

HOLLAND & HOLLAND SHOOTING GROUND & ASHBY FARM

DUCKS HILL ROAD, NORTHWOOD, LONDON

PLANNING STATEMENT

(INCLUDING - S106 HEADS OF TERMS, COMMUNITY ENGAGEMENT STATEMENT & AIRPORT SAFEGUARDING STATEMENT)

DEMOLITION OF EXISTING SITE BUILDINGS (OTHER THAN THE CENTRAL TIMBER FRAMED BARN WHICH IS RETAINED), REMOVAL OF THE EXISTING HARDSTANDING, INCLUDING MENAGE AREA, AND REDEVELOPMENT OF THE SITE TO PROVIDE A NEW HIGH QUALITY WORKSHOP FACILITY INCLUDING ASSOCIATED, PARKING, HARD AND SOFT LANDSCAPING, IMPROVEMENTS TO THE EXISTING ACCESS, SUSTAINABLE DRAINAGE & ON-SITE BIODIVERSITY NET GAIN ENHANCEMENTS.

MARCH 2026

1.0 INTRODUCTION

- 1.1 This application seeks full planning permission to enable the redevelopment of the land and existing buildings at Ashby Farm on the west side of Ducks Hill Road in Northwood to create a new, high quality workshop facility. The facility would be utilised by site owners and owners of the wider shooting grounds, Holland & Holland (HH). There are three main objectives for this proposal.
- 1.2 Firstly, HH's current workshop facility is located in Kensal Green, approximately 13 miles to the south east of the Shooting Ground. This is highly inefficient with staff having to move between the two locations generally using private cars or vans.
- 1.3 Due to the high value of the products and their specialist nature, some clients do wish to visit the workshop to choose their design, the exact piece of Walnut from which the stock will be carved and see the gun being made. As the guns are bespoke and designed for the client these need to be tested at the shooting ground with minor adjustments then undertaken at the workshop before the gun returns to shooting ground for further testing. This movement between the sites is unsustainable and costly and does not provide the right level of client service for a prestigious brand of this nature.
- 1.4 Secondly, the current Kensal Green workshop building is becoming outdated and lacks modern facilities. The proposed building would be of high quality, sustainable design and construction creating a well-lit and spacious environment. It would incorporate modern staff rest facilities, changing space and showers, greatly enhancing working conditions for employees.
- 1.5 Thirdly the existing buildings at the Ashby Farm site are of a poor quality and 'ramshackle' appearance. The site has been used for a mixture of open storage and equestrian uses which do not contribute positively to the character of the site and wider landscape. A redevelopment therefore offers the opportunity to significantly enhance the appearance of the site and so its relationship with and setting of the main shooting grounds.

- 1.6 The proposals have been the subject of three rounds of pre-application discussions. The first during 2021 where it was advised that the Council could support the principle of the redevelopment of the site to provide a new workshop facility subject to its status as 'previously developed land' being confirmed.
- 1.7 A certificate of lawfulness of existing use or development (CLEUD) was sought and granted on 24 August 2023 which confirms the lawful use off the site as "*general storage and private equestrian purposes*" i.e. previously developed land.
- 1.8 Having gained this formal confirmation further pre-application discussions, followed by engagement in the form of a Planning Performance Agreement (PPA) have taken place during 2024 and 2025. As part of this process a list of application requirements was agreed to ensure that the content of the submission would include all elements deemed necessary by officers to enable the efficient determination of the application. The application is therefore accompanied by a suite of technical reports and studies as listed at the end of this introductory section of the statement.
- 1.9 This statement discusses the site, its opportunities and constraints, the development of the proposals through pre-application discussions and the way in which the Council's advice has been considered and incorporated. It also reviews the proposals in the context of up to date national and local planning policy and guidance. It is set out as follows:

- 2.0 Site context
- 3.0 Relevant Planning History
- 4.0 Relevant Policy
- 5.0 Analysis
- 6.0 Conclusion

1.10 The application is accompanied by a full package of existing and proposed plans, elevations, sections and levels drawings, the scope of which as noted above was agreed with officers as part of the PPA process.

1.11 As also agreed, this Planning Statement incorporates a section on Community Engagement, Airport Safeguarding and a Planning Obligations Heads of Terms. It should be read in conjunction with the following documents.

- Archaeological Assessment – Brindle & Green
- Heritage Statement – Ward-Booth Partnership
- Noise Impact Assessment – RBA Acoustics
- Air Quality Assessment – Quantum Air
- Flood Risk & Drainage – MHA Structural Design
- Fire Strategy – BEFS Fire Safety Engineers
- Preliminary Ecological Appraisal & Bat Roost Assessment – Davidson-Watts
- Biodiversity Net Gain - Davidson-Watts
- Tree Survey & Arboriculture Impact Assessment – Crown Tree Consultancy
- Land Contamination (Phase 1 Desktop) – MHA Structural Design
- Landscaping Strategy including External Lighting & Urban Greening Factor – Andy Sturgeon Design
- Transport Statement – Clewlow Consulting
- Travel Plan – Clewlow Consulting
- Sustainability Statement (including Energy Statement & Overheating Strategy) – Scotch Partners
- Circular Economy Statement – Scotch Partners
- Whole Life Carbon Assessment – Scotch Partners
- Construction Management (Spoil proposals) – MHA Structural Design

- Design & Access Statement – McDonald Architects

The statement includes:

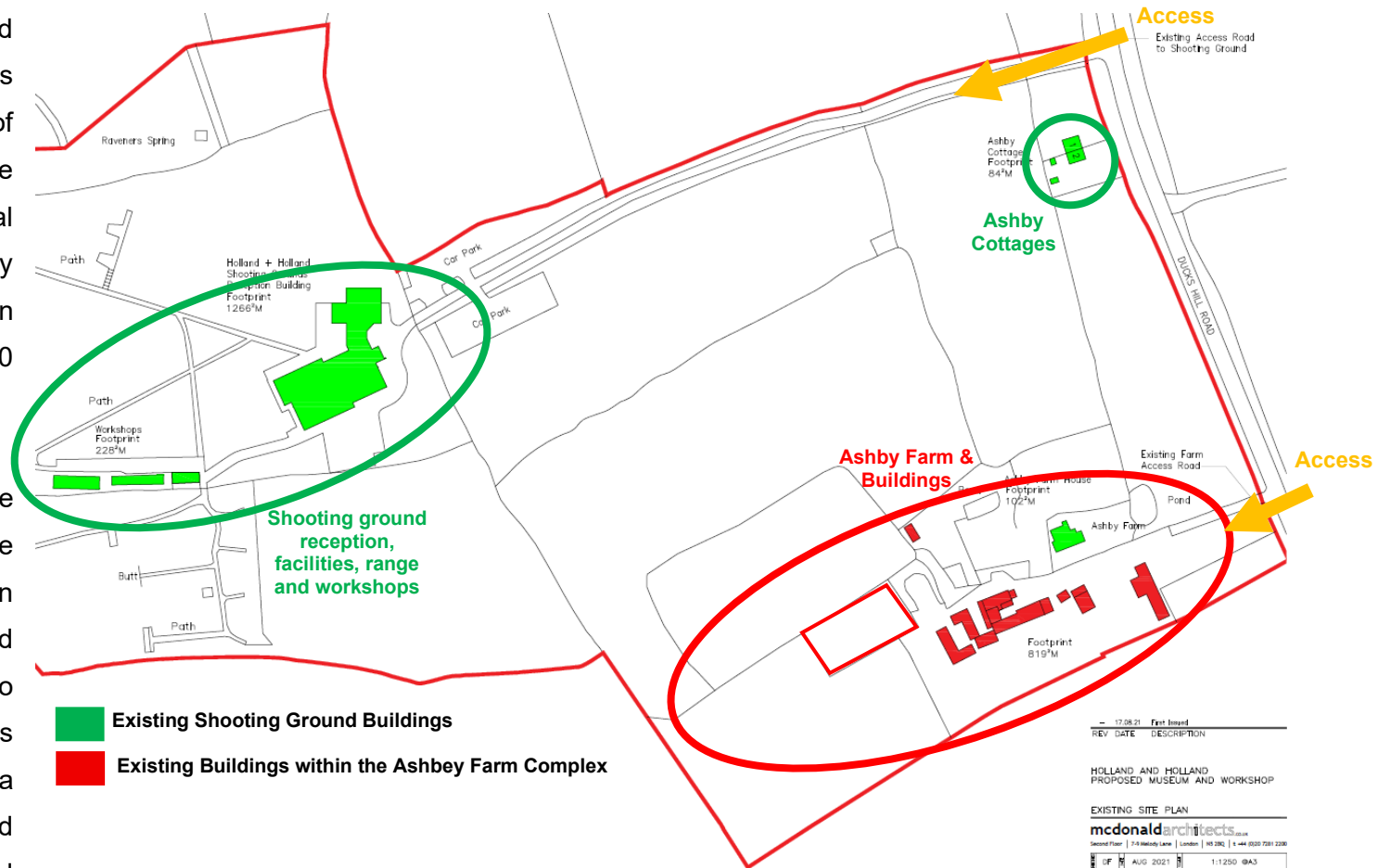
- A Secured by Design Statement
- An Accessibility Statement
- A Landscape and Visual Assessment
- A Servicing Plan
- A Refuse Strategy

1.12 It is respectfully submitted that the application package is comprehensive and should further detail be required in respect of any matters this can reasonably be secured through post decision planning condition.

2.0 SITE CONTEXT

2.1 The Holland & Holland Shooting Ground site is located on the west side of Ducks Hill Road opposite the Ruislip Woods National Nature Reserve. The facility opened in 1932 and covers an area of approximately 40 hectares.

2.2 The landholding includes the main shooting facility with the reception buildings, function space and other associated workshops and stores, two small residential properties known as Ashby Cottages, a farmhouse and associated general storage buildings and barns and an equestrian menage at what is known as Ashby Farm.



Site Plan extract showing the general site layout as existing

The Shooting Ground Area

- 2.3 Within the Shooting Ground area there is the main car park, reception building, function space (and associated support facilities), underground shooting range and various storage buildings.
- 2.4 The reception area, function space and underground shooting range were constructed during 2017 / 2018. These buildings provide the key facilities for visitors coming to shoot, attend a function or clients trying out guns as part of a purchase.
- 2.5 To the west of these core buildings are the associated stores and workshops. These are metal framed and clad (industrial style) buildings of single storey scale.
- 2.6 The outdoor clay shooting facility is located to the west of the site, beyond the reception and function buildings. These grounds are generally grassed with made paths. Tree planting breaks up the area and delineates the various field boundaries and shooting stands.



View showing the new reception area completed in 2018



View showing the new seating area within the reception building



Dining and function spaces overlooking the shooting grounds



Underground shooting range



View toward the reception building and function space



View of the western gables of the function space / kitchen building



View looking east along the line of the storage / workshop buildings



View west along the buildings

Ashby Cottages

- 2.7 Ashby Cottages are let to staff members as private dwellings.

Ashby Farm Storage & Equestrian Area

- 2.8 Ashby Farm comprises a derelict farmhouse and a large number of rather poor-quality buildings (save for one timber framed barn) to the south and west of the farmhouse.
- 2.9 Ashby Farm operates as an equestrian facility and also for general storage purposes. As noted in Section 1, these uses were confirmed through the grant of a lawful development certificate in August 2023. The aerial photographs on the following page show the appearance of the site in approximately 2023. The majority of the cars visible have since been removed and some 'tidying' of the site has taken place. It remains however a rather ramshackle and run down site in need of redevelopment.



View from the east looking west over the farm site



View looking east over the farm site



The farmhouse



View looking east along the site access toward Ducks Hill Road



Existing site buildings and areas of hardstanding

2.10 The plan opposite shows the area agreed to comprise 'Previously Developed Land' by virtue of the grant of the CLUED.

