

18 March 2016

Former Trimite Site, Arundel Road, Uxbridge

in the London Borough of Hillingdon

planning application no. 9117/APP/2016/278

Strategic planning application stage 1 referral

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

The proposal

Redevelopment of the site for three industrial/warehouse units with ancillary offices (Use Classes B1c/B2/B8) and a total floorspace of 16,178sqm (GEA) including a new access off Ashley Road, a minor re-alignment of the highway, service yards, car parking and landscaping.

The applicant

The applicant is **Optima Capital (UK) Limited**, and the architect is **Michael Sparks Associates**.

Strategic issues

The principal issues are the redevelopment of **strategic industrial land, employment, urban design, inclusive access, transport and climate change**.

Recommendation

That Hillingdon Council be advised that while the application is generally acceptable in strategic planning terms, the application does not comply fully with the London Plan, for the reasons set out in paragraph 59 of this report; but that the possible remedies also set out in paragraph 59 of this report could address those deficiencies.

Context

1 On 9 February 2016 the Mayor of London received documents from Hillingdon Council notifying him of a planning application of potential strategic importance to develop the above site for the above uses. Under the provisions of The Town & Country Planning (Mayor of London) Order 2008 the Mayor has until 21 March 2016 to provide the Council with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor's use in deciding what decision to make.

2 The application is referable under Category 1B(c) of the Schedule to the Order 2008:

Category 1B(c) : *“Development (other than development which only comprises the provision of houses, flats, or houses and flats) which comprises or includes the erection of a building or buildings (c) outside Central London and with a total floorspace of more than 15,000 square metres.”*

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

4 The Mayor of London’s statement on this case will be made available on the GLA website www.london.gov.uk.

Site description

5 The irregularly shaped site is approximately 2.2 hectares and is located within the Uxbridge Industrial Estate, which is a designated Strategic Industrial Location.

Figure 1: Aerial view of site prior to demolition. Source Michael Sparks Associates.



6 The site is entirely vacant after the demolition of buildings formerly occupied by Trimate and is bounded by Cowley Mill Road and Ashley Road to the north, Arundel Road to the west, Wallingford Road to the east and Salisbury Road to the south. The surrounding area is characterised by established industrial warehousing buildings varying in scale and size to the south, west and east to Cowley Road. Beyond the industrial estate to the west is greenfield land and the M25. To the north of the site and east of Cowley Road residential use predominates.

7 Currently, the site is accessible by vehicle from all of the surrounding roads: Ashley Road, Arundel Road, Cowley Mill Road and Wallingford Road.

8 The site is served by 4 different bus routes: two TfL routes along Cowley Road (600m away) and non-TfL routes along St John's Road (400m). The nearest London Underground station is Uxbridge, located approximately 1.5km north-east of the site. The station is served by the Metropolitan Line and the Piccadilly Line, providing a frequent service into central London. The nearest section of the Transport for London Road Network (TLRN), Western Avenue/A40, is located approximately 2.75km east of the site. The nearest section of the Strategic Road Network (SRN), Hillingdon Road/A4020, is located approximately 1.3km east of the site. The site therefore currently records a public transport access level (PTAL) of 0, on a scale where 1a is the lowest and 6b the highest.

Details of the proposal

9 Optima Capital (UK) Limited is seeking full planning permission for the erection of 3 buildings to provide B1(c), B2 industrial and / or B8 use with ancillary B1 offices, and the provision of car parking, service areas, hard and soft landscaping and alterations to vehicular and pedestrian accesses around the plot. The three proposed buildings will have the following GIA and GEA:

unit	floorspace sq.m. GIA	floorspace sq.m. GEA
1	11,116	11,461
2	3,346	3,550
3	1,069	1,167
total	15,531	16,178

