use

Notwithstanding the Town and Country Planning (Use Classes) Order (as amended), or in any provision equivalent to that Class in any statutory instrument revoking and re-enacting that Order with or without modification, the buildings hereby approved shall not be used for any purpose other than as:

- Class E(g)iii, B2 and B8: 14,075 m² floorspace for industrial processes and/or warehouse storage and distribution use; and

- Ancillary: 2,012 m² floorspace for ancillary office use.

REASON

To ensure that the provisions of the proposed development are secured to the use proposed to prevent detrimental impacts arising from an alternative use which is not permitted, including impacts on town centres, the local highway network and air quality, in accordance with Policies DME 3, DMTC 1, DMT 1, DMT 2 and DMEI 14 of the Hillingdon Local Plan: Part 2 (2020), Policies SD7, T4 and SI 1 of the London Plan (2021) and paragraphs 87, 111 and 174 of the National Planning Policy Framework (2023).

5. NONSC Restrict Enlargement of B8 Use Buildings

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

REASON

To ensure that the Local Planning Authority has assessed all the implications of the development, including impacts on design, the local highway network and air quality, in accordance with Policies DMHB 11, DMT 1, DMT 2 and DMEI 14 of the Hillingdon Local Plan: Part 2 (2020), Policies D4, T4 and SI 1 of the London Plan (2021) and paragraphs 111, 130 and 174 of the National Planning Policy Framework (2023).

6. NONSC Restrict Addition of Internal Floorspace

Notwithstanding the provisions of Part 7, Schedule 2 of the Town and Country Planning (General Permitted Development) Order 2015 (or any order revoking and re-enacting that Order with or without modification), no additional structural internal mezzanine floorspace that can be used for storage shall be created in excess of that area expressly authorised by this permission.

REASON

To ensure that the Local Planning Authority has assessed all the implications of the development, including impacts on design, the local highway network and air quality, in accordance with Policies DMHB 11, DMT 1, DMT 2 and DMEI 14 of the Hillingdon Local Plan: Part 2 (2020), Policies D4, T4 and SI 1 of the London Plan (2021) and paragraphs 111, 130 and 174 of the National Planning Policy Framework (2023).

7. NONSC Use Class Restriction - Data Centre Prohibited

Notwithstanding the Town and Country Planning (Use Classes) Order (as amended), or in any provision equivalent to that Class in any statutory instrument revoking and re-enacting that Order with or without modification, the development hereby approved shall not be used as a data centre.

REASON

To enable the Local Planning Authority to assess all the implications of the development and to ensure compliance with the Development Plan, including any impact on carbon emissions and air quality, to accord with Policies DMEI 2 and DMEI 14 of the Hillingdon Local Plan: Part 2 (2020), Policies SI 1 and SI 2 of the London Plan (2021), and paragraphs 154 and 174 of the National Planning Policy Framework (2023).

8. NONSC Ancillary Office Floorspace

The office floorspace hereby approved shall only be used as ancillary floorspace to the primary operation of the development (Use Class E(g)iii, B2 and B8).

REASON

To ensure that the provisions of the proposed development are secured to the warehouse use to prevent detrimental impacts arising from an alternative use which is not permitted, including impacts on town centres, the local highway network and air quality, in accordance with Policies DME 3, DMTC 1, DMT 1, DMT 2 and DMEI 14 of the Hillingdon Local Plan: Part 2 (2020), Policies SD7, T4 and SI 1 of the London Plan (2021) and paragraphs 87, 111 and 174 of the National Planning Policy Framework (2023).

9. NONSC Noise Levels

For the lifetime of the development hereby permitted 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 safeguard the amenity of the occupants of the surrounding properties in accordance with Policy EM8 of the Hillingdon Local Plan: Part 1 (2012), Policy DMHB 11 of the Hillingdon Local Plan: Part 2 (2020) and Policy D14 of the London Plan (2021).

10. NONSC Non-Road Mobile Machinery

All Non-Road Mobile Machinery (NRMM) of net power of 37kW and up to and including 560kW used during the course of the demolition, site preparation and construction phases 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" dated July 2014 (SPG), or subsequent guidance. Unless it complies with the standards set out in the SPG, no NRMM shall be on site, at any time, whether in use or not, without the prior written consent of the local planning authority. The developer shall keep an up to date list of all NRMM used during the demolition, site preparation and construction phases of the development on the online register at <https://nrmm.london/>."

REASON

To comply with the London's Low Emission Zone for non-road mobile machinery as per requirements of the London Environment Strategy, in accordance with Policy EM8 of the Hillingdon Local Plan: Part 1 (2012), Policy DMEI 14 of the Hillingdon Local Plan: Part 2 (2020), Policy SI 1 of the London Plan (2021) and Paragraphs 174(e), 186 and 188 of the National Planning Policy Framework (2023).

11. NONSC Connection to Future District Heating Network

The development hereby approved shall connect to a district heating network should one become available in future and should it be viable to do so.

REASON

To ensure compliance with Policy SI 3 of the London Plan (2021).

12. NONSC Digital Connectivity Infrastructure

The development hereby approved shall ensure that sufficient ducting space for full fibre connectivity infrastructure is provided.

REASON

To ensure compliance with Policy SI 6 of the London Plan (2021).

13. NONSC Fire Evacuation Lift

The development hereby approved shall accord with London Plan policy D5(B5) and D12(A) to include a minimum of one fire evacuation lift designed to meet the technical standards set out in BS EN 81-76, BS 9991 and/or BS 9999, with all such provisions remaining in place for the life of the development.

REASON

To ensure the development can accommodate robust emergency evacuation procedures, including measures for those who require step-free egress, in accordance with Policies D5 and D12 of the London Plan (2021).

14. NONSC Construction Management and Logistics Plan

Prior to the commencement of works on site, a Construction Management and Logistics Plan shall be submitted to and approved in writing by the Local Planning Authority (in consultation with relevant stakeholders). This plan shall detail:

- i. The phasing of the works;
- ii. The hours of work;
- iii. On-site plant and equipment;
- iv. Measures to mitigate noise and vibration;
- v. Measures to mitigate impact on air quality;
- vi. Waste management;
- vii. Site transportation and traffic management, including:
 - (a) HGV Routing enforcement;
 - (b) Signage;
 - (c) Vehicle types and sizes;
 - (d) Hours of arrivals and departures of staff and deliveries (avoiding peaks);
 - (e) Frequency of visits;
 - (f) Parking of site operative vehicles;
 - (g) On-site loading/unloading arrangements;
 - (h) Use of an onsite banksman (if applicable);
 - (i) Use of consolidation centres to reduce HGV movements;
 - (j) Achieve FORS Gold standard and 5* Direct Vision Standard;
 - (k) Encourage use of active travel;
- viii. The arrangement for monitoring and responding to complaints relating to demolition and construction;
- ix. Details of cranes and other tall construction equipment (including the details of obstacle lighting); and
- x. Measures to avoid and mitigate impacts to the Yeading Brook, Minet County Park and Hitherbroom Park Site of Importance for Nature Conservation.

This plan should accord with Transport for London's Construction Logistic Planning Guidance and the GLA's 'The Control of Dust and Emissions during Construction and Demolition' Supplementary Planning Guidance (July 2014) (or any successor document). It shall cover the entirety of the application site and any adjoining land which will be used during the construction period. It shall include the details of cranes and any other tall construction equipment (including the details of obstacle lighting).

The construction works shall be carried out in strict accordance with the approved plan.

REASON

To safeguard the amenity of surrounding areas and to ensure that the construction works include appropriate efficiency and sustainability measures so as not to compromise the safe and efficient operation of the local highway network and local air quality, in accordance with Policies DMT 1, DMT 2 and DMEI 14 of the Hillingdon Local Plan: Part 2 (2020) and Policies D14, SI 1, T4 and T7 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: Part 2 (2020).

15. NONSC Contaminated Land

(i) The development hereby permitted (excluding demolition, site clearance and supplementary ground investigation works e.g. beneath demolished buildings) shall not commence until a scheme to address unacceptable contamination, in accordance with the Environment Agency's guidance "Land contamination risk management" (LCRM), has been submitted to and approved by the Local Planning Authority (LPA). All works which form part of an approved remediation scheme shall be completed before any part of the development is occupied or brought into use unless the Local Planning Authority dispenses with any such requirement specifically and in writing. The scheme shall include the following measures unless the LPA dispenses with any such requirement specifically and in writing:

a) A detailed remediation strategy, to also include how completion of the remedial works will be verified, along with the details of a watching brief to address undiscovered contamination, shall be agreed in writing with the LPA. No deviation shall be made from this scheme without the express agreement of the LPA prior to its implementation.

(ii) If, during remedial or development works, contamination not addressed in the submitted remediation strategy is identified an addendum to the remediation scheme shall be agreed with the LPA prior to implementation; and

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

(iv) No contaminated soils or other materials shall be imported to the site. All imported soils for landscaping and/or engineering purposes shall be clean and free of contamination. Before any part of the development is occupied, all imported soils shall be independently tested for chemical contamination, and the factual results and interpretive reports of this laboratory testing including details of placement of the suitable materials shall be submitted to and approved in writing by the Local Planning Authority.

REASON

To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems and the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors in accordance with Hillingdon Local Plan: Part 2 (January 2020) Policies - DMEI 11: Protection of Ground Water Resources and DMEI 12: Development of Land Affected by Contamination.

16. NONSC Road Safety Audit

Prior to any above ground works, details of a full and updated Road Safety Audit of the junction access point 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 ensure appropriate servicing of the site, to safeguard highway safety and to safeguard the free flow of traffic, in accordance with Policies DMT 1 and DMT 2 of the Hillingdon Local Plan: Part 2 (2020) and Policies T3 and T7 of the London Plan (2021).

17. NONSC Energy Monitoring, Recording and Reporting

Prior to commencement of development (excluding demolition), an updated Energy Statement, including detailed energy monitoring, recording and reporting plan shall be submitted to and approved in writing by the Local Planning Authority. The plan shall accord with the requirements of the London Plan (policy SI2) and the GLA Energy Assessment Guidance (2022 or as amended).

The development must proceed in accordance with the approved reporting structure and where there is a failure to achieve the required carbon savings, the quantum (tCO₂) shall be treated as part of the shortfall and shall result in a cash in lieu contribution in accordance with the formula set out in the S106 agreement.

REASON

To ensure the development's onsite carbon savings from regulated energy demand is achieved in perpetuity (i.e. annually over 30years) in accordance with the Policy SI2 of the London Plan (2021).

18. NONSC Overheating

Prior to commencement of development (excluding demolition), the final Overheating Strategy shall be submitted to and approved in writing by the Local Planning Authority. The submission shall demonstrate how the development will reduce the potential for internal overheating and reliance on air conditioning systems in accordance with the following cooling hierarchy:

- 1) reduce the amount of heat entering a building through orientation, shading, high albedo materials, fenestration, insulation and the provision of green infrastructure;
- 2) minimise internal heat generation through energy efficient design;
- 3) manage the heat within the building through exposed internal thermal mass and high ceilings;
- 4) provide passive ventilation;
- 5) provide mechanical ventilation; and
- 6) provide active cooling systems.

The approved details shall thereafter be implemented and retained for the lifetime of the development.

REASON

To demonstrate that the final strategy will reduce the potential for internal overheating and reliance on air conditioning systems in accordance with the cooling hierarchy and Policy SI 4 of the London Plan (2021).

19. NONSC Materials

Prior to the commencement of above ground construction works for the development, details and samples of materials and external surfaces for the development (including the main building and ancillary buildings) shall be submitted to and approved in writing by the Local Planning Authority.

This shall include:

- (i) Mock up sample panels of the north facade (front elevation) provided at a scale and location to be agreed with the Local Planning Authority. This shall be accompanied by a schedule of all materials to be used in the external elevations of the buildings.
- (ii) Materials for other facades shall be submitted as a sample board with an accompanied schedule of materials.

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: Part 2 (2020).

20. NONSC Details of Access

Development shall not commence until details of access to building entrances (to include ramped/level approaches, signposting, types and dimensions of door width and lobby openings) to meet the needs of people with disabilities have been submitted to and approved in writing by the Local Planning Authority. The approved facilities should be provided prior to the occupation of the development and shall be permanently retained thereafter.

REASON

To ensure an accessible and inclusive development for everyone in accordance with Policy D5 of the London Plan (2021).

21. NONSC Cycle Parking Details

Notwithstanding the approved plans and prior to commencement of development above ground level, final details of the cycle parking provision (both short stay and long stay) shall be submitted to and approved in writing by the Local Planning Authority (in consultation with Transport for London). The details shall show cycle parking provision for 38 no. long-stay secure and covered spaces and 16 no. short-stay spaces (54 no. total). The cycle parking provision shall accord with the London Cycling Design Standards.

The approved facilities shall be provided prior to the occupation of the development and shall be permanently retained and maintained thereafter.

REASON

To provide sufficient facilities for cycle parking in accordance with Policy T5 of the London Plan (2021).

22. NONSC Toucan Crossing Details

Notwithstanding the approved plans and prior to commencement of development above ground level, final details of the access to the site from Uxbridge Road, including the details of the Toucan crossing shall be submitted to and approved in writing by the Local Planning Authority (in consultation with Transport for London). The details shall include, but not be limited to a Toucan crossing which is straight across (not staggered), reduction of carriageway width to one lane and an internal shared use footway/cycleway. The approved facilities shall be provided prior to the occupation of the development and shall be permanently retained thereafter.

REASON

To provide sufficient facilities to encourage and facilitate safe active travel to and from the site, in accordance with Policy T4 of the London Plan (2021).

23. COM9 Landscape Scheme

Prior to commencement of development above ground level, a landscape scheme shall be submitted to and approved in writing by the Local Planning Authority. The scheme shall include:-

1. Details of Soft Landscaping

1.a Planting plans (at not less than a scale of 1:100) to demonstrate no net loss of trees, and including (but not limited to) dense planting on the southern boundary in order to achieve effective screening of the site from views taken from the south

1.b Written specification of planting and cultivation works to be undertaken

1.c Schedule of plants giving species, plant sizes, and proposed numbers/densities where appropriate

2. Details of Hard Landscaping

2.a Refuse Storage

2.b Means of enclosure/boundary treatments

2.c Car Parking Layouts:

- 91 no. car parking spaces total, including:

- 21 no. car parking spaces are served by active charging infrastructure;

- All operation parking spaces, including spaces for freight vehicles, shall be served by rapid electric vehicle charging points; and

- 5 no. car parking spaces will be designated disabled persons parking bays and 5 no. spaces enlarged parking bays.

2.d Hard Surfacing Materials

2.e External Lighting

2.f Other structures

3. Living Roofs

3.a Details for the provision and maximisation of living / green / blue / brown / bio-solar roofs, including:

- Its location, extent, specification (plant species and growing medium type), landscape integration, integration with other roof plant or renewable energy infrastructure, structural integrity, construction, operation and access; the location and vegetation type to be discussed in advance with the Planning Authority so that benefits to reduction in exposure to air pollution can be obtained;

- Section/profile drawings showing the growing medium depth, different layers and membranes;

- Plans to show clearly its location, extent, drainage catchment areas (if relevant), inlets and outflows; and

- Maintenance plan to show how it will be maintained regularly, maintenance considerations due to other roof infrastructure and any changes in maintenance throughout the seasons.

4. Details of Landscape Maintenance

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

4.b Proposals for the replacement of any tree, shrub, or area of turfing/seeding within the landscaping scheme which dies or in the opinion of the Local Planning Authority becomes seriously damaged or diseased

5. Schedule for Implementation

6. Other

6.a Existing and proposed functional services above and below ground

6.b Proposed finishing levels or contours

7. Confirmation of the final Urban Greening Factor score

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

REASON

To ensure that the proposed development will preserve and enhance the visual amenities of the locality and provide adequate facilities in compliance with Policies DMHB 11, DMHB 12, DMHB 14, DMT 2, DMT 6 and DMEI 1 of the Hillingdon Local Plan: Part 2 (2020) and Policies G1, G5, T6, T6.2 and T7 of the London Plan (2021).

24. NONSC Ecological Enhancement Plan

Prior to commencement of development above ground level (excluding demolition), a scheme for the enhancement of ecology shall be submitted to and approved in writing by the Local Planning Authority. The scheme shall set out how the development will contribute positively to ecological value through the use of features and measures within the landscaping (i.e. nectar rich and diverse planting including living roofs) and the fabric of the new built form (i.e. bat and bird boxes). The scheme shall include a plan with the features annotated and the development must be built and operated in accordance with the approved scheme.

REASON

To ensure the development contributes positively to the ecological value of the area in accordance with Policy EM7 of the Hillingdon Local Plan: Part 1 (2012), Policy DMEI 7 of the Hillingdon Local Plan: Parts 2 (2020) and Policies G6 and G7 of the London Plan (2021).

25. NONSC Sustainable Drainage Scheme Details

Prior to commencement of groundworks (excluding site investigations and demolition), a final detailed drainage design shall be submitted to and approved in writing by the Local Planning Authority. This shall include drawings and supporting calculations, in accordance with document reference "21093-BGL-XX-XX-RP-D-0001 V5 Flood Risk & Drainage Strategy Report (Dated 28th September 2023)" and associated drawings. A detailed management plan confirming routine maintenance tasks for all drainage components must also be submitted to demonstrate how the drainage system is to be maintained for the lifetime of the development.

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

REASON

To ensure that surface water run off is controlled and to ensure the development does not increase flood risk, in compliance with Policy EM6 of the Hillingdon Local Plan: Part 1 (2012), Policy DMEI 9 and DMEI 10 of the Hillingdon Local Plan: Part 2 (2020), Policy SI 12 and SI 13 of the London Plan (2021), the National Planning Policy Framework (2023), and Planning Practice Guidance (Flood Risk and Coastal Change March 2014).

26. NONSC Water Infrastructure Details

Prior to the commencement of the development (not including demolition and site clearance), water infrastructure details shall be submitted to and approved in writing by the Local Planning Authority. This detail shall:-

- i) achieve at least the BREEAM excellent standard for the 'Wat 01' water category 160 or equivalent;
- ii) incorporate measures such as smart metering, water saving and recycling measures, including retrofitting, to help to achieve lower water consumption rates and to maximise future-proofing;
- iii) seek to improve the water environment and ensure that adequate wastewater infrastructure capacity is provided; and
- iv) take action to minimise the potential for misconnections between foul and surface water networks.

The development must proceed and be occupied in accordance with the approved scheme.

REASON

To ensure compliance with Policy SI 5 of the London Plan (2021).

27. NONSC Sustainable Drainage Scheme Verification

Prior to the first operation of the development, evidence (photographs and installation contracts) shall be submitted to demonstrate that the sustainable drainage scheme for the site has been completed in accordance with the submitted details. The sustainable drainage scheme shall be managed and maintained thereafter in accordance with the agreed management and maintenance plan for all of the proposed drainage components.

REASON

To ensure that surface water run off is controlled and to ensure the development does not increase flood risk, in compliance with Policy EM6 of the Hillingdon Local Plan: Part 1 (2012), Policy DMEI 9 and DMEI 10 of the Hillingdon Local Plan: Part 2 (2020), Policy SI 12 and SI 13 of the London Plan (2021), the National Planning Policy Framework (2023), and Planning Practice Guidance (Flood Risk and Coastal Change March 2014).

28. NONSC Parking Design and Management Plan

Prior to the first operation of the development, a Parking Design and Management Plan shall be submitted to and approved in writing by the Local Planning Authority. This shall detail 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. This should ensure that there is a robust management scheme for the change in shifts and mitigation against the highways safety risks that could arise from the overlap of trips made to and from the site during such shift changes.

The Parking Management Plan shall be implemented as approved and shall remain in force for the life of the development.

REASON

To allow sufficient space for all vehicles to access the application site and neighbouring sites, and to safeguard the safety of highway users, in accordance with Policies DMT 1 and DMT 2 of the Hillingdon Local Plan: Part 2 (2020) and Policies T4 and T6 of the London Plan (2021).

29. NONSC Delivery, Servicing and Waste Management Plan

Prior to the first operation of the development, details of a Delivery and Servicing Plan shall be submitted to and approved in writing by the Local Planning Authority (in consultation with Transport for London). This should accord with Transport for London's Delivery and Servicing Plan Guidance and shall include:

- (i) The expected number and time of delivery and servicing trips to the site, including how deliveries will be scheduled to avoid several delivery vehicles arriving at the site simultaneously;
- (ii) The types of vehicles that will be servicing the site, including all relevant swept path analysis for these vehicles;
- (iii) Loading bay locations and layouts and vehicle turning areas;
- (iv) Routing of delivery and servicing vehicles to and from this site, and how this routing will be enforced;
- (v) Measures that will be implemented to reduce the impact of servicing movements;
- (vi) The requirement for all vehicles to achieve FORS Gold and 5* Direct Vision standard, and detail on how this will be enforced;
- (vii) Detail on re-timing of deliveries to minimise impact on congestion and noise pollution; and
- (viii) Mechanisms for monitoring and review.

Thereafter the development shall be operated in full accordance with the approved details.

REASON

To ensure appropriate servicing of the site, to safeguard highway safety and to safeguard the free flow of traffic, in accordance with Policies DMT 1 and DMT 2 of the Hillingdon Local Plan: Part 2 (2020) and Policy T7 of the London Plan (2021).

