

STATEMENT OF CASE

**LPA PLANNING REF: 2688/APP/2016/3948
LOCAL PLANNING AUTHORITY: HILLINGDON
APPELLANT: TRANSDEV PLC**

**HOLLOWAY FARM, HARMONDSWORTH ROAD,
WEST DRAYTON**

**CHANGE OF USE OF LAND FROM GARDEN
CENTRE/NURSERY TO A VEHICLE MAINTENANCE
AREA INVOLVING ERECTION OF WORKSHOP AND
DEMOLITION OF GLASS HOUSE AND POLY
TUNNELS (RETROSPECTIVE)**

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INTRODUCTION

The Site

- 1.1 The site comprises land within the Northern half of Cherry Yard, Holloway Farm, Harmondsworth Road, located to the North of the village of Harmondsworth between Holloway Lane and the M4. Within the larger commercial area (known as Holloway Farm), there is the entrance to the Holloway Farm commercial area. This private track splits three ways. One track leads to the entrance for CCH Ltd depot immediately to the West. The track to the left leads to a large retail plant nursery and beyond the nursery is the parking area for CCH Ltd.
- 1.2 The appeal site is the land agreed by the LPA to formerly have been in A1 retail use as a garden centre / plant nursery. The nursery included a storage building, large glasshouse, polytunnels and plant growing area. The site is therefore clearly previously developed land.
- 1.3 To the west of the site lies farmland that is in the advanced stages of being allocated (Local Plan: Part 2 Site Allocations and Designations (Revised Proposed Submission Version, October 2015) for Mineral Extraction. Holloway Close separates this area from the site and this is likely to be the main access route. There are very few glimpses into the site due to the screening and its boundary adjacent to Harmondsworth Road.

Proposal

- 1.3 Planning permission was refused on 12th April 2017 for:

“Change of use of land from garden centre/nursery to a vehicle maintenance area involving erection of workshop and demolition of glass house and poly tunnels (Retrospective)

- 1.4 The proposal seeks retrospective planning approval for the change of use, demolition and resurfacing of part the site to accommodate a vehicle maintenance building with three service tracks. As part of the proposal, the pre-existing access from Holloway Close has been closed and a new access track has been created adjacent to Harmondsworth Road.
- 1.5 A hardstanding turnaround area for the vehicles to be serviced is located just north of the new building. In terms of buildings, the green three-door garage replaces a substantial glasshouse in the same position and the storage building remains. The polytunnel has been removed and part of the plant growing area has been replaced by hardstanding. The unit is adjacent to the road.
- 1.6 The maintenance building is required because of the limited provision of vehicle maintenance facilities, which can cater for CCH Ltd's on-going demands in the local area and to reduce impact of vehicle movements on the local road network. CCH Ltd are actively looking for a complete site which can accommodate a coach vehicle parking area, maintenance, offices and staff parking.

Justification for Hearing

1.7 The Appellant considers the appropriate procedure for the appeal to be heard is by way of a hearing.

1.8 The Planning Inspectorate's Planning Appeals Procedural Guidance (August 2016) states at E.1.1. that:

"The hearing is an inquisitorial process led by the Inspector who identifies the issues for discussion based on the evidence received and any representations made. The hearing may include a discussion at the site or the site may be visited, on an accompanied (without any discussion), or unaccompanied basis."

1.9 In the current appeal, the Inspector will have to test the evidence, and the issues will not be sufficiently clear from a reading of the documents and a site visit. The Appellant does not consider that formal cross-examination is necessary. However, there are likely to be detailed evidential issues relating to openness, the impact on openness, impact on the purposes of including land within the Green Belt and the weight to be given to very special circumstances that make the hearing procedure appropriate. In addition, there is likely to be detailed highways evidence, and consideration of alternative and fall back uses.

COMMON GROUND

1.10 A separate Statement of Common Ground is to be agreed by both parties, covering the following areas:

- Description of the site and area
- Description of the proposal
- Planning history of site
- Relevant planning policy
- Previous use of the site
- NPPF paragraph 89 compliance
- Highways
- Noise
- Trees and ecology
- Archaeology
- Airport safeguarding

1.11 It also identifies the matters which are the subject of specific disagreement.

STATEMENT OF CASE

- 3.1 This Statement of Case is submitted on behalf of Transdev plc (appellant) against the refusal of planning permission on 13th April 2017 by London Borough of Hillingdon for

“Change of use of land from garden centre/nursery to a vehicle maintenance area involving erection of workshop and demolition of glass house and poly tunnels (Retrospective)

- 3.2 This is the statement of William Avery. I am a chartered town planner and Member of the Royal Town Planning Institute.

