

# *Dijksman Planning*

35 Berkeley Road, Newbury, RG14 5JE

## **Planning Statement**

Formation of hard surfaced area for the  
parking of up to 25 HGV's  
(Retrospective)

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

Application by

D Hughes Limited

## Purpose of the Application

1. This application has been submitted to regularise the creation of hard standings, to be used for the parking of up to 25 heavy goods vehicles, to enable the survival of an existing local HGV haulage business. This existing local employer has been in the area for over 20 years and has been forced to relocate from their existing site, (also in Uxbridge). The business operates 25 HGV's and employs over 25 people.

## Character and Appearance of the Site

2. The application site is comprised of a .46-hectare parcel of land that is visually and physically contained on all sides; by a combination of existing commercial operations on three sides, and recent HS2 Spoil bunding on the fourth. It's character and appearance is dominated by the surrounding commercial operations that including the screening and distribution of aggregates, HGV parking and and a variety of other land intensive commercial and waste related industrial uses.

## HS2 Landscaped Spoil Bunds

3. The previously open land to the east of the site, has recently been re-formed, bunded and landscaped in association with the HS2 project under Schedule 17 of the High-Speed Rail (London – West Midlands) Act 2017. This area of formally agricultural land has been used by HS2 to dispose of surplus spoil excavated from Copthall Tunnel, south of this application site. This imported spoil has been used create intensively landscaped mounds, details of which can be found under Hillingdon Planning Reference 7680/APP/2021/4237. This has changed the landform significantly; the bunds are approximately 18m in height and as result they visually and physically contain the eastern boundary of St Leonards Farm, including application site.

## Leonards Farm – Aerial Photographs

4. The application site has for many years been part of the adjacent Leonards Farm commercial site, a grouping of various aggregate / haulage related uses, used over the years at varying levels of intensity. Several dated aerial photos (from Google Earth Pro Historical Imagery) accompany this Statement; they show the gradual evolution of the various land uses at St Leonards Farm. As follows:
  - **28/08/13** – The application site is in commercial use, in association with the activities taking place on the land immediately to the north, for what appears to be the screening of soil or aggregate. The land immediately to the east is enclosed by a hedge with no disturbance or parking in evidence.
  - **04/06/15** – The application site is starting to be overgrown, but an opening has appeared into the land to the north, the land to the west remains vegetated with what appears to be one vehicle on it.

- **07/05/18** – The application site appears to contain several vehicles, and the ground is disturbed, with the encroaching vegetation visible on the previous picture now around the edge. The land to the west remains undisturbed and is vegetated.
- **29/06/19** – This photo was taken one month after the applicant purchased this site, the central area remains disturbed ground with vehicles and trailers. The site to the immediate west has changed dramatically with all evidence of vegetation gone and replaced with hard surfacing and parked HGVs.
- **13/06/21** - Vegetation is encroaching in the application site, with only limited evidence of disturbed ground within the central area.
- **10/04/22** – Some open storage and parking is taking place on the application site, the land to the north, west and south continues to be wholly dominated by hard standings, HGVs and commercial uses.
- **05/08/24** – This photo illustrates extremely well the dominant character, appearance and the visual and physical impact of the immediate surrounds of the application site. The land to the immediate west of the site is now wholly integrated with the commercial uses of the rest of the area. It is not possible from this aerial perspective to see the form of the newly created landscaped spoil bunds.

### **Visually & Physically Contained**

5. The main purposes of including the chronological sequence of photos is to show the physical and visual context of the application site and the intensive commercial uses that have increased significantly over the past 10 or so years. This is the reality of the local environment, and it is relevant to the planning merits, and planning policies that apply to this application.

### **Permission on Adjacent Site – (19637/APP/2019/3807)**

6. The planning history of the neighbouring parcel of land, to the immediate west of this site is relevant to this application. In November 2019 retrospective permission was granted for area of hardstanding that can be seen so clearly on photo dated 29/06/2019. That hardstanding does not appear on the preceding photo dated 07/05/18, but it was considered wholly acceptable in terms of its impact on the green belt. The Officer's delegated report is helpful in explaining the material considerations. There were no landscape concerns, amenity issues, problems in relation to landscape impact or the street scene, or in terms of pedestrian and highway safety. It was considered to comply with NPPF green belt policies and policies DMEI 4, DMHB 1 and DMHB 4 of *Hillingdon Local Plan: Part Two - Development Management Policies*.

## NPPF 2014

7. The Government has recently issued a revised NPPF (December 2024) and have also made various statements regarding the importance of encouraging economic growth. The policies in the new NPPF are of direct relevance to this application.

