

PLANNING STATEMENT

C&L Country Club, Car Sales

May 2026

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APPENDIX A – PLANNING POLICY SCHEDULE

1. INTRODUCTION

- 1.1 This Planning Statement has been submitted to support an application to use part of the C&L Country Club site for the sale of cars for a temporary period of three years.
- 1.2 This proposed meanwhile use has already commenced, and is only intended as a stopgap whilst long-term redevelopment options for the wider site are pursued. In this respect, the Arora Group have previously made submissions under the Council's 'Call for Sites' carried out in 2023 for long term alternative uses to both the existing lawful use of the site and the meanwhile use for the sale of cars
- 1.3 The description of development is as follows:

Temporary change of use (3 years) of existing hard surfaced car park area associated with the existing Class F1/F2(c) (previously Class D1/D2) to Sui Generis to allow the sale of cars.

Background to the Application

- 1.4 Permission was granted in 2024 for the temporary use of the site for two years for the sale of cars.
- 1.5 The site at C&L Country Club was submitted in the call for sites in 2023 for the potential to be released from the Green Belt for a site-wide redevelopment, along with potential for utilisation of the site for a wider use - as it falls within the A40/M40 employment corridor and Heathrow industrial area. As the emerging Hillingdon local plan has still not been substantively progressed, the Arora Group is seeking a further three-year temporary planning permission for Car Sales, a temporary use which has already been established at the site under planning reference 2216/APP/2024/562, in order to continue the operations on site.
- 1.6 Since the original permission 2216/APP/2024/562, Biodiversity Net Gain (BNG) has come into force and as a result, there has been a need to update the red line plan to reduce the development extents to include less than '25sqm of on-site habitat'.
- 1.7 In May 2025, the UK government launched an 8-week consultation to improve the implementation of BNG for minor, medium and brownfield development. Part of this consultation included the introduction of new exemptions for; temporary planning permissions covering permissions granted for a maximum of 5 years. Below is an excerpt from the consultation document:

Government will use regulations to introduce a new exemption for temporary development which is for 5 years or less. The scope to deliver onsite BNG is limited due to the temporary nature of the development, as the land needs to be restored to its previous condition, therefore requiring off-site units to be

purchased. In some cases, this can create disproportionate burdens and cost pressures for short term temporary development.

Temporary development will be defined as a planning permission granted for a limited period under section 72 of the Town and Country Planning Act 1990.

This exemption will only apply for development where:

- *the whole development comprises solely of temporary development*
- *the temporary development is limited to 5 years or less*

1.8 Therefore, the need to meet BNG for this temporary development at the C&L Country Club is an unreasonable burden and cost pressure for this site and whilst the submission has been made ahead of the above exemptions coming into force, the red line plan now only includes hard surfaces and meets the current exemptions.

Structure of Statement

1.9 This Planning Statement comprises a review of the relevant site context, planning history and planning policies and provides an assessment of the proposed development.

1.10 This Statement is structured as follows:

- **Section 2** provides a description of the Site and surrounding area;
- **Section 3** describes the planning history of the Site;
- **Section 4** provides a description of the application proposals;
- **Section 5** provides a summary of national, regional and local planning policy and guidance of relevance to the proposals;
- **Section 6** examines the planning considerations for the assessment of the proposed development;
- **Section 7** provides our conclusions in respect of the proposals

Supporting Documents

1.11 This Statement should be read in conjunction with the following supporting documents:

- Completed Application Form
- Covering Letter
- Air Quality Assessment (April 2026)
- Transport Assessment (April 2026)

2. SITE AND SURROUNDING AREA

The Site

- 2.1 The application site comprises part of the car park for the C&L Country Club, which has been vacant for circa 5 years. Within the application site (red line) is a small single-storey brick building, close to the site access from West End Road, which is used as a sales office, however no other permanent structures are included within this application.
- 2.2 One structure has been assembled on site; a car cleaning facility. This structure is single storey and would be removed from the site when the proposed use ends. The remainder of the site comprises areas of hardstanding.
- 2.3 The application boundary covers approximately 6807sqm. The car park is located close to the entrance of the site on West End Road. To the west of the car park is the existing clubhouse building and further beyond lies a golf course. The clubhouse is vacant.