- 3.3 This Statement of Case (SoC) responds to the reasons for refusal of planning permission and states the reasons why the appeal should be allowed.

- 3.4 The SoC sets out the reasons why contrary to the decision notice:

1. The proposal would not represent inappropriate development in the Green Belt. If the Inspector disagrees with this view, there are very special circumstances which overcome the presumption against inappropriate development in the Green Belt.
2. The proposal would not, by reason of siting, overall size, bulk or height of the proposed buildings, the associated infrastructure or increased intensity of the use, prejudice the openness of the Green Belt or result in an unacceptable degree of urbanisation.

- 3.5 As such, the proposal would not be contrary to Policy EM2 of the Hillingdon Local Plan: Part One – Strategic Policies (November 2012), Policy OL1 of the Hillingdon Local Plan: Part Two – Saved UDP Policies (November 2012), Policy 7.16 of the London Plan or the NPPF.

Is the proposal inappropriate development in the Green Belt?

3.6 The NPPF at para. 87 (extracts included at Appendix 1) states:

“As with previous Green Belt policy, inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.”

3.7 Clarification on what constitutes inappropriate development is provided in the judgment (included at Appendix 2) on *Fordent Holdings v SSCLG* [2013] EWHC 2844:

“Previous national policy in relation to Green Belt development defined material changes of use as inappropriate unless they maintained openness and did not conflict with the purposes of including land within the Green Belt – see PPG2, Paragraph 3.12. That approach has not been carried through into the NPPF, however, where the preferred approach is to attempt to define what is capable of being “not inappropriate” development within the Green Belt, with all other development being regarded as inappropriate by necessary implication. It is for this reason that there is no definition within Chapter 9 of the NPPF of what constitutes inappropriate development, or any criteria by which whether a proposed development is or is not appropriate could be ascertained...The effect of Paragraphs 87, 89 and 90, when read together, is that all development in the Green Belt is inappropriate, unless it is either development (as that word is defined by s.55 of the TCPA) falling within one or more of the categories set out in Paragraph 90, or is the construction of a new building or buildings that comes, or potentially comes, within one of the exceptions referred to in Paragraph 89.” [19] [WEA Planning emphasis]

3.8 The decision goes on to state:

“Merely because a proposed development is inappropriate does not mean that there is a prohibition on it. The categories of what constitute very special circumstances are not closed.” [28]

- 3.9 The case law has established that development by way of a change of use will generally be inappropriate development because there is no relevant category of appropriate development in the NPPF. However, the situation in this Appeal is rather different. The proposals amount to the erection of a replacement building as part of the redevelopment of previously developed land (NPPF paragraph 89, bullet point 6). The redevelopment will therefore be appropriate provided it does not have a greater impact on the openness of the Green Belt and the purposes of including land within it.
- 3.10 Accordingly, it is submitted that the proposed development considered as a whole is appropriate development, or alternatively that the majority of its elements are appropriate which adds to the case for very special circumstances.

Storage building and retention of existing hardstanding

- 3.11 The storage building to the west and the pre-existing hardstanding form part of the original use of the site. They are therefore appropriate. While the applicant accepts the formation of hard surfacing can affect the openness of the Green Belt, in this case, the element of hard surfacing outlined on the pre-existing plan is clearly long established and has not been altered. The storage building retains its function as a storage unit.

Vehicle Maintenance Workshop building.

- 3.12 Para. 89 of the NPPF states that the construction of new buildings is inappropriate, with certain exceptions, including:

- *the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces;*
- *limited infilling or the partial or complete redevelopment of previously developed sites (brownfield land), whether redundant or in continuing use (excluding temporary buildings), which would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development.*

3.13 UDP Saved Policy (2007) OL4 “extension or replacement of buildings within the Green Belt” is referenced in the LPA’s committee report and should be engaged for the purposes of this assessment. The key tests are:

1. *whether the development would result in any disproportionate change in bulk and character of the original building;*
2. *increase the built up appearance of the site;*
3. *would not injure the visual amenities of the Green Belt by reason of siting, materials, design, traffic or activities generated.”*

Under Paragraph 215 of NPPF due weight should be given to adopted policies which predate NPPF according to their degree of consistency with NPPF. This policy is consistent with para. 89 of the NPPF.