30. NONSC Operations Management Plan

Prior to occupation, a full and detailed Operational Management Plan shall be submitted to and approved in writing by the Local Planning Authority (in consultation with Transport for London). The plan shall demonstrate (but is not limited to):

- (i) Deliveries and collections including how deliveries will be scheduled to avoid several vehicles arriving at the site simultaneously;
- (ii) The types of vehicles that will be servicing the site, including all relevant swept path analysis for these vehicles;
- (iii) Loading bay locations and layout and vehicle turning areas;
- (iv) HGV routing to and from this site, and how this routing will be enforced;
- (v) Measures that will be implemented to reduce the impact of servicing movements, including sustainable last mile movements and a cargo bike strategy;
- (vi) The requirement for all vehicles to achieve FORS Gold and 5* Direct Vision standard, and detail on how this will be enforced;
- (vii) Detail on re-timing of deliveries to minimise impact on congestion and noise pollution;
- (viii) Targets and measures that will be implemented to increase the level of electric vehicles attending this site;
- (ix) Measures that will be implemented to ensure pedestrian and cyclist safety;
- (x) Measures that will be implemented to reduce movement through consolidation; and
- (xi) Mechanisms for monitoring and review.

Thereafter the development shall be operated in full accordance with the approved details.

REASON

To ensure appropriate operation of the site, to safeguard highway safety and to safeguard the free flow of traffic, in accordance with Policies DMT 1 and DMT 2 of the Hillingdon Local Plan: Part 2 (2020) and Policy T7 of the London Plan (2021).

31. NONSC Fire Statement

Prior to the first operation of the development, 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).

32. NONSC Secured by Design

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

REASON

In pursuance of the Council's duty under section 17 of the Crime and Disorder Act 1998 to consider crime and disorder implications in exercising its planning functions; to promote the well being of the area in pursuance of the Council's powers under section 2 of the Local Government Act 2000 to ensure the development provides a safe and secure environment in accordance with Policy DMHB 15 of the Hillingdon Local Plan: Part 2 (2020) and Policy D11 of the London Plan (2021).

33. NONSC Low Emission Strategy

Prior to the first operation of the development, a Low Emission Strategy (LES) shall be submitted to and approved in writing by the Local Planning Authority. The LES shall address but be not restricted to:

- 1) Compliance with the current London Plan (March 2021) and associated Planning Guidance requirements.
- 2) Implementation of electric vehicle charging bay for cars, and rapid charging provisions for freight vehicles.
- 3) Update the proposed Travel Plan to make it more ambitious with a clear and effective strategy to encourage staff / users of the site to
 - a) use public transport;
 - b) cycle / walk to work where practicable;
 - c) enter car share schemes;
 - d) purchase and drive to work zero emission vehicles.
- 4) Avoid, whenever possible, urban areas including Air Quality Focus Areas.

The measures in the agreed scheme shall be maintained throughout the life of the development.

REASON

As the application site is within an Air Quality Management Area, and to reduce the impact on air quality in accordance with Policy EM8 of the Local Plan: Part 1 (2012), Policy DME1 14 of the Hillingdon Local Plan: Part 2 (2020), Policies SI 1 and T4 of the London Plan (2021) and Paragraphs 174(e), 186 and 188 of the National Planning Policy Framework (2023).

34. NONSC Circular Economy Monitoring Report

Prior to first operation of the development, a post-construction monitoring report should be completed in line with the Greater London Authority's (GLA) Circular Economy Statement Guidance.

The post-construction monitoring report shall be submitted to the GLA, currently via email at: circulareconomystatements@london.gov.uk, along with any supporting evidence as per the guidance.

Confirmation of submission to the GLA shall be submitted to, and approved in writing by, the Local Planning Authority, prior to operation of the development.

REASON

In the interests of sustainable waste management and in order to maximise the re-use of materials, in accordance with Policy SI 7 of the London Plan (2021).

35. NONSC Whole Life-Cycle Carbon Assessment

Prior to the first operation of the development the post-construction tab of the Greater London Authority's (GLA) Whole Life-Cycle Carbon Assessment template should be completed in line with the GLA's Whole Life-Cycle Carbon Assessment Guidance.

The post-construction assessment should be submitted to the GLA at: ZeroCarbonPlanning@london.gov.uk, along with any supporting evidence as per the guidance.

Confirmation of submission to the GLA shall be submitted to, and approved in writing by, the Local Planning Authority, prior to operation of the development.

REASON

In the interests of sustainable development and to maximise on-site carbon dioxide savings, in accordance with Policy SI 2 of the London Plan (2021).

36. COM10 Tree to be retained

Trees, hedges and shrubs shown to be retained on the approved plans shall not be damaged, uprooted, felled, lopped or topped without the prior written consent of the Local Planning Authority. If any retained tree, hedge or shrub is removed or severely damaged during construction, or is found to be seriously diseased or dying another tree, hedge or shrub shall be planted at the same place or, if planting in the same place would leave the new tree, hedge or shrub susceptible to disease, then the planting should be in a position to be first agreed in writing with the Local Planning Authority and shall be of a size and species to be agreed in writing by the Local Planning Authority and shall be planted in the first planting season following the completion of the development or the occupation of the buildings, whichever is the earlier. Where damage is less severe, a schedule of remedial works necessary to ameliorate the effect of damage by tree surgery, feeding or groundwork shall be agreed

in writing with the Local Planning Authority. New planting should comply with BS 3936 (1992) 'Nursery Stock, Part 1, Specification for Trees and Shrubs' Remedial work should be carried out to BS BS 3998:2010 'Tree work - Recommendations' and BS 4428 (1989) 'Code of Practice for General Landscape Operations (Excluding Hard Surfaces)'. The agreed work shall be completed in the first planting season following the completion of the development or the occupation of the buildings, whichever is the earlier.

REASON

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

37. NONSC Tree Protection

The tree protection measures (including tree protection fencing) detailed on the Tree Protection and Removal Plan (ref. 2246-21-02 Rev. E) shall be installed prior to commencement of development and thereafter retained throughout the demolition and construction period.

REASON

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

38. NONSC Odour Management Plan

Should the development hereby approved be used for the purposes of Use Class E(g)iii or B2, and prior to operation of the development, an Odour Management Plan which details appropriate and effective mitigation measures 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.

NOTE: Should the development be operated for B8 storage and distribution purposes, the submission and approval of an Odour Management Plan will not need to be submitted to and approved in writing by the Local Planning Authority.

REASON

To safeguard the amenity of the occupants of the surrounding properties in accordance with Policy EM8 of the Hillingdon Local Plan: Part 1 (2012).

39. NONSC Bullsbrook Road Access for Emergency Use Only

The vehicular access onto Bullsbrook Road shall only be used by vehicles in the event of an emergency (i.e. for access by emergency services, or in the event that the Uxbridge Road access is blocked as a result of an accident).

REASON

For the avoidance of doubt and in the interests of Highway Safety, to accord with Policies DMT 1 and DMT 2 of the Hillingdon Local Plan: Part 2 (2020).

40. NONSC Bird Hazard Management Plan

Prior to the commencement of above ground works, a Bird Hazard Management Plan (BHMP) shall be submitted to and approved in writing by the Local Planning Authority (in consultation with the Ministry of Defence and Heathrow Airport Limited). The BHMP should contain but not be limited to:

- Procedures and a schedule intended to ensure that breeding gulls are not supported by or attracted to the site and that any successful breeding is prevented.
- An assessment of bird strike risk at the site, to include species data and numbers.
- A monitoring schedule which includes details of means of access to all roofs.
- A checklist of measures that would be taken to address problems that may arise.

The site shall be managed strictly in accordance with the details set out in the Bird Hazard Management Plan for the life of the development.

REASON

To safeguard aircraft safety in compliance with Policy DMAV 1 of the London Borough of Hillingdon Local Plan Part 2 (2020).

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. 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.

3. 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.

4. I73 Community Infrastructure Levy (CIL) (Granting Consent)

Under the terms of the Planning Act 2008 (as amended) and Community Infrastructure Levy Regulations 2010 (as amended), this development is liable to pay the London Borough of Hillingdon Community Infrastructure Levy (CIL) and the Mayor of London's Community Infrastructure Levy (CIL). This will be calculated in accordance with the London Borough of Hillingdon CIL Charging Schedule 2014 and the Mayor of London's CIL Charging Schedule 2012. Before commencement of works the development parties must notify the London Borough of Hillingdon of the commencement date for the

construction works (by submitting a Commencement Notice) and assume liability to pay CIL (by submitting an Assumption of Liability Notice) to the Council at planning@hillington.gov.uk. The Council will then issue a Demand Notice setting out the date and the amount of CIL that is payable. Failure to submit a valid Assumption of Liability Notice and Commencement Notice prior to commencement of the development may result in surcharges being imposed.

The above forms can be found on the planning portal at:
www.planningportal.gov.uk/planning/applications/howtoapply/whattosubmit/cil

Pre-Commencement Conditions: These conditions are important from a CIL liability perspective as a scheme will not become CIL liable until all of the pre-commencement conditions have been discharged/complied with.

5.

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

6. 115 Control of Environmental Nuisance from Construction Work

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

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

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

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

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

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

7.

Flood Risk Activity Permit

The Environmental Permitting (England and Wales) Regulations 2016 require a permit to be obtained for any activities which will take place:

- on or within 8 metres of a main river (16 metres if tidal)
- on or within 8 metres of a flood defence structure or culvert (16 metres if tidal)
- on or within 16 metres of a sea defence
- involving quarrying or excavation within 16 metres of any main river, flood defence (including a remote defence) or culvert
- in a floodplain more than 8 metres from the river bank, culvert or flood defence structure (16 metres if it's a tidal main river) and you don't already have planning permission.

For further guidance please visit <https://www.gov.uk/guidance/flood-risk-activities-environmental-permits> or contact our National Customer Contact Centre on 03702 422 549 or by emailing enquiries@environment-agency.gov.uk. The applicant should not assume that a permit will automatically be forthcoming once planning permission has been granted, and we advise them to consult with us at the earliest opportunity.

8.

Given the nature of the proposed development it is possible that a crane may be required during its construction. We would, therefore, draw the applicant's attention to the requirement within the British Standard Code of Practice for the safe use of Cranes, for crane operators to consult the aerodrome before erecting a crane in close proximity to an aerodrome. This is explained further in Advice Note 4, 'Cranes and Other Construction Issues' (available at <http://www.aoa.org.uk/policy-campaigns/operations-safety/> and CAA CAP1096 Guidance to crane users on aviation lighting and notification (caa.co.uk).

9.

Advice to Applicant from Thames Water:

A Groundwater Risk Management Permit from Thames Water will be required for discharging groundwater into a public sewer. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures they will undertake to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 020 3577 9483 or by emailing trade.effluent@thameswater.co.uk.

There are public sewers crossing or close to your development. If you're planning significant work near our sewers, it's important that you minimise the risk of damage. We'll need to check that your development doesn't limit repair or maintenance activities, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes.

153 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 1	Employment Uses in Designated Sites

DMEI 1	Living Walls and Roofs and Onsite Vegetation
DMEI 10	Water Management, Efficiency and Quality
DMEI 12	Development of Land Affected by Contamination
DMEI 14	Air Quality
DMEI 2	Reducing Carbon Emissions
DMEI 6	Development in Green Edge Locations
DMEI 7	Biodiversity Protection and Enhancement
DMEI 8	Waterside Development
DMEI 9	Management of Flood Risk
DMHB 1	Heritage Assets
DMHB 10	High Buildings and Structures
DMHB 11	Design of New Development
DMHB 12	Streets and Public Realm
DMHB 14	Trees and Landscaping
DMHB 15	Planning for Safer Places
DMHB 4	Conservation Areas
DMHB 7	Archaeological Priority Areas and archaeological Priority Zones
DMT 1	Managing Transport Impacts
DMT 2	Highways Impacts
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 D4	(2021) Delivering good design
LPP D5	(2021) Inclusive design
LPP D8	(2021) Public realm
LPP D9	(2021) Tall buildings
LPP E4	(2021) Land for industry, logistics and services to support London's economic function
LPP E5	(2021) Strategic Industrial Locations (SIL)
LPP E7	(2021) Industrial intensification, co-location and substitution
LPP G1	(2021) Green infrastructure
LPP G2	(2021) London's Green Belt
LPP G5	(2021) Urban greening
LPP G6	(2021) Biodiversity and access to nature
LPP G7	(2021) Trees and woodlands
LPP HC1	(2021) Heritage conservation and growth
LPP SI1	(2021) Improving air quality

LPP SI12	(2021) Flood risk management
LPP SI13	(2021) Sustainable drainage
LPP SI2	(2021) Minimising greenhouse gas emissions
LPP SI3	(2021) Energy infrastructure
LPP SI4	(2021) Managing heat risk
LPP SI5	(2021) Water infrastructure
LPP SI6	(2021) Digital connectivity infrastructure
LPP T1	(2021) Strategic approach to transport
LPP T2	(2021) Healthy Streets
LPP T3	(2021) Transport capacity, connectivity and safeguarding
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
LPP T8	(2021) Aviation
LPP T9	(2021) Funding transport infrastructure through planning
NPPF12	NPPF 2021 - Achieving well-designed places
NPPF13	NPPF 2021 - Protecting Green Belt Land
NPPF14	NPPF 2021 - Meeting the challenge of climate change flooding
NPPF15	NPPF 2021 - Conserving and enhancing the natural environment
NPPF16	NPPF 2021 - Conserving & enhancing the historic environment
NPPF2	NPPF 2021 - Achieving sustainable development
NPPF4	NPPF 2021 - Decision-Making
NPPF6	NPPF 2021 - Building a strong, competitive economy
NPPF9	NPPF 2021 - Promoting sustainable transport

3. CONSIDERATIONS

3.1 Site and Locality

The Hayes Bridge Retail Park site measures approximately 2.88 hectares in area and is located on the eastern edge of Hillingdon borough, to the south of Uxbridge Road, East of Springfield Road. The site comprises seven units, only two of which are operational (these being Dreams and Halfords), leaving five vacant units.

The site has been designated as part of the Springfield Road Strategic Industrial Location as part of the Local Plan. The site forms part of Flood Zone 2, the Ossie Garvin Air Quality Focus Area and the Hillingdon Air Quality Management Area. The land is also subject to potential contamination.

The Yeading Brook adjoins the site to the East, beyond which is the Grand Union Canal, both of which form part of London's Blue Ribbon Network. More specifically, the adjoining Grand Union Canal is designated as a Nature Conservation Site of Metropolitan or Borough Grade I Importance and

forms part of the Canalside Conservation Area designated within Ealing. Transport for London's webCAT planning tool confirms that the Public Transport Accessibility Level is 2.

3.2 Proposed Scheme

This application seeks permission for the demolition of the existing buildings and erection of a single commercial building for employment purposes Class E(g)iii, B2 and B8, along with ancillary offices, associated infrastructure including; service yard, car parking, drainage and hard and soft landscaping. The total floorspace would be equal to 16,513m² GEA / 16,087m² GIA, including 14,075m² GIA of warehouse floorspace and 2,012m² GIA of ancillary office space.

More specifically, the large commercial building would be sited on the western boundary, with 91 no. car parking spaces to the front on the northern section of the site and service yard area with 18 no. loading docks and 16 no. HGV parking spaces on the eastern side of the plot. This design includes an attached three storey office block on the front (northern) elevation and an area of landscaping adjoining Uxbridge Road.

The combined industrial/warehouse building and ancillary offices would measure 20.32m in height at its highest point and would cover a large footprint measuring circa 187m in length and 80m in width.

3.3 Relevant Planning History

- | | |
|-----------------------------|--|
| 1911/APP/2018/1273 | Hayes Bridge Retail Park Uxbridge Road Hayes |
| | Erection of a new building measuring 214 sq. m (GIA) for use within Use Classes A1 and/or A3 and associated physical works to site layout |
| Decision: 13-06-2018 | Approved |
| 1911/APP/2020/2720 | Hayes Bridge Retail Park Uxbridge Road Hayes |
| | Erection of a new building measuring 114 sq. m (GIA) for use as retail, restaurant and/or takeaway with associated physical works to site layout |
| Decision: 27-11-2020 | Approved |
| 1911/APP/2022/927 | Hayes Bridge Retail Park Uxbridge Road Hayes |
| | Request for a Screening Opinion under Regulation 6 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 |
| Decision: 08-09-2023 | No Further Action(P) |
| 1911/BJ/95/0895 | Emi (1-3) Uxbridge Road Hayes |
| | Redevelopment of site to provide 9,290 sq. metres of Class A1 (non-food retail) floorspace and 278 sq. metres of Class A3 (Food and Drink) floorspace plus associated parking and landscaping (involving demolition of existing record factory building) (outline application) |

Decision: 26-01-1996 Approved

1911/BL/96/0289 Emi (1-3) Uxbridge Road Hayes

Variation of condition 14 (to allow the Class A3 unit to open between 08.00 hours and Midnight on every day of the week) of outline planning permission ref. 1911BJ/95/895 dated 26/01/96;
Redevelopment of site to provide 9,290m² of Class A1 (non-food retail) and 278m² of Class A3 (Food and Drink) floorspace

Decision: 03-05-1996 Approved

1911/BM/96/0326 01-Mar Uxbridge Road Hayes

Reserved matters (details of design, siting, landscaping, traffic arrangements, refuse storage, finished levels, facilities for people with disabilities, site survey of contamination and levels) in compliance with conditions 1,3,4,5,6,7, 9 and 17 of outline planning permission ref. 1911BJ/95/895 dated 26/01/96; Redevelopment of site to provide 9,290m² of Class A1 (non-food retail) floorspace and 278m² of Class A3 (Food and Drink) floorspace plus associated parking and landscaping

Decision: 15-05-1996 Approved

1911/BW/96/1285 Slough Van And Truck Centre Uxbridge Road Hayes

Redevelopment of the site to provide a landscaped area in association with approved adjoining development

Decision: 15-11-1996 Approved

Comment on Relevant Planning History

No comment.

4. Planning Policies and Standards

Development Plan

Planning law requires that applications for planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise.

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

- The Local Plan: Part 1 - Strategic Policies (2012)
- The Local Plan: Part 2 - Development Management Policies (2020)
- The Local Plan: Part 2 - Site Allocations and Designations (2020)
- The West London Waste Plan (2015)
- The London Plan (2021)

Material Considerations

The National Planning Policy Framework (NPPF) (2023) is also a material consideration in planning decisions, as well as relevant supplementary planning documents and guidance.

Local Plan 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.EM2 (2012) Green Belt, Metropolitan Open Land and Green Chains

PT1.EM3 (2012) Blue Ribbon Network

PT1.EM6 (2012) Flood Risk Management

PT1.EM7 (2012) Biodiversity and Geological Conservation

PT1.EM8 (2012) Land, Water, Air and Noise

PT1.HE1 (2012) Heritage

Part 2 Policies:

DMAV 1 Safe Operation of Airports

DMCI 7 Planning Obligations and Community Infrastructure Levy

DME 1 Employment Uses in Designated Sites

DMEI 1 Living Walls and Roofs and Onsite Vegetation

DMEI 10 Water Management, Efficiency and Quality

DMEI 12 Development of Land Affected by Contamination

DMEI 14 Air Quality

DMEI 2 Reducing Carbon Emissions

DMEI 6 Development in Green Edge Locations

DMEI 7 Biodiversity Protection and Enhancement

DMEI 8 Waterside Development

DMEI 9 Management of Flood Risk

DMHB 1 Heritage Assets

DMHB 10 High Buildings and Structures

DMHB 11 Design of New Development

DMHB 12 Streets and Public Realm

DMHB 14 Trees and Landscaping

DMHB 15 Planning for Safer Places

DMHB 4 Conservation Areas

DMHB 7 Archaeological Priority Areas and archaeological Priority Zones

DMT 1 Managing Transport Impacts

DMT 2 Highways Impacts

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 D4 (2021) Delivering good design

LPP D5 (2021) Inclusive design

LPP D8 (2021) Public realm

LPP D9 (2021) Tall buildings

LPP E4 (2021) Land for industry, logistics and services to support London's economic function

LPP E5 (2021) Strategic Industrial Locations (SIL)

LPP E7 (2021) Industrial intensification, co-location and substitution

LPP G1 (2021) Green infrastructure

LPP G2 (2021) London's Green Belt

LPP G5 (2021) Urban greening

LPP G6 (2021) Biodiversity and access to nature

LPP G7 (2021) Trees and woodlands

LPP HC1 (2021) Heritage conservation and growth

LPP SI1 (2021) Improving air quality

LPP SI12 (2021) Flood risk management

LPP SI13 (2021) Sustainable drainage

LPP SI2 (2021) Minimising greenhouse gas emissions

LPP SI3 (2021) Energy infrastructure

LPP SI4 (2021) Managing heat risk

LPP SI5 (2021) Water infrastructure

LPP SI6 (2021) Digital connectivity infrastructure

LPP T1 (2021) Strategic approach to transport

LPP T2 (2021) Healthy Streets

LPP T3 (2021) Transport capacity, connectivity and safeguarding

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

LPP T8 (2021) Aviation

LPP T9 (2021) Funding transport infrastructure through planning

NPPF12 NPPF 2021 - Achieving well-designed places

NPPF13 NPPF 2021 - Protecting Green Belt Land

NPPF14 NPPF 2021 - Meeting the challenge of climate change flooding

NPPF15 NPPF 2021 - Conserving and enhancing the natural environment

- NPPF16 NPPF 2021 - Conserving & enhancing the historic environment
- NPPF2 NPPF 2021 - Achieving sustainable development
- NPPF4 NPPF 2021 - Decision-Making
- NPPF6 NPPF 2021 - Building a strong, competitive economy
- NPPF9 NPPF 2021 - Promoting sustainable transport

5. Advertisement and Site Notice

- 5.1 Advertisement Expiry Date: **28th September 2022**
- 5.2 Site Notice Expiry Date: Not applicable

6. Consultations

External Consultees

A total of 251 no. letters were sent to neighbouring properties, a site notice was displayed to the front of the site and an advert was posted in the local paper. All forms of consultation expired on 3rd October 2022.