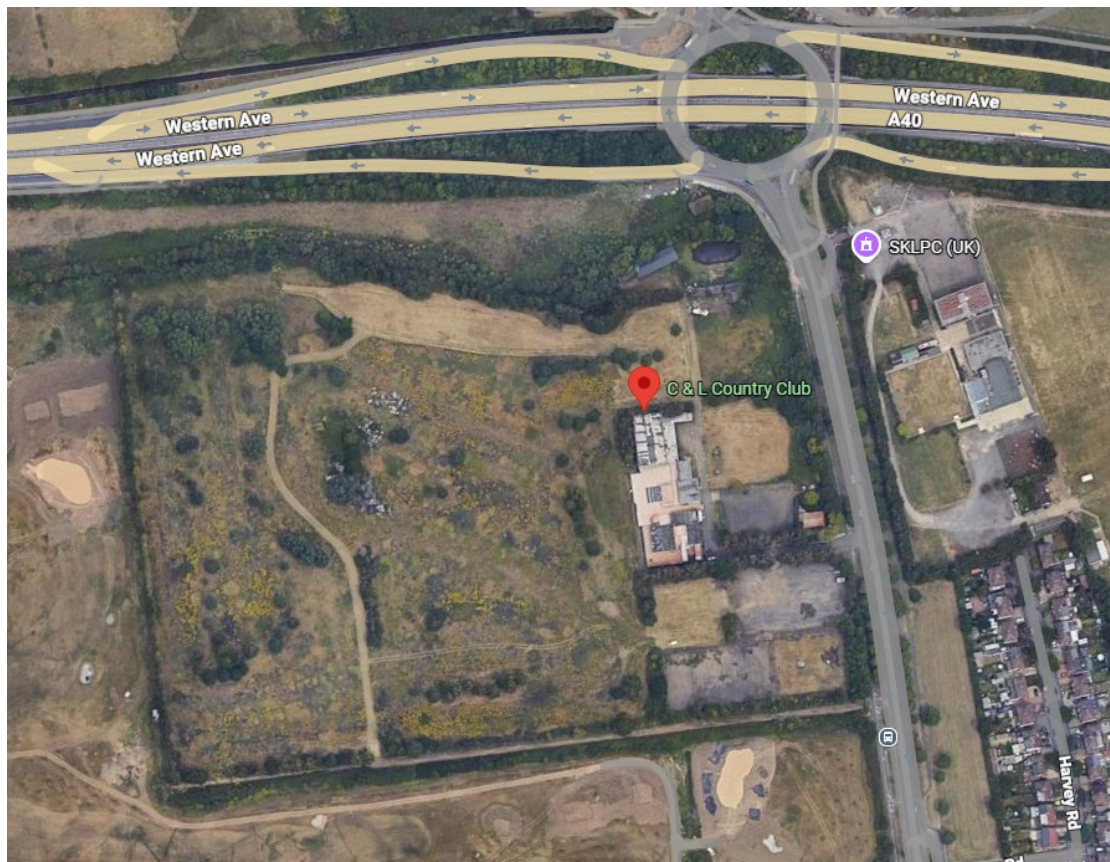


Figure 1: Aerial Image

Surrounding Area

- 2.4 The surrounding area has a mixed character, with the nearest buildings being a small grouping of houses to the south-east on Harvey Road, a community centre to the east on the opposite side of West End Road, and the commercial buildings on the northern side of the A40. To the south and west of the site is a large golf course (between Sharvel Lane and the A40) and beyond this are large open areas laid out as fields.

Planning Designations

- 2.5 The site is subject to the following planning designations:
- Green Belt
 - Air Quality Management Area (AQMA)
 - Near the southern boundary of the A40/South Ruislip Air Quality Focus Area (AQFA)

3.0 PLANNING HISTORY

3.1 The relevant planning history for the site is set out below in Table 1 below:

App Ref No.	Description of Development	Status	Decision Date
2216/APP/2024/562	Temporary change of use of existing hardsurfaced carpark area associated with the existing Class F1/F2(c) (Previously Class D1/D2) to Sui Generis to allow the sale of cars.	Approved	04.08.2024
2216/APP/2014/2500	Use of the site within Use Classes D1 and D2 (Application for a Lawful Development Certificate for an existing use)	Approved	17.10.2014
2216/APP/2014/1350	Lawful existing uses of Use Class D1 (Non-Residential Institutions) and Use Class D2 (Assembly and Leisure) (Application for a Lawful Development Certificate for an existing use)	Refusal	23.06.2014
2216/APP/2002/1815	Refurbishment and remodelling of existing 9 hole golf course using imported free-draining material	Approved	31.01.2003
2216/AE/90/1156	Formation of a nine-hole Golf Course	Approved	24.10.1990

4.0 PROPOSED DEVELOPMENT

4.1 The description of development is as follows:

Temporary change of use (3 years) of existing hard surfaced car park area associated with the existing Class F1/F2(c) (previously Class D1/D2) to Sui Generis to allow the sale of cars.