3.14 The Development Management Plan is in the advanced stages and is under consultation this summer (2017). The emerging Development Management Policy DMEI 4: Development in the Green Belt or on Metropolitan land states:

“B) Extensions and redevelopment on sites in the Green Belt and Metropolitan Open Land will be permitted only where the proposal would not have a greater impact on

the openness of the Green Belt and Metropolitan Open Land, and the purposes of including land within it, than the existing development, having regard to:

i) the height and bulk of the existing building on the site;

ii) the proportion of the site that is already developed;

iii) the footprint, distribution and character of the existing buildings on the site;

iv) the relationship of the proposal with any development on the site that is to be retained; and

v) the visual amenity and character of the Green Belt and Metropolitan Open Land.”
(WEA Planning emphasis).

3.15 Given the changes to Green Belt policy introduced through the NPPF (as discussed in a number of legal cases, including for example Redhill Aerodrome) and paragraph 215 of NPPF, it is this national policy which should attract greater weight on this appeal. The primary consideration that runs through the bullet points in NPPF 89 relating to the extension/alteration of a building, the replacement of a building and the partial redevelopment of a brownfield site is whether the proposal has a greater impact on the openness of the Green Belt.

3.16 In the instant case the maintenance building replaces the glasshouse and polytunnel which were located on this part of the site.

3.17 The new building has a Gross Internal Area (GIA) of 267 sq m. The glasshouse had a GIA of 161 sq m. The polytunnel had a GIA of 81 sq m. In combination the area of the replaced structures was 242 sq m. Accordingly there has been a net increase of 25 sq m only in floorspace. This is not material in the context of the site and certainly does not result in a building that is materially larger or has a materially greater impact on openness.

- 3.18 This is particularly the case given that the replacement building is marginally lower than the glasshouse.
- 3.19 NPPF 89 also refers to the use of the building. It is correct that the maintenance building will not be used for A1 retail purposes. However, the use is similar in character, being in nature for storage and maintenance. In addition, paragraph 90 of the NPPF views as appropriate the re-use of buildings provided that they preserve the openness of the Green Belt and do not conflict with the purposes of including land within it. There is accordingly no reason why the new use of the building should render the erection of the building inappropriate.
- 3.20 In any event, the sixth bullet point of the NPPF makes clear that the partial redevelopment of a brownfield site (as this one is) will be appropriate regardless of the use (even if previously redundant). Accordingly, the change in the use of the building does not make the replacement building inappropriate.
- 3.21 The Appellant does not consider there to be any adverse impact on any other purpose of including land in the Green Belt.
- 3.22 Turning to local policy OL4, there is clearly not a disproportionate change in the bulk and character of the built form for the reasons given above and the visual amenities of the Green Belt will not be unacceptably harmed.

Creation of new access track

- 3.23 With regard to the access track, para. 90 of the NPPF states:

“Certain other forms of development are also not inappropriate in the Green Belt provided they preserve the openness of the Green Belt and do not conflict with the purposes of including land in the Green Belt.”

- 3.24 The NPPF goes on to set out these other forms of development; one of these is *“engineering operations”*.

- 3.25 The creation of an access track is an engineering operation.
- 3.26 In 1983, the meaning of the term ‘engineering operations’ was clarified in the *Fayrewood Fish Farms Ltd v. Secretary of State for the Environment* [1984] JPL 267 decision. A summary of this (included at Appendix 3) is provided by Moore & Purdue (2012)¹. The High Court had to consider whether the excavation and removal of topsoil for the purpose of extracting underlying gravel constituted development. The Secretary of State thought that it did. Mr David Widdecombe QC, sitting as High Court Judge accepted this view but clarified that:
- “the term ‘engineering operations’ should be given its ordinary meaning in the English language, It must mean ‘operations of the kind usually undertaken by engineers, i.e. operations calling for the skills of an engineer’. These would normally be civil engineers, but could be traffic engineers or any engineers who applied their skills to land.”*
- 3.27 The access track is a road and therefore an engineering operation, which is an appropriate development in the Green Belt.