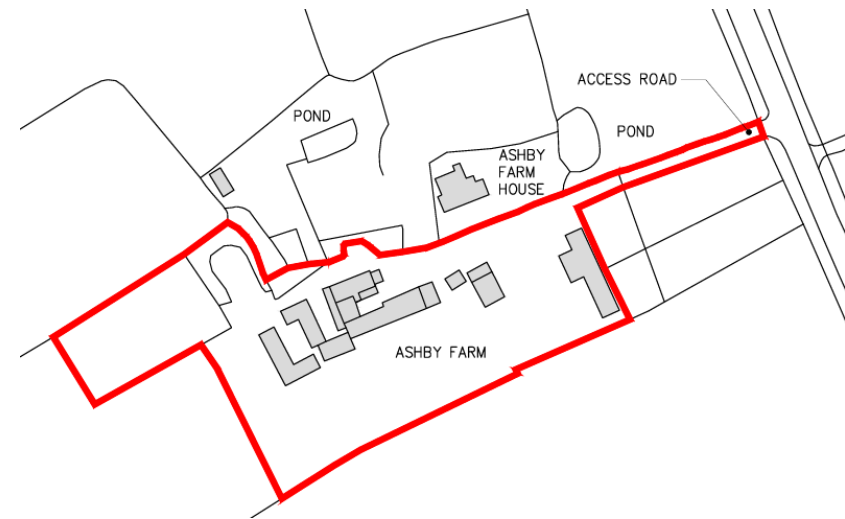
2.11 The local plan proposals map confirms that the site is entirely washed over by the Green Belt.

Heritage

2.12 The site does not lie within a Conservation Area nor are there any statutorily listed buildings within or closely adjoining the site. A heritage assessment of the existing buildings has been undertaken by the Ward-Booth Partnership. This concludes that the central timber framed barn as shown opposite is considered to hold Local Heritage Value and so is proposed for retention as part of this proposal.

Ecology / Biodiversity

2.13 A Preliminary Ecological Appraisal of the site was carried out and established the potential for some site buildings to support bats. Emergence surveys were undertaken confirming the presence of bats in three buildings of the buildings and a roost within the adjacent farmhouse. Whilst the farmhouse lies outside of the application site the presence of these bats has also been considered. As discussed further in Section 5 a bat licence will need to be obtained prior to any works taking place at the site.



Approved CLEUD boundary



Internal view of retained barn

2.14 As shown opposite the main body of the site comprises buildings including developed land, hard and sealed surfaces (red and white annotation). Modified grassland of limited ecological value lies to the west side of the site (green annotation).

2.15 Given the limited current value and the comprehensive new landscape planting proposals that the application seeks to deliver a 42.61% net gain in terms of area habitat units, and with a 21.62% net gain in hedgerow units. This is discussed further in Section 5.



Site habitat assessment plan

Flooding & Drainage Conditions

- 2.16 The application site stands within Flood Zone 1 and so not at risk from flooding from the sea, rivers or other water courses. The EA Surface Water Flood Maps also place the majority of the site at a very low risk of flooding from surface water. Some minor pooling has been recorded around the buildings. This is due to the current extent of hardstanding and lack of suitable drainage system at the site.
- 2.17 Some surface water flooding potential is shown west of the site, but this has no impact upon the proposed development as the levels fall away from the site westward into an existing ditch system.

2.18 The EA maps confirm that flooding from groundwater is very unlikely as is any impacts from sewer flooding as there is an absence of Thames Water sewer infrastructure in the vicinity of the site.

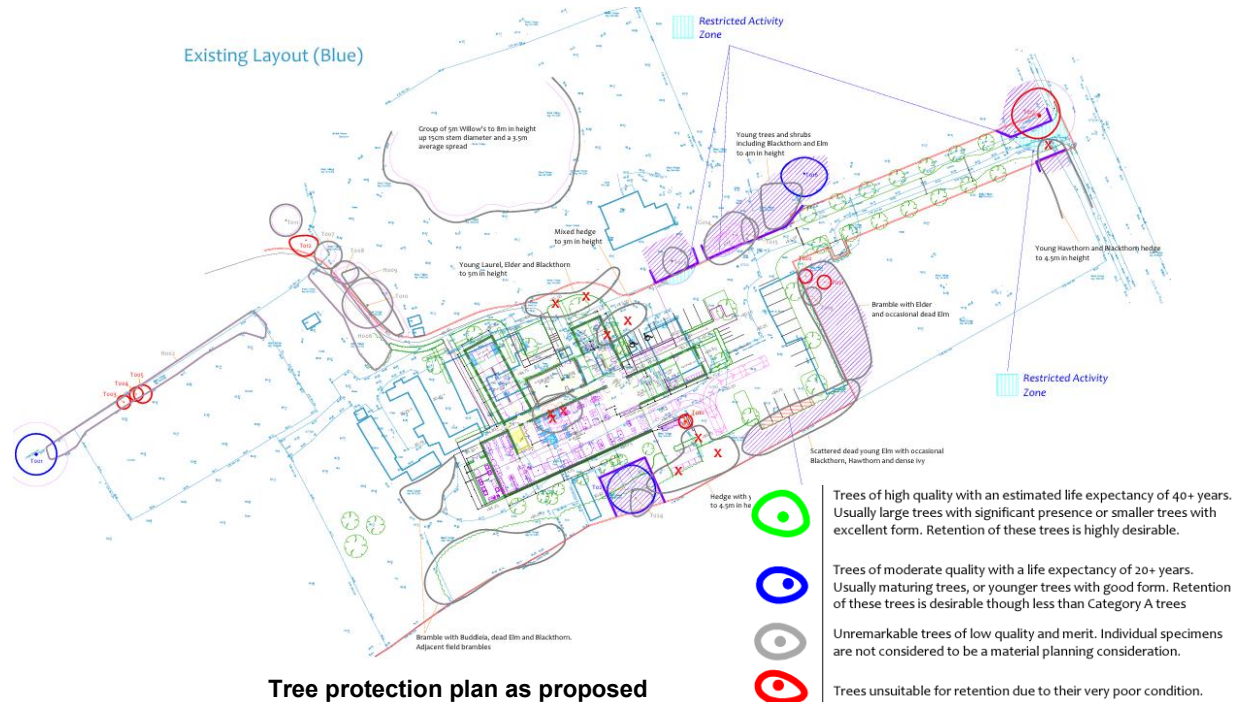
Trees

2.19 The site does not lie within a Conservation Area and there are no TPO's affecting the site of trees close to its boundaries.

2.20 That notwithstanding, a full arboricultural assessment of the site has been undertaken.

2.21 There are no Category A trees within the site and only three Category B all of which are retained.

2.22 As the proposed development replaces existing built form and actually results in a reduction in areas of hardstanding there are only limited tree removals proposed and these are Category C or U specimens. Tree protection measures would need to be put in place during the works.



Highways & Access

- 2.23 The site benefits from an existing access off Ducks Hill Road. The road in the vicinity of the entrance is subject to a 40mph speed limit. The requirement under the Design Manual for Roads and Bridges for a 40mph road is for a desirable forward visibility of 120m or a minimum of 90m. The available sightlines at the existing access 2.4m back from the edge of the carriageway in both directions exceed 120m. This is because the combined width of the verge and footpath along the western side of Ducks Hill Road, which forms part of the public highway, exceeds 2.4m.
- 2.24 The existing access is approximately 2.8m wide. As a result, if a vehicle is waiting to exit it is necessary for a vehicle wishing to enter to wait on the carriageway until the exiting vehicle has turned onto Ducks Hill Road. Although the speed limit on Ducks Hill Road is only 40mph this can be disruptive to traffic flow. Improvements to the existing access are therefore proposed as discussed further in Section 5.

Landscape & Visibility

- 2.25 The site is not the subject of any national or local designations. It is not a 'Valued Landscape' in terms of the NPPF policy guidelines. It has the character of an established farm / farmyard setting and is reasonably well screened by existing mature boundaries and scattered trees. Landscape and Visual Assessment views are included as part of the Design and Access Statement.

3.0 RELEVANT PLANNING HISTORY & PRE-APPLICATION DISCUSSIONS

Planning History

3.1 A review of the available records highlights the following entries.

16568/C/77/1109	Leisure development – 48 sqm Approved 04/10/1977
16568/E/80/0613	Leisure development -224 sqm Approved 09/07/1980
16568/F/86/0205	Extension/alterations to leisure premises of 36 sqm Approved 03/04/1986
16568/H/87/1902	Installation of a biodisc treatment plant Approved 25/01/1988
16568/M/88/1864	Use of agricultural land as an extension to shooting school grounds Approved 08/02/1989 (<i>Temporary</i>)
16568/N/89/1139	Installation of automatic clay pigeon trap to existing tower General Permitted Development 16/06/1989
16568/P/89/1242	Erection of a single storey timber shelter Approved 17/11/1989
16568/R/89/2338	Retention of renovation works to existing building (former pavilion) Approved 22/03/1990
16568/S/90/0127	Renewal of temporary permission for continued use of six-acre field for shooting grounds (Ref: 16568/M/88/1864) Approved 19/06/1990 (<i>Temporary Permission</i>)

16568/T/91/0759	Continued use of 6-acre field for shooting grounds Approved 04/03/1992 (<i>Temporary Permission</i>)
16568/W/92/1924	Erection of single storey extensions to infill a verandah and form an entrance lobby and alterations Approved 21/01/1993
16568/APP/2000/965	Erection of extension to single storey pavilion Approved 12/07/2000
16568/APP/2012/1423	Single storey building for use as a corporate facility involving demolition of existing building Approved 11/12/2012
16568/APP/2013/3588	Single storey ground floor extension to the lodge and construction of basement Approved 30/10/2014
16568/APP/2015/2277	Variation of condition 2 (approved drawings) of planning application 16568/APP/2013/3588 (Single storey ground floor extension to the lodge and construction of basement) to allow for a variation of the finished floor levels, increase in the ridge height of the building, increase in the size and depth of the basement, retention of spoil on site and associated internal alterations Approved 29/12/2015
16568/APP/2015/3140	Extension to existing reception building and new underground shooting range, including the demolition of the existing pavilion and garage Approved 08/12/2015
16568/APP/2015/4704	Details pursuant to conditions 3 (Materials), 4 (Method Statement), 5 (Landscape Scheme), 7 (Soil and Storage Handling), 8 (Sustainable Water Management) and 9 (Energy Assessment) of planning permission ref: 16568/APP/2015/3140 dated 11/12/2015 (Extension to existing reception building and new underground shooting range, including the demolition of the existing pavilion and garage) Approved 23/02/2016

- 16568/APP/2016/97** Installation of single storey modular building as a decant facility to use as function rooms, kitchen and toilet areas for a temporary period of 78 weeks (retrospective) **Approved 24/03/2016**
- 16568/APP/2016/939** Amendment to condition 2 (approved drawings) of planning permission ref. 16568/APP/2015/3140 dated 11-12-2015 'Extension to existing reception building and new underground shooting range, including the demolition of the existing pavilion and garage; to enclose the external plant area and make associated landscaping alterations **Approved 03/08/2016**
- 41892/APP/2023/666** CLEUD - "Existing use of land and buildings for general storage and private equestrian purposes"
Approved 24 August 2023

- 3.2 As will be noted, the records relate largely to the use / operation of the shooting grounds and generally involve extending the facility buildings including the recently constructed reception, function space and underground shooting range.
- 3.3 When assessing the reception and function space applications the Officers report described the shooting grounds as an 'outdoor sport and open-air recreational activity' which itself is considered an appropriate use in the Green Belt. Notwithstanding this the application was required to demonstrate that 'Very Special Circumstances' existed to achieve the permission as the buildings proposed were assessed as going beyond a necessary facility. A detailed business case was provided which demonstrated that the proposed facilities were needed to support viability and this was considered sufficient to outweigh the 'in principle' harm of constructing new buildings in the Green Belt. Of most direct relevance is the 2023 CLUED confirming the status of the Ashby Farm site as previously developed land.

Pre-application & PPA Advice

February 2022 - 16568/PRC/2021/231

- 3.4 As noted in Section 1, initial 'high level' advice was sought from the Council in 2021 / 2022 regarding the redevelopment of the Ashby Farm site to create a new workshop facility.
- 3.5 The Council confirmed that the proposal could be supported in principle provided that the 'previously developed' status of the site was first established. This was deemed necessary given the Green Belt location of the site and so the need to comply with national planning policy, one aspect of which supports the redevelopment of previously developed land within Green Belt locations.

