

Dijksman Planning

35 Berkeley Road, Newbury, RG14 5JE

Planning Statement - Addendum

Application - 19637/APP/2025/191

Formation of hard surfaced area for the parking of up to 25 Heavy Goods Vehicles (HGVs) (Retrospective)

St Leonards Farm, Newyears Green Lane, Harefield,
Uxbridge UB9 6LX

Introduction

The NPPF explicitly supports the provision of suitable sites, large and small, to cater for the needs of the logistics and haulage sector, this support provides a helpful overall context to the consideration of this proposal on this site:

Paragraph 87, states that:

*“planning policies **and decisions** should recognise and address the specific locational requirements of different sectors...[including] storage and distribution operations at a variety of scales and in suitably accessible locations that allow for the efficient and reliable handling of goods”.*

The NPPF provides further support for Logistics as a use that may, if there is evidence of need, be appropriate in green belt locations:

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

h) Other forms of development provided they preserve its openness and do not conflict with the purposes of including land within it. These are:

iii. local transport infrastructure which can demonstrate a requirement for a Green Belt location;

Highways access matters are dealt with in a separate Highways Statement; this additional planning statement considers the green belt matters raised by the planning officer who as requested additional justification, in green belt terms, for this HGV parking depot. The

proposed development is for the use of this site for an existing, long established, medium sized HGV Logistics operator working within the west London Area.

NPPF – Grey Belt Assessment

Grey belt. [148] & Annex 2 – *Glossary Definition*

Land in the GB comprising PDL and/or any other land that, in either case, does not strongly contribute to any purposes in

- (a) check unrestricted sprawl,*
- (b) prevent neighbouring towns merging or*
- (d) preserve setting and special character of historic towns...*

NB. This list does not include (c) safeguarding the countryside from encroachment”.

Green Belt Guidance – 27th Feb 2025

The Government's latest Guidance on developments within the green belt specifically addresses the considerations involved in assessing whether a site **Strongly Contributes** to the three green belt purposes and may be considered Grey Belt. It describes the factors that may result in a Strong, Moderate or Weak contribution to the three Green Belt Purposes:

Purpose A – to Check Unrestricted Sprawl of Large Built-Up Areas, “Villages should not be considered large Built-Up areas” and in relation

Purpose B - to prevent Neighbouring Towns Merging into one another, “merging of towns, not villages”.

Purpose D - to Preserve the Setting and Special Character of Historic Towns is qualified by “This purpose relates to historic towns not villages.”

Neither the NPPF nor the Guidance provides a definition of “large built-up area” or “village” and therefore this is in legal terms a matter of planning judgement. In this context the vicinity of the application site, the industrial cluster at North Hillingdon, cannot reasonably be described as a town or village. Nor can it be argued that the change of use proposed in this application could possibly lead to the unrestricted sprawl of any large built-up area, nor does this site *contribute strongly* to preventing towns merging. It is very clear that this site does not *contribute strongly* to any of the key green belt purposes. As such it may be considered Grey Belt.

Inappropriate development

Substantial weight must be given to any harm to the GB, including to its openness – other than in the case of development on PDL or grey belt land, where development is not inappropriate ([153] & FN55).

*155. The development of homes, **commercial** and other development in the Green Belt should also not be regarded as inappropriate where all the following apply:*

- a. The development would utilise grey belt land and would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan;*
- b. There is a demonstrable unmet need for the type of development proposed;*
- c. The development would be in a sustainable location, with particular reference to paragraphs 110 and 115 of this Framework; and*
- d. Where applicable the development proposed meets the ‘Golden Rules’ requirements set out in paragraphs 156-157 below.*

Category (d) Golden Rules are not applicable to this site.

Need / Sustainability / Alternative Sites

In the context of the NPPF and Planning Guidance above, the case officer has asked:

- Is there demonstrable unmet need?
- Whether this is a sustainable location for this development to meet this evidenced demonstrable unmet need?
- Has the applicant reviewed and assessed alternative and potentially more sustainably located sites.

I will answer these three questions in order.