Very special circumstances

- 3.28 As discussed in the Planning Statement, the Builders Yard, Joel Street appeal against LB Hillingdon’s decision not to grant planning permission for the construction of a new builder’s yard office, sales desk, showroom and storage facility (APP/R5510/A/10/2134967) is useful because it was permitted due to very special circumstances including visual enhancements, sustainability of the new building and disadvantages of the appellant’s fallback position.
- 3.29 The very special circumstances (VSC) have not been considered anywhere in the committee report. The VSCs are set out in the planning statement and are:

¹ A Practical Approach to Planning Law (2012), V. Moore and M. Purdue

Control over the use of space and the fallback position

- 3.30 The previous use of the site for 'inappropriate' Green Belt purposes has been long established and since the mid-eighties. See aerial photographs submitted with the application.
- 3.31 With regard to the lawful A1 use as a garden centre/nursery, the LPA does not currently have any control over lorry movements (deliveries), parking numbers or sale of goods.
- 3.32 Granting planning permission for the proposed use gives the LPA a perfect opportunity to control, for example, vehicle movements, operator registered vehicles and staff numbers through the use of conditions.
- 3.33 The potential fallback position is for the site to revert to its A1 retail use. The opportunity to control this space is an important consideration and contributes to the Very Special Circumstances, which support this application.

Site Regeneration

- 3.34 One of the roles cited by London Borough Hillingdon's Green Belt Assessment of 'Land at Harmondsworth Road/Holloway Close' (the wider commercial area) is:
- 5) To assist in urban regeneration, by encouraging the recycling of derelict and other urban land'.
- 3.35 The new use provides a positive contribution by restoring a poorly maintained and partially derelict site and providing a low impact facility that does not encroach further on the countryside.

Supporting Local Business Growth

- 3.36 There are a number of national and local policies supporting business growth which are a key material consideration which weigh in favour of the combined very special

circumstances. **NPPF Paragraph 19** seeks to ensure the planning system does “everything it can to support sustainable economic growth” and “significant weight should be placed on the need to support economic growth through the planning system”.

- 3.37 The Mayor’s Land for Industry and Transport Supplementary Planning Guidance (SPG) explicitly states:

“The loss of any existing...repair and servicing facilities through a change of use or redevelopment should be resisted, unless a suitable alternative arrangement is agreed with TfL.”

- 3.38 The Borough’s strategic objective is to create 9,000 jobs focussed in Uxbridge and the Heathrow Opportunity Area. The emerging LB Hillingdon policies were drafted before the Government’s decision (25th October 2016) to approve a 3rd runway at London Heathrow Airport. The demand for jobs and employment land to support the Airport’s growth will put much greater pressure on employment land than LB Hillingdon have planned for.

- 3.39 The vehicle maintenance facility creates a small number of jobs in the Borough and does not displace this work to an alternative maintenance depot in Aylesbury. The approval will not result in the loss of an existing repair and servicing facility for bus transport which would be resisted by the Mayor’s Land for Industry and Transport SPG.

- 3.40 Furthermore, the retention of this modest workshop would show the Borough is supporting business growth and its own strategic objectives set out in **Policy NPPF1**.

Support for existing business

- 3.41 The urgent requirement for the vehicle maintenance depot is as a result of the main supplier of this very specialist service (Silver Fox) in Uxbridge no longer being able to

service the CCH Ltd vehicles. Another supplier (CCS) has vacated premises in Uxbridge as a result of a regeneration project. They have now been displaced to Denham (around 10km away). The closest air conditioning specialist is now located in Aylesbury (around 60km away).

- 3.42 The vehicle maintenance depot needs to be close to CCH Ltd in order to service the vehicles efficiently.

Reducing impact on the local road network

- 3.43 A Highways Appeal Statement prepared by Paul Mew Associates is submitted in support of this appeal.

- 3.44 The impact of the retrospective proposals on the local road network has been assessed already as part of the Transport Statement compiled by Paul Mew Associates. This statement forms part of the application package. The LPA did not dispute these findings.

- 3.45 The vehicle maintenance building services vehicles which are associated with the CCH Ltd operation at Holloway Farm. In terms of efficiency, looking at routine maintenance alone, CCH Ltd estimate a saving of 5250 miles/ 756 trips per annum.

- 3.46 The Highways Appeal Statement finds, at para. 35, that:

“In terms of location, trip intensity, travelling and carbon usage, the site is well suited to a business linked with London Heathrow Airport. The close proximity to the airport reduces the necessity for long vehicle trips for both commercial vehicles associated with the business, and other servicing vehicles. Re-locating the site further away from the airport would naturally increase travelling time and efficiency from an economic perspective, but also increase vehicle time on the road, and contribute to congestion in other areas.”