8. Paragraph 85 states:

*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.*

9. It is our case that the retention of this site, and its use for HGV parking is desirable as a local logistics employment use, and acceptable in terms of green belt impact. The site and its surroundings have the character of a developed site. The aerial images demonstrate this clearly. The Newyears Green Lane area does not have the 'open' character associated with Green Belt land. It is instructive that one of the supporting images used in the HS2 Schedule 17 submission describes and annotates this the area as "Newyears Green Industrial Businesses". This is very apparent in the aerial image attached, entitled *Newyears Green Lane Industrial Area*. The St Leonards Farm commercial area which sets the context to the application site is demonstrably of a very different character to the surrounding open countryside.

## Green Belt Context

10. It is particularly notable that the employment sites that surround this site, on the opposite side of New Years Green Lane, and to the west, have numerous areas of hardstanding for the parking of vehicles. These areas of hardstanding are physically and visually well contained within a framework of existing, previously developed land. They do not harm the openness of the Green Belt because they form an integral part of this identifiable and distinct employment area.

## Enclosure & Screening

11. The application site is enclosed to the west by existing commercial uses of St Leonards Farm and to the south (along the road) by an existing well-established tree and hedge line. It is also now very well screened from the east by a pre-existing hedge and the new landscaped bunding. In other words, this site cannot reasonably be considered part of the open green belt.

## No Impact on Openness

12. As such the existence of hardstanding and parked HGV's will have no discernible impact upon the openness of the Green Belt in physical or visual terms. In this context the revised NPPF indicates that this land

may reasonably be described as Grey Belt and as such its development does not constitute inappropriate development.

### **Grey Belt – New Category**

13. The new glossary definition of Grey Belt is in effect a subsidiary categorisation of land within the green belt where development will not be considered “inappropriate”. This new and quite radically different definition is as follows:

*Grey belt: For the purposes of plan-making and decision-making, ‘grey belt’ is defined as land in the Green Belt comprising previously developed land and/or any other land that, in either case, does not strongly contribute to any of purposes (a), (b), or (d) in paragraph 143. ‘Grey belt’ excludes land where the application of the policies relating to the areas or assets in footnote 7 (other than Green Belt) would provide a strong reason for refusing or restricting development.*

14. This definition links to paragraph 143 but specifically excludes c) from the list of relevant purposes. Land may be considered Grey Belt (within the green belt) if it does not strongly contribute towards the following green belt purposes:

- a) to check the unrestricted sprawl of large built-up areas;*
- b) to prevent neighbouring towns merging into one another;*
- d) to preserve the setting and special character of historic towns;*

15. It is self-evident that this application site that it does not strongly contribute towards any of these three green belt purposes. As a small parcel of land, it is contained by existing well-established commercial land uses, and large newly created spoil bunds. It is clearly not part of open land within the green belt and cannot therefore contribute towards its openness.

### **Not Inappropriate**

16. The status of this site as a Grey Belt site adds considerable weight to the acceptability of the hard standing and HGV parking in planning terms.

17. Grey Belt is referred to specifically in paragraph:

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

- 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 (foot note 56);*
- c. The development would be in a sustainable location, with particular reference to paragraphs 110 and 115 of this Framework (foot note 57); and*
- d. Where applicable the development proposed meets the 'Golden Rules' requirements set out in paragraphs 156-157 below.*

18. In this case as a minor site the golden rules do not apply. It is important to note that this new policy specifically applies to *Commercial development* on grey belt land. The importance of Logistics to the Hillingdon economy and the strength of demand is acknowledged in the "London Borough of Hillingdon Employment Land and Capacity Study". There is a severe shortage of small sites for operators to use as they are under pressure for housing development, the precise reason that the applicant has been forced to relocate his business to this site. The sustainability of this site is ideal for the use proposed, and in these terms the site is ideal in its accessibility for this small business.

## **Conclusion**

- This is a visually and physically contained application site that makes no discernible contribution to the openness of the green belt.
- It falls within the new NPPF Glossary definition of Grey Belt land.
- For the use proposed this location is both sustainable and economically viable.
- The applicant is a small local haulage operator who has been removed from his current rented site after 20 years, and 25 jobs depend upon this relocation.
- There is a real and desperate shortage of locations for logistics operators in this local area, this application is made in the context of this unmet need.

**Supporting Documents**

## 1. Aerial Photos of St Leonards farm

28/08/13

04/06/15

07/05/18

29/06/19

13/06/21

10/04/22

05/08/24

## 2. Aerial Photo of Newyears Green Industrial Area