4.2 The area in question is not the whole of the C&L Country Club, but just one area of hardstanding south of the main access from West End Road. Ancillary buildings to support this change of use include the existing brick-built single-storey building near the east boundary and a car cleaning facility. None of these buildings would be used independently from the main proposed use for the sale of cars.

5.0 PLANNING POLICIES

- 5.1 Under Section 38(6) of the Planning and Compulsory Purchase Act 2004 and section 70(2) of the Town and Country Planning Act 1990, applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise.
- 5.2 Planning policy remains consistent with the initial temporary planning permission - 2216/APP/2024/562 – with no material changes. As the site was considered Previously Developed Land, temporary planning permission should be deemed acceptable as there are no changes proposed to the proposed development.
- 5.3 Planning law requires that applications for planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise. Decisions on applications should be made as quickly as possible, and within statutory timescales unless a longer period has been agreed by the applicant in writing.

Adopted Development Plan

- 5.4 The adopted development plan for London Borough of Hillingdon comprises:
- Part 1 – Strategic Policies (2012)
 - Part 2 – Development Management Policies (2020)
- 5.5 The development plan policies relevant to this application are summarised in Appendix A.

Material Considerations

- 5.6 The following policy documents and guidance which are also relevant to this application are set out below:
- National Planning Policy Framework (“NPPF”) (December 2024)
 - National Planning Policy Guidance (“NPPG”) (updated December 2024)
 - National Design Guide (January 2021)
 - The London Plan (2021)

6.0 PLANNING ASSESSMENT

6.1 This section sets out an assessment of and the justification for the Proposed Development within the context of relevant national, regional and local planning policy guidance and other material considerations. The key matters for assessment comprise:

- Principle of Development
- Impact of Amenities of Neighbouring Residential Properties
- Impact on Street Scene
- Traffic Impact and Pedestrian Safety
- Carparking
- Air Quality

6.2 Each of these matters is addressed in detail below:

Principle of Development

6.3 The site at C&L Country Club is within the Green Belt and is therefore subject to the following policy considerations:

Paragraph 153 of the NPPF (2024) states that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in exceptional circumstances.

Paragraph 153 states that when considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. 'Very Special Circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations. Paragraph 154 confirms that 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.

Paragraph 148 states that where it is necessary to release Green Belt land for development, plans should give priority to previously developed land, then consider grey belt, which is not previously developed, and then other Green Belt locations.

In terms of Local Policy, Policy DMEI 4 states that:

A) Inappropriate development in Green Belt and Metropolitan Open Land will not be permitted unless there are very special circumstances;

B) Extensions and redevelopment on sites in the Green Belt and Metropolitan Open Land will be permitted only where the proposal would not have a greater impact on the openness of the Green Belt and Metropolitan Open Land, and the purposes of including land within it, than the existing development, having regard to:

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

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

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

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

v) the visual amenity and character of the Green Belt and Metropolitan Open Land

6.4 The proposal involves utilising an existing car park area which was used in association with the C&L Country Club which had received a lawful certificate in July 2014 (2216/APP/2014/2500) for the existing use as D1 (Education & Training) and D2 (Place of Worship). From the site inspection and photos, it is evident that the building has been vacant for some time. Notwithstanding this vacancy, the carpark associated with this use would be classed as "Previously Developed Land" – as highlighted in the Officers Report, planning reference 2216/APP/2024/562 - given it is tarmacked and used functionally in association with the main building. The NPPF does allow limited development on Previously Developed Land, once it would not cause greater harm to the openness of the Green Belt.