Case history

10 There is no strategic planning history.

Strategic planning issues and relevant policies and guidance

11 The relevant issues and corresponding policies are as follows:

- Strategic industrial land London Plan;
- Economic development London Plan; the Mayor's Economic Development Strategy; Employment Action Plan
- Employment London Plan; Land for Industry and Transport SPG
- Urban design London Plan;
- Transport London Plan; the Mayor's Transport Strategy;
- Crossrail London Plan; Mayoral Community Infrastructure Levy;
- Parking London Plan; the Mayor's Transport Strategy
- Access London Plan; Accessible London: achieving an inclusive environment SPG;
- Climate change London Plan; Sustainable Design and Construction SPG; Mayor's Climate Change Adaptation Strategy; Mayor's Climate Change Mitigation and Energy Strategy; Mayor's Water Strategy
- Flood risk London Plan;

12 For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plans in force for the area are the 2012 Hillingdon Local Plan: Part 1 - Strategic Policies, and Part 2 - Saved policies of the Unitary Development Plan (2007), and the 2015 London Plan (Consolidated with Alterations since 2011).

13 The following are also relevant material considerations:

- The National Planning Policy Framework and Technical Guide to the National Planning Policy Framework.
- Hillingdon Council's Local Plan Part 2 (Revised Proposed Submission Version, October 2015), which comprises Development Management Policies, Site Allocations and Policies Map, are also relevant material considerations.

Principle of development

14 The application site is located within Uxbridge Industrial Estate, which is a Strategic Industrial Location (SIL), and specifically a Preferred Industrial Location (PIL).

15 London Plan Policy 2.17 'Strategic Industrial Locations', states that "The Mayor will, and boroughs and other stakeholders should, promote, manage and, where appropriate, protect the strategic industrial locations (SILs).... as London's main reservoirs of industrial and related capacity, including general and light industrial uses, logistics, waste management and environmental industries (such as renewable energy generation), utilities, wholesale markets and some transport functions." Policy 2.17 further informs that a PIL is "particularly suitable for general industrial, light industrial, storage and distribution, waste management, recycling, some transport related functions, utilities, wholesale markets and other industrial related activities."

16 London Plan Policy 2.7 'Outer London: Economy', encourages the management and improvement of the stock of industrial capacity to meet both strategic and local needs of small and medium sized enterprises (SMEs), start-ups and businesses requiring more affordable workspace including flexible, hybrid office/industrial premises. Policy 2.7 further asserts that the expansion of logistics and some other industrial type activities forms part of the strategy for engendering job growth in outer London. In the Hillingdon Local Plan, Uxbridge Industrial Estate is a protected employment area, and this protection is maintained in the emerging Local Plan: Part 2 Site Allocations and Designations (Revised Proposed Submission Version, October 2015) document. The Hillingdon Local Plan also supports general industrial, wholesale distribution, waste management and recycling on the site.

17 The proposal is fully supported as it involves the redevelopment of vacant strategic industrial land resulting in the reprovision of 15, 531 sq.m. of modern industrial space with ancillary offices catering to the industrial, distribution and logistics sectors, which will lead to the creation of jobs in the area.

18 However, no information on the projected number or types of jobs has been submitted by the applicant. In an effort to fulfil the requirements of London Plan policies 4.12 'Improving Opportunities for All', the applicant should seek to guarantee that local residents and businesses benefit from jobs created by this proposal.

19 In summary, the principle of industrial development meets the strategic requirements of the London Plan.

Urban and inclusive design

20 The proposed development is well designed and laid out which is supported. The consolidation of multiple access points into one entry serves as a focal point and creates a more legible site. Landscaping will be extensive along the northern boundary to soften the main frontage of the site with further landscaping along the east in front of the Service Yards. A 2.4m high paladin fence will be provided at the east of the units to secure the service yards with a timber knee rail fence elsewhere.

21 The three proposed buildings will each be two storeys (ground and mezzanine floor) in height and as such will be compatible with the surrounding residential and industrial buildings. The architectural expression will be typical of industrial buildings and a mixture of different shades of grey and silver cladding will be used. The final decision on the suitability of the materials used should be determined by the Council.

