



## Planning Statement

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Willowdene, The Common, West  
Drayton, Middlesex, UB7 7HQ

March 2026

Ref. HM26-1001

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# 1. Introduction

- 1.1 This Planning Statement has been prepared by Simply Planning Limited (SPL), on behalf of our client, Sir Lad Properties Ltd, and is submitted in support of full planning application concerning Willowdene, The Common, West Drayton UB7 7HQ (the 'Site').
- 1.2 The application seeks part retrospective planning permission for the change of use of a former residential garden to a car storage area (use Class B8/sui generis) together with the retention and reinstatement of the existing residential property, which will benefit from a newly defined domestic curtilage.
- 1.3 In addition, the application proposes a series of operational works, including: the laying of hardstanding; upgrades to the site layout; the formalisation of new boundary treatments; and the rationalisation of existing development on site. This includes the retention of an ancillary cabin for office purposes in connection with the car storage use.
- 1.4 The Local Planning Authority will be aware that the site is currently subject to an enforcement investigation (Ref: ENF/512/24), relating to the unauthorised change of use of the land for the purposes of vehicular storage and sales, together with associated operational works, "the Breach".
- 1.5 This application seeks to regularise the identified Breach in planning control through the submission of a part-retrospective planning application. In doing so, the proposals incorporate a range of works intended to improve the overall quality, layout, and appearance of the development beyond the existing situation on site. The Planning Enforcement Officer, Michaela Iyidor, has been informed of the submission.
- 1.6 As we go on to demonstrate, the proposals seek to utilise a Grey Belt site to provide much-needed employment land, contributing positively to the economic objectives of the National Planning Policy Framework (NPPF) and assisting in building a strong, responsive and competitive economy.
- 1.7 The nature of the use and associated operational works are typical of a commercial environment and are compatible with neighbouring uses, reflecting the established and evolving character of the immediate locality.

## Scope of the Submission and Supporting Documents

- 1.8 The application is accompanied by a series of technical documents which consider the acceptability of the proposals in light of the Development Plan policies and other material considerations. The accompanying documents are listed as follows:

Document	Author
Transport Statement	AVAL
Noise Impact Assessment	NoiseAir
Air Quality Assessment	NoieAir
Preliminary Ecological Assessment and BNG Assessment	Brooks Ecological
Flood Risk Assessment	Swan Environmental Services with Nicola Sugg
Land Contamination Phase I Study	Swan Environmental Services

- 1.9 A full suite of architectural drawings, prepared by LAP, also form part of the submission. These are listed in the table below:

Drawing No.	Drawing Title
9388-01	Site Location and Block Plan
9388-02	Existing Site Plan
9388-03	Existing Elevations 1 of 2
9388-04	Existing Elevation 2 of 2
9388-05	Existing Site Plan (Usage)
9388-07	Proposed Site Plan

## Structure of the Statement

1.10 This Planning Statement explains the background to the scheme and justifies why planning permission ought to be granted having considered the relevant planning policy context, planning history and all other material considerations.

- **Section 2** sets out the factual background, including a description of the application site and surrounding area. It also provides a review of the relevant planning history and the evolving context of neighbouring land uses.
- **Section 3** describes the application proposals.
- **Section 4** outlines the planning policy context against which the proposals should be judged, including the National Planning Policy Framework (NPPF), the London Plan; The Hillingdon Local Plan: Part 1 - Strategic Policies and Hillingdon Local Plan Part 2: Development Management Policies.
- **Section 5** considers the matters at issue and assesses the scheme against the Development Plan policies and material considerations.
- **Section 6** sets out the benefits of the scheme in the planning balance.

## 2. Factual Background

### Site and Surroundings

#### The Application Site

- 2.1 The application site forms part of a mixed-use area comprising a variety of commercial, light industrial and residential uses. It is situated to the west of 'The Common' and to the east of Mayfields Lake, within the town of West Drayton and within the administrative area of the London Borough of Hillingdon.
- 2.2 Geographically, the site is located in the south-western part of West Drayton, lying to the north of the M4 and to the east of the M25. The site shares boundaries with a commercial use and a residential property to the north; commercial uses to the south; Mayfields Lake to the west; and The Common to the east, beyond which lies open land including the River Colne corridor.
- 2.3 The site is broadly rectangular in shape and extends to approximately 0.52 hectares. The land is relatively flat and benefits from boundary treatments which provide a degree of screening from wider public views.
- 2.4 Vehicular access is taken from The Common, which itself is accessed via Cricketfield Road.
- 2.5 The site is currently occupied and operated as a car sales, storage, and servicing area (sui generis), with the dwellinghouse remaining in residential use. A series of works have been undertaken to facilitate the uses including the introduction of hardstanding, site fencing, storage containers, and ancillary outbuildings/structures. This application seeks to partially regularise the existing use of the land and the associated operational works.
- 2.6 The site, in its context, is shown in the aerial image below:



Figure 1 – Aerial Image of the Site – Source: Google Earth

2.7 Photographs of the site, as existing, are provided as part of the architectural package, prepared by LAP Architects.

### Policy and Landscape Designations

2.8 The site is not allocated for any specific use within the Local Plan. However, it lies within the designated Metropolitan Green Belt (shown in green shading of the policies map below – Figure 2). For the purposes of this application, and for the reasons set out elsewhere in this statement, the site is also considered to comprise Grey Belt land.

2.9 The site is adjacent to, but outside of, a Nature Conservation Site of Metropolitan or Borough Grade 1 importance (Mayfields Lake, indicated by dotted shading) and lies outside any designated archaeological priority zone (shown by brown outline)