October 2024 - 16568/PRC/2024/112

- 3.6 Having gained the CLEUD confirmation suggested by Officers as part of the initial round of pre-application discussions a second submission was made in June 2024. This included additional details regarding the scale and design of the proposed replacement facility. Following a meeting at the Council offices a written response was received on 10 October 2024. The following key aspects are reproduced in italics below with comments added were relevant.

"Green Belt

The site is in the Green Belt. As noted within the Planning Statement, Paragraph 154 within the NPPF (2023) will be applicable to this proposal as shown below:

A local planning authority should regard the construction of new buildings as inappropriate in the Green Belt. Exceptions to this are:

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

c) the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building;

d) the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces;

e) limited infilling in villages;

f) limited affordable housing for local community needs under policies set out in the development plan (including policies for rural exception sites); and

g) limited infilling or the partial or complete redevelopment of previously developed land, whether redundant or in continuing use (excluding temporary buildings), which would:

- not have a greater impact on the openness of the Green Belt than the existing development; or
- not cause substantial harm to the openness of the Green Belt, where the development would re-use previously developed land and contribute to meeting an identified affordable housing need within the area of the local planning authority.

For the purpose of this application, part (b) and part (g) will be applicable. The submission provides sufficient information through obtaining a Certificate of Lawful Development for an Existing Use (41892/APP/2023/666) **to demonstrate that the existing uses would be defined as Previously Developed Land.**

The proposal has demonstrated there would not be a greater impact on the openness of the Green Belt through an updated design which highlights that whilst there is an increase in the overall footprint of the building with a two storey building, there would be a significant increase in soft landscaping on the site. This is subject to the condition that site clearance would take place prior to the construction of new development, so that the removal of existing buildings and hard standing is guaranteed prior to new development.....

- 3.7 As will be noted Officers confirmed that the application site was agreed as previously developed land. As also noted Officers agreed that the proposed development would not have a greater impact upon the openness of the Green Belt than the existing site development. An important aspect of this was the reduction in site coverage / hardstanding and the proposed increase in soft landscaping.
- 3.8 The proposed building scale, reduction in hardstanding and increase in soft landscape remain materially the same in this current submission. It is relevant to note however (as discussed further in Section 5) that the the NPPF 2024 introduced a change to Green Belt Planning policy, removing the requirement to compare proposed development with existing and introducing a more flexible test with the relevant question now being whether the development would result in significant harm to the openness of the Green Belt.

Historic Asset

*As noted by the Urban Design Officer, the historic **timber framed barn has been identified as having historical value.....***

*The submission should provide further information of how it will **address the improvements and upkeep of the barn into the wider proposal to ensure the historic character of the barn is maintained.***

- 3.9 As was requested a heritage assessment of the barn was undertaken. The Applicant agrees that the barn retains local heritage value and so it is proposed to be retained as part of the new workshop proposal. The assessment of and analysis of the proposed works to the barn are discussed in detail within the Ward- Booth Partnership Heritage Statement.

Proposed Uses

*The applicant has confirmed that the uses for the new workshop and training facility would come under **Use Class E (g) (iii)** which is defined as: for any industrial process, being a use, which can be carried out in any residential area without detriment to the amenity of that area by reason of noise, vibration, smell, fumes, smoke, soot, ash, dust or grit.*

- 3.10 This remains the case.

Design and Conservation:

*The principle of the proposals to deliver a more compact and less sprawling complex of buildings reducing the amount of hardstanding to be replaced with landscape **is supported and welcomed.** Taking account of the Conservation comments **it is considered that the scheme should integrate the historic barn into the proposed scheme.** The proposed architectural materiality of the buildings would blend well with the Barn.*

*The site layout with the **creation of farmyard style courtyard is supported.** The clear distinction and distance between the proposed buildings and the derelict house **is also supported.***

- 3.11 As noted above the barn has been carefully integrated into this final proposal. The house remains outside of the scope of this application.

Architectural language and materiality

The proposed approach to the architectural vernacular of timber clad buildings and stone-ground floor element to the southernmost building is supported.

- 3.12 The proposals retain the agreed rural design approach noted as appropriate.

6 March 2025 - Pre App PPA 16568/PRC/2025/177

- 3.13 A further pre-application submission was lodged with the Council in November 2025. As part of the consideration of this a site meeting was held on 10 December followed by a teams meeting on 13 February 2026. A final written response dated 6 March 2025 was received on 10 March 2025. Relevant aspects of the advice received is set out below in italics with the Applicants comments / response following in each case.

Principle / Green Belt

The proposed scheme would increase the overall built volume from 2,580m³ to 6,169m³ and introduce a more consolidated building footprint of 1,028m² arranged around a central courtyard. Whilst there is a clear quantitative increase in built form, the assessment of openness is not limited to volumetric comparison. The spatial distribution, visual containment and overall site composition are material considerations.

*The existing site contains dispersed and utilitarian structures. The proposed courtyard arrangement would rationalise built form into a coherent layout centred around the retained timber-framed barn. The scheme also increases soft landscaping (from 11,452m² to 13,457.5m²) and reduces hardstanding. The proposed attenuation pond and wider landscaping strategy would further soften the site and reduce visual sprawl. Although there would be some reduction in spatial openness as a result of the increased volume, the harm would be limited in visual terms and moderated by the consolidation of development and enhanced landscape treatment. On balance, **it is considered that the proposal would not result in substantial harm to the openness of the Green Belt***

- 3.14 The Applicant concurs with the Council's assessment that this proposal would not result in substantial harm to the openness of the Green Belt and so can be considered to comprise 'appropriate' Green Belt development in accordance with paragraph 154 (g) of the NPPF.

Heritage

*The proposal seeks to retain the barn and reposition it as the focal point of the development. At present, the barn is not positively revealed within the site and its setting is compromised by the surrounding utilitarian structures. **The courtyard arrangement would provide a clearer spatial hierarchy, enabling the barn to be appreciated within a defined setting**.....*

*...the 'east barn' has also been identified as having heritage value but is not proposed to be retained in situ. Its loss would need to be clearly justified. However, **if the structure is carefully dismantled and reused either elsewhere within the site or sold for re-erection and continued use, this would preserve its historic fabric and significance**. Provided that a strategy for dismantling, recording and reuse is secured, the proposal could result in heritage gain through the continued conservation of the building's fabric rather than its loss without reuse."*

- 3.15 The Applicant again concurs with the Council's assessment that the retention of the main central barn as part of the courtyard design is appropriate and will better reveal the the building and provide an appropriate setting for it.
- 3.16 The Applicant has no objection to a condition requiring the careful dismantling of the east barn and a scheme for its reuse or sale for use elsewhere agreed.

Built Form

*The revised approach to site levels, reducing the amount of fill to be redistributed across the site, is supported. The lowering of ground levels has improved the relationship between the proposed buildings and the retained barn and has removed the need for prominent ramps, **resulting in a more coherent and legible courtyard arrangement**.*

- 3.17 As the Council notes the extent of excavation and so level changes has been reduced following initial pre-application discussions.

*The scale and height of the proposed buildings are considered appropriate in relation to the retained timber-framed barn, maintaining its visual primacy within the courtyard composition. Although the overall volume of built form would increase, **the consolidation of development into a defined area of the site is a positive urban design response**. The LVA concludes that **visual impacts would be negligible, and officers concur that the proposal would not result in visual harm to the wider Green Belt**.*

- 3.18 The Applicant generally agrees with the Council's assessment but respectfully submits that the proposal would enhance the visual amenity of the area, removing unsightly buildings and external storage rather than simply not resulting in visual harm.

*The proposed **material palette is considered sensitive** to the agricultural vernacular. The use of high-quality materials and restrained detailing reflects the rural character of the site and avoids competing with the historic barn.*

- 3.19 As set out the proposed design seeks to adopt a low key rural / farmyard aesthetic which is appropriate for the countryside location.

*The insertion of an internal spiral staircase within the retained timber-framed barn raises detailed conservation considerations. In particular, the collar beam, identified as a key historic element and potentially indicative of a structure of greater age and significance, should not be cut. **Any staircase solution would need to be designed around the existing structural fabric.** A detailed measured survey and method statement would be required to ensure that the most significant elements of the frame, including the close studding and collar, are preserved in situ.*

- 3.20 As the Council is aware, the proposal seeks to retain and safeguard the timber barn but it is not a listed building. The Council's comments regarding the insertion of the spiral staircase are noted and it is submitted that the detailed design of this element should be conditioned to allow discussion with the Council's conservation team regarding the most appropriate approach.

Landscape

*The landscape strategy represents an **enhancement over the existing situation**. The uplift in quality of the proposed BNG field, including the attenuation pond, is supported. **The introduction of a hedge along the car park and a new hedgerow along the roadside boundary would strengthen the rural edge and improve visual containment.***

- 3.21 These suggestions have been agreed and the landscape master plan shows this new proposed planting to the car park and road frontage.

*The avenue tree planting along the entrance route and the layout and material treatment of the approach from the main shooting lodge are accepted and contribute **positively to the overall composition**.*

*It is noted that the enhancement of the southern and eastern hedgerows within the red line boundary is referenced in the submission but **is not consistently shown across all drawings. This would need to be clarified and secured at application stage.** In addition, the proposed fire escape path should utilise a more appropriate rural surface treatment, **such as Breedon gravel or hoggin**, to avoid an overly engineered appearance at the site edge.*

- 3.22 The new hedging to the east and south is now shown clearly on the drawings and within the application red line. The Applicant has no objection to the use of a Breedon gravel or hoggin path. Please refer to landscape masterplan drawing no P 00 002 which now shows a hoggin finish to the fire escape path.

Amenity

Policies DMHD 1 and DMHB 11 of Hillingdon Council's Local Plan Part 2 state that planning applications should seek to achieve a satisfactory relationship with adjacent sites and avoid any unacceptable loss of visual outlook, daylight and sunlight of neighbouring properties and their outdoor amenity space.

*Given the location of the site at a considerable distance from neighbouring buildings, the proposed development **raises no concerns with regards to harm on amenity of neighbouring properties and would cause no loss of daylight/sunlight, visual outlook, privacy or any other form of disturbance on residents within the wider context of the site.***

- 3.23 The Council's assessment is clearly correct. There are no residential properties within the vicinity of the site.

Highways

*In summary, the Highway Authority has confirmed that the proposal is provisionally **acceptable in principle**, subject to the submission of a **full Transport Statement** at application stage. This must include robust evidence of existing and projected traffic levels, with particular emphasis on peak hour impacts, supported by site-specific traffic surveys and TRICS analysis. Further justification is required to demonstrate that the proposed 22 parking spaces will adequately serve staff and training-related demand, alongside compliance with requirements for EV charging, disabled parking, cycle parking and motorcycle provision.*

- 3.24 The application is accompanied by a Transport Statement which includes details of the existing workshop traffic / travel arrangements based upon surveys of the current operations. This demonstrates the parking provision is appropriate for the development proposed.

*The proposed internal access arrangements, including the widening of the Ashby Farm access road, **are acceptable in principle**, although full design details demonstrating compliance with Manual for Streets will be required. Visibility splays have previously been confirmed as satisfactory. Subject to submission of the above evidence and detailed design information, the Highway Authority will be able to reach a definitive view at application stage*

- 3.25 The access driveway has been widened to enable vehicles to pass on entry to and exit from the site. The proposals represent a highway safety benefit compared to the existing situation where a vehicle turning in must wait on the carriageway if a vehicle is seeking to leave.

Air Quality

*Any forthcoming planning application should include an **'Air Quality Impact Assessment'** that includes details of the baseline air quality conditions of the site and covers the impact that would result from fugitive dust emissions and transport related emissions, including the impact from the construction phase. A detailed evaluation of the operational phase of the development in respect to impact on future occupiers and their exposure to the prevailing levels of pollution would need to be assessed in any forthcoming application and the development will need **to demonstrate that it is Air Quality Neutral**. If this is not achievable then it may be liable to a financial contribution to mitigate against air quality, to be secured by a S106 Legal Agreement.*

- 3.26 An Air Quality Assessment accompanies this submission and demonstrates compliance with both the council's AQAP and GLA's Air Quality Neutral standards for both building emission and transport emission benchmarks. The proposed development meets both building and transport emissions benchmark which is in accordance with the Greater London Authority's AQN guidance. The site is considered air quality neutral and requires no further assessment under the AQN framework.