- 3.47 In summary, the proposals are therefore expected to result in a benefit to highway capacity, safety, and neighbouring amenity adjoining the site. This is especially when compared to the erratic, uncontrolled nature of the fallback A1/garden centre use which could potentially generate more trips and seasonal impacts on the road network.

Does the proposal prejudice the openness of the Green Belt or the purpose of including land within it?

- 3.48 As set out above it is considered that the correct approach to appropriateness is to consider the totality of the development against bullet point 6 of NPPF 89. This requires consideration of the impact of the proposals on openness and Green belt purposes. For the reasons given above it is considered that the erection of the maintenance building and the laying of the access track are appropriate development in any event being for a replacement building which is not materially larger than those it replaces, and an engineering operation which complies with national policy in any event.

- 3.49 Guidance on the concept of openness is provided again by various legal decisions. *R (Lee Valley Regional Park Authority) v Epping Forest DC* [2016] EWCA Civ 404, Treacy, Underhill, Lindblom LJJ (included at Appendix 4) states :

“The concept of “openness” here means the state of being free from built development, the absence of buildings – as distinct from the absence of visual impact”. [7]

- 3.50 The judge dealing with *Turner* [2016] EWCA Civ 466 (included at Appendix 5) discussed the concept of ‘openness’ in the Green Belt in detail. The judgement states at para. 14:

“The word “openness” is open-textured and a number of factors are capable of being relevant when it comes to applying it to the particular facts of a specific case.

Prominent among these will be factors relevant to how built up the Green Belt is now and how built up it would be if redevelopment occurs (in the context of which, volumetric matters may be a material concern, but are by no means the only one) and factors relevant to the visual impact on the aspect of openness which the Green Belt presents.”

3.51 With regard to visual impact, the judgement states:

“15 The question of visual impact is implicitly part of the concept of “openness of the Green Belt” as a matter of the natural meaning of the language used in para. 89 of the NPPF. I consider that this interpretation is also reinforced by the general guidance in paras. 79-81 of the NPPF, which introduce section 9 on the protection of Green Belt Land. There is an important visual dimension to checking “the unrestricted sprawl of large built-up areas” and the merging of neighbouring towns, as indeed the name “Green Belt” itself implies. Greenness is a visual quality: part of the idea of the Green Belt is that the eye and the spirit should be relieved from the prospect of unrelenting urban sprawl. Openness of aspect is a characteristic quality of the countryside, and “safeguarding the countryside from encroachment” includes preservation of that quality of openness. The preservation of “the setting ... of historic towns” obviously refers in a material way to their visual setting, for instance when seen from a distance across open fields. Again, the reference in para. 81 to planning positively “to retain and enhance landscapes, visual amenity and biodiversity” in the Green Belt makes it clear that the visual dimension of the Green Belt is an important part of the point of designating land as Green Belt.”

3.52 Further observations are provided in *Ouseley J in R (Lee Valley Regional Park Authority) v Broxbourne Borough Council* [2015] EWHC 185 (Admin) (included at Appendix 6):

“I would accept that the effect of development on openness may involve questions of degree. and that there may be scope for some reduction in height and bulk offsetting some greater extent or spread of built area, and, if so, that how far the offset goes before the impact on openness increases can be a matter of impression. A conclusion on the degree of impact on openness is essential to reliance on the new flexibility for “previously developed land” in the first place...and to the analysis of harm.” [59]

- 3.53 The proposal is for the redevelopment of a previously developed site. The site, in its previous use, contained substantial built development. With regard to buildings, the proposal comprises the retention of the storage building, and the replacement of the glasshouse (and polytunnel) with a new vehicle maintenance workshop. The workshop is on the same part of the site as the demolished glasshouse and polytunnels, and does not represent any material or disproportionate increase in height or bulk.
- 3.54 In fact the impact on openness is marginally improved by the re-positioning of the bulk from east to west (glass houses) to a north south orientation, which shifts the volume towards the M4 boundary.
- 3.55 With regard visual impact, the judgement discussed above makes clear that this is an important part of assessing openness. The landscape assessment submitted in support of the application found that the proposal has had no negative effects on the district level landscape character, where the main sensitivities are interruption to long views; disruption to simple uniform character, and; the flat landform where development is easily visible. On the site itself, the assessment found that the proposal had not resulted in the loss of any landscape elements such as hedgerows and trees. The new building has been designed to have a similar footprint to the buildings it replaces, and is of a similar height (in fact marginally lower) than the demolished glasshouse.