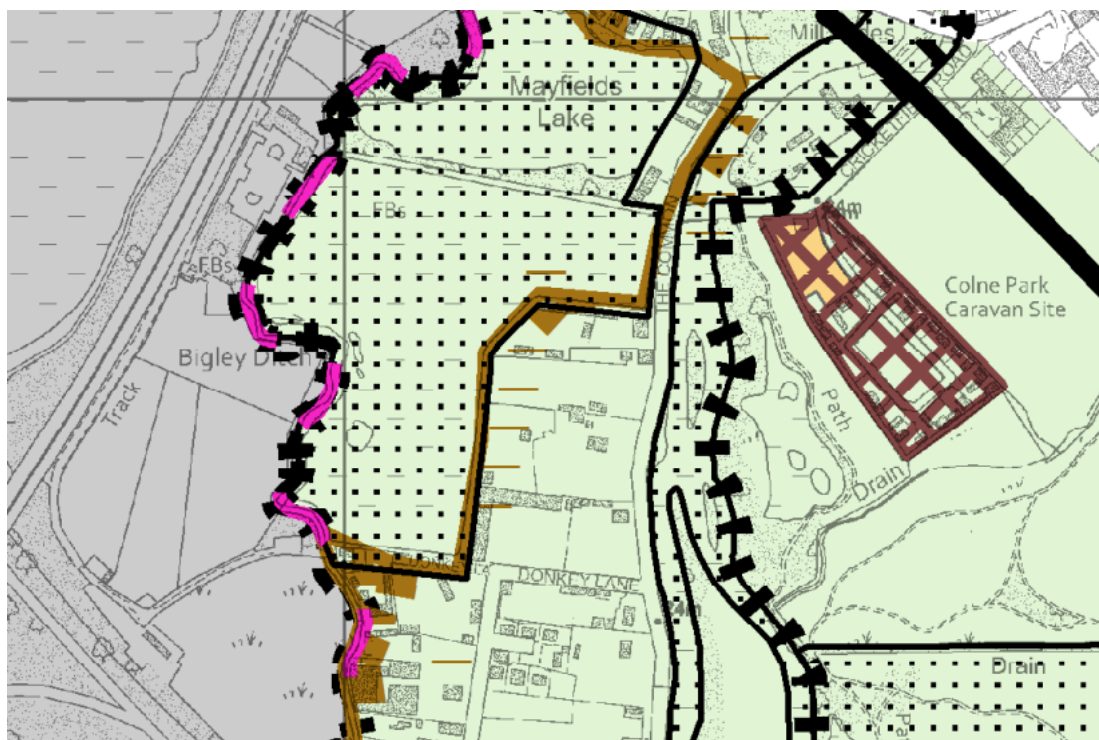


Figure 2 – Adopted local plan Policies Map

2.10 The site is also located within the Environment Agency's Flood Zone 3 and is therefore at the greatest risk of fluvial flooding. The existing commercial use of the site for car sales, storage, and servicing (*sui generis*) is less vulnerable to flood risk and, thereby, more compatible with the site's location and context.

2.11 The site has no other specific landscape designations or planning policy constraints.

### The Surrounding Environment

2.12 The site forms part of an area that has been subject to significant change and expansion over the past 25 years. As a result, the character and use of the immediate locality have evolved organically, with a mix of commercial, light industrial, and residential activities now established.

2.13 The commercial uses within the immediate locality include: Class E premises, open storage and B8 uses, motor vehicle repair workshops, timber yards, scrap yards, manufacturing operations, car sales premises, and a breakers yard.

2.14 A review has been undertaken of the relevant planning history associated with neighbouring premises, together with an assessment of aerial photography dating from 1999 to 2026. This analysis has informed the preparation of a high-level land use plan of the immediate locality, which is presented at Figure 3.

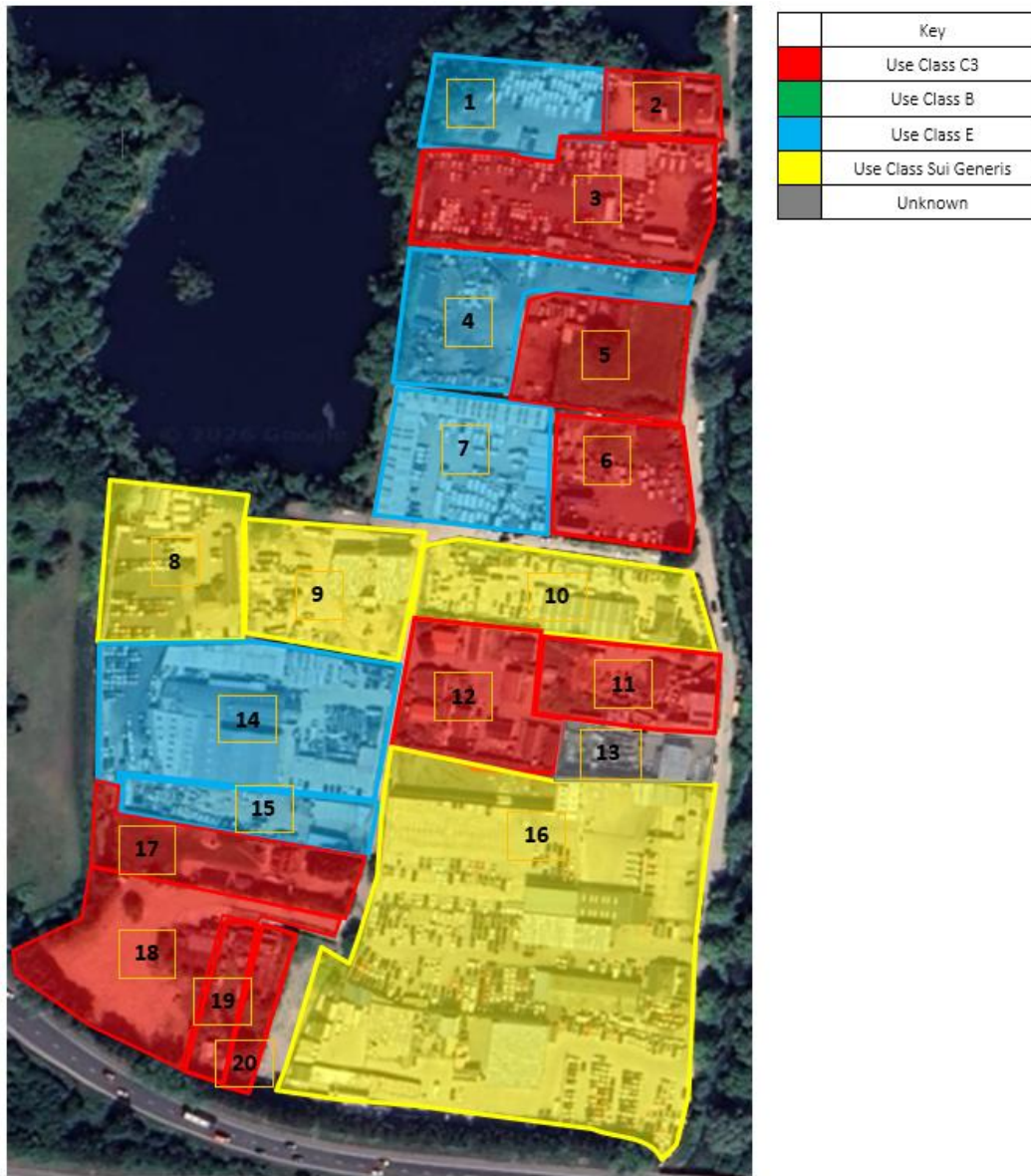


Figure 3 – Land Uses within immediate Locality.

2.15 Whilst a number of sites within the immediate locality do not appear to benefit from express planning permission, they comprise longstanding and established uses. Furthermore, a review of publicly available records identifies a number of enforcement investigations relating to nearby premises which have since concluded, all resulting in “no further action” being taken.

2.16 It is, therefore, evident that the immediate locality comprises an established mixed-use destination and functions as a non-designated employment area ‘Mayfields Lake’, providing important local jobs and services. The proposed development is entirely consistent with the pattern of land uses in this locality.

2.17 The predominance of commercial and industrial activity in the surrounding area has significantly influenced the character of the site, such that the Green Belt qualities in this location have been substantially eroded. As a result, the site and its immediate surroundings can reasonably be considered to constitute Grey Belt land (see Section 5 below). This reflects the fact that the site does not strongly contribute to any of the purposes of including land within the Green Belt.