Evidence of Unmet Need

The London Plan and Hillingdon's Employment & Capacity Study December 2023 both agree that there is a shortfall of industrial and commercial land available for logistics operators, within Greater London in general and West London and Hillingdon, in particular. The business on this site is focussed on a longstanding client base of industrial customers within a fairly tight 25-mile radius of this site; this is

business to business haulage, an important component of the logistics sector in west London.

The London Plan

The London Plan and related documents from the Greater London Authority (GLA) explicitly identify a significant under supply of haulage and logistics sites in London.

The current London Plan (2021) was published by the Mayor of London taking into account the previous Hillingdon Employment Land Study Update (2014), which sets out the framework for the city's development over the next two decades.

Chapter 6: *Economy* is of note as it sets out policies related to London's economy and employment land. The issue of industrial land is the focus on over one-third of its policies.

The current plan recognises the intense competition for land, particularly from residential development, which has led to a large-scale loss of industrial land.

Hillingdon's Employment Capacity Study comments on the London Plan as follows:

*Policy E4: In alignment with the NPPF, this sets out an objective to ensure a "sufficient supply of land and premises in different parts of London to meet current and future demands for industrial and related functions". Policies E4:A1 and E4:A2 state that provision of "light and general industrial uses" should be a mechanism of providing industrial economic development as well as "**storage and logistics/distribution** (Use Class B8), including 'last mile' distribution close to central London and the Northern Isle of Dogs". Policy E4:A8 further states that that flexible (B1c/B2/B8) hybrid space is also important "to accommodate services that support the wider London economy and population". As well as creating new industrial land, the London Plan is clear about the importance of retaining London's existing industrial land. Policy E4:C states that "the retention, enhancement and provision of additional industrial capacity" should be planned, monitored and managed for designated sites (notably Strategic Industrial Locations², Locally Significant Industrial Sites³ and **Non-Designated Industrial Sites**).*

The current London Plan, and recent representations to the "Towards a new London Plan" consultation emphasise the shortage of Land for Logistics:

Capacity vs. Supply: The London Plan recognizes that even after accounting for residential conversions, the **demand for industrial land capacity far exceeds supply**. Forecasts show that a "no net loss"

policy for industrial capacity is insufficient, and **more provision is needed.**

Lost industrial land: Reports from organizations like the Centre for London highlight the critical nature of the shortage. One report found that London has lost a quarter (24%) of its industrial floorspace over the last two decades see – page 26

*“The logistics industry is facing rapid changes as shopping online becomes the norm and consumers expect to receive their packages rapidly and at a low cost. **Meeting this demand is pushing logistics companies to seek out smaller industrial sites and warehouses closer to residents and with good transport links. However, with industrial land in short supply and land values at an all-time high, doing so is increasingly challenging**”.*

<https://www.centreforlondon.org/publication/london-industrial-future/>

Industry feedback: Logistics industry bodies, such as Logistics UK and the UK Warehousing Association (UKWA), have worked with the GLA to emphasize this problem during the London Plan consultation process. They note the intense competition for land and unaffordable rents. See <https://www.ukwa.org.uk/wp-content/uploads/2025/06/UKWA-Submission-London-Plan-1-June-2025.pdf>

Increased competition: Logistics operators report a "total lack of supply" for sites, especially for "last mile" operations in inner London. Freight and Servicing Action Plan: Transport for London's (TfL) action plan acknowledges the shortage of industrial land for consolidation centres and freight activities.

In response to the identified shortage, the London Plan and associated guidance documents outline strategies to manage and provide for industrial, and logistics needs. These include:

Intensification and Co-location: Boroughs are encouraged to intensify industrial floorspace on existing sites and explore co-locating industrial and residential uses. However, the GLA and industry acknowledge this can be challenging to implement effectively. "Last Mile" Logistics: The plan specifically recognizes the need for "last mile" distribution hubs, especially in the Central Activities Zone and inner London.

There are logistics sites which cater for specific needs such as the application site, for multiple HGV parking, which relies on the low-density use of commercial land. This is a use that cannot be met by the *intensification* of the use of existing employment land.