22 A unisex disabled accessible toilet with a level access shower will be provided and this is welcomed. The development platform will be generally level and entrances to the building will be clearly defined and any glazing to the doors or side screens will incorporate high and low level manifestation in accordance with Approved Document M. Disabled parking spaces will be provided to meet the Council's parking standards and designed in accordance with Approved Document M recommendations. These parking spaces will be located close to office entrances and the approach route to the entrance will be level with dropped kerbs.

Climate Change

Energy efficiency standards

23 A range of passive design features and demand reduction measures are proposed to reduce the carbon emissions of the proposed development. Both air permeability and heat loss parameters will be improved beyond the minimum backstop values required by building regulations. Other features include low energy lighting. The applicant is also proposing a Building Management System.

24 The applicant is proposing cooling to the ancillary office of Unit 1. The applicant should provide evidence of how policy 5.9 has been addressed to avoid overheating and minimise cooling demand.

25 The development is estimated to achieve a reduction of 53 tonnes per annum (12%) in regulated CO₂ emissions compared to a 2013 Building Regulations compliant development.

District heating

26 The applicant has carried out an investigation and there are no existing or planned district heating networks within the vicinity of the proposed development. The applicant has, however, provided a commitment to ensuring that the development is designed to allow future connection to a district heating network should one become available.

27 The applicant is proposing individual heating systems for each of the three industrial units. Given that the scheme is not situated in a district heating opportunity area and has a relatively low heating demand, this approach is accepted in this instance.

Combined Heat and Power

28 The applicant has investigated the feasibility of CHP. However, due the intermittent nature of the heat load, CHP is not proposed. This is accepted in this instance.

Renewable energy technologies

29 The applicant has investigated the feasibility of a range of renewable energy technologies and is proposing to install a total of 655 sq.m. of roof mounted Photovoltaic (PV) panels on the roofs of the three units. A roof layout drawing should be provided to demonstrate that there is sufficient capacity to accommodate the proposed PV arrays.

30 The applicant is also proposing Air Source Heat Pumps (ASHP) to provide space heating for unit 1.

31 A reduction in regulated CO₂ emissions of 112 tonnes per annum (24%) will be achieved through this third element of the energy hierarchy.

Overall Carbon Savings

32 Based on the energy assessment submitted at stage I, table 1 below shows the residual CO₂ emissions after each stage of the energy hierarchy and the CO₂ emission reductions at each stage of the energy hierarchy.

Table 1: CO₂ emission reductions from application of the energy hierarchy

	Total residual regulated CO₂ emissions (tonnes per annum)	Regulated CO₂ emissions reductions	
		(tonnes per annum)	%
Baseline i.e. 2013 Building Regulations			
Energy Efficiency	404	53	12%
CHP	404	0	0%
Renewable energy	292	112	24%
Total		165	36%

33 A reduction of 165 tonnes of CO₂ per year in regulated emissions compared to a 2013 Building Regulations compliant development is expected, equivalent to an overall saving of 36%. The carbon dioxide savings exceed the target set within Policy 5.2 of the London Plan. However, the comments above should be addressed before compliance with London Plan energy policy can be verified.

Conclusion

34 Whilst the applicant has broadly followed the energy hierarchy, further revisions and information are required before the proposals can be considered acceptable and the carbon dioxide savings verified.

Flood risk and drainage

35 London Plan policy 5.12 'Flood risk management' seeks to ensure that flood risk is adequately assessed and considered in the location and design of new development and that sustainable drainage methods are employed where appropriate to address flood risk issues. London Plan Policy 5.13 'Sustainable drainage' notes that unless practical reasons that prevent their use exist, sustainable urban drainage systems (SUDS) should be utilised to achieve greenfield run-off rates and to ensure surface water run-off is managed close to its source and in line with the drainage hierarchy wherever possible.