## Site Planning History

2.18 The sites planning history is set out in the table below:

Application No.	Description	Decision
22653/76/1087	Householder development – residential extension	Approved (29/07/1976)
22653/A/79/0516	Householder dev. (small extension, garage etc) (P)	Approved (23/01/1979)
22653/C/83/0809	Dog Kennels	Approved Temporary (31/05/1983)
22653/D/88/2336	Erection of a 2-storey rear extension accommodating indoor pool	Approved (20/10/1988)
22653/G/89/1820	Demolition of existing house and erection of a two storey dwelling house and indoor swimming pool	Approved (22/08/1989)
22653/J/93/1558	Erection of dog kennels for boarding purposes; renewal of planning permission ref:22653/C/83/809 dated 14.10.83	Approval (22/09/1993)

2.19 The planning history indicates that the site was formerly in longstanding use as a residential premises, which subsequently evolved to include associated commercial activity, including the introduction of a kennels business.

2.20 There is no recent planning history associated with the property. The operational works and change of use that form the subject of this application were undertaken without the benefit of planning permission.

### Enforcement Position and Existing Scenario

2.21 As set out above, the application follows a recent enforcement investigation (Ref: ENF/512/24) relating to the unauthorised change of use of the land for vehicular storage, sales, and servicing, together with associated operational works.

2.22 The operational works undertaken on the site comprise:

- The laying of hardstanding across the site;
- The installation of site fencing around the perimeter, including 1.8m hit-and-miss metal fencing along the southern boundary and 3m metal sheet fencing along the northern and western boundaries;
- The siting of storage containers and cabins;
- The erection of an ancillary car store and maintenance structure; and
- The installation of entrance gates.

2.23 The use includes the storage of c.100 cars together with the temporary storage of HGVs and vans.

2.24 The existing site layout is shown in Figure 4 below.



Figure 4: Existing Site Layout Plan

2.25 Given the informal nature of the existing arrangement, the application proposals seek to substantially improve the character, functionality, and operation of the site by formalising and clearly defining its use solely for car storage, while reintroducing areas of landscaping and greening. The proposals are discussed in detail in Section 3 below.

### 3. Proposed Development and Operations

- 3.1 This application seeks part retrospective planning permission for the change of use of a former residential garden to a car storage area (Use Class B8 / sui generis), together with the retention of the existing residential property, which will benefit from a newly defined domestic curtilage.
- 3.2 The proposals seek to regularise and refine the use of the land solely for car storage purposes, removing more intensive elements such as vehicle sales and servicing activities previously undertaken on site without the benefit of planning permission.
- 3.3 In addition, the application includes a series of operational and layout improvements over and above the existing situation, including the reconfiguration of the site layout, the replacement of boundary treatments, the introduction of site greening, and the rationalisation and removal of existing ad hoc structures.
- 3.4 An existing cabin will be retained to provide ancillary office accommodation in connection with the proposed car storage use.
- 3.5 The proposed operational works comprise:
- The removal of existing car storage/servicing structures and surplus containers;
  - The reconfiguration and formalisation of the site layout, including defined internal access routes and appropriate turning areas;
  - The replacement of existing boundary treatments with palisade fencing, supplemented by new hedgerow planting to enhance visual amenity;
  - The regrading of the site to appropriate levels to support improved drainage and flood water storage capacity;
  - The relaying of new permeable hardstanding;
  - The introduction of a defined area of domestic curtilage associated with the dwelling; and
  - The provision of an ecological buffer zone along the western boundary of the site.
- 3.6 The site will operate solely for the purposes of vehicle storage. Vehicles will typically be stored on site in connection with a wider sales operation, with cars transported to off-site dealerships as required. No vehicle sales or servicing activities will take place at the application site.
- 3.7 The site will provide capacity for the storage of approximately 149 vehicles.
- 3.8 The proposed use will be low intensity in nature, with no visiting members of the public. The site will be operated by a small number of staff, comprising approximately 2 full-time and 2 part-time employees.
- 3.9 The proposed hours of operation are:
- Monday to Saturday: 10:00 – 18:30
  - Sunday: 11:00 – 17:00
- 3.10 The proposals include the provision of 2no. staff parking spaces, 1no. visitor space, 1no. EV space and 5no. cycle parking spaces to support sustainable travel choices.



## 4. Planning Policy Context

- 4.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that when determining a planning application, regard is to be had to the Development Plan and that determination shall be made in accordance with the Development Plan, unless material considerations indicate otherwise.
- 4.2 The Development Plan comprises:
- Hillingdon Local Plan Part 1: Strategic Policies (November 2012)
  - Hillingdon Local Plan Part 2: Development Management Policies (January 2020)
  - Hillingdon Local Plan Part 2: Site Allocations and Designations (January 2020)
  - London Plan (2021).
- 4.3 The application site is not subject to any made Neighbourhood Plan.
- 4.4 The Council has commenced preparation of a new Local Plan; however, this is at an early stage. It is anticipated that any emerging Local Plan will not be adopted until at least February 2028.
- 4.5 The Local Plan review has been significantly delayed from an anticipated 2026 completion, owing to changes in the national planning context; in this respect, new site allocations and the development pipeline for commercial development have not been brought forward as originally envisaged.
- 4.6 The National Planning Policy Framework (NPPF) and National Planning Practice Guidance (NPPG) are also important material considerations.

### National Context

#### National Planning Policy Framework

- 4.7 At the national level, planning guidance is contained in the NPPF which was updated in December 2024. The NPPF is an important material consideration and seeks to secure positive growth in a way that balances economic, environmental and social progress for this and future generations.
- 4.8 Planning law requires that applications for planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise.
- 4.9 At the heart of the NPPF is a presumption in favour of sustainable development (Paragraph 11) which is seen as the golden thread running through both plan making and decision taking. Indeed, Paragraph 11 states:

*For decision-taking this means:*

- c) *approving development proposals that accord with an up-to-date development plan without delay; or*
- d) *where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:*
  - i. *the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for refusing the development proposed; or*
  - ii. *any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole, having particular regard to key policies*

*for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination.*

4.10 In this respect, paragraph 8 explains that there are three overarching objectives to achieving sustainable development:

- a) *“an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right type 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.”*

4.11 Paragraph 39 requires that local planning authorities approach decisions in a positive and creative way, working proactively with applicants to secure development that will improve the economic, social and environmental conditions of the area.

4.12 Chapter 6 of the NPPF relates to building a strong, competitive economy.

4.13 Paragraph 85 of the NPPF acknowledges that planning policies and 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.

4.14 Paragraph 86 requires planning policies to set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth; and to facilitate development to meet the needs of a modern economy, while allowing for new and flexible working spaces to enable a rapid response to changes in economic circumstances.

4.15 Paragraph 87 requires planning policies and decisions to recognise and address the specific locational requirements of different sectors. This including, for example, making provision for clusters or networks of knowledge and data-driven, creative or high technology industries; and for storage and distribution operations at a variety of scales and in suitably accessible locations.

4.16 Chapter 11 requires development to make effective use of land to meet identified needs.

4.17 Chapter 12 (Achieving well-designed places) states that the creation of high-quality buildings and places is fundamental to what the planning and development process should achieve. It continues by remarking that good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities. Being clear about design expectations, and how these will be tested, is essential for achieving this.