Towards a New London Plan: During consultations for this new plan, the GLA acknowledged that the historic loss of industrial land is

unsustainable and is considering a city-wide approach to allocate industrial land and release less suitable sites.

New London Plan Consultations: Logistics submissions to the new London Plan have centred on protecting existing industrial land and creating new opportunities, while also highlighting the need for **specific logistics infrastructure like lorry parking**. Key themes include the underestimation of logistics space demand, the **pressure on industrial land from housing targets**, and the importance of developing a plan that supports the sector to avoid suppressed demand. Industry groups, such as the UK Warehousing Association (UKWA) and Logistics UK, have provided detailed feedback on these issues, contributing to the Greater London Authority's (GLA) planning process. Key points from submissions:

Land protection and provision: Submissions to the recent consultation also emphasize the need for stronger protection of existing logistics land, and a call for new designations in areas like the "grey belt".

The UKWA noted that the London Plan has acknowledged the need to protect industrial land and potentially create new sites but warned that housing targets could still put pressure on warehousing and logistics space.

Infrastructure needs: The Freight Transport Association (FTA) submission to the London Plan argues that the plan should include provisions for lorry parking facilities, a major point of concern for the industry due to regulations requiring driver rest breaks. These submissions also highlight the need for specific protection for land used for micro-consolidation, often located in underutilized car parks.

Demand and employment: Industry bodies like the UKWA and Logistics UK argue that demand for logistics space is being underestimated and that the sector is crucial for London's economy and job creation. Some submissions highlighted the significant employment generated by logistics space, with one report suggesting a job is created for every 97 sq m of floor space, notes the UK Warehousing Association (UKWA).

Co-location and safety: While the UKWA supports co-locating industrial businesses with other uses, it has cautioned that **safety must be a primary consideration, and not all businesses are suitable for co-location. This is highly relevant to the application site, which is a business-to-business bulky goods HGV haulage operator that has potential to conflict with other users in more sensitive locations.**

Hillingdon Employment & Capacity Study December 2023

The recent strategic employment data for Hillingdon Borough indicates a shortage of land for logistics, across the full range of provision,

despite the borough's strong logistics sector. The Hillingdon Employment Land and Capacity Study (2023) identified a need for additional logistics floorspace, *and the available land supply is insufficient to meet this demand*. While the borough has a significant amount of existing industrial land, much of it is older, and there is a lack of new sites available for modern logistics development to accommodate future growth. The statistics around the precise shortfall depend upon assumptions around future intensification, but this land hungry HGV use cannot be accommodated through that potential solution.

Main findings

This study identifies a general and worsening lack of availability of floorspace due to loss of industrial land. This is reflected in two key indicators, increasing rent costs and a very low vacancy rate. Both of which make it extremely hard for businesses to relocate.

Paragraph 2.8 states:

*(National) Planning policies are now expected to recognise and address the specific locational requirements of these sectors and others. **The recognition of storage and distribution operations is considered overdue and reflects the growing role that logistics activities play in the wider economy.***

Paragraph 2.29 states:

Key Message 3: Deep and Broadening Demand

*...industrial demand is at unprecedented levels in London across a whole host of uses and unit sizes. **This demand/supply imbalance is driving strong rental value and capital value growth.***

- *Headline industrial rents have seen strong growth – now at £19psf – which reflects a 36% uplift on the 10-year average of £14psf. As expected, smaller buildings reflect higher values psf, but there is a premium for 100k sqft plus, **due to the depth of demand for logistics**, and an array of wider uses the feed demand for units of this nature.*

3. Demand Context: Exploring Demand Signals for Employment Floorspace

Chapter Summary

- *Hillingdon's employment mix is dominated by the Transport and Storage (30,000 jobs),*
- ***The local industrial market is overheating** and is dominated by demand from the existing aviation industry but also 'last mile' distribution activity as well as data centres.*

Paragraph 3.61 states:

*3.61 In London a severe lack of general industrial and light industrial stock of all sizes and typologies has limited market activity. **Since 2001 industrial vacancy rates have dropped from 16% to around 4% today – this illustrates that stock is well-used and unlikely to be meeting demand from businesses.***

Hillingdon's Industrial Picture

This is highly relevant to this application in reinforcing the evidence that there is a shortage of industrial land in general and in relation to Logistics.