Flood Risk and Drainage

*.....A forthcoming planning application should include a **'Flood Risk Assessment and Drainage Strategy'** that would be reviewed at consultation stage*

- 3.27 An FRA and sustainable drainage proposal has been prepared in support of this application.

Contamination

The Phase 1 Geo-environmental Desk Study concludes that no significant contamination sources have been identified on the site. The ground conditions comprise cohesive material overlying the London Clay Formation, and the assessment does not indicate any notable contamination risk. The earthworks strategy has therefore been developed on the assumption that excavated material can be safely reused on site. Should any contamination be discovered during intrusive investigation, the report states that it can be managed by placing the material in a suitable location within the site and capping it, with the location recorded for future reference. This would avoid the need to remove material off-site while ensuring the risk of accidental future excavation is minimised.

*The Council's Contaminated Land Officer has been consulted and **raises no objection to the proposal**, subject to a land contamination condition.*

- 3.28 A phase 1 survey has been undertaken and accompanies this application.

Ecology

*Bats – At application stage, **a detailed mitigation strategy and updated survey** (if required by seasonal constraints) would need to be submitted, together with **confirmation of the licensing route and long term management of replacement roost features**.*

- 3.29 Appropriate bat survey work has been undertaken. The report recommends that prior to the commencement of any works that could damage or destroy a bat roost or kill, injure or disturb a roosting bat, the Site must be registered under a bat mitigation licence to enable the bat roosts to be damaged or destroyed legally.
- 3.30 This licence process would take place after planning permission is granted and with any conditions relating to bats having been discharged. No works will commence on site in the location of the bat roosts until a copy of the licence and any supporting documentation is provided to contractors working on the remodelling.

Biodiversity Net Gain

The development will be subject to the statutory requirement to deliver a minimum 10% biodiversity net gain under the Environment Act 2021. A completed and up-to-date Biodiversity Metric calculation will be required to establish the baseline habitat value of the site and demonstrate how the mandatory net gain will be achieved.....

- 3.31 A full BNG metric calculation is included with this application. It demonstrates that the proposals will deliver a 42.61% net gain in terms of area habitat units, and with a 21.62% net gain in hedgerow units

Archaeology

*The site does **not** fall within an Archaeological Priority Zone (APZ). However, due to the size of the site exceeding 0.5 hectares, **an Archaeological Desk Based Assessment would be required**, with details of a methodology of investigation, which should be carried out prior any ground demolition, to provide the basis for considering and designing any mitigation works that may be necessary as part of any development*

- 3.32 Consultantss Brindle and Green have prepared a desk based assessment as requested. This considers that there is only potential for negligible value modern remains and low value medieval and post-medieval remains at the site. Post decision invasive investigation could be secured by condition should the Council archaeologist consider that necessary.

Energy & Sustainability

*An **Energy Strategy** should be reviewed at application stage and should provide details and should achieve the GLA's target of **15% energy efficiency savings** for non-residential floorspace. The strategy should incorporate reductions on emissions by PV renewable energy to ensure that the development complies with the minimum zero carbon requirements, in compliance with the objectives of policy EM1 of the Local Plan Part 1 and Policy SI2 of the London Plan, which seek for **net zero carbon** and appropriate measures to demonstrate how internal overheating and reliance on air conditioning systems is reduced. In addition, the achievement of BREEAM 'excellent', or equivalent standards, would be welcomed.*

- 3.33 The accompanying Sustainability Statement which includes an Energy Statement confirms the intention to target the BREEAM 'Excellent' standard and deliver a net zero proposal.

Trees & Landscaping

The proposed building layout would uplift landscaping and would not involve the loss of significant trees. The removal of large areas of hardstanding and increase of grassland/soft landscaping with additional tree planting is welcomed. Additionally, the enhanced native planting around the pond and introduction of additional native species would be seen as an improvement to the open green character of the site.

*Notwithstanding the above, **an Arboricultural Report should be submitted** as part of a forthcoming planning application, to include tree protection measures and the amount of additional soft landscaping features, to ensure that the proposals reinforce the green character of the site, which is a key visual asset within this part of the Green Belt. The proposals raise no concerns in principle with regards to urban greening, biodiversity and visual amenity, and subject to further details, would be consistent with the requirements contained in Policy D8 of the London Plan.*

- 3.34 An arboricultural assessment prepared by Crown Tree Consultancy supports this submission.

Safety & Security

*Policy D12 of the London Plan requires the submission of a **Fire Safety Statement** for all major forms of development proposals. Any forthcoming Fire Safety Strategy should include details of escape routes and evacuation routes, fire safety systems including detectors and alarm systems, prevention measures and accessibility for firefighting rescue vehicles and access/exit points. However, the proposal would need to be reviewed as part of formal consultation at application stage by the London Fire Brigade for further comments. With regards to secured by design, measures to tackle crime prevention, such as active frontages, external lighting, and surveillance should be reviewed at application stage.*

- 3.35 A Fire Safety Statement addressing Policy D12 is included with this submission.

4.0 RELEVANT PLANNING POLICY

4.1 The following planning policies are considered relevant to this pre-application.

National Planning Policy Framework (NPPF) December 2024

4.2 The NPPF provides the governments guidance on the way in which the planning system should approach the delivery of sustainable new development. We highlight the following aspects.

4.3 The purpose of the planning system is to achieve sustainable development (paragraph.7) Paragraph 8 then explains:

“8. Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives):

a) an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure.

b) a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities’ health, social and cultural well-being; and

c) an environmental objective – to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.”

4.4 Paragraph 38 explains that Local Planning Authorities should approach decisions on proposed development in a positive and creative way so that application for sustainable development can be approved wherever possible. Paragraph 48 notes that:

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

4.5 Importantly in this case the NPPF makes clear at paragraphs 49 & 50 that:

“49. Local planning authorities may give weight to relevant policies in emerging plans according to:

- a) the stage of preparation of the emerging plan (the more advanced its preparation, the greater the weight that may be given);*
- b) the extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given); and*
- c) the degree of consistency of the relevant policies in the emerging plan to this Framework (the closer the policies in the emerging plan to the policies in the Framework, the greater the weight that may be given)*

50. However, in the context of the Framework – and in particular the presumption in favour of sustainable development – arguments that an application is premature are unlikely to justify a refusal of planning permission other than in the limited circumstances where both:

a) the development proposed is so substantial, or its cumulative effect would be so significant, that to grant permission would undermine the plan-making process by predetermining decisions about the scale, location or phasing of new development that are central to an emerging plan; and

b) the emerging plan is at an advanced stage but is not yet formally part of the development plan for the area.

4.6 Paragraph 51 makes clear that:

“..... Where planning permission is refused on grounds of prematurity, the local planning authority will need to indicate clearly how granting permission for the development concerned would prejudice the outcome of the plan-making process.”

4.7 Paragraph 85 advises that:

“.....planning decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development.....

4.8 Paragraph 139 confirms that:

“Development that is not well designed should be refused, especially where it fails to reflect local design policies and government guidance on design, taking into account any local design guidance and supplementary planning documents such as design guides and codes.”

4.9 Paragraph 154 (g) states:

“Development in the Green Belt is inappropriate unless one of the following exceptions applies:

g) limited infilling or the partial or complete redevelopment of previously developed land (including a material change of use to residential or mixed use including residential), whether redundant or in continuing use (excluding temporary buildings), which would not cause substantial harm to the openness of the Green Belt.”

4.10 Chapter 16 is entitled “Conserving and Enhancing the Historic Environment”. It advises:

207. In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets’ importance and no more than is sufficient to understand the potential impact of the proposal on their significance.....

4.11 Paragraph 216 sets out that:

“The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.

The National planning Policy Framework – Consultation draft December 2025

4.12 In December 2025 the Government published a consultation draft of the new NPPF. This is of course liable to some change and alteration to reflect the responses to the consultation which ends in March 2026. However, the following extracts are relevant to potential logistics development at the Appraisal Site.

*“7. The national decision-making policies should also be read as a whole (including relevant footnotes and annexes). **Some of these policies indicate how much weight the government would expect a particular consideration to be given**, including cases where it is appropriate to give substantial weight to certain benefits, and the limited circumstances in which it is expected that permission would be refused.*

E2: Meeting the need for business land and premises.

1. To support business growth, **substantial weight** should be given to:

*a. **The economic benefits of proposals for commercial development which allow businesses to invest, expand and adapt; especially where this would support the economic vision and strategy for the area**, the implementation of the Industrial Strategy, **support improvements in freight and logistics** and/or reflect proposals for Industrial Strategy Zones and AI Growth Zones;*

b. Benefits for domestic food production, animal welfare and the environment which can be demonstrated through proposals for development for farm and agricultural modernisation.

2. Where a development proposal is required to demonstrate whether an **unmet need exists** (including to demonstrate compliance with policy S5) consideration should be given to whether:

*a. **Market signals indicate an undersupply** of specific types of land or premises, taking into account the anticipated catchment area for the type of development proposed, the changing needs of different sectors and the availability of existing land and buildings; or*

*b. A development proposal's **specific locational requirements are met by existing allocations in the development plan.** This includes, but is not limited to, situations where:*

i. existing businesses plan to expand or improve their premises, or clusters or networks of businesses need to grow (such as clusters of knowledge and data driven, creative or high technology industries and associated facilities and infrastructure); or

ii. the availability of infrastructure (such as adequate grid connections or water and wastewater capacity) makes certain locations particularly important, including opportunities to co-locate large-scale generators and users of power (such as data centres); or

iii. proposals would meet a local, regional or national need for the provision of new, expanded or upgraded facilities that would result in more efficient, reliable or sustainable handling of goods (whether for their receipt, storage, processing, interchange or distribution).

4.13 The draft NPPF is therefore positive in that:

- It requires that “substantial Weight” is given to the economic benefits of proposals for commercial development.
- It seeks to formalise the generally accepted concept that support for development should be forthcoming where a need for new economic development is clear and existing commitments do not accommodate the identified need.

The London Plan 2021

4.14 The London Plan contains a number of overarching policies which are relevant to the proposals. We highlight the following;

Policy D4 – Requires that Design and access statements submitted with development proposals should demonstrate that the proposal meets the design requirements of the London Plan

Policy D5 – Seeks inclusive accessible design in all new developments.

Policy D11 – New developments should be safe, secure and resilient against emergencies including fire, flood, weather, terrorism and related hazards as set out in the London Risk Register.

Policy D12 – states that all development proposals must achieve the highest standards of fire safety

Policy HC1 - Heritage conservation and growth requires that development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings.

Policy G5 Urban greening – states that all new major development proposals should contribute to the greening of London by including urban greening as a fundamental element of site and building design,

Policy G6 Biodiversity and access to nature – states that development proposals should manage impacts on biodiversity and aim to secure net biodiversity gain.

Policy SI 1 Improving air quality – seeks to ensure that all development proposals are least Air Quality Neutral

Policy SI 2 Minimising greenhouse gas emissions – requires that major development is net zero-carbon and should include a detailed energy strategy to demonstrate how the zero-carbon target will be met. A minimum on-site reduction of at least 35 per cent beyond Building Regulations is required. Residential development should achieve 10 per cent, and non-residential development should achieve 15 per cent through energy efficiency measures

Policy SI 3 Energy infrastructure – states that major development proposals within Heat Network Priority Areas should have a communal low-temperature heating system.

Policy SI 4 Managing heat risk – seeks to ensure that new proposals minimise adverse impacts on the urban heat island through design, layout, orientation, materials and the incorporation of green infrastructure.

Policy SI 5 Water infrastructure – sets out that new development must minimise the use of mains water, achieve a mains water consumption of 105 litres or less per head per day and achieve the BREEAM excellent standard for the ‘Wat 01’ water category or equivalent. Measures for smart metering and water saving and recycling should be incorporated.