A total of 6 comments have been received from three residential properties. This includes two objections and 4 comments. All comments are summarised below:

Comments:

- It is not understood what Class E(g)III, B2, B2 means.
- If it is going to be waste management, then what type of waste will be processed? Will it be domestic waste, Industrial Waste, Toxic waste, Chemical waste etc?
- Why has the application been extended on a monthly basis? What is happening with the application?

Objections:

- The application is not clear about what is proposed.
- The traffic along Uxbridge Road between the Ossie Garvin roundabout and South is already significant.
- Adding extra HGV's queueing at the right turn into the site would worsen traffic.
- Residents do not want waste management to take place on site.
- The existing shops are convenient and helpful to residents.
- Quality of life will be affected.
- The prices of houses will be affected.
- The closure or non-closure of the retail park will affect employees.

PLANNING OFFICER COMMENT:

During the application, Officers explained to residents what the proposals were, confirming that the development sought permission for a flexible use comprising the following use classes:

- Class E (Commercial, Business and Service): part (g)iii for carrying out of industrial processes.
- Use Class B2 (General Industrial): the carrying out of industrial processes.

Hillingdon Applications Planning Committee - 6th December

2023 PART 1 - MEMBERS, PUBLIC & PRESS

- Use Class B8 (Storage or Distribution): use for storage or as a distribution centre.

It was also explained that there is no end user for the proposed development and as such, the specific operation is not confirmed but could include waste management processes.

It is also noted that paragraph 188 of NPPF (2023) states that the focus of planning decisions should be on whether proposed development is an acceptable use of land, rather than the control of processes or emissions (where these are subject to separate pollution control regimes). Planning decisions should assume that these regimes will operate effectively.

It is noted that questions were received regarding progress on the application. Throughout the application process, Officers engaged with the Applicant Team on amendments to the scheme. Specifically, the design of the proposal was discussed and amended plans were submitted. These are considered within the main body of the report.

All material planning considerations are addressed within the main body of the report, including the economic and employment impact (Section 07.01), the impact posed to the amenity and health of residents (Sections 07.08, 07.18 and 7.22), and the impact on the local highway network (Section 07.10). It is, however, noted that the impact on the value of properties is not a material planning consideration.

MINISTRY OF DEFENCE:

The application site occupies the statutory safeguarding zone(s) surrounding RAF Northolt. In particular, the aerodrome height, technical and birdstrike safeguarding zones surrounding the aerodrome and is approx. 4.87 km from the centre of the airfield.

After reviewing the application documents, I can confirm the MOD has no safeguarding objections to this proposal.

NATIONAL AIR TRAFFIC SERVICES:

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

HEATHROW AIRPORT:

We have now assessed the above application against safeguarding criteria and can confirm that we have no safeguarding objections to the proposed development.

However, if a crane is needed for installation purposes? We would like to draw your attention to the following:

Cranes

Given the nature of the proposed development it is possible that a crane may be required during its construction. We would, therefore, draw the applicant's attention to the requirement within the British Standard Code of Practice for the safe use of Cranes, for crane operators to consult the aerodrome before erecting a crane in close proximity to an aerodrome. This is explained further in Advice Note 4, 'Cranes and Other Construction Issues' (available at <http://www.aoa.org.uk/policy-campaigns/operations-safety/> and CAA CAP1096 Guidance to crane users on aviation lighting and notification (caa.co.uk).

PLANNING OFFICER COMMENT:

The informative note recommended by Heathrow Airport has been included in the recommendation at section 2 of this report.

THAMES WATER:

Waste Comments

With regard to SURFACE WATER drainage, Thames Water would advise that if the developer follows the sequential approach to the disposal of surface water we would have no objection. Management of surface water from new developments should follow Policy SI 13 Sustainable drainage of the London Plan 2021. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required.

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

There are public sewers crossing or close to your development. If you're planning significant work near our sewers, it's important that you minimize the risk of damage. We'll need to check that your development doesn't limit repair or maintenance activities, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes.

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

Water Comments

With regard to water supply, this comes within the area covered by the Affinity Water Company. For your information the address to write to is - Affinity Water Company The Hub, Tamblin Way, Hatfield, Herts, AL10 9EZ - Tel - 0845 782 3333.

PLANNING OFFICER COMMENT:

The informative note recommended by Thames Water has been included in the recommendation at section 2 of this report.

ENVIRONMENT AGENCY (INITIAL COMMENTS):

Having reviewed the information, we object to this application as submitted as it involves works within 8 metres of the Yeading Brook main river. We recommend that planning permission is refused as it is unlikely that we would grant a flood risk activity permit for this application as submitted.

This objection is in-line with Policy DME1 8: Waterside Development of the London Borough of Hillingdon Local Plan Part 2 (Development Management Policies) 2020. Reason Whilst the main industrial unit proposed is more than 8m away from the top of the bank, the distance between the HGV parking spaces and the Yeading Brook is unclear. The applicant has also failed to:

- Acknowledge and include the assessment of an 8-metre buffer zone, which starts from the top of the riverbank, within any documents submitted (I.e., the inclusion of an 8m buffer zone in the existing layout). This application proposes the installation of 17 HGV parking spaces near the watercourse, but without the inclusion of an 8-metre buffer zone it is unclear how much distance there is between the top of the bank and the closest parking space.
- The applicant has failed to assess the current stability of the bank and provide evidence that the installation of 17 HGV parking spaces will not further compromise it (due to the potential weight of the HGVs) and increase the risk of flooding to Bullsbrook Road and the surrounding properties to the Yeading Brook.
- Assess whether access to the riverbank is still possible. The proposed development would restrict essential maintenance and emergency access to the Watercourse. The permanent retention of a continuous unobstructed area is an essential requirement for future maintenance and/or improvement works. This includes the consideration for any space required for future defence maintenance, or replacement, including the use of vehicles and heavy-duty machinery.

Overcoming our objection: In order to overcome our objection the applicant must provide the following:

1. Provide a map showing the exact location and distance from the top of the riverbank in relation to the development. It must be demonstrated that the development is more than 8m from the top of bank. This includes the distance of the HGV parking spaces from the top of bank.
2. Provide evidence that the 8 metre buffer zone has been assessed. If an 8m buffer zone is not considered reasonable, the applicant must provide environmental justification to ensure that the proposed development will not interfere with natural geomorphological process and will not be placed at risk of damage arising from channel migration/erosion.
3. Must assess that the installation of 17 HGV parking spaces will not compromise the stability of the bank. Clarification should be given as to how long and often the HGV parking spaces will be used. This could be achieved by submitting evidence including, but not limited to, foundation designs with distances from the top of the bank and loading calculations.
4. Bank stability investigation works must be carried out in order to establish a baseline, or if there may be any potential problems with the bank. We would require seeing the findings. If the applicant cannot conduct these investigations, they must adequately justify why.
5. We require access to the river to conduct essential maintenance and emergency access. The applicant must consider the space required (8m) for future river maintenance and emergency works, including the use of vehicles and heavy-duty machinery.

Informative

Hillingdon Applications Planning Committee - 6th December

2023 PART 1 - MEMBERS, PUBLIC & PRESS

Flood Risk Activity Permit

The Environmental Permitting (England and Wales) Regulations 2016 require a permit to be obtained for any activities which will take place:

- on or within 8 metres of a main river (16 metres if tidal)
- on or within 8 metres of a flood defence structure or culvert (16 metres if tidal)
- on or within 16 metres of a sea defence
- involving quarrying or excavation within 16 metres of any main river, flood defence (including a remote defence) or culvert
- in a floodplain more than 8 metres from the river bank, culvert or flood defence structure (16 metres if it's a tidal main river) and you don't already have planning permission.

For further guidance please visit <https://www.gov.uk/guidance/flood-risk-activities-environmental-permits> or contact our National Customer Contact Centre on 03702 422 549 or by emailing enquiries@environment-agency.gov.uk. The applicant should not assume that a permit will automatically be forthcoming once planning permission has been granted, and we advise them to consult with us at the earliest opportunity.

Advice to LPA

Flood risk standing advice

The proposed development falls within Flood Zone 2, which is land defined in the planning practice guidance as being at risk of flooding.

We have produced a series of standard comments for local planning authorities and planning applicants to refer to on 'lower risk' development proposals. These comments replace direct case-by-case consultation with us. This proposal falls within this category.

These standard comments are known as Flood Risk Standing Advice (FRSA). They can be viewed at <https://www.gov.uk/guidance/flood-risk-assessment-for-planning-applications#when-to-follow-standing-advice>

We recommend that you view our standing advice in full before making a decision on this application. We do not need to be consulted.

Flood mitigation

The development lies within Flood Zone 2 and falls under our FRSA (as above). The developer may wish to include additional measures to mitigate the impact of more extreme future flood events. Measures could include raising ground or finished floor levels and/or incorporating flood proofing measures. Further guidance on preparing properties for flooding can be found at <https://www.gov.uk/government/publications/prepare-your-property-for-flooding>.

Water Resources

Increased water efficiency for all new developments potentially enables more growth with the same water resources. Developers can highlight positive corporate social responsibility messages and the use of technology to help sell their homes. For the homeowner lower water usage also reduces water and energy bills.

We endorse the use of water efficiency measures especially in new developments. Use of technology that

ensures efficient use of natural resources could support the environmental benefits of future proposals and could help attract investment to the area. Therefore, water efficient technology, fixtures and fittings should be considered as part of new developments.

We recommend that all new non-residential development of 1000sqm gross floor area or more should meet the BREEAM 'excellent' standards for water consumption.

We also recommend you contact your local planning authority for more information.

Final comments

Thank you for contacting us regarding the above application. Our comments are based on our available records and the information submitted to us. Please quote our reference number in any future correspondence and provide us with a copy of the decision notice for our records. This would be greatly appreciated.

If you are minded to approve the application contrary to our objection, I would be grateful if you could re-notify us to explain why, and to give us the opportunity to make further representations.

ENVIRONMENT AGENCY FOLLOW-UP:

Based on a review of the newly submitted information, we confirm that the drawings sufficiently demonstrate in detail that the proposed 17 HGV parking spaces will not impact the structural stability of the riverbank. Therefore, we are now in a position to remove our objection to the proposed development.

PLANNING OFFICER COMMENT:

It should be clarified that since the receipt of the above comments from the Environment Agency, the proposed plans have been amended and now indicate that the number of HGV parking spaces has been reduced to 16. This does not raise any new issues having regard to the nature of the amendment.

GREATER LONDON AUTHORITY:

Strategic issues summary

Land use principles: The proposed development is acceptable in principle as it would optimise the potential of the site appropriate to this Strategic Industrial Location (SIL). Given the site's out-of-centre location within an area characterised by industrial uses, the loss of the retail uses on this site to accommodate industrial use is acceptable. Nevertheless, concern is raised with the extent of heavy goods vehicles (HGVs) associated with the proposal, and further discussions are required on safe and sustainable freight operations.

Urban design: No strategic design issues are raised to the development of an industrial warehouse on SIL.

Transport: Further information is required on HGV operations, Healthy Streets, Travel Plans, network impact, access, road safety, parking, and freight.

Sustainable development and environment: Further information is required on energy, circular economy, whole-life cycle carbon, biodiversity, drainage, air quality, water efficiency, and noise.

Recommendation:

Hillingdon Applications Planning Committee - 6th December

2023 PART 1 - MEMBERS, PUBLIC & PRESS

That Hillingdon Council be advised that the application does not yet comply with the London Plan for the reasons set out in paragraph 79. Possible remedies set out in this report could address these deficiencies.

GREATER LONDON AUTHORITY (ECOLOGY AND URBAN GREENING):

The GLA Stage 1 response (dated 30/09/2022) states that the applicant should provide further information regarding urban greening, specifically regarding enhancing the site's eastern buffer to enhance the corridor to the Yeading Brook Site of Importance for Nature Conservation (SINC). This does not appear to have been provided and should be done so as soon as possible.

The GLA response sets out that despite being a B2 / B8 scheme, the Urban Greening Factor (UGF) score of 0.087 is very low and requests a review of proposed urban greening. This does not appear to have been provided and should be done so as soon as possible.

The GLA response requests that the applicant provides quantitative evidence that the proposed development secures biodiversity net gain. The applicant has provided a Biodiversity Net Gain Assessment, which states that there would be a 20.02% net gain for habitat units and 23.41% net gain for hedgerow units. It confirms that trading rules have been satisfied. No further information on this matter is requested. Recommendations in the report should be implemented or robust justification should be given as to why they cannot be. The applicant should prepare an Ecological Management Plan (EMP) to support long-term maintenance and habitat creation. The EMP should be secured by planning condition and approved, if the proposed development is granted planning consent.

The GLA response requests further information to demonstrate that the value of trees retained and proposed outweighs the value of the current tree stock. This does not appear to have been provided and should be done so as soon as possible.

At present, the proposed development cannot be considered to be compliant with green infrastructure policy.

PLANNING OFFICER COMMENT:

This is discussed in more detail within the main body of the Committee Report.

TRANSPORT FOR LONDON (Comments Dated June 2023):

Principle of Development

TfL have raised concerns about the principle of this development, in particular how it satisfies Policy T7 which is clear that development proposals for new consolidation and distribution facilities should be supported, provided that they do not cause unacceptable impacts on London's strategic road network and:

- Reduce road danger, noise and emissions from freight trips;
- Enable sustainable last-mile movements, including by cycle and electric vehicle;
- Deliver mode shift from road to water or rail where possible.

Within previous responses to this application, TfL have highlighted that this proposal represents an increase in the level of HGV movement to and from the site by 365%. HGVs carry greater road safety risk. Whilst it is noted that the existing site generates HGV movement, this proposals represents a significant increase. Noting the proposed routing, a greater level of HGV movement will arise on the A312, which is accessed via Ossie Garvin roundabout.

The applicant has indicated that the following matters can be dealt with through a Delivery and Servicing Plan and Operational Management Plan, secured through condition:

- HGV routing to and from the site and how this routing will be enforced;
- Measures that will be implemented to reduce the impact of servicing movements, including sustainable last mile movements and cargo bike;
- The requirement for all vehicle to achieve FORS Gold and 5* Direct Vision standard.

This document should also contain details on how the proposed development will seek to:

- Re-time deliveries to minimise the impact on congestion and noise pollution;
- Targets to increase the level of electric vehicles attending this site;
- Measures that will be implemented to reduce movements through consolidation.

The applicant should ensure that they are providing the infrastructure necessary to support sustainable and active freight to and from this site i.e. cargo bikes, cycle repair and maintenance facilities, electric vehicle charging points. It is noted that the applicant has identified that all HGV bays will have electric vehicle charging provision and one rapid charging bay will be provided.

Suggested wording for the Delivery and Servicing Plan and operational Management Plan can be found below:

Delivery and Servicing Plan Condition

Prior to occupation, a full and detailed Delivery, Servicing and Waste Management Plan shall be submitted to and approved in writing by the Local Planning Authority (in consultation with Transport for London). The plan shall demonstrate (but is not limited to)

- 1.The expected number and time of delivery and servicing trips to the site, including how deliveries will be scheduled to avoid several delivery vehicles arriving at the site simultaneously;
- 2.The types of vehicles that will be servicing the site, including all relevant swept path analysis for these vehicles;
- 3.Loading bay locations and layouts and vehicle turning areas;
- 4.Routing of delivery and servicing vehicles to and from this site, and how this routing will be enforced;
- 5.Measures that will be implemented to reduce the impact of servicing movements, including sustainable last mile movements, consolidation and cargo bikes;
- 6.The requirement for all vehicles to achieve FORS Gold and 5* Direct Vision standard, and detail on how this will be enforced;
- 7.Detail on re-timing of deliveries to minimise impact on congestion and noise pollution;
- 8.Targets and measures that will be implemented to increase the level of electric vehicles attending this site;
- 9.Mechanisms for monitoring and review.

The approved Delivery and Servicing Plan shall be implemented in full accordance with the approved details from the first occupation of the development and shall be adhered to for the lifetime of the development.

Operational Management Plan condition

Prior to occupation, a full and detailed Operational Management Plan shall be submitted to and approved in writing by the Local Planning Authority (in consultation with Transport for London). The plan shall

demonstrate (but is not limited to):

1. Deliveries and collections including how deliveries will be scheduled to avoid several vehicles arriving at the site simultaneously;
2. The types of vehicles that will be servicing the site, including all relevant swept path analysis for these vehicles;
3. Loading bay locations and layout and vehicle turning areas;
4. HGV routing to and from this site, and how this routing will be enforced;
5. Measures that will be implemented to reduce the impact of servicing movements, including sustainable last mile movements and a cargo bike strategy;
6. The requirement for all vehicles to achieve FORS Gold and 5* Direct Vision standard, and detail on how this will be enforced;
7. Detail on re-timing of deliveries to minimise impact on congestion and noise pollution;
8. Targets and measures that will be implemented to increase the level of electric vehicles attending this site;
9. Measures that will be implemented to ensure pedestrian and cyclist safety;
10. Measures that will be implemented to reduce movement through consolidation;
11. Mechanisms for monitoring and review.

The approved Operational Management Plan shall be implemented in full accordance with the approved details from the first occupation of the development and shall be adhered to for the lifetime of the development.

A contribution towards the monitoring of the Operational Management Plan and Delivery and Servicing Plan, as well as the identification of a Monitoring Framework, should be secured within the S106 agreement for this site.

Healthy Streets

It is noted that the applicant has undertaken an Active Travel Zone (ATZ) assessment, the scope of which was agreed with the Council and TfL prior to it being undertaken. The assessment concluded that improvements are not considered to be requirement as part of the development to accommodate movements associated with employees and visitors. It is understood that the applicant has offered a contribution of £21,718.75 towards delivering improvements identified within the ATZ assessment. This is welcomed. TfL will support Hillingdon in securing further contributions towards the delivery of ATZ works.

The applicant has proposed to create a shared footway/cycleway connecting to the existing route along Uxbridge Road along the northern boundary of the site. It has also been indicated that the proposed development would also deliver minor amendments to the kerblines at the access, reduce the width of the exit lane to a single lane, minor road marking amendments and the removal of the guiderail and central kerbing for 9m within the vicinity of the site. Whilst these improvements are welcomed, they do appear to be modest when considering the scope and nature of the proposed development and TfL is of the view that the proposed development should be doing more to enhance the walking and cycling environment. Uxbridge Road has been identified as a priority in the Strategic Cycling Analysis and is seen as a connection with the highest potential to increase levels of cycling. The development, and that of others along the Uxbridge Road, should be seeking to create seamless connections and enhancements to this cycling corridor. Taking this into consideration and noting the proposed amendments to the site access and the applicant's own mode share targets they should be going further, for example through upgrading the existing crossing to a toucan, and this crossing going straight across this junction. As such, we would expect the applicant to redesign and test in modelling software the junction improvements to this junction - TfL have sent a separate e-mail to Hillingdon Council on what could be considered for this junction. It is

understood that this has been passed on to the applicant. Further improvements, as referred to within TfL's e-mail, to this access would support in enhancing cycling and walking connections to and from the site and add to pre-existing cycling infrastructure along Uxbridge Road. This would be in line with the Mayor's Healthy Streets approach, which is central to the Mayor's Transport Strategy and referred to in Policy T2 of the London Plan. It would also be in line with Policy T5, which states that development should seek to overcome barriers to cycling (particularly important in this location noting SCA has identified that there is a great potential for cycling trips along Uxbridge Road), also improvements to the walking and cycling environment could support facilitating a strategic modal shift in line with Policy T1. Improvements to the active travel environment, and connections from this site to the cycle networks in proximity, can also support in enabling sustainable last mile movement, including cycle, in line with Policy T7. As such, there is a strong policy basis for the applicant undertaking this further work.

As part of their design, the applicant will also need to consider the safety of cyclists with respect to the expected HGV movements, which currently do not use this access point. As noted above, the proposed development will represent an increase of 365% of HGV movement to and from it, and these vehicles carry greater road safety risk. This request is made in line with the Mayor's Vision Zero approach, and Policy T4 of the London Plan. The design proposals should thus consider swept paths of vehicles they intend to use as well as detrunking (reducing size) of the junction to fit into new expected use of the development site.

The applicant should note that the design should be supported by a modelling exercise, which has been developed in accordance with TfL Modelling Guidelines and MAP standards.

The agreed design for this junction should then be delivered through a S278 agreement, secured within the S106 agreement for this site.

Trip Generation and Network Impact

TRICS has also used for the existing retail use, despite the applicant undertaking a survey of vehicle movement at this site. It is understood that at the time of this survey only one retail unit was unoccupied (Argos). TfL does not consider the closure of one unit as being robust justification for not utilising the survey data, particularly noting trips to this unit may have been linked with others at this site.

The proposals are for a speculative B2/B8 development and that the end users and specific operation of the proposed development is now known at this site. The applicant has undertaken a TRICS assessment for the proposed use of the site and are of the view that the B8 trip rates identified will provide a robust worst-case analysis.

The submitted information does not address TfL's concerns about shift working - as highlighted in previous response there is a concern that there could be an intensity of vehicle movement during a short period of time and the end/start period. There is a concern that this is still not being presented within the submitted trip generation assessment. As previously requested, the applicant should be providing a trip generation analysis for the shift working scenario to enable a robust assessment of the impact that the proposed development will have on the surrounding transport network. Paragraph 4.4.2 of the TA states that the 12 hour obtained trip rates for the proposals have been 'factored to each hour accordingly' to identify the 24-hour movement of the proposed development. No information has been given on how they have factored each hour - a query that was also made in TfL's previous response.