6.5 As set out above, the lawful use of the wider C&L site, as a sports facility, leisure centre and function room, ceased approximately five to six years ago, and the retained building is in a very poor state of repair which would require significant investment to bring back into viable use. In this regard, the Arora Group have made

representations on the Council's most recent 'Call for Sites' in 2023, setting out our long-term vision for the site which would include comprehensive redevelopment and a permanent change of use.

- 6.6 As an interim solution, it is proposed that part of the site be used for the sale of cars (*sui generis*), which would enable some form of continued employment from the site, in accordance with the general thrust of Policies GG2, GG5 and E9 of the London Plan which seek to boost economic output. Without this meanwhile use, the vacant site would provide no benefit to the local economy and would be an underutilised brownfield site. It is further worth mentioning that in its vacant state, the site attracted some criminal behaviour which included breaking and entering, arson, and theft, despite measures to prevent unlawful access by the current owner. In this regard, the impacts from the most recent break-in attempts at C&L were significantly reduced by allowing tenants to operate on part of the site, as the current occupiers were able to notify the emergency services and the owners very quickly which helped to mitigate the level of damage caused.
- 6.7 The change of use would have no discernible impact on the Green Belt in and of itself, as the scheme relies on an existing extent of hardstanding (formerly a part of the car park for the leisure use), and no new hardstanding is proposed to support the temporary change of use. It is acknowledged that the introduction of a car cleaning facility would have a very low adverse impact on openness, simply by introducing one structures which were not there previously on top of existing hardstanding, however a visual assessment of the site reveals that neither of these structures can be readily seen from the public realm because of existing thick foliage along the eastern and southern boundaries. As such, whilst in spatial terms there is a modest increase in floorspace and volume, the proposal has no visual impacts on the Green Belt.
- 6.8 In any event, regardless of the level of harm to the Green Belt's openness identified by the London Borough of Hillingdon as part of this application, any harm arising from the development would be temporary in nature because of the proposed meanwhile use, as the site would be returned to its pre-existing state (i.e. removal of the cars and the car cleaning facility) once the temporary permission has lapsed and it is assumed that this would be controlled by way of a suitably worded condition. On this basis, whilst there may be some very minor level of harm to the Green Belt in terms of spatial impacts, the permanent nature of the Green Belt (one of its two key characteristics) would be unaffected by this proposal.

Impact of Amenities of Neighbouring Residential Properties

- 6.9 Policy DHMB 11 of the Borough Local Plan states that *development proposals should not adversely impact on amenity, daylight and sunlight of adjacent properties and open space.*
- 6.10 The nearest residential properties are located along Harvey Road to the east of the site; the residential properties are located approximately 68m from the application site and are separated by West End Road.

- 6.11 The proposal would have no impact on neighbour's amenity in terms of a loss of light, privacy or outlook, noting that the proposal relates largely to a change of use. The additional structure on site (car cleaning facility) are both single storey and positioned very far from the nearest residential property.
- 6.12 As a commercial site, there is the potential for some noise to be generated on site as part of the usual day to day functions of the site. Having said that, no significant noise-generating activities would take place on site, with the most potential for noise coming from the washing of cars, although this is likely to be negligible given that the nearest property to the car cleaning facility is approximately 200 metres to the south-east.
- 6.13 Additionally, we are not aware of any complaints from members of the public in relation to undue noise or other amenity concerns as a result of the current tenants being on-site.

Impact on Street Scene

- 6.14 Policies D3 and D4 of the London Plan (2021) require development proposals to be of high quality and to enhance the local context by delivering buildings and spaces that positively respond to local distinctiveness.
- 6.15 Policy BE1 of the Hillingdon Local Plan seeks a quality of design in all new development that enhances and contributes to the area in terms of form, scale and materials; is appropriate to the identity and context of the townscape; and would improve the quality of the public realm and respect local character.
- 6.16 Policy DMHB 11 states that new development will be required to be designed to the highest standards and incorporate principles of good design.
- 6.17 Policy DMHB 12 states that development should be well integrated with the surrounding area.
- 6.18 The application proposes the temporary change of use of part of the car park area to Sui Generis to facilitate the sale of cars. The site comprises two sections of hardstanding, previously serving as car parking for the Country Club.
- 6.19 There is limited operational development associated with the use and the existing southern car park would be used solely for the car sales. The northern section of the car park would not form part of the commercial car sales and would also not include any additional structures.
- 6.20 The site has a very functional appearance, consistent with the proposed use. The car cleaning facility have a fairly neutral impact on the character of the area, and cannot be easily seen from outside the boundaries of the site. It is proposed that these

structures would be removed from the site once the meanwhile use ceases, and so any very minor harm to the appearance of the area would be short-lived.