Policy SI 7 Reducing waste and supporting the circular economy – requires that new developments consider resource conservation, waste reduction, increases in material re-use and recycling, and reductions in waste going for disposal.

Policy SI12 Flood Risk Management – states that development proposals should ensure that flood risk is minimised and mitigated, and that residual risk is addressed.

Policy SI 13 Sustainable drainage – States that development proposals should aim to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible

Local Planning Policy

- 4.15 The development plan for the London Borough of Hillingdon is currently comprised of the ‘Local Plan: Part 1 Strategic Policies’ adopted November 2012 and the Part 2 Plan ‘Development Management Policies’ adopted January 2020.

- 4.16 In terms of the Green Belt, Strategic Policies policy EM2 sets out that development within the Green Belt will be assessed against the policy framework established at the national level i.e. the NPPF as described above.
- 4.17 Policy E2 highlights that the council will seek to focus new development/growth in areas which have been specifically identified and designated as 'employment sites' in the plan.
- 4.18 Policy DMEI 4 advises that redevelopment on sites in the Green Belt will be permitted where the proposal would not have a greater impact on the openness of the Green Belt 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.
- 4.19 Policy BE1 'Built Environment' is a general design policy, much of which is not directly relevant to this proposal. We highlight the following elements:

The Council will require all new development to improve and maintain the quality of the built environment in order to create successful and sustainable neighbourhoods, where people enjoy living and working and that serve the long-term needs of all residents. All new developments should:

1. Achieve a high quality of design in all new buildings, alterations, extensions.....

2. Be designed to be appropriate to the identity and 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 and seek to protect the amenity of surrounding land and buildings, particularly residential properties

.....

5. Improve areas of poorer environmental quality.....

.....

7. Improve the quality of the public realm and provide for public and private spaces that are attractive, safe, functional, diverse, sustainable, accessible to all, respect the local character and landscape, integrate with the development, enhance and protect biodiversity through the inclusion of living walls, roofs and areas for wildlife, encourage physical activity and where appropriate introduce public art

8. Create safe and secure environments that reduce crime and fear of crime, anti-social behaviour and risks from fire and arson having regard to Secure by Design standards.....

4.20 Policy EM1:Climate Change Adaptation and Mitigation advises that the Council will ensure that climate change mitigation is addressed at every stage of the development.

4.21 Policy DMHB1: Heritage Assets requires that development proposals to avoid harm to the historic environment.

4.22 Policy DMHB 11: Design of New Development states that all development, including extensions, alterations and new buildings will be required to be designed to the highest standards and incorporate principles of good design including harmonising with the local context.

- 4.23 Policy EM6: Flood Risk Management advises that the Council require new development to be directed away from Flood Zones 2 and 3 in accordance with the principles of the National Planning Policy Framework (NPPF). All new developments should include sustainable drainage proposals.
- 4.24 Policy DMEI 7: Biodiversity Protection and Enhancement requires that the design and layout of new development should retain and enhance any existing features of biodiversity or geological value within the site.
- 4.25 Policy DMT 1: Managing Transport Impacts states that all developments will be required to meet the transport needs of the development and address its transport impacts in a sustainable manner. Development proposals will be required to undertake a satisfactory Transport Assessment and Travel Plan if they meet or exceed the appropriate thresholds.

5.0 ANALYSIS

The Proposal

- 5.1 It is proposed to relocate the Holland & Holland workshop facility from Kensal Green to the Ashby Farm area of the wider Shooting Ground site on Ducks Hill Road. The proposed workshop should not be confused with a commercial factory.
- 5.2 All of the Holland & Holland products are hand made by individual craftsmen working with traditional methods, generally at benches and with specialist tools.



Views showing work being undertaken at the existing Kensall Green workshop

- 5.3 The proposed facility would handle all aspects of gun making from the carving of the wooden stock through to the of the guns firing 'action' This work is all undertaken by highly skilled individuals

5.4 Holland & Holland considers the relocation of the workshop facility to the Shooting Grounds site as essential for the future of the business in order to deliver the kind of service that clients now expect from a premium brand of this nature.

5.5 The company also has a strong desire to reduce its carbon footprint, and a single site operation would deliver this. The facility would remove the inefficiencies of traveling between the sites and so reduce use of private cars and work vehicles.

5.6 The existing site exhibits a tired and untidy appearance. Whilst it is not highly visible from public vantage points there is a desire to redevelop the area to greatly improve its appearance and so the wider setting of the main shooting ground facility.



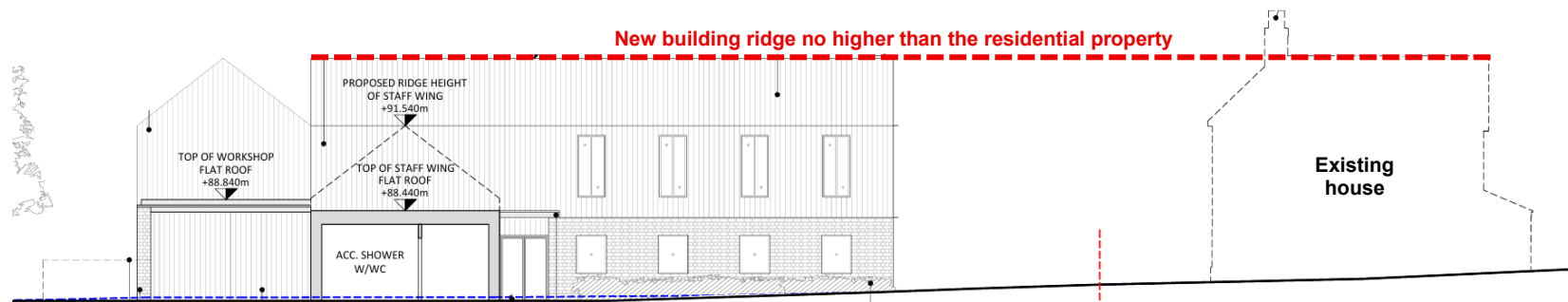
Blocks of Walnut Wood awaiting carving



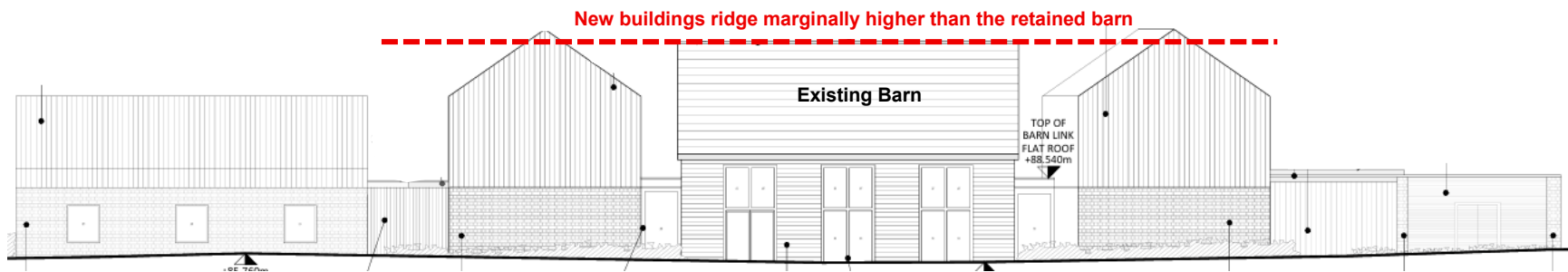
Hand engraving underway

Principle – Green Belt Policy

- 5.8 The application site lies within the Green Belt. However, its status as Previously Developed Land (PDL) has been established through the grant of a certificate of lawfulness as discussed in Section 3.
- 5.9 Paragraph 154 (g) of the NPPF advises that the redevelopment of PDL within the Green Belt will not be considered inappropriate in principle provided that it would not **cause substantial harm to the openness of the Green Belt**. As the Council is aware this replaced the former paragraph 154(g) wording when the NPPF was updated in December 2024. The test had previously required an assessment of whether the proposed development would have a materially greater impact upon the openness of the Green Belt than the existing site buildings. Whilst this is no longer a test required by National Green Belt policy, it remains part of the Local Plan (Policy DME1 4) and so the following aspects are highlighted:
- The overall building footprint at the site is proposed to increase from 843sqm to 1028sqm (This includes the retained barn – if the retained barn is discounted the increase would just be 55sqm).
 - Areas of hardstanding are proposed to be reduced by 928sqm from 2773sqm to 1845sqm (Excluding new footpath / cart track).
 - The overall sprawl of built form across the site would reduce by 54metres from approximately 102 metres to 48 metres.
- 5.10 Whilst the volume of the proposed site buildings will increase, (2580 to 6169 cubic metres) this is the only measurable aspect where an increase occurs. The additional internal volume would not be readily visible / apparent because of the compact building layout and the building form proposed.
- 5.11 In terms of height, care has been taken to ensure that the proposed buildings are of a similar scale to the existing barns that they replace and that the highest point sits at the same level as the ridge height of the adjacent residential property which would remain the most prominent building on the site.



Elevation / Section looking west with the retained residential property set to the right (north)



View looking south showing the retained barn relative to the new build elements

5.12 It is respectfully the applicant's submission that due to the modest overall height, reduced building sprawl, reduction in hard surfaced areas and increase in soft landscaping the proposed development would not have a greater impact on openness than the existing buildings and so complies with Policy DEM I4. It is also clear that in current NPPF paragraph 154 (g) terms, this proposal would not cause substantial harm to the openness of the Green Belt and so can be considered 'appropriate' in principle. The Council confirmed its agreement to assessment as part of its 6 March 2026 pre-application response commenting:

“Whilst there is a clear quantitative increase in built form, the assessment of openness is not limited to volumetric comparison. The spatial distribution, visual containment and overall site composition are material considerations.....

*The existing site contains dispersed and utilitarian structures. The proposed courtyard arrangement would rationalise built form into a coherent layout.....**it is considered that the proposal would not result in substantial harm to the openness of the Green Belt**”*

Other Material Considerations in support of the principle of this proposal

- 5.13 Whilst the principle of the proposal complies with the key aspects of planning policy and guidance and so there is no need to set out a further case in favour of the proposals, (a very special circumstances case is unnecessary), it is considered appropriate to highlight the following further material considerations in favour of the principle of this proposal.

Reduced vehicle trips and Co2.

- 5.14 At the present time staff move between the shooting ground site at Ducks Hill Road and the Kensal Green workshop generating vehicular trips on each occasion. One return trip from the workshop to the Shooting Ground or vice versa is approximately 28 miles. If this journey was undertaken just once a day this generates trips of 868 miles a month or 10,416 miles a year. This equates to 8.2 tons of Co2. In reality there are a number of trips each day not just one and so the above figures can be multiplied by on average a factor of four or five. It is clear that relocating the workshop to the application site would have an instant sustainability and pollution reduction benefit and so respond to local plan Policy E1 ‘Climate change’.

Business Needs / Protection of Jobs

- 5.15 The guns made at the workshop must be tested at the Shooting Ground. They then go back to the workshop for fine adjustments. This has been managed to a degree over recent years but is no longer sustainable with added traffic congestion causing lost time and higher fuel prices adding significantly to the costs.

- 5.16 As may be appreciated, over time a continual rise in costs and lost efficiency through congestion and delay will threaten the operations at the Shooting ground and potentially impact jobs. This proposal addresses that threat. As the Council is aware paragraph 85 of the NPPF requires that *planning decisions should help create the conditions in which businesses can invest, expand and adapt* and that *'significant weight' should be placed on the need to support economic growth and productivity, taking into account 'local business needs'*.
- 5.17 The emerging NPPF review includes similar if, not even more positive guidance as part of a proposed new national planning policy E2. This requires that “substantial weight” should be given to commercial development that enables business to invest, expand and importantly in this case “adapt”. The use of the term ‘substantial weight’ suggests a greater emphasis than in the current NPPF which uses the lesser term ‘significant’.