4.18 Chapter 13 of the NPPF relates to protecting Green Belt land. At paragraph 142, it is acknowledged that the Government attaches great importance to Green Belt. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open.

4.19 Paragraph 143 outlines that the Green Belt serves five purposes:

- (a) *To check the unrestricted sprawl of large built up areas;*

- (b) *To prevent neighbouring towns merging into one another;*
- (c) *To assist in safeguarding the countryside from encroachment;*
- (d) *To preserve the setting and special character of historic towns; and*
- (e) *To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.*

4.20 Paragraph 153 of the NPPF notes that:

*“Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.”*

4.21 Paragraph 153 continues by stating:

*“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.”*

4.22 Paragraph 154 advises that a local planning authority should regard the construction of new buildings as inappropriate in the Green Belt. It does, however, set out list of exceptions and certain other forms of development which are not regarded as inappropriate in the Green Belt, including:

- buildings for agriculture and forestry;
- the provision of appropriate facilities, including buildings, for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotment;
- the extension or alteration of a building; the replacement of a building;
- limited infilling in villages;
- limited affordable housing for local community needs;
- the complete or partial redevelopment of brownfield land; and other forms of development provided they preserve its openness and do not conflict with the purposes of including land within it.

4.23 Paragraph 155 sets out further exceptions and states:

*“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.”*

4.24 As demonstrated below, save for criterion d), which is not applicable to commercial development, the application proposals satisfy each of these requirements.

4.25 The NPPF also sets out guidance relating to flood risk, drainage, the natural environment and biodiversity, which are also of relevance to the application site and proposed development.

## **The Development Plan**

### **London Plan (2021)**

4.26 The London Plan was adopted in March 2021; it is the overall strategic plan for London and serves as a blueprint for the future development and sustainable, inclusive growth of the city. The Plan sets out a fully integrated economic, environmental, transport and social framework for development over the next 20-25 years.

4.27 The London Plan is legally part of each of London's Local Planning Authorities' Development Plan and must be taken into account when planning decisions are taken in any part of Greater London.

4.28 The Plan sets out six core 'good growth' objectives which should be taken into account for all planning and development in London. These include:

- The Building strong and inclusive communities (GG1)
- Making the best use of land (GG2)
- Creating a healthy city (GG3)
- Delivering the homes Londoners need (GG4)
- Growing a good economy (GG5)
- Increasing efficiency and resilience (GG6)

4.29 The London Plan policies relevant to the application proposals include:

- GG1: Building Strong and Inclusive Communities – Amongst other strategic priorities, Policy GG1 seeks to ensure London continues to generate a wide range of economic opportunities.
- GG2: Making the Best Use of Land – Policy GG2 promotes the development of brownfield land, prioritises sites which are well connected.
- GG5: Growing a Good Economy – Policy GG5 aims to conserve and enhance London's global economic competitiveness by supporting economic diversification and ensuring sufficient employment and industrial space to drive development and regeneration.
- D3: Optimising Site Capacity Through the Design-led Approach – Policy D3 is an overarching design policy. It requires development to make the best use of land by following a design-led approach that optimises the capacity of sites. Development proposals are expected to enhance local context by delivering buildings and spaces that positively respond to local distinctiveness through their layout, orientation, scale, appearance and shape. The policy also seeks to ensure developments achieve safe, secure and inclusive environments; provide active frontages; deliver appropriate outlook, privacy and amenity; provide access to greens and open spaces; prevent or mitigate the impacts of noise and poor air quality; create usable environments and spaces; respond to existing character of a place; be of a high quality, with architecture that pays attention to detail; and aim for high sustainability standards.
- D4: Delivering Good Design – Advocates the delivery of good design

- D14: Noise – Policy D14 requires development to avoid significant adverse noise impacts to pressure health and quality of life.
- E2: Providing Suitable Business Space – Policy E2 supports the provision of a range of B8 uses to meet the needs of micro, small, and medium-sized enterprises (SMEs). It requires that business space is designed and delivered to be fit for purpose, having regard to the intended type and use of the space.
- E4: Land for Industry, logistics and Services to Support London’s Economic Function – Policy E4 seeks to ensure the provision and retention of a sufficient supply of land and premises to meet both current and future demand for industrial and related uses. This includes, inter alia, storage and logistics/distribution uses (Use Class B8), as well as the delivery of affordable industrial and related workspace suitable for micro, small and medium-sized enterprises (SMEs).
- E7: Industrial Intensification, Co-Location and Substitution – Development proposals should be proactive and encourage the intensification of business uses in Use Classes B1c, B2 and B8.
- G1: Green Infrastructure – Policy G1 requires development proposals should incorporate appropriate elements of green infrastructure that are integrated into London’s wider green infrastructure network.
- G2: London’s Green Belt – Policy G2 notes that the Green belt Should be protected from inappropriate development, and that development proposals that would harm the Green Belt should be refused except where very special circumstances exist. The Policy notes that development in the Green Belt is subject to national planning policy tests.
- G5: Urban Greening – Policy G5 requires that development proposals contribute to the greening of London by incorporating urban greening as a fundamental element of site and building design. This includes measures such as high-quality landscaping (including trees), green roofs, green walls, and nature-based sustainable drainage systems.
- G6: Biodiversity and Access to nature – Policy G6 requires development proposals to manage impacts on biodiversity and aim to secure net biodiversity gain.
- G7: Trees and Woodlands – Policy G7 requires development proposals to ensure that existing trees of value are retained, wherever possible.
- SI1: Improving Air Quality - Policy SI1 seeks to improve air quality. It requires developments to be at least Air Quality Neutral and to use design solutions to prevent or minimise increased exposure to existing air pollution.
- SI2: – Minimising Greenhouse Gas Emissions – Policy SI2 requires that major developments achieve net zero-carbon standards. This involves reducing greenhouse gas emissions during operation and minimising both annual and peak energy demand, following the principles set out in the energy hierarchy.
- SI12: Flood Risk Management – Policy SI12 requires development proposals to minimise and mitigate flood risk, and ensure that any residual risk is properly addressed.
- SI13: Sustainable Drainage - Policy SI13 requires that development proposals incorporate sustainable drainage systems (SuDS) to manage surface water runoff. Proposals should aim to reduce flood risk, improve water quality, enhance biodiversity, and provide amenity and green infrastructure benefits wherever possible.
- T3: Transport Capacity, Connectivity and Safeguarding – Policy T3 requires that development proposals support and enhance transport capacity and connectivity. Proposals should ensure that new

development is well integrated with existing transport networks and that transport infrastructure is safeguarded to meet current and future needs.

- T4: Assessing and Mitigating Transport Impacts – Policy T4 requires development proposals to assess their potential transport impacts and to incorporate measures to avoid, reduce, or mitigate adverse effects. This includes ensuring that proposals support safe, efficient, and sustainable movement for all users, including pedestrians, cyclists, and public transport passengers.
- T5: Cycling – Policy T5 requires development proposals to support and promote cycling as a safe, convenient, and attractive mode of transport. This includes providing appropriate cycling infrastructure, secure cycle parking, and connections to existing and planned cycle networks
- T6: Car parking – Policy T6 requires development proposals to provide car parking that is appropriate to the site’s context and local accessibility. Proposals should balance the need for parking with wider objectives, including promoting sustainable travel, reducing congestion, and supporting safe and efficient movement for all users.