It is noted that the applicant has not submitted any modelling as part of the revised information. The applicant maintains that the number of vehicle movements at the site will be reduced but does not appear to have given any consideration to the change in nature of development, the different travel patterns that it will create and vehicle types that will going to and from the site. For example, HGVs take up a greater

amount of road space than cars and this development represents a 365 per cent increase from existing HGV use at this, the majority of which will be using a different junction to access and egress the site than previous proposals. As mentioned previously, any modelling or analysis undertaken to support the applicant's conclusion that the proposed development would result in a lesser impact than the existing use should be provided.

The applicant has stated that the proposed development would not result in an unacceptable impact on road safety, particularly in the context of the Ossie roundabout. The applicant has provided no analysis to support this assumption.

As mentioned in the Healthy Streets section above, the applicant should look into repurposing junction space with a view of creating a safer environment for pedestrians and cyclists, whilst also considering the impact of the number of larger vehicles that will be using the Uxbridge Road junction to enter the site.

Car Parking

It is noted that there has been a further reduction in the quantum of car parking to 91 spaces. Whilst this reduction is welcomed, this quantum is still not in line with London Plan policies. As acknowledged by the applicant and noted in TfL's previous comments, this site is located within an outer London Opportunity Area. As such the maximum level of parking for this site would be 28 (1 space per 600 sqm GIA), rather than the 165 cited by the applicant within their response. As such, to comply with London Plan policy T5 a reduction in the quantum of car parking is required.

As highlighted in TfL's previous comments on this application, the proposed development should be seeking to instil sustainable and active travel patterns to this site in line with the Mayor's strategic mode shift target. Based on the modal split presented within the Transport Addendum, it is estimated 40.6 per cent of journeys will be made by modes of private vehicle. This is not in line with the mayor's strategic mode shift target, as detailed in Policy T1. As highlighted previous, a reduction in the quantum of general parking provision, coupled with implementing measures identified within the Travel Plan and enhancing the sustainable and active travel environment, could assist in facilitating a strategic modal shift.

It is noted that there has also been a reduction in the quantum of HGV parking. An assessment of TRICS sites, and the quantum of HGV parking that they have, has been undertaken. This assessment demonstrates that on average, the TRICS site provide one HGV loading bay per 1005.7 sqm, and one HGV parking bay per 1431.7 sqm. Applying this ratio to this proposal would equate to a total of 17 loading bays and 12 HGV parking bays. This proposal is proposing 16 loading bays and 16 HGV parking bays. Based on the ratio presented, the applicant is providing 33.3% more loading bays than other sites.

Construction Logistics

No further comments on this matter. A CLP should be secured through the appropriate mechanism.

TRANSPORT FOR LONDON (Final Comments Dated November 2023):

Principle of Development

Throughout the consultation process of this applicant, TfL have raised concerns about the principle of this development, in particular how it satisfies Policy T7 which is clear that development proposals for new consolidation and distribution facilities should be supported, provided that they do not cause unacceptable impacts on London's strategic road network and:

- Reduce road danger, noise and emissions from freight trips;
- Enable sustainable last-mile movements, including by cycle and electric vehicle;
- Deliver mode shift from road to water or rail where possible.

As acknowledged by the applicant, the proposed development will result in a significant increase in the level of HGV movement to and from this site - from 38 to 296. This is a significant increase in comparison to existing levels, and noting the proposed routing, a greater level of HGV movement will arise on the A312, which is accessed via Ossie Garvin roundabout. The applicant previously indicated that they were happy for the following matters to be dealt with through a Delivery and Servicing Plan and Operational Management Plan, secured through condition:

- HGV routing to and from the site and how this routing will be enforced;
- Measures that will be implemented to reduce the impact of servicing movements, including sustainable last mile movements and cargo bike;
- The requirement for all vehicle to achieve FORS Gold and 5* Direct Vision standard.

As noted in TfL's response on the 23rd June, the above documents should also contain details on the following:

- Re-time deliveries to minimise the impact on congestion and noise pollution;
- Targets to increase the level of electric vehicles attending this site;
- Measures that will be implemented to reduce movements through consolidation.

Suggested wording for these conditions was sent across - have these been agreed? As noted in our previous response, a contribution towards the monitoring of the Operational Management Plan and Delivery and Servicing Plan, as well as the identification of a Monitoring Framework, should be secured

Site Layout

Following a meeting with the applicant, it is understood that the principle of a straight across toucan at this site access has been agreed. A straight across toucan would support the Strategic Cycling Analysis corridor running east to Southhall from the Ossie Garvin Rbt. It is understood that this is to be delivered via a S278, with a condition securing the detailed design of this crossing prior to commencement at this site. Noting this, it should be ensured that the S278 has flexibility to ensure that any amendments required, as highlighted through the detailed design process, can be implemented. The detailed design should include the lane reduction, straight crossing and dimensions on the eastern arm and the location of any CCTV cameras. As part of the detailed design, an updated Road Safety Audit will also need to be undertaken. TfL, would however, like to re-iterate our expectations for highway modelling that is submitted to support planning applications for the applicants future reference.

- As highlighted in previous correspondence TfL have concerns in regards to the robustness of the models submitted. Such concerns largely arise due to the models not following TfL's traffic modelling guidelines and Model Auditing Process (MAP). Lack of model audit and noncompliance with the guidance could result in outputs being flawed and could in the worst case lead to misinterpretation of results. Also as part of MAP TfL require signals critical timings and method of control to be checked by Engineering department - all to ensure proposed timings are safe and feasible to implemented as modelled. The applicant should ensure that such guidelines and processes are being followed, and the sufficient time in the timeline for the planning application is being allocated to this.

- It is also noted that in the modelling of the junction the applicant has used TEMPro. As noted on TfL's website, we do not support the use of TEMPro (NTEM) derived growth factors to inform projects in London and recommend that London specific forecasts are used instead. The London specific forecasts are

aligned with the London Plan, for example, in terms of growth (population and employment) and policy relating to the provision of car parking.

TfL would also like to note that this scheme has not been through TfL PEAR (Planning Engineering Advice Request) process either which was developed to ensure design proposals meet highway standards.

Cycle Parking

A total of 54 cycle parking spaces are proposed, taking that form of 38 long-stay and 16 short-stay.

The applicant has stated that the cycle parking will be provided in accordance with London Cycle Design Standards, Based on the Plans provided, TfL disagrees with this statement

It does not appear that the proposed development is providing cycle parking suitable to accommodate larger and adapted cycles. LCDS requires at least 5 per cent of cycle parking provision to be suitable to accommodate larger and adapted cycles, but based on the updated plans, it appears that no such provision is being provided at this site. To accommodate larger and adapted cycles, at least 1.8m between Sheffield stands should be provided. These spaces should also not form part of the lower-tier of a two-tier rack.

It appears that the applicant is providing cycle parking provision, in which the lower tier of a two-tier stand is a Sheffield stand. TfL's preference is that two-tier and Sheffield stands are separate provision.

An aisle width of at least 2.5m beyond the lowered tier should be provided. Based on the plans provided, it appears that only an aisle width of 2m is being provided. It should be ensured that you are achieving the aisle widths identified within Figure 8.1 of LCDS.

Further thought is also needed on the positioning of the short-stay cycle parking spaces, as there is a concern that when some of these stands are occupied others will not be able to be accessed.

Design amendments to the cycle parking provision is required to address the concerns raised above.

Car Parking

It is noted that 91 general and 16 HGV parking spaces are to be provided. As such, our comments on this matter remain as those issued on the 27th June 2023, which have been copied below for ease of reference. It is noted that there has been a further reduction in the quantum of car parking to 91 spaces. Whilst this reduction is welcomed, this quantum is still not in line with London Plan policies. As acknowledged by the applicant and noted in TfL's previous comments, this site is located within an outer London Opportunity Area. As such the maximum level of parking for this site would be 28 (1 space per 600 sqm GIA), rather than the 165 cited by the applicant within their response. As such, to comply with London Plan policy T5 a reduction in the quantum of car parking is required. As highlighted in TfL's previous comments on this application, the proposed development should be seeking to instil sustainable and active travel patterns to this site in line with the Mayor's strategic mode shift target. Based on the modal split presented within the Transport Addendum, it is estimated 40.6 per cent of journeys will be made by modes of private vehicle. This is not in line with the mayor's strategic mode shift target, as detailed in Policy T1. As highlighted previous, a reduction in the quantum of general parking provision, coupled with implementing measures identified within the Travel Plan and enhancing the sustainable and active travel environment, could assist in facilitating a strategic modal shift. It is noted that there has also been a reduction in the quantum of HGV parking. An assessment of TRICS sites, and the quantum of HGV parking that they have, has been undertaken. This assessment demonstrates that on average, the TRICS site provide one HGV

loading bay per 1005.7 sqm, and one HGV parking bay per 1431.7 sqm. Applying this ratio to this proposal would equate to a total of 17 loading bays and 12 HGV parking bays. This proposal is proposing 16 loading bays and 16 HGV parking bays. Based on the ratio presented, the applicant is providing 33.3% more loading bays than other sites.

Trip Generation

The submitted information indicates that there will be three shifts for warehouse workers. It still does not appear that any consideration has been given to the increase in intensity of vehicle movement during shift change. You have indicated that 134 employees will be travelling by car - is this across the three shifts, or per shift? How was the 24-hour profile derived? This was a query in previous TfL comments and does not appear to be addressed in the submitted material.

Noting the above outstanding queries, TfL still have concerns in regard to the trip generation assessment for this site. As mentioned in previous responses contributions towards Ossie Garvin Roundabout and/or the A312 Healthy Streets scheme may be required from this scheme. The site is resulting in a significant increase in HGV movement to and from the site. HGVs carry greater road safety risk. It is also noted that the proposed vehicle routing to the site will be concentrated to and from the A312 and Ossie Garvin Roundabout. Collision Statistics also indicate that there have been a number of accidents on this roundabout in recent years. It is recommended that a contribution towards a study which seeks to identify safety improvements (and designs) that could be made at this roundabout and its four arms is secured. It is suggested that a contribution of £50,000 is secured towards this study, however we note that the borough is the highway authority for this roundabout (with TfL being traffic authority as it forms part of the SRN) and cost of such a study should also be confirmed with the appropriate internal stakeholder.

Active Travel

It is welcomed that the applicant is contributing towards the delivery of the improvements identified within their Active Travel Zone assessment.

PLANNING OFFICER COMMENT:

Matters raised in TFL's comments are discussed within the main body of the Committee Report and relevant planning conditions have been included in Section 2.

GREATER LONDON ARCHAEOLOGICAL ADVISORY SERVICE:

The proposal is unlikely to have a significant effect on heritage assets of archaeological interest.

The application site is not in an Archaeological Priority Area, has been extensively developed over the last century and previous archaeological investigations in the vicinity have proved negative. I therefore conclude that it has low archaeological potential.

No further assessment or conditions are therefore necessary.

LONDON FIRE BRIGADE:

The London Fire Brigade (LFB) has been consulted with regard to the above-mentioned premises and have no observations to make. It should be ensured that if any material amendments to this consultation is proposed, a further consultation will be required.

The Applicant is advised to ensure the plans conform to Part B of Approved Document of the Building Regulations and that the application is submitted to Building Control/Approved Inspector who in some circumstances may be obliged to consult the Fire Authority.

I also enclose Guidance note 29 on Fire Brigade Access similar to that in B5 of the Building Regulations, Particular attention should be made to paragraph 16, Water Mains and Hydrants, by the applicant.

If there are any deviations from the guidance in ADB) vol 1 and 2: B5 Access and facilities for the fire service in relation to water provisions, then this information needs to be provided to the Water Office (water@london-fire.gov.uk) to discuss the proposed provision.

If there are any deviations to Brigade access and facilities then this information needs to be provided to Fire Safety Regulation (FSR-AdminSupport@london-fire.gov.uk) to review the proposed provision. Once we have received this information then the LFB can provide a response on the consultation and advice in regards to hydrants upon receipt of an appropriate site plan showing premises layout, access to it, and water supply infrastructure if available.

EALING COUNCIL:

No comments received.

Internal Consultees

PLANNING POLICY OFFICER:

Principle of Development

The site is currently an out of town centre retail park known as the Hayes Bridge Retail Park. The site is therefore not a sequentially preferable location for main town centres uses and there are no policies in the Development Plan which requires the site to be retained as an out of town centre retail park. The site is designated as a Strategic Industrial Location (SIL) in the Development Plan. Policy E5 of the London Plan (2021) outlines that proposals in SILs should be supported where the uses proposed fall within the industrial-type activities set out in Part A of Policy E4. This includes use classes B8, B2 and E(g)(iii). Please note that any planning application would need to be conditioned to restrict the uses to those above. Use class E(g) contains offices, which are a main town centre use and therefore would not be supported in this location. The restriction to E(g)iii only should be included via condition. Please also review whether the Council is including restrictions on data centres via condition at the point of determination. This would prevent the need for the applicant to submit information regarding energy connectivity.

Urban Greening

The proposal is within an Air Quality Management Area (AQMA) and therefore must provide onsite provision of living roofs and/or walls, in line with Policy DME1 1 of the Local Plan: Part 2 (2020).

PLANNING OFFICER COMMENT:

It should be noted that green roofs have been incorporated into the scheme on the roofs of the ancillary office accommodation.

ACCESS OFFICER:

Hillingdon Applications Planning Committee - 6th December

2023 PART 1 - MEMBERS, PUBLIC & PRESS

This proposal is for a new commercial/industrial unit located in the Springfield Road Retail Park to the west of Hayes has been reviewed with reference to policy D5 and D12 as set out in the 2021 London Plan. No accessibility concerns are raised subject to the following Conditions attached to any planning approval:

Development shall not commence until details of access to building entrances (to include ramped/level approaches, signposting, types and dimensions of door width and lobby openings) to meet the needs of people with disabilities have been submitted to and approved in writing by the Local Planning Authority. The approved facilities should be provided prior to the occupation of the development and shall be permanently retained thereafter.

Reason: To ensure an Accessible and Inclusive development for everyone in accordance with London Plan policy D5.

The development hereby approved shall accord with London Plan policy D5(B5) and D12(A) to include a minimum of one fire evacuation lift designed to meet the technical standards set out in BS EN 81-76, BS 9991 and/or BS 9999, with all such provisions remaining in place for the life of the development.

Reason: To ensure the development can accommodate robust emergency evacuation procedures, including measure for those who require step-free egress, in accordance with London Plan policy D5 and D12.

PLANNING OFFICER COMMENT:

The conditions recommended by the Access officer have been included in the recommendation at section 2 of this report.

NOISE SPECIALIST:

Sufficient information has been provided by the Applicant to make a recommendation with respect to noise by way of an 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 considering uncertainty: 'For the lifetime of the development hereby permitted the rating level of noise caused by the operation of development, including both static plant and equipment, and vehicles, 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 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'.

PLANNING OFFICER COMMENT:

The condition recommended by the Noise officer has been included in the recommendation at section 2 of this report.

FLOOD AND WATER MANAGEMENT CONSULTANT (Final Comments):

a) Review Summary

This application has changed from the previous application submitted in the following way(s):

- Type of development: N/A
- Types of conveyance / attenuation features: N/A
- Runoff rate restriction (l/s): N/A

- Runoff rate restriction per hectare (l/s/ha): N/A
- Runoff attenuation volume (m³): An additional 100m³ of storage from the permeable paving has been included in the drainage calculations.
- Maintenance plan: N/A
- Any other previously identified outstanding matters: Exceedance flow volumes have been reduced.

b) Recommendation and Requests

We recommend approval of the application. The applicant has provided updated drainage calculations that include the permeable paving attenuation volume, and this attenuation volume has sufficiently reduced the exceedance flow volumes.

c) Conditions Proposed

- Prior to commencement of groundworks (excluding site investigations and demolition), the applicant must submit a final detailed drainage design including drawings and supporting calculations to the Lead Local Flood Authority for review and approval, aligned with the "22/11/2022 21903-BGL-XX-XX-RP-D-0001 V3 Bridgewater Retail Park, Hayes - Flood Risk Assessment & Drainage Strategy" and associated drawings. The applicant is required to undertake soakage testing to confirm that the on-site rates are unsuitable for infiltration. A detailed management plan confirming routine maintenance tasks for all drainage components must also be submitted to demonstrate how the drainage system is to be maintained for the lifetime of the development.

- No building hereby permitted shall be occupied until evidence (photographs and installation contracts) is submitted to demonstrate that the sustainable drainage scheme for the site has been completed in accordance with the submitted details. The sustainable drainage scheme shall be managed and maintained thereafter in accordance with the agreed management and maintenance plan for all of the proposed drainage components.

PLANNING OFFICER COMMENT:

The above comments are noted and suitably worded conditions have been included within the recommendation at section 2 of this report.

AIR QUALITY OFFICER:

Summary of Comments

The proposed development is located within the LBH Air Quality Management Area and within Ossie Garvin Focus Area bringing additional traffic emissions which will add to current likely exceedances. 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 DME1 14 of the 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.

The proposed development is not air quality neutral and not air quality positive.

Damage Cost and Mitigation Measures

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.

Any 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.

The undiscounted level of mitigation required to the proposed development for traffic emissions is £772,630. Once all deductions were applied, the remaining value of mitigation due for traffic emissions is £695,367. 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 £77,263.

The level of mitigation required to the proposed development for building emissions is £35,862.

Therefore, if no further mitigation is offered by the applicant, a section 106 agreement with the LAP of £731,228 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.

Observations

In addition, Air Quality conditions are required to reduce operational emissions AND manage construction emissions as required by the Mayor of London. See text below.

Condition Air Quality - Low Emission Strategy

No development shall commence until a low emission strategy (LES) has been submitted to and approved in writing by the Local Planning Authority. The LES shall address but be not restricted to:

- 1) Secure compliance with the current London Plan (March 2021) and associated Planning Guidance requirements.
- 2) The implementation of a FAST electric vehicle charging bay for cars, LGVs and HGVs. This is to be implemented above the minimum number of charging points required in the London Plan.
- 3) Update the proposed Travel Plan to make it more ambitious with a clear and effective strategy to encourage staff / users of the site to
 - a) use public transport;
 - b) cycle / walk to work where practicable;
 - c) enter car share schemes;
 - d) purchase and drive to work zero emission vehicles.
- 4) Avoid, whenever possible, urban areas including LBH Focus Areas.

The measures in the agreed scheme shall be maintained throughout the life of the development.

Reason - As the application site is within an Air Quality Management Area, and to reduce the impact on air quality in accordance with policy EM8 of the Local Plan: Part 1 (November 2012), policy DMEI 14 of the London Borough of Hillingdon Local Plan (part 2), the London Borough of Hillingdon Air Quality Action Plan 2019-2023, London Plan (2021) policy SI1 and T4, and paragraphs 174(e), 186 and 188 of the NPPF (2023).

Conditions - Reducing Emissions from Demolition and Construction

A. No development shall commence until a Plan has been submitted to, and approved in writing by, the LPA. This must demonstrate compliance (drawn up accordance with) the GLA Control of Dust and Emissions from Construction and Demolition SPG (or any successor document).

Reason: Compliance with London Plan Policy SI 1 and in accordance with Mayor of London "The Non-road mobile machinery (standard condition recommended by Mayor of London, London Local Air Quality Management Policy Guidance 2019).

B. All Non-Road Mobile Machinery (NRMM) of net power of 37kW and up to and including 560kW used during the course of the demolition, site preparation and construction phases 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" dated July 2014 (SPG), or subsequent guidance. Unless it complies with the standards set out in the SPG, no NRMM shall be on site, at any time, whether in use or not, without the prior written consent of the local planning authority. The developer shall keep an up-to-date list of all NRMM used during the demolition, site preparation and construction phases of the development on the online register at <https://nrmm.london/>.

Reason: Compliance with the London's Low Emission Zone for non-road mobile machinery as per requirements of the London Environment Strategy.

PLANNING OFFICER COMMENT:

Suitably worded conditions and the recommended planning contribution have been included in the recommendation at section 2 of this report.

HIGHWAYS OFFICER:

Planning permission is sought to demolish several large out-of-town retail units and the construction of 16,087sq.m GIA of B8 (storage or distribution), supported by 2,014sq.m ancillary E(g) offices in its place, at this stage the end user is not known. The development would provide 16no. dock loading doors and 2no. level access doors. There would be 16no. HGV parking spaces and 91no. car parking spaces of which 5no. would be blue badge/accessible. Twenty parking spaces would have electric vehicle charge points. The development would provide 54no. cycle parking spaces, 36no. long-stay and 16no short-stay. The site has a PTAL ranking of 2 indicating that access to public transport is limited compared to London as a whole. This suggests that there would be a strong reliance on the private car for trip making to and from the site.

The application site fronts onto the A4020 Uxbridge Road, this is a dual carriageway with a 40mph speed restriction, it has footways/cycleways on either side of the carriageway. The main site entrance would be from the A4020 Uxbridge Road via a three-arm signal-controlled junction, there would also be an emergency access to the rear of the site leading onto Bullsbrook Road. Bullsbrook Road is a c.7.3m wide

Hillingdon Applications Planning Committee - 6th December

2023 PART 1 - MEMBERS, PUBLIC & PRESS

single carriageway road which provides access to the service yards and premises of 4no. sites - including the application site.