Removal of the existing non-confirming use / Site Enhancement

- 5.18 The existing Ashby Farm site benefits from an unrestricted / unfettered storage and equestrian use. This means that it can be used for open storage and / or as a commercial equestrian operation or both without controls on hours of use, the heights and appearance of the storage and the numbers of vehicles entering and leaving the site via a sub-optimal access. There are no requirements to provide any new or enhanced landscaping or biodiversity enhancement.
- 5.19 In contrast, this application proposes to remove the unsightly nature of the ramshackle buildings and the open storage and greatly enhance the sites contribution to its context. It brings the site within planning control enabling the Council to secure appropriate access arrangements, landscape enhancements biodiversity improvements and removes the potential for the site to operate in a manner which could impinge upon neighbours and the wider area over time if retained as an uncontrolled storage yard.

Retention and Enhancement off the Timber Barn

- 5.20 Whilst none of the site buildings are statutorily listed nor do they stand within a Conservation Area or are protected in any other way, as part of pre-application discussions with the Council, it has been recognised that the central timber barn at the site does hold some local level heritage value. This proposal offers the opportunity to retain and enhanced the barn and secure its future in a productive use ensuring its retention and maintenance in the longer term.
- 5.21 Heritage matters are discussed in detail in the supporting Heritage Statement prepared by the Ward Booth Partnership and later in this section but also highlighted here as an aspect that may be considered an 'in principle' benefit of the application proposal.

Detailed Considerations

Layout, Design & Appearance

- 5.22 National Planning Policy requires that all new development is of a high quality and makes clear that development which is not of a high quality should be refused planning permission (NPPF paragraph 139)
- 5.23 Local Plan Policy BE1 similarly seeks high quality development. It states that the Council will require all new development to improve and maintain the quality of the built environment. It is a criteria-based policy which is used to assess all forms of development including larger scale residential proposals. The criteria relevant to the current proposal are considered below.

Achieve a high quality of design in all new buildings

- 5.24 Sections 4 & 5 of the accompanying Design and Access Statement provides a detailed analysis of the design approach adopted for the proposed new buildings. This explains the form and layout of the new buildings echo that of a rural farmyard layout with the retained barn central to this.

5.25 Design development has been wholistic with site landscape and sustainability being driving factors in establishing the correct scale, form and orientation of the buildings. The proposals have been the subject of careful review by the Council's planning, conservation and landscape officers during the pre-application process. Feedback received has been incorporated with amendments introduced particularly in respect of site levels and so the appearance of the buildings on approach from the north and east sides.

5.26 The use of high-quality materials and the delivery of a complementary and comprehensive landscaping scheme ensures that the site will provide a high-quality outward appearance in glimpsed views from the surrounding area but also a high-quality feel and experience for those working at the facility and visitors to it. The facility will represent and present a 'first impression' of the Holland & Holland brand and it is the company's objective that this will be exemplar in terms of finish and quality.

5.27 The 6 March 2026 pre-application feedback comments:

“.....the proposed redevelopment is considered to **achieve a high standard of design.**”

Be designed to be appropriate to the identity and 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 and seek to protect the amenity of surrounding land and buildings, particularly residential properties.

5.28 The application site is somewhat detached from any neighbouring built form from which a clear architectural style or context could be drawn and reflected in the proposed development. However, prior to more recent use for storage and equestrian purposes, the site was a farm and retains a rural, agricultural character. It comprises a farmstead with a farmhouse standing to the north / northeast of a collection barns and buildings in a courtyard style grouping.

- 5.29 These buildings are of traditional rectangular forms, with pitched roofs, larger openings within the facades and generally constructed from a mix of timber cladding, masonry and various roof forms including metal and composite sheeting. The adjacent house is of masonry construction with a tiled roof.
- 5.30 The application proposal seeks to reflect this agricultural vernacular in terms of the scale and proportion of the new built forms. Rather than propose one large regular 'workshop' i.e. a large single space with ancillary facilities off this, the design reflects a collection of separate but linked rectangular barns with pitched roofs of stepping heights and so retains the farmyard aesthetic. Door and window apertures are of an agricultural scale, and the timber framed barn is retained at the centre of the grouping, much as it is today providing a further layer of context to the proposal.
- 5.31 The layout results in a number of distinct, clearly defined spaces, in particular on arrival from the east and from the north and within the central courtyard. These assist in providing a 'human' scale and feel as opposed to that of a large commercial / workshop building.
- 5.32 Materiality is also important to providing buildings which reflect their context. The use of flint and stone bases to the buildings with cladding above assists in delivering a rustic rural aesthetic whilst maintaining a high-quality overall feel.
- 5.33 A number of 3D visuals are included within the Design & Access Statement with extracts on the following page showing the way in which the new buildings would complement the retained farmhouse and incorporate the timber barn as an integral element of the overall composition.
- 5.34 The visuals also demonstrate the importance of the high quality hard and soft landscaping to integrate the built form into the site and surrounding landscape.



View looking into the site from the east with the retained farmhouse set to the right of the view



View from the north west on arrival from the shooting ground



View showing the proposed new buildings and the stepping roof form

5.35 It is considered that the approach is clearly appropriate for the site context.

Improve areas of poorer environmental quality

5.36 As shown below the site has been used for a mixture of open storage and equestrian uses.



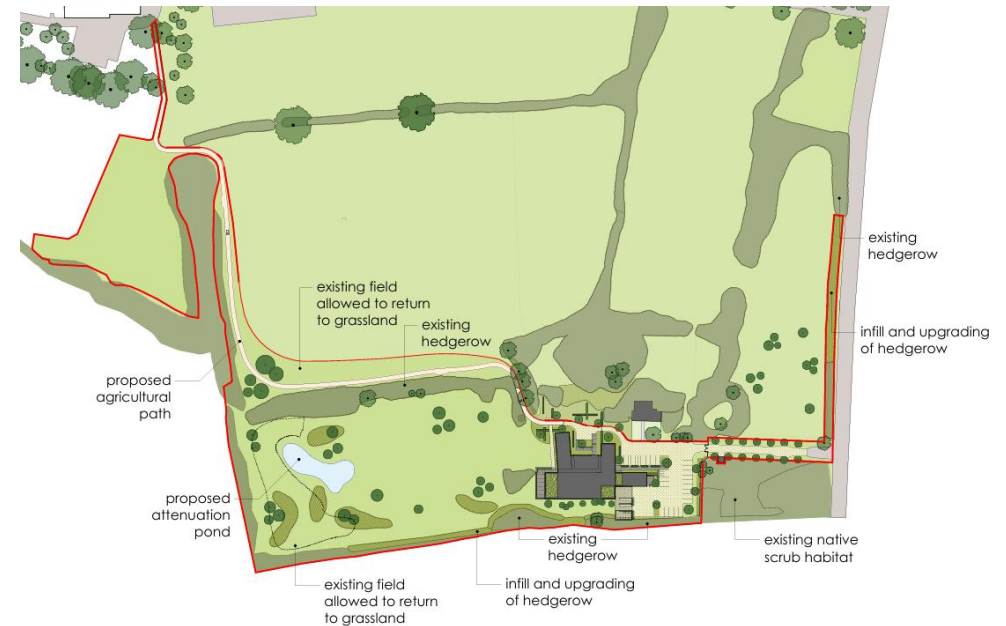
Aerial views across the site from the south and north taken from 'Google' 3D imagery



Views with the site providing a general impression of the way in which the site has been used

5.37 All open storage and all hard surfacing set to the west of the group of buildings is to be removed and the site subject to a comprehensive landscape enhancement scheme. An extract of the plan is shown opposite. This includes new areas of grassland, tree and hedge planting.

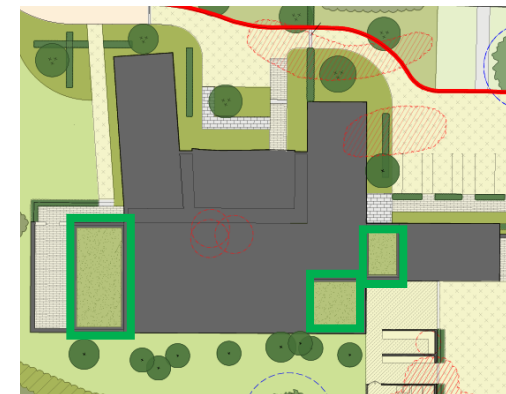
5.38 In addition to the obvious visual enhancements of the site that the proposals deliver there will also be a significant improvement in the sites ecological value as a result of the new planting and pond creation. As discussed further in this statement and supporting reports the proposals far exceed minimum policy requirements for Biodiversity net gain and Urban Greening. It is clear that this element of the policy has been complied with.



Landscape master plan

Improve the quality of the public realm and provide for public and private spaces that are attractive, safe, functional, diverse, sustainable, accessible to all, respect the local character and landscape, integrate with the development, enhance and protect biodiversity through the inclusion of living walls, roofs and areas for wildlife, encourage physical activity.

5.39 As outlined above the proposals introduce a comprehensive landscaping scheme and remove unsightly elements of storage and hardstanding from the site. This results in the creation of high-quality area around the new buildings for the benefit of staff and visitors to the premises. Green roofs are incorporated where possible as shown opposite.



Plan showing green roof locations

5.40 It is very clear that the proposals would improve the public realm at the site, its landscape and biodiversity interest. These factors are discussed further below.

Create safe and secure environments that reduce crime and fear of crime, anti-social behaviour and risks from fire and arson having regard to Secure by Design standards

5.41 A Secure by Design Statement is included as part of the Design & Access Statement. In summary:

- The site has one access from Ducks Hill Road, which is the sole point of access for workshop staff and deliveries.
- A second point of access is provided via an informal footpath track linking from the main Shooting Ground buildings to the north. Anyone arriving at the site from the north would be a member of staff or a visitor escorted by a staff member.
- Both entrances will have a control gate with intercom as the primary means of security.
- Access to the new building would be via the retained barn where there would be a staffed at all times.
- Care has also been taken as part of the landscape design development to ensure clear sightlines and lighting in and around the building both during the day and at night.

5.41 Overall it is considered that the approach is high quality and contextual as required by Policy BE1. The Council expressed its general agreement to the approach at pre-application stage commenting as follows:

“The scale and height of the proposed buildings are considered appropriate in relation to the retained timber-framed barn, maintaining its visual primacy within the courtyard composition.

The proposed material palette is considered sensitive to the agricultural vernacular. The use of high-quality materials and restrained detailing reflects the rural character of the site”

Access & Highways

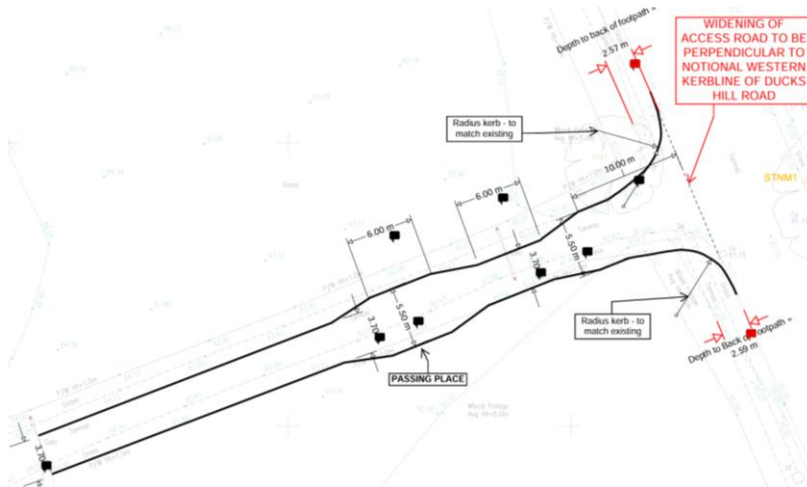
5.42 Policy DMT1 requires that access and transport matters are carefully considered in all new developments. Major development proposals must be supported by a Transport Statement and Travel Plan.

5.44 Responding to this requirement a Transport Statement & Travel Plan have been prepared by Clewlow Consulting and Velocity respectively. In terms of vehicular access, the existing driveway from Ducks Hill Lane is to be retained but improved along its length to enable two cars to pass and remove the potential for waiting vehicles on the carriageway.