### Hillingdon Local Plan Part 1: Strategic Policies (2020)

4.30 The Hillingdon Local Plan: Part 1- Strategic Policies, is the key strategic planning document for the Borough and sets out the long-term vision and objectives for the Hillingdon.

4.31 The policies relevant to the application proposals include:

- Policy NPPF1: National Planning Policy Framework, Presumption in Favour of Sustainable Development – Policy NPPF1 applies a presumption in favour of sustainable development and confirms that, when considering development proposals, the Council will take a positive approach that reflects the presumption in favour of sustainable development contained within the National Planning Policy Framework.
- Policy E2: Location of Employment Growth – Policy E2 seeks to support economic development by accommodating approximately 9,000 new jobs over the plan period, directing employment growth to appropriate and sustainable locations within the Borough.
- Policy E6: Small and Medium-Sized Enterprises (SME) – Policy E6 encourages the development of affordable accommodation for small and medium-sized business in appropriate sustainable locations throughout the borough.
- Policy BE1: Built Environment – Policy BE1 seeks to ensure that all development achieves a high quality of design that responds positively to the local context. Proposals should contribute to a strong sense of place, enhance the character and appearance of the area, and incorporate principles of inclusive design, sustainability, and climate resilience.
- Policy EM1: Climate Change Adaptation and Mitigation – Policy EM1 seeks to ensure that development addresses the challenges of climate change by incorporating measures to reduce carbon emissions and improve resilience. Proposals should promote energy efficiency, the use of renewable energy, and sustainable design and construction, while also adapting to the potential impacts of climate change, including flood risk.
- Policy EM2: Green Belt – Policy EM2 states that any proposals for development in Green Belt and Metropolitan Open Land will be assessed against national and London Plan policies, including the very special circumstances test.

- Policy EM6: Flood Risk Management – Policy EM6 seeks to ensure that flood risk is appropriately managed in the Borough. Development proposals should avoid areas at highest risk of flooding and incorporate suitable mitigation measures to reduce risk, including the use of sustainable drainage systems (SuDS).
- Policy EM7: Biodiversity and Geological Conservation – Policy EM7 seeks to preserve and enhance Hillingdon's biodiversity and geological conservation.
- Policy EM8: Land, Water, Air and Noise – Policy EM8 seeks to ensure that development does not have an unacceptable impact on land, water, air quality, or noise levels. Proposals should prevent contamination, safeguard water resources, minimise air pollution, and control noise, while incorporating measures to improve environmental quality wherever possible.

## Hillingdon Local Plan Part 2: Development Management Policies (2020)

4.32 The Development Management Policies document provides detailed policies that form the basis of the Council's decisions on individual planning applications in relation to the economy; town centres; new homes; the historic and built environment; environmental protection and enhancement; community infrastructure; and transport and aviation

4.33 The policies relevant to the application proposals include:

- DME 2: Employment Uses Outside of Designated Sites – Policy DME 2 relates primarily to the loss of employment land; however, the supporting text to the policy notes that non-designated employment sites operate without harm to local amenity and offer real benefits to the local economy.
- DMHB 11: Design of New Development – Policy DMHB 11 sets out the overarching design requirements for new development within the Borough. It requires all development to be designed to the highest standards and, incorporate principles of good design. In particular it requires development to harmonise with the local context. It also seeks to preserve the amenity, daylight and sunlight of adjacent properties and open space.
- DMHB 14: Trees and Landscaping – Policy DMHB 14 requires all development proposals to provide hard and soft landscaping appropriate to the character of the area, which supports and enhances biodiversity and amenity.
- DMEI 4: Development in the Green Belt or on Metropolitan Open Land – Policy DMEI 4 confirms that inappropriate development in the Green Belt will not be permitted unless there are very special circumstances. It continues to note 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.
- DMEI 7: Biodiversity Protection and Enhancement - Policy DMEI 7 requires the design and layout of new development to retain and enhance any existing features of biodiversity or geological value within the site.
- DMEI 9: Management of Flood Risk – Policy DMEI 9 Emphasises that development must avoid and reduce the risk of flooding.
- DMEI 10: Water Management, Efficiency and Quality – Policy DMEI10 seeks to ensure suitable sustainable urban drainage systems are utilised in accordance with the London Plan sustainable drainage hierarchy.

- DMEI 14: Air Quality – The policy indicates that all proposals should demonstrate appropriate reductions in emissions to contribute towards meeting national air quality objectives. It also requires development to be, as a minimum, carbon neutral and contribute towards the improvement of air quality.
- DMT 1: Managing Transport Impacts – Policy DMT 1 requires development proposals to meet the transport needs of the development and address its transport impacts in a sustainable manner. The policy emphasises the importance of sustainable, safe and equal access
- DMT 2: Highways Impacts - Policy DMT 2 set out the general requirements in relation to highway impacts. The policy indicates the development must ensure that they provide safe and efficient vehicular access; do not contribute to a deterioration of air quality, noise or local amenity; accommodate safe, secure and convenient access and facilities for cyclists and pedestrians; minimise congestion; and comprise suitable mitigation measures to address any traffic impacts.
- DMT 6: Vehicle Parking - Policy DMT6 sets out the parking standards for development.

#### **Hillingdon Local Plan Part 2: Site Allocations and Designations (2020)**

4.34 The application site is not allocated with the Site Allocations and Designations Plan.

## 5. Planning Considerations

5.1 Having set the planning context against which the proposals should be judged in the preceding section, we now consider the proposals against that guidance, alongside any other relevant considerations. We do so under a number of headings below.

### Principle of Development – Grey Belt Case

5.2 The principal issue for consideration is whether the proposed development constitutes (in)appropriate development within the Green Belt.

5.3 London Plan Policy G2 and Local Plan Policy EM2 both reinforce that the Green Belt should be protected from inappropriate development. Accordingly, development proposals must be assessed against national policy, having regard to the tests set out in the National Planning Policy Framework (NPPF).

5.4 Paragraph 142 of the NPPF notes that the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open.

5.5 Paragraph 154 states that the construction of new buildings should be regarded as inappropriate in the Green Belt. It does, however, set out a number of exceptions, including: buildings for agriculture and forestry; the provision of appropriate facilities, including buildings, for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotment; the extension or alteration of a building; the replacement of a building; limited infilling in villages; limited affordable housing for local community needs; the complete or partial redevelopment of brownfield land; and other forms of development provided they preserve its openness and do not conflict with the purposes of including land within it.

5.6 Paragraph 155 goes on to state:

*“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.”*

5.7 As demonstrated below, save for criterion d), which is not applicable to commercial development, the appeal proposals satisfy each of these requirements. Indeed the site falls squarely within the definition of Grey Belt land, occupies a sustainable location and delivers much needed employment/commercial land, for which there is an identified local need.

5.8 Accordingly, the proposed development should not be regarded as inappropriate development in the Green Belt and is, therefore, acceptable in principle.