As the site is within the Heathrow Opportunity Area, the published London Plan 2021 would allow just 27no. car parking spaces. The Highway Authority does not consider this to be a suitable standard considering the site's location, PTAL ranking and proposed use. The London Plan also advises that car parking provision for B2 and B8 uses should be based on the standards for office provision under Policy T6.2 Office parking considering the "significantly lower employment density in B2 and B8 developments". This would allow a maximum of 161no. car parking spaces, this is almost identical to the Hillingdon Local Plan: Part 2 Development Management Policies lower standard - 163no. spaces. The 91no. spaces proposed is therefore in accordance with both Plans though a much lower standard. To demonstrate that 91no. spaces are adequate the applicant highlights that whilst the workforce maximum capacity of the building would be 461no., taking into account annual leave and sick leave it is anticipated that the building would usually be 85% occupied which would total 392no. workers, the car parking spaces ratio per worker would be 0.23. Considering the site would provide a low amount of car parking, the Highway Authority require that a Parking Design and Management Plan is submitted to the Council for approval, this has been agreed by the applicant.

The published London Plan 2021 Policy T6.5 Non-residential disabled persons parking requires in workplaces that 5% of total parking provision are designated parking bays and a further 5% enlarged. To be in accordance with this Policy the Highway Authority require that in addition to the 5no. designated bays proposed that a further 5no. enlarged bays are provided. This should be secured by a planning condition.

The proposal would provide 20no. electric vehicle charge points, this is also in accordance with the Local Plan which requires 5% of spaces have active and a further 5% passive provision. For this proposal 22% of spaces would have active provision which is accepted. Furthermore, the applicant reports that electric vehicle charge points would be provided for each of the HGV bays, a rapid electric vehicle charging point would also be provided within the service yard. If the application is recommended for approval, the Highway Authority would require a planning condition obliging the applicant to submit full details of the electric vehicle charge points proposed, including rapids, this has been agreed by the applicant.

The London Plan Policy T5 Cycling would require that the development provides no.32no. long-stay (16,087sq.m GEA/500sq.m) and 16no. short-stay cycle parking spaces (16,087sq.m GEA/500sq.m), 48no. spaces in total, the 54no. cycle parking spaces proposed is therefore in accordance with Policy T5 and accepted.

To determine the net change in trip generation between the existing use and application site in use as B8 storage and distribution use the applicant has interrogated the TRICS database. In its current use, the PM peak is busiest when there would be 283no. total vehicle two-way movements including 3no. total HGV two-way movements. However, it would be during the PM Peak 17:00 to 18:00h that the proposal would generate the greatest number of trips. There would be 64no. total vehicle two-way movements and 10no. total HGV two-way movements. Over a 12h period, the total vehicle two-way movements would fall from 3,348no. to 708no. a reduction of 2,640no. However, the number of 12h total HGV two-way movements would increase with the proposal, from 37no to 172no. This raises road safety concerns as HGVs present the greater road safety risk to other road users, the greatest risk of all being to cyclists and pedestrians. In its existing use HGVs enter and leave the site from Bullsbrook Road to the south. As part of this proposal HGVs would take access directly from the A4020 Uxbridge Road.

Road traffic comprises of a whole range of vehicle types and sizes, ranging from 16.5 meter articulated lorries to private cars and bicycles, because these vehicles have different characteristics in terms of length, turning radii, acceleration, speed etc they all have a different impact on the operation of the road network.

For example, a private car can pull away at traffic signals without difficulty whereas a large lorry accelerates much more slowly reducing the number of vehicles that can pass during a green signal. For the purposes of traffic modelling all vehicle types are given a Passenger Car Unit rating which takes into account their impact on the flow of all traffic.

The document Traffic Modelling Guidelines Version 4, Transport for London (September 2021) recommends following the Passenger Car Unit values.

- Pedal cycle 0.2
- Motorcycle 0.4
- Car or light goods vehicle 1.0
- Medium goods vehicle 1.5
- Bus or coach 2.0
- Heavy goods vehicle (HGV) 2.3

A private car is given a score of 1, because large lorries occupy more road space and travel more slowly, they have a passenger car unit score of 2.3, in simple terms one large lorry is the equivalent of just over two cars.

As shown in the table below, in its existing use as retail park over the period 07:00 to 19:00h it is calculated there are 3,348no. total vehicle two-way movements. All these vehicles use the A4020 Uxbridge Road access. In its proposed use as B8 warehousing with HGVs and private cars both taking access to/from the Uxbridge Road, over the 12 hour period 07:00 to 19:00 the HGV traffic would be equivalent to 396no. pcu two-way movements. In addition to this would be 536no. two-way light movements giving 932no. total vehicle movements. The proposed use would reduce the number of pcu's leaving the site via the A4020 Uxbridge Road access by 2,416no.

As mentioned above it is proposed that the Bullsbrook Road access would be used for emergency access only, it is currently used by HGVs servicing the retail units and there are 37no. two-way movements a day. With the proposal these movements would cease, this has the benefit of reducing the amount of traffic using the busy Springfield Road j/w Uxbridge Road junction, there would be 85no. fewer pcu movements between 07:00 and 19:00h which is welcomed as it would help alleviate congestion and delay in this location.

The Highway Authority notes that the site would be operational 24-hours per day. This raises concerns regarding parking accumulation as the demand for parking may exceed supply when the shifts change, colleagues will arrive and need somewhere to park before workers parking on-site have left. How this will be managed must be clearly set out in the Parking Design Management Plan.

As with any development, the Highway Authority requires that the proposal is self-sufficient in transport terms. This proposal would have a minimal amount of car parking spaces, 91no. would be provided though the London Plan would allow up to 161no. The Highway Authority is mindful that if car parking is not available on-plot people may resort to parking injudiciously on the surrounding streets presenting a risk to road safety and hindering the free flow of traffic. This would be counter to the London Plan policy T4 Assessing and mitigating transportation impacts which requires that "development proposals should not increase road danger". To help mitigate against this happening, the Highway Authority expects the applicant to contribute towards active travel and public transport measures that offer a genuine alternative to trip making by the private car. At the request of the Highway Authority the applicant has agreed to remodel the access onto the A4020 Uxbridge Road, designs have already been received that show the provision of a toucan crossing, reducing the exit to one lane and continuing the shared use footway/cycleway into the site. The Highway Authority welcomes the changes proposed but any planning

approval shall be subject to the receipt of detailed plans to be thoroughly tested through technical assessment and potential road safety audit. All cost arising from this work shall be borne by the applicant.

The Highway Authority requires that through a 1990 Town and Country Planning Act s.106 legal agreement that the applicant funds the delivery of further works that will facilitate safe and convenient active travel to the site. This will broaden the travel choice offered to workers and visitors thereby reducing the number of private car trips generated. This would allow the site to be self-sufficient in transport terms given that on-plot parking would be limited. The applicant has confirmed they are willing to contribute £21,718 to the works listed below.

1990 Town and Country Planning Act Healthy Street Heads of Terms

Supply & install 2no. new street benches - £6,250.00
Supply & install 6no. new Sheffield cycle stands - £2,250.00
Supply & install new replacement guard rail - £7,656.25
Supply & plant 5no. new tree pit & tree - £11,562.50
Total - £21,718.75

Subject to the above there are no highway objections to this proposal. If the Local Planning Authority is minded to recommend planning approval, then the Highway Authority would require the following conditions and Heads of Terms.

Planning conditions

1. The applicant submits detailed plans to the Council for approval showing the remodelling of the Hayes Bridge access j/w Uxbridge Road to include a toucan crossing, reduction of carriageway width to one lane and an internal shared use footway/cycleway. The Highway fees incurred assessing these drawings shall be borne by the applicant. The agreed design for this junction should then be delivered through a 1980 Highways Act s.278 agreement to be secured within a 1990 Town and Country Planning Act s.106 agreement for this site.
2. The applicant funds a package of Healthy Streets works at a cost of £21,718.75 to be secured within a 1990 Town and Country Planning Act s.106 agreement for this site. REASON to comply with the published London Plan 2021 policy T2 Healthy Streets.
3. The applicant enters a 1980 Highways Act 2.278 legal agreement allowing them to carry out agreed works on the Council's highway to be secured within a 1990 Town and Country Planning Act s.106 agreement for this site. REASON to comply with the published London Plan 2021 policy T2 Healthy Streets, policy T4 Assessing and mitigating transport impacts and policy T5 Cycling.
4. An Operations Management Plan is submitted to the Council for approval that sets out how the transport needs of the proposal will be managed.
5. Prior to the first operation of the development, details of a Delivery and Servicing Plan shall be submitted to and approved in writing by the Local Planning Authority. This should accord with Transport for London's Delivery and Servicing Plan Guidance and include.
 - i. The expected number and time of delivery and servicing trips to the site, including how deliveries will be scheduled to avoid several delivery vehicles arriving at the site simultaneously;
 - ii. The types of vehicles that will be servicing the site, including all relevant swept path analysis for these vehicles;
 - iii. Loading bay locations and layouts and vehicle turning areas;

- iv. Routing of delivery and servicing vehicles to and from this site, and how this routing will be enforced;
- v. Measures that will be implemented to reduce the impact of servicing movements;
- vi. The requirement for all vehicles to achieve FORS Gold and 5* Direct Vision standard, and detail on how this will be enforced;
- vii. Detail on re-timing of deliveries to minimise impact on congestion and noise pollution;
- viii. Mechanisms for monitoring and review.

Thereafter the development shall be operated in full accordance with the approved details.

REASON To ensure appropriate servicing of the site, to safeguard highway safety and to safeguard the free flow of traffic, in accordance with Policies DMT 1 and DMT 2 of the Hillingdon Local Plan: Part 2 (2020) and Policy T7 of the London Plan (2021).

6. A Construction Logistics Plan is submitted to the Council for approval. This should include

- i. The phasing of the works;
- ii. The hours of work;
- iii. On-site plant and equipment;
- iv. Measures to mitigate noise and vibration;
- v. Measures to mitigate impact on air quality;
- vi. Waste management;
- vii. Site transportation and traffic management, including:
 - (a) HGV Routing enforcement;
 - (b) Signage;
 - (c) Vehicle types and sizes;
 - (d) Hours of arrivals and departures of staff and deliveries (avoiding peaks);
 - (e) Frequency of visits;
 - (f) Parking of site operative vehicles;
 - (g) On-site loading/unloading arrangements;
 - (h) Use of an onsite banksman (if applicable);
 - (i) Use of consolidation centres to reduce HGV movements;
 - (k) Achieve FORS Gold standard and 5* Direct Vision Standard;
 - (l) Encourage use of active travel.
- viii. The arrangement for monitoring and responding to complaints relating to demolition and construction; and
- ix. Details of cranes and other tall construction equipment (including the details of obstacle lighting).

REASON to comply with London Plan 2021 policy T7 Deliveries, servicing, and construction.

7. A Car Parking Management Plan is submitted to the Council for approval. REASON to comply with the published London Plan 2021 policy T6 Car parking.

8. Plans shall be submitted to the Council for approval confirming that 5no. car parking spaces will be designated disabled persons parking bays and 5no. spaces enlarged parking bays. REASON to be in accordance with the published London Plan policy T6.5 Non-residential disabled persons parking.

9. All operational parking must provide infrastructure for electric or other Ultra-Low emission vehicles. REASON to comply with the published London Plan policy T6.2 Office Parking.

Heads of Terms

1. The applicant makes a Healthy Streets contribution of £21,718.75 to fund the delivery of works to encourage and enable trip making by walking, cycling and public transport in lieu of car parking being provided on-plot.

2. The applicant enters a 1980 Highways Act s.278 agreement with the Council that will allow the applicant to enter into a legal agreement with the Council (in our capacity as the Highway Authority) to make permanent alterations or improvements to the highway as part of a planning approval. Work affecting the highway can only begin once the s.278 agreement is signed by the developer and the Council, and all pre-commencement requirements listed in the s.278 agreement have been met and approved by the Council.

PLANNING OFFICER COMMENT:

Suitably worded conditions and heads of terms have been incorporated into the Officer's recommendation at section 2 of this report to capture the recommendations of the Highway Authority.

PLANNING SPECIALIST TEAM MANAGER (Energy Comments dated November 2022):

I have no objections to the proposed development with regards to energy.

The energy assessment provides limited detail on the solutions to achieve zero carbon requirements of London Plan Policy SI2. The assessment concludes both a slight shortfall and extensive net improvement although the latter appears to be based on a reporting error.

The assessment relies on PV panels and air source heat pumps to achieve the be green requirement of the London Plan. Air source heat pumps are no be green measures as they require grid electricity to run them.

The report is sufficient for this stage of consideration but a far more detailed and reporting compliant assessment needs to be secured ahead of development commencing. As there is likely to be a shortfall in emissions, a heads of term for a S106 should capture the cash in lieu contribution allowed for by the London Plan Policy SI2.

Condition

Prior to commencement of development (excluding demolition), a detailed energy assessment shall be submitted to and approved in writing by the Local Planning Authority. The assessment shall accord with the requirements of the London Plan (policy SI2) and the GLA Energy Assessment Guidance (April 2020 or as amended). The assessment shall clearly identify the baseline energy demand and associated carbon emissions in accordance with the prevailing building regulation requirements. The assessment shall then 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. Where the measures do not collectively contribute to a zero carbon saving (noting a minimum requirement of 35% saving onsite) to the agreement of the Local Planning Authority, the report shall set out (a) the 'onsite saving' and (b) the 'shortfall'; to be presented in tCO2/annum.

The 'shortfall' shall then be subject to an offsite contribution in accordance with the London Plan Policy SI2.

The Energy Assessment shall also provide details of the 'be seen' recording and reporting measures to be agreed in writing by the Local Planning Authority. The 'be seen' measures must comply with the requirements of London Plan Policy SI2 and demonstrate that the 'onsite saving' is being achieved in perpetuity.

The development must proceed and be operated in accordance with the approved details.

Reason

To ensure the development's regulated energy demand doesn't contribute to CO2 emissions in accordance with Policy SI2 of the London Plan.

Section 106 Requirement

On commencement of development (excluding demolition), the shortfall (where applicable) identified in the Energy Assessment required by Condition shall form an in lieu contribution to the Council's carbon offset fund at £95/tCO2 annualised over 30 years (i.e. shortfall x 30 x 95 = £contribution).

PLANNING OFFICER COMMENT:

Following amendments to the scheme, the Energy Statement was updated and the Planning Specialist Team Manager was re-consulted. Their comments are copied below.

PLANNING SPECIALIST TEAM MANAGER (Final Energy Comments Dated November 2023):

The application was lodged in 2022 and therefore the GLA energy assessment guidance of 2020 was applicable. However, the application now spans into 2023 and the updated 2022 GLA Energy Assessment Guidance would be applicable.

The submission meets the requirements of the former but not the latter, notably in relation to the assessment of the scheme against the prevailing Building Regulations; i.e. the report uses 2013 in accordance with 2020 guidance and not 2021 in accordance with the 2023 guidance.

There is also a limited amount of detail on the PV type and installation mechanism particularly in combination with the roof plans and how they will sit alongside rooflights.

Consequently, I agree with the approach outlined below seeking:

- 1 - an updated energy strategy in accordance with current guidance (2023)
- 2 - a S106 generic clause capturing any shortfall
- 3 - a 'be seen' monitoring and reporting condition.

The general approach taken is supported and it the amount of PVs could offset the energy loads of the building. However more detailed information set against the current guidance would be required to establish the specifics.

PLANNING OFFICER COMMENT:

A suitably worded planning condition and heads of term has been included in the Officer's recommendation at section 2 of this report.

CONTAMINATED LAND OFFICER:

I have reviewed a copy of the geo-environmental information within the following report submitted in support of the application:

- Title: Phase 1 Geo-Environmental Risk Assessment; Ref: 21.2188/CB/LC; Date:09 December 2021;
Prepared by: Paragon Building Consultancy Limited

The report provides details of a phase 1 study which includes the required initial conceptual site model and preliminary risk assessment which identify and assess potential contaminant linkages at the site.

The maximum risks associated with land contamination are identified as medium, and the report provides suitable recommendations which outline a structured site investigation to be implemented in accordance with the listed parameters within the report document.

I therefore recommend the following conditions to be imposed if planning permission is awarded:

Proposed conditions for land affected by contamination.

(i) The development shall not commence until a scheme to deal with contamination has been submitted to and approved by the Local Planning Authority (LPA). All works which form part of any required remediation scheme shall be completed before any part of the development is occupied or brought into use unless the Local Planning Authority dispenses with any such requirement specifically and in writing. The scheme shall include the following measures unless the LPA dispenses with any such requirement specifically and in writing:

(a) A site investigation including, where relevant, sampling of soils, ground gases and vapours, surface water and groundwater, together with the results of analyses and risk assessment, shall be carried out by a suitably qualified person. The report should also clearly identify all risks, limitations and recommendations for remedial measures to make the site suitable for the proposed use; and

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

(ii) If during remedial or development works contamination not addressed in the submitted remediation scheme is identified an addendum to the remediation scheme shall be agreed with the LPA prior to implementation; and

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

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

REASON To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems and the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors in accordance with Hillingdon Local Plan: Part 2 (January 2020) Policies - DMEI 11: Protection of Ground Water Resources and DMEI 12: Development of Land Affected by Contamination.

PLANNING OFFICER COMMENT:

A suitably worded condition has been included within the Officer recommendation at Section 2 of this Committee Report.

BUILDING CONTROL:

No comment received.

7. MAIN PLANNING ISSUES

7.01 The principle of the development

OUT OF TOWN CENTRE RETAIL PARK

The site is currently an out of town centre retail park known as the Hayes Bridge Retail Park. The site is therefore not a sequentially preferable location for main town centres uses and there are no policies in the Development Plan which requires the site to be retained as an out of town centre retail park.

STRATEGIC INDUSTRIAL LOCATION

The site is located within the designated Strategic Industrial Location (SIL) located off Springfield Road. SIL is the capital's main reservoir of land for industrial, logistics and related uses. SILs are given strategic protection because they are critical to the effective functioning of London's economy. The proposed E(g)(iii), B2 and B8 facility falls within the industrial-type activities set out in Policy E4, Part A, of the London Plan (2021).

Policy E7, Part D (1), of the London Plan (2021) requires that industrial uses within SILs are intensified to deliver an increase in capacity in terms of floorspace. Accordingly, the proposed development would include a significant uplift in floorspace. The proposed intensification in industrial capacity would be supported from a strategic perspective. This is considered to be a positive benefit of the scheme given the ongoing demand for industrial floorspace within the borough and the need to optimise the capacity of existing brownfield sites.

Policy E7, Part D (2), of the London Plan (2021) also requires that the industrial and related activities on-site and in surrounding parts of the SIL are not compromised in terms of their continued efficient function, access, service arrangements and days/hours of operation noting that many businesses have 7-day/24-hour access and operational requirements. Policy E5 also states that development proposals within or adjacent to SILs should not compromise the integrity or effectiveness of these locations in accommodating industrial-type activities and their ability to operate on a 24-hour basis. This is considered in more detail within relevant sections of the report.

OFFICE FLOORSPACE

A total of 2,012 m² of office floorspace is proposed as part of the development. The principle of office floorspace within a SIL is generally not supported by the London Plan (2021). The only new office floorspace that would typically be permitted within a SIL is that deemed to be ancillary to the land

uses established within Policy E4 Part A. Based on the application submission, it is agreed that the office floorspace proposed is wholly ancillary to the main E(g)(iii), B2 or B8 use. A planning condition has been recommended to ensure that if planning permission is granted, the office accommodation would remain ancillary to the development. Subject to the aforementioned condition, this element of the proposal is considered acceptable in principle.

ECONOMY

Paragraph 81 of the NPPF (2023) states that significant weight should be placed on the need to support economic growth and productivity.

It is agreed that there would be economic benefits arising from the proposed scheme, but LBH is unable to verify the Appellants stated figures with respect to the scale of the economic benefits. Significant weight is afforded to such benefits in line with Paragraph 81 of the NPPF (2023).

EMPLOYMENT

The site is host to a range of large buildings occupied by various retail uses. These did include: -

- Currys PC World
- Halfords
- Harveys and Bensons for Beds
- Dreams
- Office Outlet
- Argos
- AHF
- Tapi Carpets

As a consequence of the pandemic and the changing nature of retail, resulting in a significant shift to online sales, the Planning Statement (which is dated May 2022) states that four of the referenced units have expressed an interest in terminating their leases and vacating with immediate effect, two of the companies have recently gone into administration and one company will be consolidating its existing interests in a nearby store. At present day, it is understood that five of the seven units are now vacant, leaving only 2 operational units which are occupied by Dreams and Halfords.

Based on the Economic Benefits Statement (dated February 2022) submitted, the proposed development would generate approximately 444 jobs as a B2 unit and 234 jobs as a B8 unit. The Applicant submits that the existing premises generates between 75 and 85 full-time employees if all 8 units are fully let, equal to 12,867m².

Based on the Employment Density Guide (3rd Edition dated November 2015), what was formerly known as Use Class A1 retail generates 1 job per 15-20m² for a foodstore and 1 job per 90m² for a retail warehouse. Based on this, 12,867m² of a foodstore would generate 644 full time jobs and 12,867m² of retail warehouse would generate 143 full time jobs.

For balance, it should be noted that the site as it exists could generate a significant number of full time jobs, albeit the existing scenario appears to indicate that this is not a likelihood.

Policy E11 of the London Plan (2021) states that development proposals should support employment, skills development, apprenticeships, and other education and training opportunities in both the construction and end-use phases, including through Section 106 obligations where appropriate. In

accordance with this, the Council's Planning Obligations Supplementary Planning Document (2014) requires that developments with estimated construction costs of over £2 million and a construction period of three months or more deliver an in-kind employment and training scheme or financial contributions towards training and employment in the borough. If planning permission is granted, an employment strategy and construction training scheme would be secured by Section 106 legal agreement.

7.02 Density of the proposed development

Not applicable to the consideration of this application.