Traffic Impact and Pedestrian Safety

- 6.21 The Borough Local Plan at Policies DMT 1 and DMT 2 requires the council to consider whether the traffic generated by proposed developments is acceptable in terms of the local highway and junction capacity, traffic flows and conditions of general highway or pedestrian safety.
- 6.22 Policy T4 of the London Plan (Assessing and mitigating transport impacts) sets out that proposals should reflect and be integrated with current and planned transport access, capacity and connectivity. Transport assessments should be submitted with proposals to ensure that impacts on the capacity of the transport network are considered. The cumulative impacts of development on public transport and the road network capacity including walking and cycling, as well as associated effects on public health, should be taken into account and mitigated, and proposals should not increase road danger.
- 6.23 Policy T7 of the London Plan (Deliveries, servicing and construction) sets out that proposals should facilitate sustainable freight movement by rail, waterways and road. In addition, proposals should facilitate safe, clean, and efficient deliveries and servicing.
- 6.24 These London plan policies should be read alongside Policy DMT1 of the Hillingdon Local Plan Part 2 (Managing Transport Impacts) and Policy DMT2 of the Hillingdon Local Plan Part 2 (Highways Impacts), which set out that proposals will be required to meet the transport needs of the development and address its transport impacts in a sustainable manner, whilst ensuring that safe and efficient vehicular access to the highway network is provided and impacts on local amenity and congestion are minimised.
- 6.25 In terms of specific parking standards, Policy T6 of the London Plan (Car Parking) sets out that car parking should be restricted in line with levels of existing and future public transport accessibility and connectivity. Car-free development should be the starting point for all development proposals in places that are (or are planned to be) well-connected by public transport, with developments elsewhere designed to provide the minimum necessary parking ('car-lite').
- 6.26 Policy DMT6 of the Hillingdon Local Plan Part 2 (Vehicle Parking) sets out that proposals must comply with the parking standards outlined in Appendix C, however it should be noted that there are no specified standards for the proposed sui generis use within either the London Plan or Hillingdon Local Plan.
- 6.27 Policy DMT6 of the Borough Local Plan also highlights the need to supply 5% passive and 5% active EVCP spaces. In the previous application for temporary planning this

was deemed not necessary due to the temporary time period applied for and therefore has not been considered for this planning application.

- 6.28 The proposed use of the site, for the sale of cars, has the potential to impact local highway conditions, depending on how intensively it is used and the number of vehicle movements generated by the use in operation. Noting that the proposed use has already commenced, a survey was undertaken to count the number of vehicle movements into and out of the site on a Wednesday, Saturday and Sunday in January 2024. The results of this survey are included within the submitted Transport Assessment, along with a general assessment of Highways impacts.
- 6.29 The results of the survey showed that traffic generation from the site was extremely low on all three days, with a maximum daily trip generation of 26 one-way vehicular trips (or around one trip every 30 minutes). Whilst it is acknowledged that this trip rate could be higher in spring or summer than in winter, these surveys do show the very low traffic generation of the car sales use both in actual numbers and in comparison to the TRICS data for the extant use of the wider site as a sports facility and leisure centre (26 one-way vehicle trips compared to 918 one-way vehicle trips per day).
- 6.30 The proposed temporary use of the car park at C&L Country Club for car sales would have no greater impact on the local area with regards to car movements than if the C&L was operational. Were this building to recommence operations, there would be sufficient ancillary car parking available to allow it to function.
- 6.31 For a full assessment and further details of transport impacts, please review the Transport Assessment (April 2026) prepared by The Cunningham Consultancy.