Flood risk

36 The FRA prepared by Bradbrook Consulting confirms that an area of Flood Zone 2 bisects the site. Parts of the site are also at risk of surface water flooding (coinciding to some extent with area of Flood Zone 2 across the site and corresponding with the existing central soak aways for the site), as are parts of the wider catchment, such as nearby Arundel Road.

37 The FRA proposes that the new industrial units will have finished floor levels set 150mm above the existing site levels, i.e. above the 1 in 100 year + CC flood level.

38 The proposals are acceptable in terms of London Plan policy 5.12 (flood risk).

Surface Water Run-off

39 The FRA states that impermeable surface coverage will remain consistent with existing fully impermeable coverage. With the site being somewhat elevated above the surrounding roads (approx. 150mm), the potential for the site to contribute to surface water flooding of neighbouring areas means that the application of London Plan policy 5.13 will be particularly important.

40 The FRA proposes a below ground geo-cellular storage tank with hydro brakes to restrict flows off site to 50% of existing rates (i.e. 117l/s across the 2.9ha site for a 1 in 30 year storm), with potential for the tank to be unlined (if the existing soil is found to be suitable for infiltration). However, this remains relatively high for a site of this size.

41 Green roofs have been excluded due to the slope of the roofs and their weight on the large span structure. Landscaping to attenuate stormwater has also been excluded due to the land take required.

42 However, there remains potential to exploit the landscaping proposed along the northern boundary of the site for stormwater retention, for example through a swale that could divert stormwater from the rooftop of Unit 1, and particularly of Unit 2 with its proposed grass strips between hedges, for irrigation.

43 Consideration should also be given to Design for Exceedance, i.e. where some areas of open space (such as car parks) are specifically designed to hold and attenuation rainwater for less frequent storms (say 1 in 10 years or less often).

44 Development should not commence until a sustainable drainage regime meeting the requirements of London Plan policy 5.13 has been submitted to and approved by London Borough of Hillingdon Lead Local Flood Authority.

Transport

Highway Impact

45 TfL is in agreement with the applicant that the net traffic impact to the local network will be minimal. It is estimated that there will be an increase of 54 two-way vehicle trips in the AM and 47 in the PM. Modelling of the proposed priority junction also suggests there is significant spare capacity to accommodate development traffic without causing delay to existing road users on Ashley Road. However, TfL also notes that, in the vicinity, Cowley Mill Road is one of the most congested borough roads during peak hours; therefore Hounslow Council may still consider whether to seek mitigation from this proposal.

Bus network

46 TfL is satisfied that current bus services will be able to deal with the minimal uplift in passengers; therefore no mitigation for bus services will be required.

Vehicular, cycling and pedestrian site access

47 The proposed development is to be served via a new priority junction with Ashley Road at the northern site boundary, which will lead to the internal access road, as well as car park and service yards access. As HGVs will also access the site, it is important to ensure satisfactory safe manoeuvres and any turning movements required can be made without impact on other traffic. Tracking for these movements are shown in the Transport Assessment (TA) and TfL is satisfied that the arrangement is suitable.

48 TfL recommends that the applicant nevertheless makes this junction a safer and more attractive environment for pedestrians and cyclists. As an example, reducing the corner radii and crossing distance for pedestrians, and/or providing a raised table treatment, could slow turning vehicle movements, and minimise risk for cyclists both on – and off-carriageway while also improve pedestrians' comfort/safety. The applicant may also consider the provision of separated access to the site for cyclists and pedestrians.

Car parking

49 The TA states that three units on site will be served by 148 car parking spaces, with 16 dedicated disabled parking spaces. Electric Vehicle Charging Points and Blue Badge parking are also being provided in line with London Plan standards. TfL is satisfied that car parking meets Policy 6.13 of the latest London Plan.