5.9 We provide an assessment against each criterion of Paragraph 155 below.

### Criterion a) – Grey Belt Land and the Purposes of the Green Belt

5.10 The Glossary to the NPPF defines Grey Belt Land as follows:

*“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.”*

5.11 Whilst the application site does not comprise previously developed land, it does not make a strong contribution to purposes (a), (b), or (d) of the Green Belt, as set out in paragraph 143 of the NPPF. In this context, the site is considered to meet the definition of Grey Belt land.

5.12 In short, the site forms part of an established mixed-use location which functions as a non-designated employment area and has evolved organically over the past 20–30 years. Commercial and light industrial uses have been present in the locality for a sustained period of time, contributing to its established character and function. The proposed development is entirely consistent with the prevailing pattern of land uses in the immediate area.

5.13 We now consider each purpose in turn, having particular regard to the guidance contained within Paragraph: 005 Reference ID: 64-005-20250225 of the National Planning Practice Guidance (PPG) – *“How should the contribution land makes to the relevant Green Belt purposes be assessed?”*

**Purpose (a) - To check the unrestricted sprawl of large built-up areas**

5.14 The site is both visually and spatially contained, positioned between commercial uses of a comparable nature, and effectively constitutes an infill location within an established Grey Belt context.

5.15 Mayfields Lake provides a strong and defensible boundary to the west, forming a clear edge to the developed area, while The Common and the River Colne beyond form a defined edge to the east. These features maintain suitable separation from the open countryside and neighbouring settlements. As such, development of the site would not result in encroachment into the open countryside but would instead represent logical infill development, fully consistent with the established pattern and character of the surrounding area.

5.16 Beyond the site, the wider pattern of development is influenced and contained by strategic transport infrastructure, including the M25 to the west and M4 to the south, i.e. the Thorney Interchange.

5.17 In this context, the application site cannot be said to play a meaningful role in checking the unrestricted sprawl of large built-up areas and does not, therefore, strongly contribute to Green Belt purpose (a).

**Purpose (b) – To prevent neighbouring towns merging into one another**

5.18 The PPG is clear that this purpose relates to the merging of towns, not villages. Whilst West Drayton is identified as a suburban town, the nearest neighbouring settlements comprise smaller village clusters, including Iver, Thorney, and Richings Park. Accordingly, the development of the site would not result in the merging of two or more towns, in any way.

5.19 Furthermore, having regard to the infill nature of the site (see purpose [a]), the proposed development would not extend the built form into open areas or reduce the separation between settlements.

5.20 As such, the proposed development would have no material effect on the coalescence of settlements and does not contribute to Green Belt purpose (b).

**Purpose (d) – to preserve the setting and special character of historic towns**

- 5.21 Whist West Drayton is an historic town, the application site is located to the south-west of the town centre and does not form part of its setting. The site has no meaningful visual, physical, or experiential relationship with the historic core or its heritage assets.
- 5.22 As such, the proposed development would not affect the setting or special character of West Drayton and does not contribute to Green Belt purpose (d).

#### *The Application of Footnote 7*

- 5.23 As defined in the NPPF, Grey Belt excludes land where the application of policies relating to the areas or assets in Footnote 7 to the NPPF (other than Green Belt) would provide a strong reason for refusing or restricting development.
- 5.24 In considering the application of Footnote 7, it is noted that the site is not located within, nor does it form part of, any of the following designations:
- Habitats sites (including those listed in paragraph 194 of the NPPF) or Sites of Special Scientific Interest;
  - Local Green Space;
  - National Landscapes (Areas of Outstanding Natural Beauty);
  - National Parks (or land within the Broads Authority) or designated Heritage Coast;
  - Irreplaceable habitats; or
  - Designated heritage assets (or other heritage assets of archaeological interest).
- 5.25 Whilst the site lies within an area at risk of flooding, this matter is addressed separately within this Statement and does not preclude the principle of the proposed development.
- 5.26 On the contrary, the proposals include the regrading of the site to facilitate improved drainage and increased floodwater storage capacity. Furthermore, the use of the site for car parking is considered a less vulnerable form of development and is therefore appropriate in this location.

#### *Summary on Grey Belt Definition*

- 5.27 Based on the above information the site does not strongly contribute to purposes (a), (b), or (d) of the Green Belt. Furthermore, there no policies referenced within Footnote 7 that would provide a clear or strong reason for refusing or restricting the proposed development.
- 5.28 Accordingly the application site falls squarely within the definition of 'Grey Belt' land as set out in the NPPF.

#### *Purposes of the Remaining Green Belt*

- 5.29 Having regard to the infill nature of the application site and its contained position within an established mixed-use area, the proposed development would not undermine the purposes of the remaining Green Belt.
- 5.30 As set out above, the site does not make a meaningful contribution to Green Belt purposes (a), (b), or (d). In respect of purpose (c), the site is visually and spatially contained and its development would not result in encroachment into the countryside.
- 5.31 In relation to purpose (e), the proposed use of the site for the storage of vehicles would not undermine the regeneration of previously developed land. The proposal reflects the established pattern of development within the locality and does not prejudice the delivery or reuse of brownfield sites elsewhere.

### Summary on Criterion a)

- 5.32 Accordingly, the appeal proposals would utilise Grey Belt land without fundamentally undermining the purposes of the remaining Green Belt in the area.
- 5.33 The proposals, therefore, comply with criterion a) of paragraph 155 of the NPPF.

### **Criterion b) – Unmet Employment Need**

- 5.34 Criterion b) of paragraph 155 of the NPPF requires there to be a demonstrable unmet need for the type of development proposed.
- 5.35 In this instance, the application seeks planning permission for the regularisation of the use of the site for car storage, ancillary to an off-site vehicular sales dealership. The development therefore relates to the provision of employment land within the industrial storage/distribution (B8) and wider sui generis sector.
- 5.36 For the reasons set out below, we contend that there is a demonstrable need for this type of use within the Borough.

### Overall Employment Land Need in Hillingdon

- 5.37 The Hillingdon Employment Land and Capacity Study (2023) identifies a substantial and growing requirement for industrial and warehousing floorspace across the Borough. The preferred growth scenario forecasts a need for between +263,845 and +322,930 sqm of additional employment floorspace by 2038, including +42,577 to +45,283 sqm of general industrial (B2/E(g)(iii)) and +125,437 to +147,304 sqm of warehousing (B8).
- 5.38 These figures reflect strong structural demand and confirm that the Borough's existing supply, together with its development pipeline, is insufficient to meet projected employment growth over the plan period. The Study also highlights that the industrial land market in Hillingdon is operating under significant pressure, necessitating both the protection of existing sites and the provision of new opportunities capable of accommodating a range of employment-generating uses.