Paragraph 3.66 states:

*3.66 Heathrow and its supply chain drive significant demand for warehousing in Hillingdon. Demand around the airport has historically been dominated by **Transport & Storage** businesses carrying out functions for airlines and logistics companies that receive air freight.*

The applicant serves this sector of the local economy, with several longstanding customers dependent on Heathrow logistics.

Table 19 is highly relevant:

Rising Importance of Logistics - national demand for logistics space has increased significantly over the last five years driven by a range of factors including onshoring, automation, e-commerce and technology. This demand has filtered through to London which, when combined with a highly constrained industrial market, has pushed down vacancies and driven up rents across the city. Hillingdon has felt the brunt of these pressures as reflected in industrial vacancy rates falling from 7% in 2015 to 5% in 2022 and rents increasing from £11.05 psf to £19.41 psf over the same period.

*Hillingdon's industrial demand is primarily driven by Heathrow which is the UK's largest airport and a significant attractor of inward investment. **The main link between the airport and employment land is through logistics operations***

This extensive research, produced for Hillingdon Borough Council as part of the evidence base to feed into the emerging development plan, indicates that, across the Borough and in West London Generally:

Insufficiency: There is a current land shortage for logistics facilities.

Need for new sites: The study specifically identified a future need for additional land for large-scale logistics floorspace that the existing land supply cannot meet.

Strategic importance: Hillingdon is a "Limited Transfer" Borough, meaning there is a careful and managed release of surplus employment land, but this does not negate the shortage of new land for logistics.

Existing vs. new land: While the borough has a large supply of existing industrial land, much of it is not suitable for logistics operations, nor given the low vacancy rate, is it available to new or relocating businesses. It is important to note that many of the proposed solutions to the acknowledged imbalance and under supply depend upon future intensification of uses, on existing sites.

North Hillingdon

The North Hillingdon cluster is specifically identified within the capacity study situated to the northwest of the borough with sites in and around Harefield.

The HGV operation that is the subject of this application is a low intensity, land-based use, that cannot be accommodated on an existing occupied site. It is an essentially *space hungry* activity, namely the parking and operating of HGVs. It is exactly the kind of use described as being typically found at Newyears Green in the North Hillingdon Cluster by the study:

Cluster E North Hillingdon

Para 5.56 - The cluster comprises two distinct employment sites that have been appraised as part of this study which cover an area of over 11 Ha and provide c.10,673 sqm of built employment space - though it is important to note that much activity is undertaken on open yards and other uncovered/undeveloped land in this location. The sites are:

- ***Newyears Green Lane: A non-designated site that comprises a range of different 'bad neighbour' facilities, including waste-management, recycling facilities and some smaller warehousing.***

*5.57 In terms of 'availability', most businesses on the Newyears Green Lane site **require low density build configurations and open space** as they primarily undertake recycling and waste activities which are 'space hungry'. This means intensification and/or redevelopment potential is limited as is 'availability'. The site is also relatively isolated, with poor accessibility to the strategic road network meaning **only a handful of industrious occupiers** would consider it an attractive location.*

The Applicants Specific Locational Requirements & Lack of Alternative Sites

The applicant was forced to leave his former depot, where he operated from 1994 - 2024. That site, Smiths Farm, Kensington Road, Northolt, UB5 6AH is located only 7 miles (12-minute drive) from the application site. This previous depot was granted planning permission for residential redevelopment by Ealing Borough Council in May 2024 Ref 23/1604/FUL. The applicant was therefore forced to leave which placed this business under threat, the only option available was to relocate to this application site. Several commercial land agents were instructed to find an alternative location.

Site Finding Criteria

For this business to survive it requires a location providing:

- road access close to existing customers
- short commuting distances for existing staff
- other noisy / HGV uses in the vicinity
- a large enough site for 25 HGV's

Several Commercial Land Agents were instructed find a site that would meet these criteria, with an acknowledgement that there may need to be operational compromises between these requirements, but only ones that would still enable the business to continue. The location of the staff, businesses and area of operation are illustrated and explained in the accompanying Highways Statement.