Cycle parking

50 The proposed level of cycle parking does not meet the most updated version of the London Plan standards. The total requirement generated by the uses on the site is 41 long-stay and 18 short-stay spaces, but the applicant only proposes 36. The minimum requirement for office spaces in Outer London is 1 long-stay cycling space per 150sqm rather than 1 space per 250sqm.

51 TfL recommends that the location of the cycle parking facilities in Unit A be revised – ideally closer to the unit main entrance. This will reduce interactions between cyclists and heavy vehicles parking and loading. TfL also suggests provision of complementary facilities to be considered: this can include, but not limited to, showering and changing facilities with accessible features and storage.

52 TfL requests that the applicant provides a study of 'cycling level of service' of streets and junctions in the vicinity of the site, in particular links to Uxbridge Station. The study should follow the methodology explained in the London Cycling Design Standards. This assessment will help to identify severance issues and fundamental crossings to access the site and can inform which improvements could be made to provide a safer access to cyclists.

Travel Plan and Construction and servicing

53 The applicant is required to submit a full Travel Plan, a framework Construction Logistics Plan (CLP) and a Deliveries & Servicing Plan (DSP). These should be secured by condition/s106 agreement.

Community Infrastructure Levy

54 The Mayor has introduced a London-wide Community Infrastructure Levy (CIL) to help implement the London Plan, particularly policies 6.5 and 8.3, which will contribute towards the funding of Crossrail. The Mayor has arranged boroughs into three charging bands. The rate for Hillingdon is £35/sq.m. The required CIL should be confirmed by the applicant and Council once the components of the development or phase thereof have themselves been finalised.

55 London Councils are also able to introduce CIL charges, which are payable in addition to the Mayor's CIL. Hillingdon has adopted a CIL charging schedule and more details are available on the Council's website.

Local planning authority's position

56 Hillingdon Council's position is not yet known.

Legal considerations

57 Under the arrangements set out in Article 4 of the Town and Country Planning (Mayor of London) Order 2008 the Mayor is required to provide the local planning authority with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. Unless notified otherwise by the Mayor, the Council must consult the Mayor again under Article 5 of the Order if it subsequently resolves to make a draft decision on the application, in order that the Mayor may decide whether to allow the draft decision to proceed unchanged, or direct the Council under Article 6 of the Order to refuse the application, or issue a direction under Article 7 of the Order that he is to act as the local planning authority for the purpose of determining the application (the next bit is optional) and any connected application. There is no obligation at this present stage for the Mayor to indicate his intentions regarding a possible direction, and no such decision should be inferred from the Mayor's statement and comments.

Financial considerations

58 There are no financial considerations at this stage.

Conclusion

59 London Plan policies on strategic industrial land, employment, urban and inclusive design, accessibility, energy, flooding and transport are relevant to this application. The application is broadly acceptable in strategic planning terms, however further information is needed on the matters set out below:

- **Flooding:** further information on a sustainable drainage regime meeting the requirements of London Plan policy 5.13 should be submitted to and approved by London Borough of Hillingdon Lead Local Flood Authority before the proposal can be considered compliant with the London Plan.
- **Employment and training:** The provision of jobs for local residents and on-the-job training for young people should be conditioned.
- **Transport:** the provision of additional cycle parking and upgraded complementary facilities, as well as information on the 'cycling level of service' of streets and junctions in the vicinity of the site are required before the proposal can be considered to comply with the London Plan. In addition, as indicated in the transport section at paragraph 53 of this report, the applicant is required to submit a full Travel Plan, a framework Construction Logistics Plan (CLP) and a Deliveries & Servicing Plan (DSP).
- **Climate change:** whilst the application has broadly followed the energy hierarchy, further information should be provided indicating how preventing overheating and minimising cooling demand will be addressed; and drawings should be submitted to demonstrate that there is sufficient capacity on the roof to accommodate the proposed PV arrays.

60 Whilst the application is broadly acceptable in strategic planning terms, on balance, it does not fully comply with the London Plan.

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