### Need for Lower-Value and Sui Generis Industrial Uses and Pressures Created by Heathrow Corridor

- 5.39 In addition to traditional B-Class activities, the Study recognises the important role of sui generis industrial uses, including vehicle-related activities such as motor vehicle storage and associated operations. These uses form a legitimate component of the Borough's employment land portfolio and are appropriate within industrial and employment-focused locations.
- 5.40 The Study identifies particular pressure on land-extensive, lower-value activities, which are unable to compete economically with higher-value uses such as logistics and data centres. Industrial rental values have also increased significantly (by approximately 51% over the past decade), whilst vacancy rates remain low (circa 5%), both of which are clear indicators of capacity constraints. As a result, businesses requiring large areas of open or flexible space, such as the vehicle storage operations as proposed, face increasing difficulty in securing accommodation within designated employment areas.
- 5.41 Added to this, Hillingdon's industrial market is heavily influenced by the Heathrow economic corridor, which generates substantial demand for warehousing, logistics, and aviation-related uses. Demand from freight operators, last-mile distribution, and airport-linked businesses creates intense competition for industrial land. The Study confirms that Heathrow-related activities dominate take-up and exert upward pressure on land values, contributing to the displacement of more traditional and lower-value employment uses.

- 5.42 This pressure is further heightened by the expansion of data centres within the Borough. These uses further intensify demand for industrial land and contribute to the erosion of affordable space for SMEs and specialist operators.
- 5.43 Collectively, these factors mean that uses such as vehicle storage, are increasingly unable to operate within prime industrial locations and must instead be accommodated on more flexible and lower-value sites.

#### Summary of Need

- 5.44 The evidence demonstrates that Hillingdon faces a borough-wide shortfall in industrial and warehousing land, alongside significant pressure on high-value employment plots, particularly within the Heathrow corridor where logistics operators and data centre providers are driving up land values and constraining supply. This has resulted in the displacement of lower-value, land-extensive sui generis uses, which are increasingly unable to compete for space in the borough's core industrial areas. This includes vehicle storage activities, such as those proposed through this application which, despite forming an important operational component of the wider employment land supply, are particularly vulnerable to being priced out of high-demand locations.
- 5.45 The application proposals directly contribute to meeting the identified need for sui generis industrial uses and, therefore, accord with criterion b) of paragraph 155.

#### **Criterion c) – Site Sustainability and Appropriate Location in the Grey Belt**

- 5.46 Criterion (c) of paragraph 155 of the NPPF requires development to be located in a sustainable location, with particular reference to paragraphs 110 and 115 of the NPPF.
- 5.47 Paragraph 110 confirms that the planning system should actively manage patterns of growth in support of sustainable transport objectives. Significant development should be focused on locations which are, or can be made, sustainable through limiting the need to travel and offering a genuine choice of transport modes. It also recognises that opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and that this should be reflected in decision-making.
- 5.48 Paragraph 115 requires that, in determining applications, sustainable transport modes are prioritised having regard to the type of development and its location; that safe and suitable access can be achieved for all users; and that any significant impacts on the transport network can be mitigated to an acceptable degree.
- 5.49 The application site forms part of an established, non-designated employment area 'Mayfield Lakes' which has evolved organically over time and accommodates a range of comparable commercial, light industrial, and sui generis uses. In this context, the site represents an appropriate, sustainable and established location for employment-generating activity, and it would not be reasonable to reach an alternative conclusion given the character and function of the area.
- 5.50 Furthermore, as set out in the above needs assessment, there is intense competition for space within Strategic Industrial Locations (SILs), Locally Significant Industrial Sites (LSISs), and Heathrow corridor industrial areas. The evidence demonstrates that lower-value and land-extensive uses are increasingly being displaced from these locations. In this context, locating the use within the Grey Belt avoids competition with higher-value employment uses, whilst ensuring that an established and employment-generating activity continues to function within the Borough.
- 5.51 With specific regard to paragraphs 110 and 115 of the NPPF, the application is supported by a Transport Statement prepared by AVAL, which considers the accessibility of the site and the potential transport impacts arising from the proposed development.

- 5.52 The assessment confirms that the site benefits from an established vehicular access and will operate at a low intensity, with movements primarily associated with vehicle delivery. The removal of on-site sales and servicing activities will reduce trip generation when compared to the existing unauthorised use. The development will not give rise to any severe cumulative impacts on the local highway network.
- 5.53 Safe and suitable access can be achieved for all users, and the scale and nature of the proposed use are such that opportunities for sustainable transport can be supported through the provision of cycle parking and EV charging.
- 5.54 Accordingly, the site represents a sustainable and appropriate location for the proposed development, having regard to its established employment function, its role within the wider land supply context, and its compliance with the transport objectives set out in the NPPF.

#### **Criterion d) – Golden Rules**

- 5.55 Criterion (d) of paragraph 155 requires, where applicable, that development meets the ‘Golden Rules’ set out in paragraphs 156–157 of the NPPF.
- 5.56 Paragraphs 156–157 relate specifically to residential development within the Green Belt and establish requirements concerning affordable housing provision, necessary improvements to local infrastructure, and the provision of accessible green space.
- 5.57 The application proposals comprise sui generis industrial uses and associated operational development. They do not involve residential development and therefore do not engage the ‘Golden Rules’.
- 5.58 As such, Criterion (d) is not applicable to this application.

#### **Summary of paragraph 155 – Grey Belt Case**

- 5.59 Taking the above into account, it has been demonstrated that the application proposals relate to the development of a Grey Belt site located within an established non-designated employment area. The site represents an infill location, contained by existing commercial and comparable land uses, and does not contribute meaningfully to the purposes of the Green Belt. The proposals are consistent with the prevailing pattern of development and respond to an identified need for land-extensive, sui generis commercial uses which play an important role in supporting local employment and the wider economy
- 5.60 The proposals therefore comply with paragraph 155 of the NPPF and should not be regarded as inappropriate development within the Green Belt. As such, the principle of development is acceptable.

#### **Principle of Development – Economic Benefits**

- 5.61 The proposed vehicle storage use forms an essential ancillary function to an established off-site car dealership and is inherently employment-generating. Its operational characteristics mean that it cannot viably be accommodated within higher-density industrial estates or modern warehouse stock. The Council’s Employment Land and Capacity Study recognises that such land-extensive, lower-value uses form an important part of the wider industrial land supply and require appropriate sites to operate effectively, particularly in the context of acute land supply pressures across the Borough.
- 5.62 By locating this activity at this location, the proposal ensures that higher-value industrial land can be reserved for uses that require it, whilst enabling an SME operation to continue functioning within Hillingdon, wholly in accordance with Policy E6.

- 5.63 Indeed, the proposals, represent a logical and organic expansion of an established non-designated employment area and reflects the way in which the surrounding locality has evolved over time to accommodate a range of commercial and industrial uses.
- 5.64 The proposals will support employment through the provision of on-site jobs, whilst also sustaining a wider business operation and associated supply chain linked to the off-site dealership. In doing so, the development will contribute positively to the local economy.
- 5.65 Paragraph 85 of the NPPF places significant weight on the need to support economic growth and productivity, including by creating the conditions in which businesses can invest, expand, and adapt. Paragraph 86 further requires planning decisions to facilitate development that meets the needs of the modern economy. The proposed development directly aligns with these objectives.
- 5.66 At the strategic level, the London Plan seeks to conserve and enhance London’s global economic competitiveness, including through the support of a diverse range of employment activities. At the local level, Policy E6 supports SMEs by ensuring the availability of a range of flexible and affordable accommodation types, whilst Policy DME 2 recognises that non-designated employment sites can provide real benefits to the local economy.
- 5.67 In this context, the proposal delivers clear economic benefits. It supports an existing business, contributes to local employment, and ensures that an appropriate site is available for a form of development that is demonstrably needed but increasingly difficult to accommodate within designated employment areas. These benefits should be afforded significant weight in the overall planning balance.