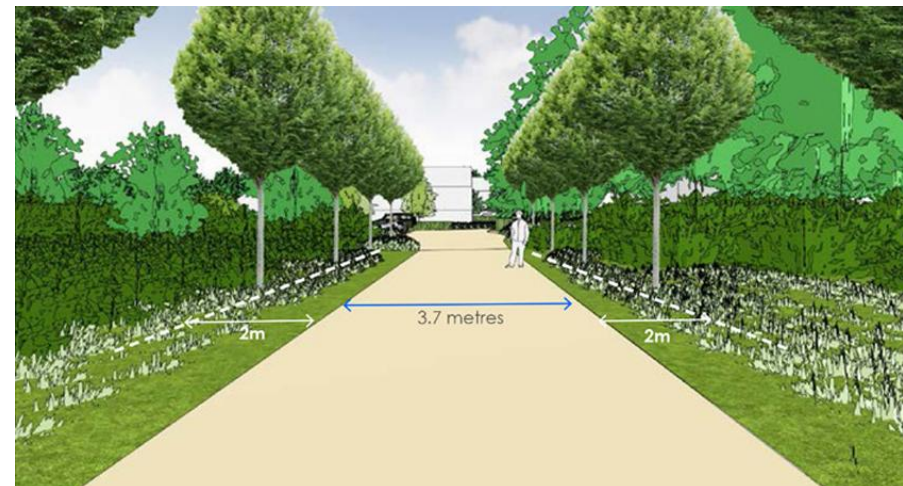


Existing view looking east along the driveway toward Ducks Hill Road

5.45 The proposed driveway would be 3.7 metres wide, widening to 5.5 metres at the entrance and in the area set back from the entrance to ensure that vehicles can pass safely without impact upon the carriageway.



Proposed access enhancements



View along enhanced access driveway

- 5.46 Section 3 of the assessment identifies the existing traffic volumes using the site based upon the equestrian use. This confirms that the current operations generate 320 two-way trips per week. This is due to the 7-day nature of caring for horses. No addition is made for the general storage use but clearly this would have an impact raising existing trips well above that subject to the intensity of the use.
- 5.47 The statement also considers the existing traffic generation from staff and general comings and goings at the Kensal Green site as that operation is effectively to be replaced at this application site. This generates 319 two-way trips i.e. one less than the existing equestrian operation at this site. The report concludes that both the typical weekday and the weekly total traffic movements will be less than the existing. As no intensification is likely there would be no adverse impact upon local highway conditions.
- 5.48 As shown below the existing site access benefits from visibility in excess of 120m which is the requirement for a 40mph road.



View from the site access looking north



View from the site access looking south

5.49 The acceptability of the access arrangements were confirmed at pre-application stage and complies with Policy DMT1.

5.50 A draft Travel Plan prepared by consultants Velocity accompanies this application. This includes the appointment of a travel plan coordinator who would be responsible for promoting sustainable travel initiatives and ensuring information regarding public transport services are available to all employees and visitors. Car sharing initiatives are proposed as well as the provision of electric vehicle charging.

Sustainability

5.51 The applicant is keen to develop a highly sustainable building. As a major development a number of London Plan policies are relevant to its consideration.

- Policy SI 2 requires that major development is net zero-carbon and should include a detailed energy strategy to demonstrate how the zero-carbon target will be met. A minimum on-site reduction of at least 35 per cent beyond Building Regulations is required. Residential development should achieve 10 per cent, and non-residential development should achieve 15 per cent through energy efficiency measures
- Policy SI 4 seeks to ensure that new proposals minimise overheating through design, layout, orientation, materials and the incorporation of green infrastructure.
- Policy SI 5 sets out that new development must minimise the use of mains water, achieve a mains water consumption of 105 litres or less per head per day and achieve the BREEAM excellent standard for the 'Wat 01' water category or equivalent.
- Policy SI 7 requires that new developments consider resource conservation, waste reduction, increases in material re-use and recycling, and reductions in waste going for disposal. Circular economy statements are required.

5.52 In response to these requirements and the applicants desire to develop a highly sustainable new building, Scotch Partners were appointed to work with the design team in the development of the proposals. The following documents are submitted in support of this application.

- Sustainability Statement (including Energy Statement & Overheating Strategy)
- Circular Economy Statement
- Whole Life Carbon Assessment

5.53 In general summary, the development will achieve a total carbon dioxide reduction of up to 37.3%, exceeding the London Plan requirement of 35% through energy improvement measures.

5.54 The Life Cycle Assessment (LCA) tool has been used to calculate the projected Global Warming Potential (GWP) for the Site based on the anticipated material quantities in an inventory analysis. The materials will be represented within the model by using materials with associated Environmental Product Declarations (EPDs). EPDs are produced by manufacturers and identify the carbon emissions of a product. By scheduling the materials proposed for the Site, the overall carbon emissions can be approximated.

5.55 The upfront Carbon emissions (Modules A1–A5) estimated for the Ashby Farm Artisan Factory Relocation are within the limits outlined by the GLA benchmarks. Additionally, the decarbonised and non-decarbonised Life Cycle Embodied Carbon (Modules A–C, excluding B6 & B7) results are within the GLA benchmark limits.

5.56 The design has been guided by six fundamental principles of circular economy approach. These are as follows.

1. Component or material reuse and recycle
2. Designing for adaptability
3. Designing for flexibility
4. Designing for replaceability
5. Designing for disassembly;
6. Designing for longevity.

5.57 A Pre-Demolition Audit and Pre-Redevelopment Audit has been produced by Velocity which highlights existing materials that can be recycled or reused on-site and off-site. A Whole Life Carbon Assessment (WLCA), Outline Site Waste Management Plan (OSWMP), Operational Waste Management Strategy (OWMS) and Design and Access Statement (DAS) have also influenced the approaches for design to adhere to.

5.58 Key design approaches and targets have been identified includes the following:

- Ensuring that a rate of 20% recycled content and recyclability of materials is considered and delivered during procurement in line with the WLCA and circularity assessment on One Click.
- Diverting a minimum of 95% of demolition, construction and excavation waste from landfill.
- Substructure and superstructure concrete frame can use cement replacement recycled products such as GGBS and limestone fines.

5.59 The project is targeting a rating of “Excellent” under the BREEAM industrial building use type.

5.60 It is considered that the various reports demonstrate compliance with SI 2, 4, 5 and 7 of the London Plan.

Ecology - Biodiversity Net Gain & Urban Greening

- 5.61 Local Plan Policy DMEI 7 requires that the design and layout of new development should retain and enhance any existing features of biodiversity or geological value within the site. London Plan Policies G5 and G6 require major development of this nature to deliver urban greening and Biodiversity Net Gain. Davidson-Watts Ecology have prepared a full Preliminary Ecological Appraisal (PEA) of the site including associated Bat emergence surveys of the site buildings. These have confirmed the presence of bats in three buildings. A bat licence will need to be obtained prior to any works taking place at the site.
- 5.62 A Biodiversity Net Gain (BNG) assessment has also been undertaken. The as existing baseline assessment and post development enhancement map extracts are shown below. Through the removal of the menage, hardstanding to the south and west of the building complex and new tree hedge and scrub planting a significant BNG enhancement is delivered.



BNG – As existing baseline map



BNG – Post Development Enhancement Map

- 5.63 The assessment metric demonstrates a 42.61% net gain in terms of area habitat units, and with a 21.62% net gain in hedgerow units significantly exceeding the usual 10% target. Alongside these works the proposed landscaping enhancements and provision of green roofs deliver an Urban Greening Factor of 0.5, again substantially in excess of the 0.3 target.
- 5.64 The proposals therefore easily comply with Policies DMEI 7 of the Hillington Local Plan and G5 and G6 of the London Plan.

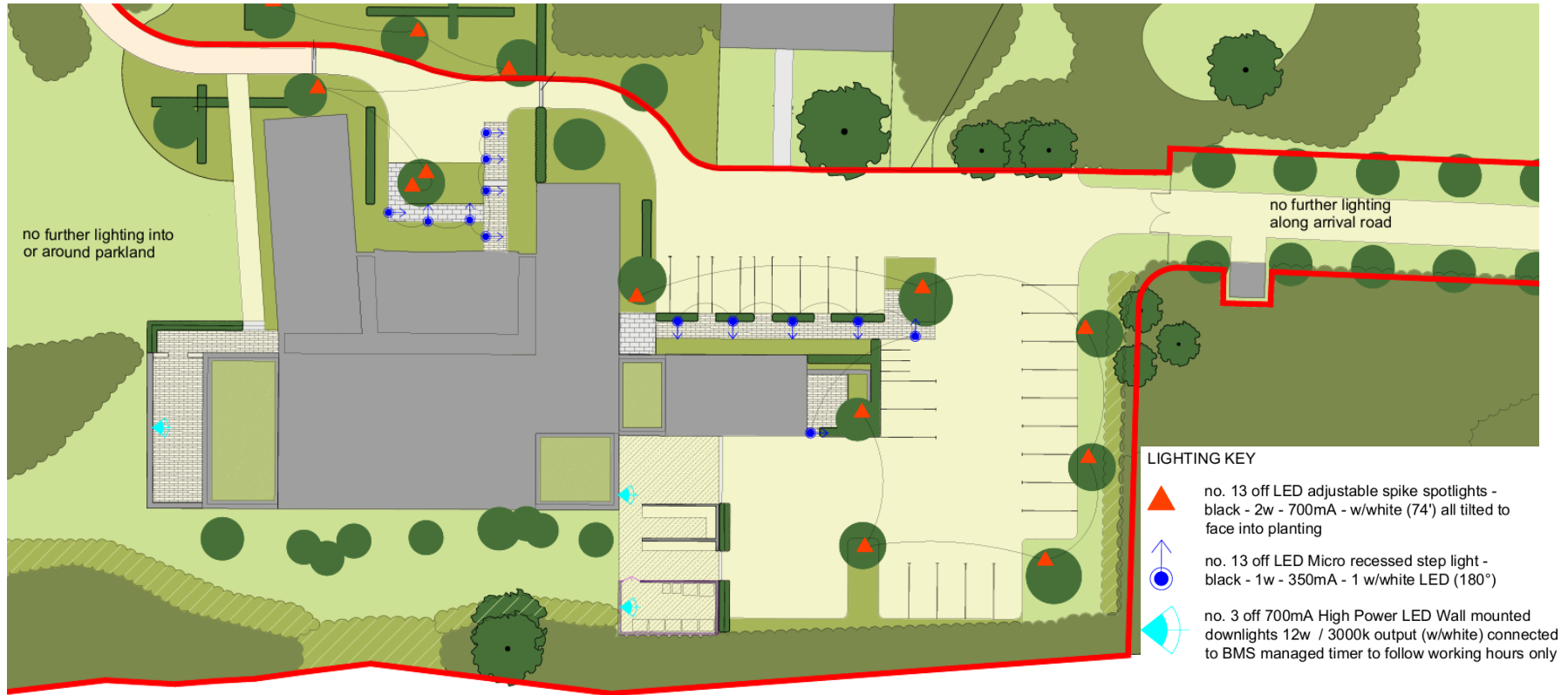
Landscaping & Landscape Impact

- 5.65 As explained throughout this statement it is proposed that large areas of hardstanding are removed and returned to natural grassland / meadow land, particularly west of the building complex.
- 5.66 As shown on the following page the application 'red line' area and so the landscape proposals cover a wider area than the 'development' area and include complementary works such as the provision of a new hedge boundary along Ducks Hill Road north of the main entrance. A new drainage pond is provided to the west of the building complex and existing hedge boundaries are proposed to be strengthened where necessary and gaps infilled.
- 5.67 A low key hoggin path is proposed to link between the proposed workshop and the main shooting ground. This has been routed along the edge of the field boundaries to the north to minimise visual impacts. It would be used primarily as a footpath but would also be of a width sufficient to accommodate a 'golf buggy'. This will provide the opportunity for staff and clients to access between the two areas without the need to drive out of the site, along Ducks Hill Road and back into the new workshop area.
- 5.68 Whilst the landscaping plans provided are of a comprehensive nature it is anticipated that the details of species and planning densities would be secured by planning condition.