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

ARCHAEOLOGY

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

GLAAS have been consulted as part of the application process and have confirmed that the proposal is unlikely to have a significant effect on heritage assets of archaeological interest. All necessary processes have been followed and the proposal would not be considered contrary to Policy DMHB 7 of the Hillingdon Local Plan: Part 2 (2020).

CONSERVATION AND HERITAGE

Policy DMHB 4 of the Hillingdon Local Plan: Part 2 (2020) states that new development, including alterations and extensions to existing buildings, within a Conservation Area or on its fringes, will be expected to preserve or enhance the character or appearance of the area. It should sustain and enhance its significance and make a positive contribution to local character and distinctiveness. In order to achieve this, the Council will:

- A) Require proposals for new development to be of a high quality contextual design.
- B) Resist the loss of buildings, historic street patterns, important views, landscape and open spaces or other features that make a positive contribution to the character or appearance of the Conservation Area; any such loss will need to be supported with a robust justification.

The above is supported by Policy HC1 of the London Plan (2021).

The application site does not contain any designated heritage assets and it does not form part of a Conservation Area. In Hillingdon, the nearest listed building is Bulls Bridge and the nearest locally listed building is the Toll House near Bulls Bridge. Both are located in the Bulls Bridge Conservation Area which is sited circa 1600m to the South-West. In Ealing the closest listed buildings to the site are Church of St George (Grade II) approximately 650m East of the site at Tudor Road and the Grade II listed water tower at the Southall Gas Works site approximately 1200m to the South-East. The closest Locally listed buildings are Nos. 49-53 Northcote Avenue (the Northcote Arms).

The setting of the heritage assets identified above would not be affected by the development due to the distance and the intervening buildings and vegetation between the buildings and Bulls Bridge Conservation Area.

The heritage asset that would be most affected by the development would be the Ealing Canalside Conservation Area (in particular the southwestern part) and its setting. The Canalside Conservation Area is not in the London Borough Hillingdon but in the neighbouring London Borough of Ealing. The Canalside Conservation Area Southwest Part covers the stretch of the canal comprising the towpath on the western side and extends to the centre of the canal.

It is understood that there would only be one view of the proposed development from the canal, between the DB Schenker Hayes building and Monier Redland Ltd building. This view would be partially screened by planting and the development would be set circa 250m from the canal view. Taking into account the limited extent of views which would be affected, it is concluded that the development would not be harmful to the setting of the Canalside Conservation Area. As such, the proposed development would not be considered contrary to Policy DMHB 4 of the Hillingdon Local Plan: Part 2 (2020) and Policy HC1 of the London Plan (2021).

7.04 Airport safeguarding

Policy DMAV 1 of the Hillingdon Local Plan: Part 2 (2020) states:

A) The Council will support the continued safe operation of Heathrow Airport and RAF Northolt and will consult with the airport operator on proposals in the safeguarded areas. Proposals that may be a hazard to aircraft safety will not be permitted.

B) In consultation with the Airport Operator, the Council will ensure that:

- i) areas included in Airport Public Safety zones are protected from development which may lead to an increase in people residing, working or congregating in these zones; and
- ii) sensitive uses such as housing, education and hospitals are not located in areas significantly affected by aircraft noise without acceptable mitigation measures.

National Air Traffic Services (NATS), the Ministry of Defence and Heathrow Airport Safeguarding have been consulted and have confirmed either no comment or no safeguarding objection to the proposed development. Following amendments to the scheme, a green roof has been added to the roof of the ancillary office block. As such, it is considered necessary that a bird hazard management plan is secured by planning condition. Subject to securing such a condition, the proposed development would accord with Policy DMAV 1 of the Hillingdon Local Plan: Part 2 (2020).

7.05 Impact on the green belt

Not applicable to the consideration of this application.

7.07 Impact on the character & appearance of the area

POLICY CONTEXT

Paragraph 126 of the NPPF (2023) states that the creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.

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. 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.

Policy D9 of the London Plan sets out considerations relating to tall buildings. These are defined in the policy as buildings not less than 6 storeys or 18 metres measured from ground to the floor level of the uppermost storey. It is understood that where buildings do not contain multiple storeys (such as the industrial/warehouse building proposed), the GLA interprets the policy as effectively providing a minimum tall building height of 21m, (noting that the 18 metres referenced is to the 'floor level' of the uppermost floor and having regard to typical storey heights).

Policy BE1 of the Hillingdon Local Plan: Strategic Policies (Built Environment) sets out to create successful and sustainable neighbourhoods, new development (including new buildings, alterations and extensions) should be of a high-quality design that 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.

Policy DMHB 11 of the Hillingdon Local Plan: Part 2 (2020) states that:

A) All development will be required to be designed to the highest standards and, incorporate principles of good design including:

i) harmonising with the local context by taking into account the surrounding:

- scale of development, considering the height, mass and bulk of adjacent structures;
- building plot sizes and widths, plot coverage and established street patterns;
- building lines and setbacks, rooflines, streetscape rhythm, for example, gaps between structures and other streetscape elements, such as degree of enclosure;
- architectural composition and quality of detailing;
- local topography, views both from and to the site; and
- impact on neighbouring open spaces and their environment.

ii) ensuring the use of high quality building materials and finishes;

iii) ensuring that the internal design and layout of development maximises sustainability and is adaptable to different activities;

iv) protecting features of positive value within and adjacent to the site, including the safeguarding of heritage assets, designated and un-designated, and their settings; and

v) landscaping and tree planting to protect and enhance amenity, biodiversity and green infrastructure.

B) Development proposals should not adversely impact on the amenity, daylight and sunlight of adjacent properties and open space.

C) Development will be required to ensure that the design safeguards the satisfactory re-development of any adjoining sites which have development potential.

D) Development proposals should make sufficient provision for well designed internal and external storage space for general, recycling and organic waste, with suitable access for collection. External bins should be located and screened to avoid nuisance and adverse visual impacts to occupiers and neighbours.

ASSESSMENT

Location:

The site lies within the Springfield Road Strategic Industrial Location and is currently occupied with a large sprawling collection of commercial units comprising wholesale retail. The existing retail buildings are laid out in an approximate L-shape, with a largely blank building facade fronting onto Uxbridge Road, in addition to an expansive car park. It is considered that the existing buildings are of a design

and appearance which is typical of an out of centre retail park. Their design and form is not considered to be of high quality and makes a poor contribution to the street scene of Uxbridge Road in design terms. The site is currently accessed from the North off Uxbridge Road. A secondary access (for servicing and delivery vehicles) is located to the South off Bullsbrook Road. The site is bounded to the North by Uxbridge Road, to the East by Yeading Brook, to the South by Bullsbrook Road and to the West by industrial units.

Context heights:

The existing Hayes Bridge Retail Park development comprises a large footprint of buildings, measuring 7.5m at the eaves and 10m at the top of the pitched roof.

The warehouse buildings immediately adjoining the site are large in footprint and measure circa 13m in height (equivalent to 4 stories). Further afield, the Hyatt Place Hotel covers a small footprint but measures 12 stories in height. There is also a consent (ref. 69827/APP/2021/1565) for a hotel on nos. 15-17 Uxbridge Road which again covers a small footprint but measures 14 stories in height.

In stark contrast to the industrial location, the area to the North of Uxbridge Road comprises 2 storey houses of fine urban grain.

The proposed development would measure 20.32m in height at its highest point and would cover a large footprint measuring circa 187m in length and 80m in width. This would equate to a form of development which covers circa 14,960m² in area and massing which creates circa 300,000m³ in built volume. The proposal would effectively double the height of buildings which currently exist on site and combined with the significant footprint proposed, the development would be considered significantly taller than the majority of its surroundings. The proposal would not meet the definition of a tall building as defined in Policy D9 of the London Plan, nevertheless, this would be a substantial building and accordingly, the impact of the development on the character and appearance of the area warrants careful consideration.

Long Range View:

The building's tall height and long elevations would result in a prominent appearance from the far distance. The building would be clearly visible from the motorway and recognisable above the tree line. The long sidelines would make the building prominent from the long distance and impact moderately on the skyline. The building would alter the skyline in views perceived from the Great Union Canal and Minet Country Park. The impact on long range views is considered to be moderate.

Mid Range View:

The proposed building volume would contrast with the 2 storey residential neighbourhood to the North of Uxbridge Road and alter the skyline. From the western approach the proposal would be concealed by two tall hotels and only visible from the nearer distance. However, from the eastern approach along Uxbridge Road, the building would cover a significant amount of skyline. Within the Springfield Industrial Estate, the building would be seen and would be perceived as occupying the skyline. The impact on mid range views is considered to be moderate.

Impact of the Character and Appearance of the Area:

Uxbridge Road, together with Bath Road, form the two most important historic movement corridors in

Hillingdon Borough. The published 2013 Hillingdon Townscape Characterisation study analysed Uxbridge Road and states: 'It continues to be a focus for thousands of residents living to the north and south of it - primarily as a transport connection, but also as a location for shops and services.'

Given its significance for both residents and visitors travelling through Uxbridge Road, Officers expect development to make a positive design contribution in order to strengthen the corridor. Whilst there are existing instances along this corridor which are poorly designed, development must aspire to improvement and existing poor urban design examples aren't a precedent to follow for safety, environmental, urban design and transport reasons.

Officers have worked proactively with the Applicant Team in order to achieve a form of design which establishes a better street presence and relationship with the public realm. Officers did explore whether the proposed building could be re-sited closer to Uxbridge Road (with parking to the rear) to accord with established building lines. However, this option was discounted due to the highway safety implications of concentrating private vehicle movements down Springfield Road and Bullsbrook Road. The applicant has therefore sought to improve the scheme through concentrating on improving design features such as material variations, and landscaping in order to provide a more active frontage.

Following the submission of amended plans, the development has been confirmed as comprising a large commercial building (for employment purposes Class E(g)iii, B2 and B8) to be sited on the western boundary, with car parking to the front on the northern section of the site and service yard area to the eastern side of the plot. This design includes an attached, ancillary three storey office element to the front of the building, as well as an area of landscaping to the front of the site.

Building Lines:

Paragraph 52, part vii, of the National Model Design Code (2021) states that new development should follow the established building line where it exists or where there is no building line, developments within an urban neighbourhood should be set back 1m to 3m from the pavement and that the percentage of street facing building line that is occupied by development should be 75%.

The southern side of Uxbridge Road has a building line established by the Hyatt Hotel, the hotel development permitted on 15-17 Uxbridge Road, the Metro Bank, the Galaxy Real Estate HQ building and Quality Foods, as well as the existing development on the Hayes Bridge Retail Park site. The established building line varies between a set back of circa 10m and 22m. More specifically, the existing Hayes Bridge Retail Park building sits between 13m and 22m back from the Uxbridge Road pavement.

It is agreed that a landscape buffer should be incorporated into the design which would necessitate that the 3m set back of development from the pavement is exceeded. Due to the location of the proposed car park to the front, the main warehouse building would sit between 48m and 66m back from the Uxbridge Road. Whilst the positioning of the building would not accord with the established building line, as has been noted, it would not be feasible to re-position the building closer to the site frontage because of the need to site the car park and take vehicular access from Uxbridge Road. In any event, it is considered that the existing building line is varied in the vicinity and notably, the existing development on site consists of a blank, unattractive building facade (set 13m - 22m back from Uxbridge Road) and an expansive carpark (stretching some 200 metres from Uxbridge Road, back into the site). In the context, the proposal would make a positive impact on the streetscene and it is considered that a refusal of planning permission in relation to the building line could not be

substantiated in the event of a planning appeal. Furthermore, the set back of the building line would ensure that the large building does not feel overbearing from the street and it would allow for an appropriate relationship with residential properties to the north east, by enabling a generous separation distance. Taking all of these factors into account, the positioning of the building on site is considered appropriate and acceptable.

Massing:

Having regard to the significant mass of the development, officers sought amendments to the scheme to improve its design. Following negotiations, the applicant has amended the proposal to include a parapet sawtooth roof form. It is considered that this would provide visual interest to the development. The inclusion of the attached office accommodation at the front of the building would also help to provide visual interest and break up the mass as viewed from Uxbridge Road.

Public Realm:

Paragraph 53, part i of the National Model Design Code (2021) states that the ground floor of new development may be treated differently to the upper floors to create a relationship with the street. It may use different materials and include active uses. Paragraph 53, part iii, states that the treatment of boundaries has a significant role in creating character. Paragraph 59, part iii, also states that the arrangements for car parking can have a major impact on the quality of place. They should aim to minimise the impact of the car and solutions will vary depending on context.

The proposed main industrial/warehouse building exhibits horizontally laid grey cladding at ground level and a vertically laid oyster cladding system at upper levels with a parapet sawtooth roof shape to sit in front of the functional pitched roof. It is considered that whilst this remains a large mass of building, the material treatments and roof design would add visual interest to the development. Vertically laid copper cladding would be used on the office element to improve legibility and this, along with the heavily glazed facade would aid in activating the frontage of the site. Green walls (proposed in an earlier iteration of the scheme) have been removed from the design due to concerns expressed by the GLA with regard to the fire safety risks associated with such provisions on places which would be frequented by people.

The main entrance is logically located on the north-east corner of the building, this being the closest point to the Uxbridge Road public realm. As has been noted previously, a substantial area of landscaping would be located adjacent to Uxbridge Road at the front of the site. This would be mounded and would help to screen and limit views of the car park from Uxbridge Road. This is considered to be a positive aspect of the scheme. A condition has been recommended in section 2 of this report to secure the final details and implementation of the hard and soft landscaping to ensure that this is of high quality.

Further into the site, the yard space and loading bays would be visible from the Uxbridge Road street scene. Therefore details of internal fencing would be secured by condition with the intention of providing a suitable form of screening.

Summary:

As discussed above, the proposed development would not fully respond to the established building lines along Uxbridge Road, but it would not be feasible to re-site the building closer to the road due to Highway safety reasons. The development would provide visual interest with the proposed sawtooth

roof form, the activation of the front elevation and the landscaped buffer which sits on the frontage. Accordingly, the development would make a positive contribution to the streetscene in the context. Furthermore, the set back of the building line would ensure that the large building does not feel overbearing from the street and it would allow for an appropriate relationship with residential properties to the north east, by enabling a generous separation distance. Overall, the development is considered acceptable in design and appearance terms and would have an acceptable impact on the character and appearance of the area, consistent with the aims of relevant planning policies detailed above.

7.08 Impact on neighbours

Policy DMHB 11 of the Hillingdon Local Plan: Part 2 (2020) states that:

B) Development proposals should not adversely impact on the amenity, daylight and sunlight of adjacent properties and open space.

Paragraph 5.38 of the Hillingdon Local Plan: Part 2 (2020) states: "The Council will aim to ensure that there is sufficient privacy for residents and it will resist proposals where there is an unreasonable level of overlooking between habitable rooms of adjacent residential properties, schools or onto private open spaces. A minimum of 21 metres separation distance between windows of habitable rooms will be required to maintain levels of privacy and to prevent the possibility of overlooking. In some locations where there is a significant difference in ground levels between dwellings, a greater separation distance may be necessary."

Paragraph 5.40 of the Hillingdon Local Plan: Part 2 (2020) states: "For the purposes of this policy, outlook is defined as the visual amenity enjoyed by occupants when looking out of their windows or from their garden. The Council will expect new development proposals to carefully consider layout and massing in order to ensure development does not result in an increased sense of enclosure and loss of outlook."

Paragraph 5.41 of the Hillingdon Local Plan: Part 2 (2020) states: "The Council will aim to minimise the impact of the loss of daylight and sunlight and unacceptable overshadowing caused by new development on habitable rooms, amenity space and public open space. The Council will also seek to ensure that the design of new development optimises the levels of daylight and sunlight. The Council will expect the impact of the development to be assessed following the methodology set out in the most recent version of the Building Research Establishments (BRE) "Site layout planning for daylight and sunlight: A guide to good practice".

Neighbouring properties are located on the opposite site of Uxbridge Road, circa 40m from the northern site boundary. Based on the size and siting of the proposed development, it is not considered likely that such a proposal would have a detrimental impact on the amenity, daylight and sunlight of adjacent properties. As such, the development is not considered contrary to Policy DMHB 11, Part B, of the Hillingdon Local Plan: Part 2 (2020).

7.09 Living conditions for future occupiers

Not applicable to the consideration of this application.

7.10 Traffic impact, Car/cycle parking, pedestrian safety

The site is located on Uxbridge Road. Based on TfL's WebCAT planning tool, the site has a PTAL rating between 1a and 2 (poor).

The following planning policies are considered:

Policy DMT 1 of the Hillingdon Local Plan: Part 2 (2020) states:

A) Development proposals will be required to meet the transport needs of the development and address its transport impacts in a sustainable manner.

Policy DMT 2 of the Hillingdon Local Plan: Part 2 (2020) states that proposals must ensure that safe and efficient vehicular access to the highway network is provided, schemes do not contribute to the deterioration of air quality, noise or local amenity or safety of all road users and residents. Also that impacts on local amenity and congestion are minimised and there are suitable mitigation measures to address any traffic impacts in terms of capacity and functions of existing and committed roads.

Policy DMT 6 of the Hillingdon Local Plan: Part 2 (2020) requires that proposals comply with the Council's parking standards in order to facilitate sustainable development and address issues relating to congestion and amenity. This should be viewed in conjunction with Policies T6 and T6.1 of the London Plan (2021).

Paragraph 111 of the NPPF (2023) states that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe. This is supported by Policy T4 of the London Plan (2021).

Staff Car Parking:

Policy T6.2 of the London Plan (2021) states that car parking provision at Use Classes Order B2 (general industrial) and B8 (storage or distribution) employment uses should have regard to these office parking standards and take account of the significantly lower employment density in such developments.

Policy T6.2, Table 10.4, of the London Plan (2021) outlines that car parking requirements for Class E(g)iii, B2 and B8 as follows:

- Outer London Opportunity Areas - Up to 1 space per 600 sq.m. gross internal area (GIA)
- Outer London - Up to 1 space per 100 sq.m. (GIA)

Based on the provision of 16,087m² floorspace, between 28 no. and 165 no. car parking spaces should be provided. The proposed development would include 91 no. car parking spaces to be located to the front of the site. For the site to be self-sufficient in transport terms, the Highway Authority require that the proposal should make a contribution towards active travel and public transport measures that broaden travel choice. Without such measures, employees would be more likely to travel by private car and deem the on-plot provisions to be insufficient. Subject to securing such a contribution by legal agreement, the proposed car parking provision is considered to be acceptable.

Disabled Person Car Parking:

Policy T6.5, Table 10.6, of the London Plan (2021) states that 5% of all car parking spaces should be provided as designated disabled persons parking bays and 5% should be provided as enlarged parking bays which are capable of being converted to disabled persons parking.

The above requirements would equate to 5 no. designated disabled persons parking bays and 5 no. enlarged parking bays. The plans indicate that 5 no. designated disabled persons parking would be

provided but enlarged bays are not indicated. This matter can be readily resolved by way of a planning condition and recommended condition number 23 (landscaping) addresses this.

Electric Vehicle Charging Points:

Policy T6 of the London Plan (2021) states that new developments with car parking should make provision for electric vehicles or other Ultra-Low Emission vehicles.

The information submitted indicates that 21 electric vehicle charging points are proposed as part of the application. The implementation of the charging points would be secured by recommended condition number 23 (landscaping).

Cycle Parking:

Policy T5 of the London Plan (2021) outlines the following cycle parking requirements:

- Long-stay: 1 no. space per 500m²
- Short-stay: 1 no. space per 1000m²

Based on a proposal for 16,087m² of floorspace, at least 33 no. long stay and 17 no. short stay cycle parking spaces are required. The proposed development would provide 38 no. secure and covered cycle parking spaces, including four adaptive cycle parking spaces, internally within the main building. A total of 8 no. Sheffield Stands are also proposed to provide short stay parking for 16 bicycles. A total of 54 cycle spaces are proposed and this is considered to be acceptable by the Highway Officer. It is noted that TfL has raised some detailed design points in respect of the proposed cycle parking and in order to address this and to secure the final details and implementation of cycle parking, a condition has been included which requires the submission of details which comply with the London Cycling Design Standards (condition no. 21).

Parking Management Plan:

The Highway Authority notes that the site would be operational 24-hours per day. In order to ensure effective parking management in respect of shift changes, a parking management plan condition has been included as recommended by the Highway Officer.

HGV Loading Bays and Parking:

The proposed plans indicate that the proposed warehouse would provide 18 no. loading bays and 16 no. HGV parking spaces. The Council's Highway Officer is satisfied with this arrangement.

Electric Vehicle Charging Points for Freight Vehicles

Policy T7 of the London Plan (2021) states under point (B)(3) that development should provide rapid charging points for freight vehicles. In support of this, Policy T6.2 of the London Plan (2021) states under point (F) that all operational parking must provide infrastructure for electric or other Ultra-Low Emission vehicles. The London Plan defines Operational parking as parking for vehicles which are required for the function of a building or the activities within it. This can include spaces for fleet vehicles, taxis or loading bays, but does not include parking for personal travel such as commuting.

The provision of rapid charging for freight vehicles would be secured by planning condition number 23.

Trip Generation:

To determine the net change in trip generation between the existing use and application site in use as B8 storage and distribution use the applicant has interrogated the TRICS database. It should be noted that B8 is assessed as it is considered the worst case scenario of the proposed uses in trip generation terms. In its current use, the PM peak is busiest when there would be 283no. total vehicle two-way movements including 3no. total HGV two-way movements. It would be during the PM Peak 17:00 to 18:00h that the proposal would generate the greatest number of trips. There would be 64no. total vehicle two-way movements and 10no. total HGV two-way movements. Over a 12h period, the total vehicle two-way movements would fall from 3,348no. to 708no. a reduction of 2,640no.