Absolute Lack of Available Alternative Sites

The description of the lack of availability of logistics sites identified in the London Plan and Employment Land Capacity Study has been born out by the applicants attempts to find another site. A sequential test approach would suggest a comparison between alternative available sites, but there have been no suitable or available sites identified by any of the agents over a 12-month period. An email from Gibbs Gillespie commercial agents is submitted with this statement, it is representative of the attempts made by others to find an HGV operating site within the area of search. There is no question that there is a genuine shortage of this kind of employment land in Hillingdon; namely land available for a low-density HGV depot. The applicant's experience has been an absolute lack of availability of any suitable site.

SUMMARY

Demonstrable Unmet Need

The evidence provided by the current London Plan and the numerous representations made to the New London Plan are robust in demonstrating a lack of employment land, increasing rents and low vacancy rates. This evidence is repeated and supported by the 2023 Hillingdon Employment Land and Capacity Study. The applicants own experience in attempting to find a site in west London bears out the points made in both those documents. His eviction from his previous depot to make way for residential development is a perfect example of the reduction of available small and medium sized low density, low value commercial sites necessary for HGV Haulage based logistics.

Sustainable Location

Para 155 refers to paragraphs 110 and 115 of the Framework which emphasise access to services and public transport. However, in making planning decisions account should be taken of the NPPF *taken as a whole*, which in para 114 states:

114. Planning policies and decisions should recognise the importance of providing adequate overnight lorry parking facilities, taking into account any local shortages, to reduce the risk of parking in locations that lack proper facilities or could cause a nuisance. Proposals for new or expanded distribution centres should make provision for sufficient lorry parking to cater for their anticipated use.

It is also important to note that:

116. Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network, following mitigation, would be severe, taking into account all reasonable future scenarios.

Considering the operational requirements and business needs of the operator **this site is in a highly sustainable location for its specific use** as an HGV operating depot, serving an existing longstanding customer base within a roughly 25-mile radius, in the context of pre-existing staff travel to work arrangements.

As an HGV haulage logistics operation, the locational criteria are not the same as class E offices, or a doctor's surgery or school, or residential uses, where access to alternative means of transport can be a realistic prospect. One of the locational criteria for this business is to be as far away as possible from potential conflicting noise sensitive land uses; to be away from pedestrians or cyclists or children crossing roads. Para 114 above acknowledges the importance of locating lorry

parking where it does not cause a nuisance. In other words, the sustainability criteria that relate to this Business-to-Business HGV Haulage Logistics operation are not the same as with other pedestrian, cyclist or public transport orientated land uses.

In the terms relevant to the operation of this business, it is a highly sustainable location. The proximity to staff is particularly important and this location ensures that their journey to work distances are minimised. Currently 12 of the 29 staff car share, and the applicant runs a minibus that collects 9 others. The distance travelled by staff who drive are thankfully short, due to the location of this site.

Sequential Test

The notion of undertaking a sequential test in relation to this application is to misunderstand the reality of commercial land availability. There is an absence of small-scale HGV operating sites available within west London, and there are none within the necessary area of search for this logistics operation. To continue in operation this business must be as close as possible to its previous location; Northolt, UB5 6AH, only seven miles from this site. This is necessary for access to existing customers and to retain staff who live in the area. Within west London such sites are simply not on the open market, if they do appear they are purchased for residential redevelopment or high-density commercial development. They are not leased for low value, low density HGV parking.

Conclusions

There are convincing reasons to conclude that this parcel of land does not strongly contribute to any of purposes (a), (b) or (d) in paragraph 143 of the NPPF. As such it may be considered a grey belt site, within an area where there is an acknowledged shortage of industrial land. This change of use is necessary due to the lack of alternative sites. It is in a sustainable location for this specific business to business haulage use. It can therefore be considered not inappropriate development in the greenbelt. This is a location recognized as entirely suitable for this type of use, within Hillingdon's own Employment Land Capacity Study 2023 (paragraph 5.56). This is a location where HGV parking does cause any planning harm.

Ken Dijksman MRTPI

October 2025