Overall site landscaping master plan

5.69 Given the rural location it is proposed that lighting will be minimised to that necessary to ensure health and safety around the building entrance and car parking area. As shown below, no lighting is proposed along the access driveway and similarly no lighting would be installed west of the building complex or along the link path to the shooting ground.



Proposed lighting plan

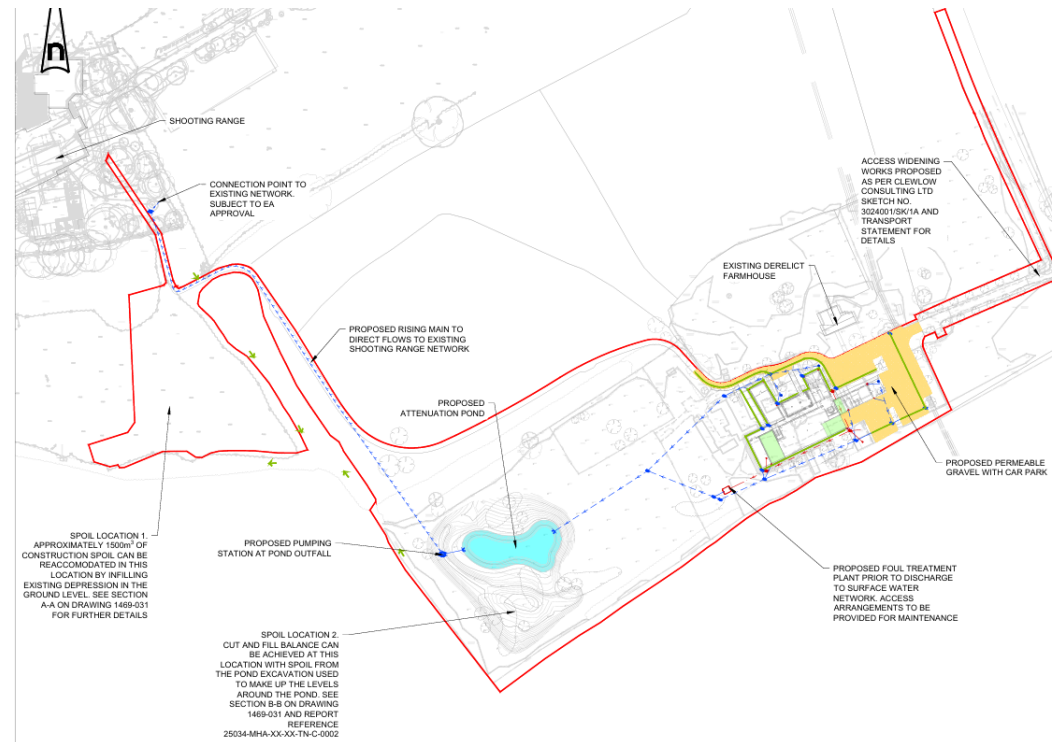
5.70 Landscape and Visual Assessment views of the proposals and how these would sit within the landscape is provided on pages 36 and 37 of the Design & Access Statement.

5.71 As is apparent, as the height of the buildings would not exceed the height of the existing farmhouse the ridges would not be prominent in the landscape and largely screened by existing mature boundaries and the new planting proposed by this application.

Flood Risk & Sustainable Drainage

5.72 Policy EM6: advises that the Council will require new development to be directed away from Flood Zones 2 and 3 in accordance with the principles of the National Planning Policy Framework (NPPF). All new developments should include sustainable drainage proposals.

5.73 In terms of the first element of the Policy the site stands wholly within Flood Zone 1. In terms of the second, a sustainable drainage proposal has been developed as shown opposite. Surface water will be conveyed towards a new outfall to an existing ditch north west of the site (adjacent to the shooting range). Through use of rainwater harvesting, green roofs, permeable paving, filter drains, and a pond it is proposed to limit surface water flows to a maximum flow of 1.4l/s for the 1 in 100 year storm event (including a 40% climate change allowance).



Surface water drainage strategy

Heritage – The Retention and Use of the Timber Barn

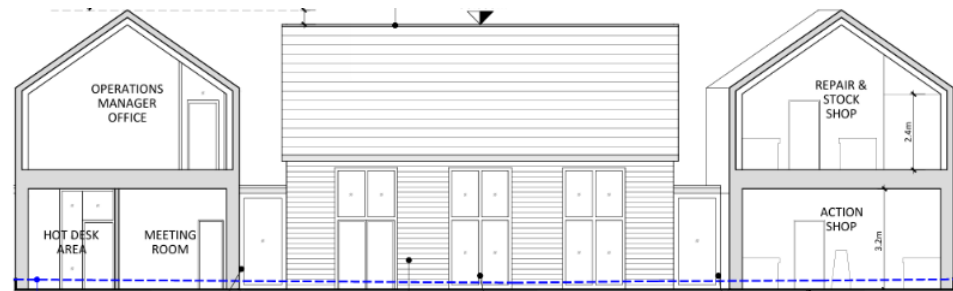
5.74 None of the site buildings are listed but the central timber framed barn, despite the fact that it has been altered and rebuilt has been highlighted as possessing local heritage value.

5.74 The Applicant has embraced the importance of this barn and the proposed design retains the structure at the centre of the new building group with linkages between it and the building.

5.76 The retained and enhanced barn will visually present as an integral part of the new facility. The new build proposals will enable the form, character and history of the barn to be experienced in a positive way.

5.77 The proposal will secure the maintenance and repair of the barn and ensure that it has a viable long-term use so that it can survive for future generations to come

5.78 These proposals are supported by a detailed heritage analysis provided by the Ward Booth Partnership and have been discussed and agreed with the Council’s Conservation Team. Pre-application comments advised as follows:



North elevation / section showing the retained barn and glazed links



View showing the incorporation of the timber barn

*“The proposal seeks to retain the barn and reposition it as the focal point of the development. At present, the barn is not positively revealed within the site and its setting is compromised by the surrounding utilitarian structures. **The courtyard arrangement would provide a clearer spatial hierarchy, enabling the barn to be appreciated within a defined setting.....**”*

Airport Safeguarding

5.79 Pre-application advice highlighted the need to consider the potential for any conflict with aviation safeguarding requirements associated with nearby RAF Northolt and Heathrow Airport. New buildings can impact aviation operations and infrastructure by being too close or too tall, or of a nature which could interfere with radar and navigation aid infrastructure. The borough includes safeguarding areas where it is required that:

- development should not exceed prescribed heights.
- the potential impact of hazardous bird activity is considered.
- consideration is given to the potential impacts of large reflective surfaces.
- the need for tall cranes during construction is considered.

5.80 In this case the proposal does not include tall buildings. The ridge height of the proposed new buildings is no higher than the existing two storey house and so significantly lower than heights that could result in adverse impacts.

5.81 The proposed works to redevelop an existing site will have no impacts upon the potential for bird strikes at Northolt or Heathrow.

5.82 No large reflective surfaces are proposed. Materials are to be traditional and rustic. Minimal low-level lighting is incorporated. This is not of a nature which could impact flights on approach or leaving either airport.

5.83 Given the modest overall height of the proposed new buildings there will be no need to utilise tall cranes at the site.

5.84 There are no reasons to consider this modest proposal would have any adverse impacts upon Heathrow or RAF Northolt.

Community Engagement

5.85 As shown opposite the application site lies within a semi-rural location set well away from any residential properties.

5.86 The location is appropriate for the current shooting use with noise from the activity sufficiently removed from any neighbours so as not to result in materially harmful impacts.

5.87 The nearest neighbour to the south is Young Wood Farm. This is separated from the site by a on open field and approximately 260 metres.



Aerial view showing nearest neighbours to the site

5.89 To the north the nearest neighbour is a commercial use 'DHF Feeds' approximately 380 metres as the Crow files and separated by open land land landscaped boundaries. A residential property 'Ducks Hill Grange' is then set beyond this at approximately 410 metres. The main residential area of Northwood lies to the east and is separated from the site by woodland and approximately 540 metres.

- 5.90 An approach was made to the Northwood Residents Association and the Local Ward Members to offer a meeting and / or discussion regarding the draft proposals.
- 5.91 The Residents Association kindly responded to thank the applicant for the offer but noted that whilst the association attends public consultation events it does not generally hold meetings on individual applications. It was noted that the association would review the application on submission and given its location, its interest would mainly centre around traffic and any visual impacts that may result.
- 5.92 These matters are discussed at length in this statement, the Design and Access Statement and supporting Transport Statement. In brief the height of the proposed buildings is to be retained at two storey and no higher than the ridge of the existing farmhouse. It is considered that as a result of this, the existing mature planting, additional landscaping proposed and the distance to any public vantage points there would be no adverse visual impacts arising from the proposal. The transport impacts are assessed as neutral in terms of the trade off with the existing use at the site and so would have no adverse impacts upon local roads or junctions.
- 5.93 Councillor Lewis and Councillor Higgins are the ward members for this area. Councillor Lewis kindly responded to the invitation to discuss the proposals, and a meeting was arranged for 3 February 2025 at the shooting ground site. Due to Councillor Higgins position as 'Chair' of the Planning Committee, it was noted that it would not be possible to discuss matters with Councillor Higgins.
- 5.94 The draft proposals were presented to Councillor Lewis and questions answered amongst other aspects on access, traffic, design, building heights and landscaping. Feedback received was positive and supportive of the proposals subject of course to seeing the final proposals and application package on submission.

S106 – Heads of Terms

5.95 As part of the pre-application discussions Officers advised that:

“At application stage, statutory consultees may request financial contributions that would be secured by Section 106 Agreement, this may include highways, air quality, carbon offsetting, biodiversity / BNG, employment / training opportunities”.

5.96 The Applicant acknowledges this potential.

5.97 The pre-application response also advised:

“.....the development will need to demonstrate that it is Air Quality Neutral. If this is not achievable then it may be liable to a financial contribution to mitigate against air quality, to be secured by a S106 Legal Agreement.”

5.98 An air quality report is included with the application submission. This demonstrates that the proposal will be Air Quality Neutral.

5.99 Should a S106 Agreement prove necessary the Applicants Solicitors details are as follows:

Julian Parks

Moore Barlow

Gateway House, Tollgate, Chandler’s Ford, Eastleigh SO53 3TQ

5.100 Direct contact details can be provided on request.

6.0 CONCLUSIONS

- 6.1 Planning permission is sought to enable the redevelopment off the Ashby Farm site to facilitate the re-location of Holland and Holland's existing workshop in Kensal Green to this site.
- 6.2 The redevelopment comprises appropriate Green Belt development in the context of Paragraph 154 (g) of NPPF. This supports the redevelopment of previously developed land where it would not cause "*substantial harm to the openness of the Green Belt*".
- 6.3 For the reasons set out in this statement and as demonstrated in the supporting package of reports, plans and visuals it is clear that this proposal would not cause substantial harm to the openness of the Green Belt. Rather it would significantly reduce the sprawl of unplanned development and open storage at the site and enhance the contribution that it makes to its surroundings.
- 6.5 The proposal represents high quality design and secures the future of the existing timber framed barn which stands central to the site and is considered to be of local heritage value.
- 6.6 The proposals reduce the extent of hard surfacing at the site and increase the extent of soft landscaping. New and strengthened hedge boundaries are proposed alongside new tree planting. These proposals deliver a 42.61% net gain in terms of area habitat units, and with a 21.62% net gain in hedgerow units. An Urban Greening Factor of 0.5 is achieved well in excess of the 0.3 target.
- 6.7 Sustainability and energy efficiency has been central to the development of the proposals which target the BREEAM 'Excellent' standard. A sustainable drainage scheme is proposed including the use of rainwater harvesting from the new buildings.
- 6.8 Improvements to the site access and appropriate levels of on-site car and cycle parking are to be provided.

- 6.9 The proposal has no adverse impacts upon any residential properties or other site neighbours.
- 6.10 The proposed new workshop facility would greatly assist Holland and Holland with the overall efficiency and sustainability of its operations at Ducks Hill Lane. It will support the business in its desire to improve, adapt and provide an enhanced working environment for its employees and secure employment at this site into the future.
- 6.11 The Councils support for this application is respectfully requested.