The number of 12h total HGV two-way movements would increase with the proposal, from 37no to 172no. This raises potential road safety concerns as HGVs present the greater road safety risk to other road users, the greatest risk of all being to cyclists and pedestrians. In its existing use, HGVs enter and leave the site from Bullsbrook Road to the south. As part of this proposal HGVs would take access directly from the A4020 Uxbridge Road.

Road traffic comprises of a whole range of vehicle types and sizes, ranging from 16.5 meter articulated lorries to private cars and bicycles. Different vehicle types have different characteristics in terms of length, turning radii, acceleration, speed etc., therefore have different impacts on the operation of the road network. For the purposes of traffic modelling, all vehicle types are given a Passenger Car Unit (PCU) rating which takes into account their impact on the flow of all traffic. A private car is given a score of 1, whereas lorries - as they take up more road space and travel more slowly - are given a passenger car unit score of 2.3.

In its proposed use as B8 warehousing with HGVs and private cars both taking access to/from the Uxbridge Road, over the 12 hour period 07:00 to 19:00, the HGV traffic would be equivalent to 396no. PCU two-way movements. In addition to this would be 536no. two-way light movements giving 932no. total vehicle movements. The proposed use would reduce the number of PCU's leaving the site via the A4020 Uxbridge Road access by 2,416no.

It is proposed that the Bullsbrook Road access would be used for emergency access only. It is currently used by HGVs servicing the retail units and there are 37no. two-way movements a day. With the proposal these movements would cease and would have the benefit of reducing the amount of traffic using the busy Springfield Road j/w Uxbridge Road junction. There would be 85no. fewer PCU movements between 07:00 and 19:00h which is welcomed as it would alleviate congestion and delay in this location.

In summary, the proposal would significantly decrease overall movements to and from the site but would increase HGV movements. HGV movements would be redirected to the junction with Uxbridge Road which would have more capacity for such movements. The proposal would be beneficial for road conditions on Springfield road and Bullsbrook Road. On this basis and subject to the recommended conditions and planning obligations, the trip generation associated with the proposal is considered to be acceptable.

Access:

The information submitted, including swept path analysis, confirms that access to and from the site by HGVs could be accommodated by the junction with Uxbridge Road. The exit arm from the site access

would also be reduced to a single lane. This prevents vehicles from queuing side by side and would minimise the potential of collisions for vehicles exiting the site. This accords with the recommendations of the Road Safety Audit. However an updated Road Safety Audit would be secured by planning condition for the final detailed design of the access.

Highways Improvements:

Policy T4, part C, of the London Plan (2021) states that where appropriate, mitigation, either through direct provision of public transport, walking and cycling facilities and highways improvements or through financial contributions, will be required to address adverse transport impacts that are identified.

An Active Travel Zone Assessment has been conducted, concluding that a £21,718.75 contribution is necessary to deliver off-site highway improvement works, including the provision of new street benches, sheffield cycle stands, new guard rail and tree planting.

In consultation with Transport for London, it has also been requested that obligations be secured requiring the developer to make permanent alterations or improvements to the adopted highway. This would include but is not limited to changes to the access into the development site, creation of a straight across toucan crossing (as opposed to staggered toucan crossing), alteration of the signal controls (if necessary), removal of guardrail between footway and cycleway, removal of centre kerb upstand for a distance of 9m and re-surfacing of the footway and cycleway. The works outlined above would encourage more sustainable forms of travel and reduce the highway safety risk associated with an increase in HGV movements. The measures have been agreed in principle by the applicant and would be secured through the recommended conditions and S106 obligations.

Transport for London has also requested a £50,000 contribution towards the commissioning of a feasibility study which identifies highway safety improvements and designs that could be made to the Ossie Garvin Roundabout and its four arms. This is not considered to be necessary or reasonable and as such does not meet the tests for securing planning obligations set out under paragraph 57 of the NPPF (2023). Specifically, significant financial contributions are already being secured under the Section 106 legal agreement in respect of air quality mitigation which could be used for highways related improvement works to the Ossie Garvin roundabout. It is not necessary or reasonable to seek further contributions in this instance.

Travel Plan:

A Travel Plan would be secured through the S106 legal agreement.

Construction Logistics Plan, Service Delivery Plan and Operations Management Plan:

Having regard to comments received from TfL and the Highway Authority, a Construction Logistics Plan, Delivery and Servicing Plan and Operations Management Plan would be secured by planning conditions. It is noted that Transport for London has also requested that a financial contribution is secured for the monitoring of the Delivery and Servicing Plan/Operational Management Plan, however this is not considered to be necessary or reasonable and as such does not meet the tests for securing planning obligations set out under paragraph 57 of the NPPF (2023). The Council does not, at present, actively monitor such plans and as such, any contribution to be secured would not and could not be used for the means it would be secured for.

Summary:

Subject to the necessary planning conditions and obligations, the proposed development would not be considered to prejudice conditions on the local highways network, in accordance with Policies DMT 1, DMT 2, DMT 5 and DMT 6 of the Hillingdon Local Plan: Part 2 (2020) and Policies T4 and T7 of the London Plan (2021).

7.11 Urban design, access and security

URBAN DESIGN

Please see Section 07.07 of the report.

DISABLED ACCESS

Please see Section 07.12 of the report.

SECURITY

Policy DMHB 15 of the Hillingdon Local Plan: Part 2 (2020) states that the Council will require all new development to ensure safe and attractive public and private spaces by referring to the Council's latest guidance on Secured by Design principles. Where relevant, these should be included in the Design and Access Statement. Development will be required to comprise good design and create inclusive environments whilst improving safety and security by incorporating the following specific measures:

- i) providing entrances in visible, safe and accessible locations;
- ii) maximising natural surveillance;
- iii) ensuring adequate defensible space is provided;
- iv) providing clear delineations between public and private spaces; and
- v) providing appropriate lighting and CCTV.

This is supported by Policy D11 of the London Plan (2021).

A secured by design condition has been recommended in order to achieve appropriate accreditation. Subject to such a condition, the proposal would accord with Policy DMHB 15 of the Hillingdon Local Plan: Part 2 (2020) and Policy D11 of the London Plan (2021).

7.12 Disabled access

Policy D5 of the London Plan (2021) states that development proposals should achieve the highest standards of accessible and inclusive design. They should:

- 1) be designed taking into account London's diverse population;
- 2) provide high quality people focused spaces that are designed to facilitate social interaction and inclusion;
- 3) be convenient and welcoming with no disabling barriers, providing independent access without additional undue effort, separation or special treatment;
- 4) be able to be entered, used and exited safely, easily and with dignity for all; and
- 5) be designed to incorporate safe and dignified emergency evacuation for all building users. 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.

The proposed development would include disabled persons parking bays and lift access to all floors. The information submitted indicates that the lift would not be arranged as an evacuation lift.

The Council's Access Officer has considered the detail of the proposal and has raised no objection subject to conditions. These conditions would require that details of the building entrances are accessible and that one fire evacuation lift is in fact provided. Subject to the necessary conditions, the proposal is considered to accord with Policy D5 of the London Plan (2021).

7.13 Provision of affordable & special needs housing

Not applicable to the consideration of this application.

7.14 Trees, landscaping and Ecology

TREES AND LANDSCAPING

Policy G1 of the London Plan (2021) states that development proposals should incorporate appropriate elements of green infrastructure that are integrated into London's wider green infrastructure network.

Policy DMEI 1 of the Hillingdon Local Plan: Part 2 (2020) states that all development proposals are required to comply with the following:

- i) All major development should incorporate living roofs and/or walls into the development. Suitable justification should be provided where living walls and roofs cannot be provided; and
- ii) Major development in Air Quality Management Areas must provide onsite provision of living roofs and/or walls. A suitable offsite contribution may be required where onsite provision is not appropriate.

Policies DMHB 11 and DMHB 14 of the Hillingdon Local Plan: Part 2 (2020) require that new development is high quality, sustainable, adaptable, and harmonises with the local context. Landscaping and tree planting should enhance amenity, biodiversity and green infrastructure. Development proposals will be required to provide a landscape scheme that includes hard and soft landscaping appropriate to the character of the area, which supports and enhances biodiversity and amenity particularly in areas deficient in green infrastructure.

The proposed development would result in the removal of 8 individual trees and one group, including:

- T5 - category B
- T6 - category U
- T7 - category C
- T8 - category C
- T9 - category C
- T10 - category B
- T27 - category C
- T28 - category C
- G32 - category C

Category B trees have moderate quality or value capable of making a significant contribution to the area for 20 or more years.

Category C trees are of low quality, adequate for retention for a minimum of 10 years expecting new planting to take place; or young trees that are less than 15 cms in diameter which should be considered for re-planting where they impinge significantly on the proposed development.

Category U trees should be removed as they have irremediable defects, structural weakness, or are trees with infectious pathogens.

The loss of the category C and U trees is accepted and although the loss of two category B trees is regrettable, it is acknowledged that 30 no. replacement trees are proposed to be planted. A landscape buffer is proposed to the front of the site which includes tree planting, hedgerow planting and a curved pathway which leads to the front of the office block. Pockets of planting are also proposed within the car park and to the side of the yard space adjoining the Yeading Brook. These planted areas are proposed to retain existing trees and groups of trees where appropriate and these would be protected during construction by tree protection measures as indicated on the submitted drawings. Green roofs are proposed on top of the ancillary office areas of the development. The landscaping proposed has been amended and improved during the course of the planning application process and is considered to represent an improvement to the existing landscaping on the site. The final details of hard and soft landscaping would be secured by condition no. 23 to ensure they are of high quality and are implemented. Subject to this condition, the proposal would accord with Policies DMHB 11 and DMHB 14 of the Hillingdon Local Plan: Part 2 (2020).

URBAN GREENING FACTOR

Policy G5 of the London Plan (2021) states:

A) Major development proposals should contribute to the greening of London by including urban greening as a fundamental element of site and building design, and by incorporating measures such as high-quality landscaping (including trees), green roofs, green walls and nature-based sustainable drainage.

B) The Mayor recommends an Urban Greening Factor target score of 0.4 for developments that are predominately residential, and a target score of 0.3 for predominately commercial development (excluding B2 and B8 uses).

An Urban Greening Factor score of 0.3 is the target for commercial development, although it is acknowledged that the proposed industrial use does not strictly have to accord with such standards (as B2 and B8 uses are excluded). The original scheme submitted achieved an Urban Greening Factor score of 0.085 and has since been amended to include a larger landscape buffer to the north of the site, some pockets of landscaping in parts of the site, and green roofs on the ancillary parts of the development serving the offices. The amended Urban Greening Factor Score has been confirmed at 0.149, which is considered to be acceptable and confirmation of the final score would be secured by planning condition.

ECOLOGY

Paragraph 174 of the NPPF (2023) states that planning decisions should contribute to and enhance the natural and local environment by: d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures. This is supported by Policy G6 of the London Plan (2021) and Policy DMEI 7 of the Hillingdon Local Plan: Part 2 (2020).

The site is not subject to any statutory or non-statutory nature conservation designations. There are, however, two Nature Conservation Sites of Borough Grade II or Local Importance within a short distance of the site, including the Yeading Brook which immediately adjoins the site and the Grand Union Canal which is sited circa 170m to the East.

The Preliminary Ecological Appraisal submitted confirms that the site and its immediate surroundings are a suitable habitat for breeding birds and low value habitat for foraging and commuting bats. No trees or buildings were identified within or immediately adjacent to the site boundary as having bat roosting potential. The report recommends that vegetation clearance is carried out outside of the bird breeding season and that measures are implemented to avoid night-time lighting of areas that could provide flight lines and foraging habitats.

In addition to the mitigation measures outlined above, opportunities for enhancements include the provision of green roofs on the new buildings proposed and landscape planting of native shrubs and trees to improve the connectivity to nearby habitats and biodiversity of the area.

The Biodiversity Net Gain Assessment submitted states that the development would deliver a net gain of 55.84% (a net change of 0.89 units) and 263.84% for hedgerows (a net change of 3.34 units). These would exceed the biodiversity net gain target of 10%.

The final details of an Ecological Enhancement Scheme which maximises net gains in biodiversity value for the development would be secured by planning condition number 24. A Construction Environmental Management Plan would also be secured (as part of condition no. 14) to ensure appropriate practices are employed so as not to significantly impact upon local ecology. Subject to such conditions, the proposal is considered to accord with the NPPF (2023), Policy G6 of the London Plan (2021) and Policy DME1 7 of the Hillingdon Local Plan: Part 2 (2020).

7.15 Sustainable waste management

Policy SI 7 and Policy D6 of the London Plan (2021) require developments to be designed with adequate, flexible, and easily accessible storage space and collection systems that support, as a minimum, the separate collection of dry recyclables (at least card, paper, mixed plastics, metals, glass) and food.

In addition, Policy EM11 of the Hillingdon Local Plan: Part 1 (2012) 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.

Policy DMHB 11 of the Hillingdon Local Plan: Part 2 (2020) also states that:

D) Development proposals should make sufficient provision for well designed internal and external storage space for general, recycling and organic waste, with suitable access for collection. External bins should be located and screened to avoid nuisance and adverse visual impacts to occupiers and neighbours.

A bin storage area is proposed adjacent to the north-eastern corner of the proposed warehouse building. As per the above policy, this storage area should be internalised and there is no reason why this cannot be incorporated into the design of the scheme. In this case, external storage is proposed and would be partially screened by tree and hedge planting. The storage area would be accessible for servicing and delivery purposes. The proposed arrangements are considered acceptable in principle and the final details would be secured through the recommended landscaping condition.

CIRCULAR ECONOMY

Policy EM11 of the Local Plan: Part 1 (2012) requires all new development to address waste management at all stages of a development's life from design and construction through to the end

use and activity on site, ensuring that all waste is managed towards the upper end of the waste hierarchy.

Policy SI 7, Part B, of the London Plan (2021) states that referable applications should promote circular economy outcomes and aim to be net zero-waste. A Circular Economy Statement should be submitted, to demonstrate:

- 1) how all materials arising from demolition and remediation works will be re-used and/or recycled
- 2) how the proposal's design and construction will reduce material demands and enable building materials, components and products to be disassembled and re-used at the end of their useful life
- 3) opportunities for managing as much waste as possible on site
- 4) adequate and easily accessible storage space and collection systems to support recycling and re-use
- 5) how much waste the proposal is expected to generate, and how and where the waste will be managed in accordance with the waste hierarchy
- 6) how performance will be monitored and reported.

An amended Circular Economy Statement has been submitted in response to the Greater London Authority's Stage 1 response and is considered by LBH Planning Officers to be acceptable. A post-construction circular economy monitoring report would be secured by planning condition. Subject to such a condition, the proposed development would accord with Policy SI 7 of the London Plan (2021).

7.16 Renewable energy / Sustainability

WHOLE LIFE-CYCLE CARBON

Policy SI 2, Part F, of the London Plan (2021) states that development proposals referable to the Mayor should calculate whole life-cycle carbon emissions through a nationally recognised Whole Life-Cycle Carbon Assessment and demonstrate actions taken to reduce life-cycle carbon emissions.

The applicant has submitted a Whole Life-Cycle Carbon (WLC) assessment as required. A condition would secure the submission of a post-construction assessment to report on the development's actual WLC emissions. Subject to such a condition, the proposal would accord with Policy SI 2, Part F, of the London Plan (2021).

CO2 EMISSIONS

Policy SI 2 of the London Plan (2021) states that:

A. 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:

- 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.

B. 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.

C. A minimum on-site reduction of at least 35 per cent beyond Building Regulations is required for

major development. Residential development should achieve 10 per cent, and non-residential development should achieve 15 per cent through energy efficiency measures. 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:

- 1) through a cash in lieu contribution to the borough's carbon offset fund, or
- 2) off-site provided that an alternative proposal is identified and delivery is certain.

E. 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 Energy Statement states that the development would achieve 111% savings on-site, exceeding the minimum planning policy requirement of 35%. This is achieved through the use of high efficiency systems and photovoltaic panel solution. Hence, there is no requirement to secure a financial contribution in order to achieve net zero-carbon. The Council's Energy Officer, having reviewed the applicant's Energy Statement, considers the information submitted to meet the requirements of the 2020 GLA energy assessment guidance but not the 2022 GLA energy assessment guidance. There is also a limited amount of detail on the PV type and installation mechanism particularly in combination with the roof plans and how they will sit alongside rooflights. In order to address this, as recommended by the Energy Officer, a condition has been included to secure a more detailed report and monitoring to ensure compliance with the requirements. In addition, an obligation has been included in the S106 heads of terms to allow for a financial contributions to be secured, in the event that the development does not achieve net zero-carbon.

Subject to the aforementioned condition and requisite clause within the Section 106 legal agreement, the proposal would accord with Policy SI 2 of the London Plan (2021).

ENERGY INFRASTRUCTURE

Policy SI 3 of the London Plan (2021) states that major development proposals within Heat Network Priority Areas should have a communal low-temperature heating system:

- 1) the heat source for the communal heating system should be selected in accordance with the following heating hierarchy:
 - a) connect to local existing or planned heat networks
 - b) use zero-emission or local secondary heat sources (in conjunction with heat pump, if required)
 - c) use low-emission combined heat and power (CHP) (only where there is a case for CHP to enable the delivery of an area-wide heat network, meet the development's electricity demand and provide demand response to the local electricity network)
 - d) use ultra-low NOx gas boilers
- 2) CHP and ultra-low NOx gas boiler communal or district heating systems should be designed to ensure that they meet the requirements in Part B of Policy SI 1 Improving air quality
- 3) where a heat network is planned but not yet in existence the development should be designed to allow for the cost-effective connection at a later date.

The proposed development will incorporate space for future plate heat exchangers to allow for future connection to a district heating scheme for export of low grade heat should one become available. A planning condition has been recommended to secure this, ensuring compliance with Policy SI 3 of the London Plan (2021).

OVERHEATING

Policy SI 4 of the London Plan (2021) states:

A) Development proposals should minimise adverse impacts on the urban heat island through design, layout, orientation, materials and the incorporation of green infrastructure.

B) Major development proposals should demonstrate through an energy strategy how they will reduce the potential for internal overheating and reliance on air conditioning systems in accordance with the following cooling hierarchy:

- 1) reduce the amount of heat entering a building through orientation, shading, high albedo materials, fenestration, insulation and the provision of green infrastructure;
- 2) minimise internal heat generation through energy efficient design;
- 3) manage the heat within the building through exposed internal thermal mass and high ceilings;
- 4) provide passive ventilation;
- 5) provide mechanical ventilation; and
- 6) provide active cooling systems.

The details submitted confirm the following with respect to each point above:

1) The building is proposed to incorporate:

- low G-value glass and blinds to limit the solar gain through the windows'
- spandrel panels below desk level and above ceiling level to eliminate solar gain where glazing would have no daylighting benefit;
- The building fabric is of a medium weight construction, utilising a highly insulated facade at ground floor to absorb direct solar gain, rather than allow it to permeate directly through a lightweight structure. The cladding in the upper floors consists of metal panels with highly insulated wool core with low U-value to minimise heat gains and losses (to exceed Part L targets); and
- Extensive external shading is to be provided around the glazed office areas to significantly reduce the solar gain in summer.

2) The internal heat gains will consist of occupants, office equipment and lighting. While the design team cannot influence the future tenant's occupancy and equipment loads, highly efficient LED lighting will be specified which will reduce the associated heat gains. Furthermore, this will be coupled with occupancy and daylight controls to ensure the lighting does not operate when it is not required. Utilising a VRV Heat pump system rather than a low temperature hot water system minimises the heat gains from associated pipework.

3) The exposed internal thermal mass of concrete slabs and exposed high ceilings in the warehouse will assist to manage the internal heat within the building.

4) Due to the potential high occupancy levels at future fit out stage passive ventilation is not appropriate.

5) Mechanical ventilation is to be provided in all occupied areas to provide an element of free cooling.

6) Active cooling systems are provided via VRV heat pump systems in occupied spaces but due to the steps taken earlier in the cooling hierarchy, their demand will be reduced.

The details submitted indicates that the cooling hierarchy has been incorporated into the principle of the proposed design. The information submitted is considered satisfactory at this stage and the final details of the Overheating Strategy are proposed to be secured by condition. Subject to the aforementioned condition, the proposal would accord with Policy SI 4 of the London Plan (2021).

7.17 Flooding or Drainage Issues

FLOOD RISK

Policy SI 12 of the London Plan (2021) requires that development proposals ensure that flood risk is minimised and mitigated. This is supported by Policy EM6 of the Hillingdon Local Plan: Part 1 (2012) and Policy DMEI 9 of the Hillingdon Local Plan: Part 2 (2020). Notably, proposals that fail to make appropriate provision of flood risk and surface water flooding mitigation will be refused.

The site is located in Flood Zone 2. A Flood Risk Assessment (FRA) has been submitted and concludes that the risk of flooding from pluvial, sewer and groundwater flooding is low.

Regarding the fluvial flood risk from the Yeading Brook, the FRA proposes to set the finished floor levels of the new building at 29.975, which is a minimum of 0.865m higher than the 1 in 1000-year event level (29.11m AOD). The fluvial flood maps provided by the EA demonstrate that the site is located outside of the 100 years plus climate change floodplain, thereby demonstrating that the proposed development would not displace floodwater offsite.

Condition 3 requires compliance with the submitted Flood Risk Assessment (and proposed finished floor level), therefore subject to this condition, the proposed development is considered to accord with Policy SI 12 of the London Plan (2021), Policy EM6 of the Hillingdon Local Plan: Part 1 (2012) and Policy DMEI 9 of the Hillingdon Local Plan: Part 2 (2020).