Carparking

- 6.32 Hillingdon Local Plan: Part 2 Policy - DMT 6 requires that new development will only be permitted where it accords with the council's adopted parking standards unless it can be demonstrated that a deviation from the standard would not result in a deleterious impact on the surrounding road network.
- 6.33 There are no prescriptive parking standards that can be applied to this SG planning use type. There are 5 car parking spaces available for staff. Consequently, vehicle movements as a result of staff is very low, and two to three parking spaces are needed to cater for staff. Staff parking takes place on a large area of hardstanding at the northern end of the application site (in a separate area to the storage of cars) which provides more than enough space for cars to park on site.
- 6.34 All customer related parking can be adequately contained within the site envelope given that there is no convenient/safe alternative parking available elsewhere. This is predominantly due to the physical characteristics of West End Road which is designated as a Transport for London (TfL) bus 'red route' clearway that legally prohibits parking at all times. This clearly acts a strong parking deterrent also supplemented by the highly trafficked nature and restricted width of the roadway

which inherently dissuades parking due to the perception of 'potential exposure to vehicle damage' and therefore becomes 'self-regulating' by acting as a natural deterrent to on-street parking irrespective of any formal parking prohibition.

Air Quality

- 6.35 The proposed development is located within the LBH Air Quality Management Area, it is within the catchment area of A40/ South Ruislip Focus Area. As per the London Plan, developments need to be neutral as minimum and LBH requires development proposals located in Focus Areas to be air quality positive (LBH Air Quality Local Action Plan 2019-2024), contributing to the reduction of emissions in these sensitive areas.
- 6.36 According to LBH Local Action Plan, proposed development within Focus Areas (or with impacts on FAs) require more stringent air quality neutral procedures and needs to be Air Quality positive.
- 6.37 An Air Quality Assessment prepared by Greenavon (April 2026), has been submitted separately, and this concludes that existing and future concentrations of pollutants across the proposed development are predicted to be below the relevant air quality standards, and therefore the application site is considered suitable for its proposed end-use. The AQA concludes that during the operational phase, the proposed development would have no significant impact on local air quality and is Air Quality Neutral. Moreover, because of the proposed meanwhile use, any impacts would, in any event, be temporary.
- 6.38 Given the approach adopted under planning permission 2216/APP/2024/562, the current application proposes the planting of 3 trees (as shown on drawing 233L-(20)-200-P4 Proposed Site Plan) which is considered proportionate mitigation and avoids the need for a monetary contribution. This approach delivers an air quality positive development and accords with policy DMEI 14 of the adopted Local Plan.
- 6.39 On the basis of the additional planting, the scheme would meet air quality policies. The 3 trees were planted on site once planning permission was granted. The permission - 2216/APP/2024/562 – granted in 2022 deemed the need to plant 3 no. trees which would contribute towards improving air quality. These trees were planted on site and therefore no contribution towards air quality was required. Should this application be deemed the same outcome, the applicant has deemed tree planting to be a suitable air quality offset should this be necessary.

7.0 CONCLUSION

- 7.1 This Planning Statement has been prepared by in support of a full temporary planning application for:

Temporary change of use (3 years) of existing hard surfaced car park area associated with the existing Class F1/F2(c) (previously Class D1/D2) to Sui Generis to allow the sale of cars.

- 7.2 This Planning Statement has assessed the proposed development in the context of the adopted development plan, relevant supplementary guidance and material planning considerations.
- 7.3 Relevant planning matters have been fully assessed, and it is concluded that the proposed use of the site for the sale of cars is considered to comply with the NPPF, London Plan, and Hillingdon Local Plan (Parts 1 and 2) insofar as they encourage economic growth and the effective use of land. The Arora Group has long-term intentions for the site involving comprehensive redevelopment and the proposed use of part of the site for the sale of cars is requested as a meanwhile use, for a temporary period of three years only.

APPENDIX A – PLANNING POLICY SCHEDULE

Policy	Details
Part 1 Policies (2012)	
PT1.BE1	Built Environment
PT1.EM2	Green Belt, Metropolitan Open Land and Green Chains
PT1.HE1	Heritage
Part 2 Policies (2020)	
DMEI 4	Development on the Green Belt or Metropolitan Open Land
DMHB 1	Heritage Assets
DMHB 3	Locally Listed Buildings
DMHB 7	Archaeological Priority Areas and archaeological Priority Zones
DMHB 11	Design of New Development
DMHB 12	Streets and Public Realm
DMT 2	Highways Impacts
DMT 6	Vehicle Parking
DMEI 14	Air Quality
LPP D4	Delivering good design
LPP G2	London's Green Belt
LPP S3	Education and childcare facilities
LPP S5	Sports and recreation facilities