3.56 The assessment found that with regard to visual effects, *“the greatest effect is to views for users of Harmondsworth Road, on a short section where the entrance to both sites and the new structure is partially visible. There are glimpsed views from Footpath 1. This change in the visual amenity comprises only a small change to pre-existing views.”*

3.57 Therefore the visual impact of the development is minimal, and cannot be said to result in a loss of openness.

3.58 The proposal also includes planting mixed native species hedgerows, which will provide extra screening.

Does the proposal result in an unacceptable degree of urbanisation?

3.59 The new sui generis use of the site does not represent an intensification of use compared to the previous A1 retail use. As the transport assessment has found, vehicle movements will be at a similar level (perhaps lower than) the previous use. The Highways Appeal Statement finds at para. 34 that:

“The extant site use as a vehicle maintenance area would not generate additional demand, whilst the nature of the development does not have the propensity for seasonal or weekend peaks, which would have been more likely as the former plant nursery.”

3.60 The purposes of including land in the Green Belt are listed in paragraph 80 of the NPPF:

- *to check the unrestricted sprawl of large built-up areas;*
- *to prevent neighbouring towns merging into one another;*
- *to assist in safeguarding the countryside from encroachment;*
- *to preserve the setting and special character of historic towns; and*

- *to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.”*

3.61 The proposal involves redevelopment of a previously developed site; no development is proposed outside of the existing site boundary. Furthermore, the building proposed replaces the previous glasshouse and polytunnel on the same part of the site, with no significant increase in bulk. Therefore the proposal cannot be said to result in sprawl, the merging of towns into one another or encroachment into the countryside. There are no historic towns nearby.

3.62 The proposal assists in urban regeneration, by recycling previous developed land.

3.63 The proposal does not, therefore, result in an unacceptable degree of urbanisation.

3.64 Paragraph 81 of the NPPF states that planning authorities should:

“plan positively to enhance the beneficial use of the Green Belt, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land.”

3.65 The proposal includes planting mixed native species hedgerows, which will enhance biodiversity. Environmental improvements will restore the site to a clean and safe operation, improving its appearance.

Would planning conditions overcome objections?

3.66 Planning conditions and/or obligations could overcome any objections considered by the inspector to arise by controlling the following:

- Vehicle movements;
- Agreed landscaping plan;
- Parking spaces;
- Staff numbers;.and

- Limiting the use to registered vehicles;

3.67 The appellant is happy to cooperate with the LPA in agreeing suitable management conditions. **Appendix 8** sets out the proposed condition for the use of registered vehicles on the site to provide a limit on vehicle movements.

Duty to Cooperate

3.68 The appellant's agent contacted the LPA twice to discuss any revisions to the proposal including revisions to the rear materials and design. However, the LPA did not respond with any suggested modifications. Further they did not notify the agent, the appellant or the landowner of the date of planning committee.

3.69 The LPA have failed in their NPPF Paragraph 186 and 187 duty to cooperate. The materials could be conditioned to mitigate the LPA's concerns regarding materials. See **Appendix 7** for the email correspondence and lack of response from the LPA.

CONCLUSIONS

4.1 The appellant respectfully requests the Inspector to allow the appeal against the refusal of planning permission at Holloway Farm, Harmondsworth Road, West Drayton, for *"Change of use of land from garden centre/nursery to a vehicle maintenance area involving erection of workshop and demolition of glass house and poly tunnel^s (Retrospective)*

4.2 The appeal should be allowed because:

- The proposal is for the redevelopment of previously developed land, therefore it is appropriate development in the Green Belt.
- The bulk, height and siting of the replacement building does not result in the development having any greater impact on openness than the previous A1

retail use. The site is not any more built up than it was during the previous use.

- The proposal also does not affect openness due to visual impact, because it is well-screened and views into the site are very limited.
- The proposal does not represent any intensification of use at the site; in particular, the vehicle movements will be the same (or lower than) those relating to the previous A1 retail use.
- The proposal does not result in an unacceptable degree of urbanisation.
- The proposal does not affect the purposes of including land in the Green Belt.

4.3 The proposal complies with national and local planning policies and is a sustainable development. Therefore, the appeal should be allowed.

Appendix 1

Appendix 2

Appendix 3

Appendix 4

Appendix 5

Appendix 6

Appendix 7

Appendix 8