SUSTAINABLE DRAINAGE

Policy SI 13 of the London Plan (2021) also requires that development proposals utilise sustainable urban drainage systems (SuDS) unless there are practical reasons for not doing so, and should aim to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible. This is supported by Policy EM6 of the Hillingdon Local Plan: Part 1 (2012) and Policy DMEI 10 of the Hillingdon Local Plan: Part 2 (2020).

The drainage strategy proposes to restrict runoff to the equivalent greenfield runoff rate for all events up to the 100-year event plus 40% climate change using a variable discharge. This is supported.

Permeable paving is proposed and welcomed. Green roofs have been incorporated into the revised design proposal and provide multiple benefits, including biodiversity and amenity benefits. Both Thames Water and the Council's Flood and Water Management Specialist have confirmed no objection to the proposed drainage strategy.

Conditions have been recommended to secure the final details and implementation of the drainage scheme. Subject to these conditions, the scheme would accord with Policy EM6 of the Hillingdon Local Plan: Part 1 (2012), Policy DMEI 10 of the Hillingdon Local Plan: Part 2 (2020) and Policy SI 13 of the London Plan (2021).

WATER INFRASTRUCTURE

Policy SI 5 of the London Plan (2021) states:

C) Development proposals should:

- 2) achieve at least the BREEAM excellent standard for the 'Wat 01' water category 160 or equivalent (commercial development)
- 3) incorporate measures such as smart metering, water saving and recycling measures, including

retrofitting, to help to achieve lower water consumption rates and to maximise future-proofing.

E) Development proposals should:

- 1) seek to improve the water environment and ensure that adequate wastewater infrastructure capacity is provided
- 2) take action to minimise the potential for misconnections between foul and surface water networks.

During the consultation process, Thames Water has confirmed no objection to the proposed development in respect of waste water network and sewage treatment works. However, insufficient information has been submitted in respect of the BREEAM standards for Wat 01 credits and water metering and saving measures.

However, the test is to determine whether this lack of information needs to be resolved prior to determination or post approval via way of condition. The information requested is not of a unique nature and the information provided shows compliance with policy to the extent necessary at this stage of the process. Whilst it is accepted further information is necessary there is nothing to suggest that this would not be forthcoming. Securing the information by way of condition would satisfy the requirements of the planning policy.

Subject to the necessary planning condition, the proposed development would accord with Policy SI 5 of the London Plan (2021).

7.18 Noise or Air Quality Issues

NOISE

Policy D13 of the London Plan (2021) places the responsibility for mitigating impacts from existing noise and other nuisance-generating activities or uses on the proposed new noise-sensitive development. Development should be designed to ensure that established noise and other nuisance-generating uses remain viable and can continue or grow without unreasonable restrictions being placed on them.

Policy D14 of the London Plan (2021) states that in order to reduce, manage and mitigate noise to improve health and quality of life, residential and other non-aviation development proposals should manage noise by:

- 1) avoiding significant adverse noise impacts on health and quality of life
- 2) reflecting the Agent of Change principle as set out in Policy D13 Agent of Change
- 3) mitigating and minimising the existing and potential adverse impacts of noise on, from, within, as a result of, or in the vicinity of new development without placing unreasonable restrictions on existing noise-generating uses
- 4) improving and enhancing the acoustic environment and promoting appropriate soundscapes (including Quiet Areas and spaces of relative tranquillity)
- 5) separating new noise-sensitive development from major noise sources (such as road, rail, air transport and some types of industrial use) through the use of distance, screening, layout, orientation, uses and materials - in preference to sole reliance on sound insulation
- 6) 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
- 7) promoting new technologies and improved practices to reduce noise at source, and on the transmission path from source to receiver.

This is supported by Policy EM8 of the Hillingdon Local Plan: Part 1 (2012) and Policy DMHB 11 of the Hillingdon Local Plan: Part 2 (2020).

The Noise Impact Assessment (Dated 27th January 2022) submitted confirms that the proposed development can operate during the daytime and night-time periods without giving rise to adverse noise effects. This has been reviewed in detail by the Council's Noise Specialist who concludes that sufficient information has been provided and that no objection is raised subject to a condition to control the noise level conditions in perpetuity. Subject to the aforementioned condition (which has been included within the recommendation at Section 2 of this report), the development is considered to accord with Policy EM8 of the Hillingdon Local Plan: Part 1 (2012), Policy DMHB 11 of the Hillingdon Local Plan: Part 2 (2020) and Policies D13 and D14 of the London Plan (2021).

AIR QUALITY

Paragraph 186 of the NPPF (2023) states that planning decisions should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and Clean Air Zones, and the cumulative impacts from individual sites in local areas. Opportunities to improve air quality or mitigate impacts should be identified, such as through traffic and travel management, and green infrastructure provision and enhancement.

Policy SI 1 of the London Plan (2021) supports the above.

Policy EM8 of the Hillingdon Local Plan: Part 1 (2012) states that the Council will seek to safeguard and improve all land, water, air and noise quality. All development should not cause deterioration in the local air quality levels and should ensure the protection of both existing and new sensitive receptors.

Policy DMEI 14 of the Hillingdon Local Plan: Part 2 (2020) states:

A) Development proposals should demonstrate appropriate reductions in emissions to sustain compliance with and contribute towards meeting EU limit values and national air quality objectives for pollutants.

B) Development proposals should, as a minimum:

- i) be at least "air quality neutral";
- ii) include sufficient mitigation to ensure there is no unacceptable risk from air pollution to sensitive receptors, both existing and new; and
- iii) actively contribute towards the improvement of air quality, especially within the Air Quality Management Area.

The development is located within the Hillingdon Air Quality Management Area and the Ossie Garvin Air Quality Focus Area. Focus Areas are defined as places where the pollution levels are already elevated and therefore improvements are required. The nature of the development will attract more vulnerable receptors into the AQMA and the Hayes Air Quality Focus Area and therefore the air quality impacts of the development, their mitigation and the protection of the users from exposure to pollution sources is a material consideration.

The proposed development is not Air Quality Neutral and needs to be Air Quality positive, requiring that the additional traffic generated by the operation of the proposed development needs to be mitigated. The Council's Air Quality Officer has calculated the level of mitigation required as equal to £772,630. Flat rate deductions have been applied for the Travel Plan (10%). The remaining value of

mitigation is £695,367. The Air Quality Officer has also calculated the cost of mitigating the building emissions is £35,862. The total sum required for mitigation is therefore equal to £731,228 and this would be secured through the S106 Legal Agreement. In accordance with the advice of the Air Quality Officer, planning conditions have also been recommended to secure a Low Emission Strategy and compliance with the GLA Control of Dust and Emissions from Construction and Demolition SPG.

Subject to the aforementioned planning conditions and obligation, the proposal would accord with Policy EM8 of the Hillingdon Local Plan: Part 1 (2012), Policy DMEI 14 of the Hillingdon Local Plan: Part 2 (2020), Policy SI 1 of the London Plan (2021) and the NPPF (2023).

7.19 Comments on Public Consultations

Please refer to Section 06.1 of the report.

7.20 Planning obligations

Policy DMCI 7 of the Hillingdon Local Plan: Part 2 (2020) states:

A) To ensure development is sustainable, planning permission will only be granted for development that clearly demonstrates there will be sufficient infrastructure of all types to support it. Infrastructure requirements will be predominantly addressed through the Council's Community Infrastructure Levy (CIL).

B) Planning obligations will be sought on a scheme-by-scheme basis:

- i) to secure the provision of affordable housing in relation to residential development schemes;
- ii) where a development has infrastructure needs that are not addressed through CIL; and
- iii) to ensure that development proposals provide or fund improvements to mitigate site specific impacts made necessary by the proposal.

C) Applications that fail to secure an appropriate Planning Obligation to make the proposal acceptable will be refused.

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

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

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

On the basis of the NPPF and the Community Infrastructure Levy Regulation 2010, it is only considered reasonable to request contributions towards the following:

- i) Air Quality Contribution: A financial contribution amounting to £731,228 shall be paid to address the air quality impacts of the proposed development.
- ii) Carbon Offset Contribution: Any additional shortfall identified through the ongoing reporting required by Condition 17 shall form a cash in lieu contribution in accordance with Policy SI2 of the

London Plan at a rate of £95/tCO₂ annualised for not more than 30 years beginning on the commencement of development. (i.e if a shortfall is first identified after 5 years the cash in lieu contribution is based on a 25year duration).

iii) Travel Plan: A full Travel Plan shall be submitted to and approved in writing by the Local Planning Authority. The Plan will include such matters as: targets for sustainable travel arrangements; effective measures for the ongoing monitoring of the Travel Plan; and a commitment to delivering the Travel Plan objectives.

iv) Active Travel Zone Improvements: A financial contribution amounting to £21,718.75 shall be paid to the Council to fund the delivery of works to encourage and enable trip making by walking, cycling and public transport in lieu of car parking being provided on-plot.

v) Section 278: Obligation for the developer to enter a 1980 Highways Act s.278 agreement with the Council to make permanent alterations or improvements to the adopted highway. This will include but is not not limited to changes to the access into the development site, creation of a straight across toucan crossing (as opposed to a staggered toucan crossing), new/alteration of the signal controls, removal of guardrail between footway and cycleway, removal of centre kerb upstand for a distance of 9m and re-surfacing of the footway and cycleway.

vi) Employment Strategy and Construction Training: Details shall be in accordance with the Council Planning Obligations SPD with the preference being for an in-kind scheme to be delivered. Securing an Employment/Training Strategy Agreement is the Council's priority. A financial contribution will only be accepted in exceptional circumstances.

vii) Project Management & Monitoring Fee: A financial contribution equal to 5% of the total cash contributions secured from the scheme to enable the management and monitoring of the resulting agreement, is sought.

COMMUNITY INFRASTRUCTURE LEVY (CIL)

Please be advised that as from 1 April 2012, all planning approvals for schemes with a net additional internal floor area of 100m² or more will be liable for the Mayoral Community Infrastructure Levy (Mayoral CIL), as legislated by the Community Infrastructure Levy Regulations 2010 and The Community Infrastructure Levy (Amendment) Regulations 2011. The liability payable will be equal to £60 per square metre (from April 2019). The London Borough of Hillingdon is a collecting authority for the Mayor of London and this liability shall be paid to LBH in the first instance.

In addition the development represents Chargeable Development under the Hillingdon Community Infrastructure Levy, which came into effect on 1st August 2014.

The liability payable is as follows:

Mayoral CIL: £196,483.64
Hillingdon CIL: £22,798.73
Total: £219,282.37

7.21 Expediency of enforcement action

Not applicable to the consideration of this application.

7.22 Other Issues

Hillingdon Applications Planning Committee - 6th

December

2023 PART 1 - MEMBERS, PUBLIC & PRESS

DIGITAL CONNECTIVITY

Policy SI 6 of the London Plan (2021) states:

A) To ensure London's global competitiveness now and in the future, development proposals should:

- 1) ensure that sufficient ducting space for full fibre connectivity infrastructure is provided to all end users within new developments, unless an affordable alternative 1GB/s-capable connection is made available to all end users
- 2) meet expected demand for mobile connectivity generated by the development
- 3) take appropriate measures to avoid reducing mobile connectivity in surrounding areas; where that is not possible, any potential reduction would require mitigation
- 4) support the effective use of rooftops and the public realm (such as street furniture and bins) to accommodate well-designed and suitably located mobile digital infrastructure.

A planning condition would ensure that sufficient ducting space for full fibre connectivity infrastructure is provided within the development. Subject to the recommended condition, the proposed development would accord with Policy SI 6 of the London Plan (2021).

CONTAMINATED LAND

Policy DMEI 12 of the Hillingdon Local Plan: Part 2 (2020) states:

A) Proposals for development on potentially contaminated sites will be expected to be accompanied by at least an initial study of the likely contaminants. The Council will support planning permission for any development of land which is affected by contamination where it can be demonstrated that contamination issues have been adequately assessed and the site can be safely remediated so that the development can be made suitable for the proposed use.

B) Conditions will be imposed where planning permission is given for development on land affected by contamination to ensure all the necessary remedial works are implemented, prior to commencement of development.

C) Where initial studies reveal potentially harmful levels of contamination, either to human health or controlled waters and other environmental features, full intrusive ground investigations and remediation proposals will be expected prior to any approvals.

D) In some instances, where remedial works relate to an agreed set of measures such as the management of ongoing remedial systems, or remediation of adjoining or other affected land, a S106 planning obligation will be sought.

The Council's Contamination Officer considers that the proposal is acceptable subject to a planning condition requiring details of a remediation strategy. Subject to such a condition, the proposal is not considered contrary to Policy DMEI 12 of the Hillingdon Local Plan: Part 2 (2020).

FIRE SAFETY

Policy D12 of the London Plan (2021) states that all major development proposals should be submitted with a Fire Statement, which is an independent fire strategy, produced by a third party, suitably qualified assessor. The statement should detail how the development proposal will function in terms of:

- 1) the building's construction: methods, products and materials used, including manufacturers' details
- 2) 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
- 3) features which reduce the risk to life: fire alarm systems, passive and active fire safety measures and associated management and maintenance plans

- 4) 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
- 5) how provision will be made within the curtilage of the site to enable fire appliances to gain access to the building
- 6) ensuring that any potential future modifications to the building will take into account and not compromise the base build fire safety/protection measures.

An amended Fire Safety Statement has been submitted during the course of the application and demonstrates consideration of fire safety principles early in the development process.

A final fire statement will be secured by planning condition and it is noted that the development will also require separate Building Control approval, where fire safety matters will be fully assessed and regulated. Subject to the recommended fire statement planning condition, the proposal would accord with Policy D12 of the London Plan (2021).

ODOUR

Policy EM8 of the Hillingdon Local Plan: Part 1 (2012) states that the Council will seek to safeguard and improve all land, water, air and noise quality.

Comments were received from residents regarding the use of the development and whether any permitted use could give rise to waste management activities. It was also explained that there is no end user for the proposed development and as such, the specific operation is not confirmed but could include waste management processes.

It is noted that paragraph 188 of NPPF (2023) states that the focus of planning decisions should be on whether proposed development is an acceptable use of land, rather than the control of processes or emissions (where these are subject to separate pollution control regimes). Planning decisions should assume that these regimes will operate effectively. Notwithstanding, Officers have recommended that an Odour Management Plan condition be secured in the event that the development is used for the purposes of industrial processing (Use Class E(g)iii or B2). Subject to such a condition, the development would not have an adverse impact on the amenity and health of neighbouring residents, in accordance with Policy EM8 of the Hillingdon Local Plan: Part 1 (2012).

MICROCLIMATE

In terms of the impact of the proposed development on the microclimate, or more specifically, wind conditions, a Wind Microclimate Desktop Study has been submitted. It is stated that the proposed development is likely to provide a comfortable environment for pedestrians and occupants, therefore the impact of the proposed development on the microclimate is acceptable.

8. Observations of the Borough Solicitor

General

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

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

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

Planning Conditions

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

Planning Obligations

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

Equalities and Human Rights

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

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

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

9. Observations of the Director of Finance

Not applicable.

10. CONCLUSION

The proposed demolition of existing buildings and erection of a single commercial building for employment purposes Class E(g)iii, B2 and B8, is considered to be an appropriate use within a

Strategic Industrial Location. The significant uplift in floorspace will ensure the intensification of industrial capacity, which is supported by strategic policies.

The economic benefit of commercial development is acknowledged and supported by national, regional and local planning policies. As noted under Paragraph 81 of the NPPF (2023), significant weight should be placed on the need to support economic growth and productivity. The Economic Benefits Assessment submitted demonstrates that there will be economic and employment benefits arising from the proposed development. For balance, it should be noted that the site as it exists could generate a significant number of full time jobs, albeit the existing scenario includes five out of seven vacant units on this site and would indicate that this is not a likelihood.

The proposed building would be of considerable size and scale and as noted in the main body of the report, the siting would not fully respond to the established building lines along Uxbridge Road. Nevertheless, the design would provide visual interest with the sawtooth roof form, the activation of the front elevation and the landscaped buffer which sits on the frontage. Taking into account that alternative options which would bring the building forward in line with established buildings lines (with car parking located to the rear) are not feasible from a highway safety perspective, the siting is justified in this case and it is considered that the proposal would make a positive contribution to the streetscene in the context. Furthermore, the set back of the building line would assist in ensuring an appropriate relationship with residential properties to the north east, enabling a generous separation gap. Based on these considerations, the development is considered to be of appropriate quality and would have an acceptable impact on the character and appearance of the area. This is subject to the recommended conditions which would secure final details of hard and soft landscaping and external finishes.

Subject to the planning conditions and obligations recommended, the proposed development is also considered acceptable with respect to neighbour amenity, the local highway network, accessibility, security, ecology, waste, energy, flood and water management, noise, contaminated land and fire safety.

Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that planning applications should be determined in accordance with the development plan unless material considerations indicate otherwise. For the reasons outlined above and within the main body of the report, this application is considered to comply with the Development Plan and is recommended for approval, subject to securing the necessary planning conditions and a Section 106 legal agreement.

11. Reference Documents

National Planning Policy Framework (September 2023)

National Design Guide (2021)

National Model Design Code (2021)

The London Plan (March 2021)

Hillingdon Local Plan: Part 1 - Strategic Policies (November 2012)

Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020)

Accessible Hillingdon Supplementary Planning Document (September 2017)

Planning Obligations Supplementary Planning Document (July 2014)

Hillingdon Townscape Characterisation Study (November 2013)

Contact Officer:

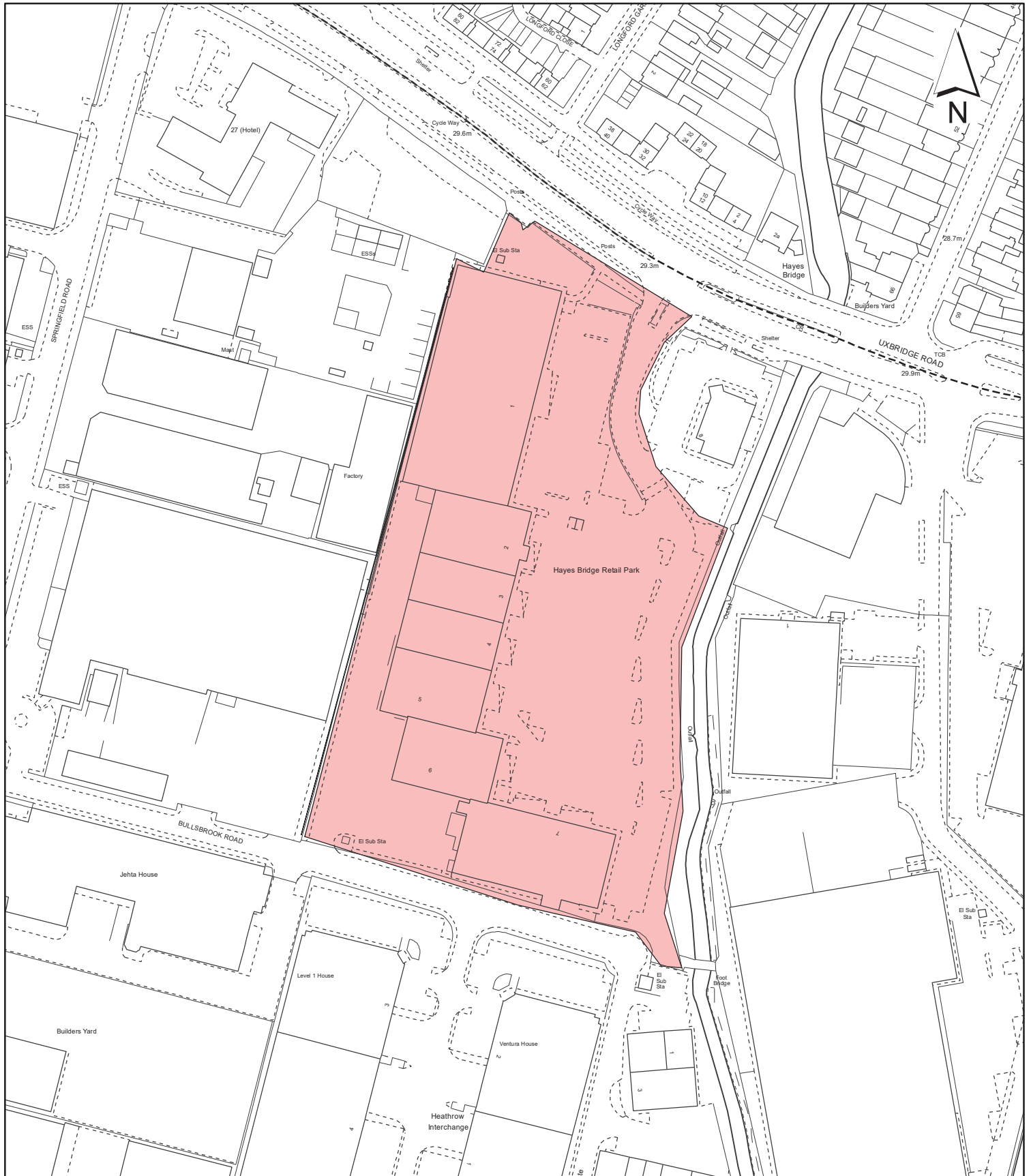
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Hillingdon Applications Planning Committee - 6th December

2023 PART 1 - MEMBERS, PUBLIC & PRESS



Notes:

 Site boundary

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Site Address:

**Hayes Bridge Retail Park
 Uxbridge Road**

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

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

Planning Application Ref:

1911/APP/2022/1853

Scale:

1:2,000

Planning Committee:

Major

Date:

December 2023



HILLINGDON
 LONDON