### **Principle of Development – Retention of Dwelling**

- 5.68 The proposals include the retention of the existing dwelling, together with associated works to reinstate a clearly defined domestic curtilage.
- 5.69 Given that the lawful use of the property falls within Use Class C3 (Dwellinghouse), there can be no in-principle objection to its continued use as a residential property.
- 5.70 Furthermore, the dwelling forms part of an established mixed-use environment, where residential and employment uses coexist without conflict. The retention of the dwelling is therefore consistent with the character of the area.
- 5.71 Historically, the domestic curtilage associated with the property extended into areas now characterised by surrounding commercial and employment uses. In this context, the reinstatement of a more proportionate and clearly defined domestic curtilage represents a balanced approach, reflecting the evolved mixed-use character of the locality. The proposed arrangement ensures that the dwelling retains an appropriate level of private amenity space, whilst responding to the prevailing land use pattern. This approach is also consistent with the form and arrangement of neighbouring properties within the immediate area.
- 5.72 The quality of accommodation and amenity impacts of the development upon the dwelling are discussed further below.

### **Evolution of the Area and Land Use Context**

- 5.73 Over time, the surrounding area has evolved from a predominantly residential context to a mixed-use environment, with a range of commercial, light industrial, and sui generis uses now firmly established. This pattern of development has been facilitated through the granting of planning permissions and the continued operation of longstanding uses on neighbouring sites.

- 5.74 As a result, the character of the immediate locality has materially changed, such that the application site no longer sits within a purely residential setting. Instead, it forms part of a wider commercial and employment-focused cluster.
- 5.75 In this context, the continued use of the site solely for residential purposes would be out of keeping with its surroundings. The introduction and formalisation of a compatible commercial use, alongside the retention of the dwelling, represents a logical and pragmatic response to the prevailing land use pattern.
- 5.76 The proposed mixed-use arrangement reflects the established character of the area and ensures that the site can function effectively within its context, without giving rise to land use conflict.

### **Design, Visual Impact and Site Greening (Operational Works)**

- 5.77 The application proposals include a series of operational works which seek to significantly improve the visual appearance, functionality, and environmental quality of the site, particularly when compared to the existing arrangement.
- 5.78 At present, the site is characterised by an ad hoc and unstructured layout, including the siting of containers, structures, and areas of hardstanding. The proposed development seeks to rationalise and formalise this arrangement through a coordinated and well-defined layout.
- 5.79 The proposals include the removal of surplus structures, including existing containers and former servicing-related buildings. This will reduce visual clutter and enhance the overall appearance of the site. Only a single portacabin will be retained to provide ancillary office accommodation in connection with the proposed use.
- 5.80 The internal layout will be amended to incorporate a formal parking and vehicle storage arrangement with internal access routes and turning areas. This results in a more efficient, organised and legible use of the site.
- 5.81 New palisade fencing will provide a consistent and secure boundary to the site while allowing for the free flow of surface water. This will be supplemented by substantial tree and shrub planting around the perimeter, which will soften the visual impact of the development and enhance its integration with the surrounding area. In addition, the proposals incorporate native scrub planting along the frontage (eastern boundary), together with an ecological buffer zone along the western boundary. Collectively, these measures will deliver biodiversity enhancements and contribute positively to urban greening.
- 5.82 Whilst it is acknowledged that the proposed development will have an urbanising effect, the proposals deliver a coherent form of development which responds appropriately to the character of the surrounding area. The proposed use of the site for car storage is wholly consistent with the established character of the immediate locality, which is defined by a mix of commercial, light industrial, and sui generis uses. The development will therefore integrate appropriately within its context and will not appear out of keeping with neighbouring land uses.
- 5.83 Overall, the proposals will deliver a well-defined, organised, and visually enhanced site layout, representing a significant improvement over the existing informal and unauthorised arrangement.
- 5.84 Accordingly, the proposals are consistent with Policies DMHB 11 and BE1, which require development proposals to harmonise with the local context and prevailing character of the area.

### **Residential Standards**

- 5.85 The proposals include the reinstatement of a clearly defined domestic curtilage, incorporating a traditional rear garden area. The dwelling and its curtilage will be physically and functionally separated from the adjacent commercial use, ensuring a clear distinction between the two. The proposed rear garden is of a

generous size and is entirely appropriate for a dwelling of this scale, while also contributing positively to the greening of the site.

5.86 The provision of a defined garden area, together with the low-intensity nature of the proposed commercial use, ensures that an acceptable standard of residential amenity is maintained. The proposed use is less intensive than the previous unauthorised activities, with no public access and controlled hours of operation. As set out in the technical assessments below, the proposals are acceptable in respect of noise and air quality and will not give rise to adverse impacts on the residential environment.

### **Transport Considerations**

5.87 The application proposals seek to formalise the vehicle parking arrangements and internal circulation within the site, including the provision of adequate turning space. The cessation of vehicle sales and servicing activities, together with the removal of any HGV-related operations, will significantly reduce the overall intensity of the use and associated vehicle movements.

5.88 The proposals also include the provision of dedicated cycle parking and electric vehicle (EV) charging infrastructure, supporting more sustainable modes of transport and aligning with policy objectives.

5.89 The application is supported by a Transport Statement, prepared by AVAL, which considers existing conditions, access arrangements, parking and cycle parking provision, servicing, waste management, and trip generation.

5.90 The assessment confirms the following:

- The proposed development represents a low intensity commercial use that generates a modest level of daily vehicle activity.
- Given the operational characteristics of the site, particularly the absence of customer sales activity and the absence of any car servicing/garage car repair like work and the low number of staff, the development will not result in any material impact on the operation or capacity of the surrounding highway network.
- Operational servicing demands are minimal, with a maximum of two HGVs per week, including a small car loader, according to the Applicant. HGV movements are not a daily activity. These movements can be safely accommodated via the existing access from The Common, which will have new gates.
- All vehicle trips associated with the site will utilise Cricketfield Road and Mill Road, which are existing established access routes serving the site and surrounding commercial uses. There is no evidence of recorded road safety issues or accidents associated with these routes, and the proposals are not expected to give rise to any adverse highway safety impacts.
- The Vehicle swept path assessment in Appendix C further demonstrate that all operational vehicles (low car loader vehicle, rigid truck, refuse vehicle and a large car) can enter, manoeuvre, and exit the site without conflict or reliance on the public highway. The existing access arrangements are therefore suitable and require no modification.
- Large cars can access the different parking spaces in the new parking layout on the site.
- Staff parking has been formalised to meet local policy requirements, providing three dedicated bays including disabled and EV charging provision. This ensures that all staff parking demand is contained within the site, eliminating the potential for overspill onto The Common. A visitor space is also provided.

- Cycle parking has also been included at a proportionate level (5 cycle parking spaces are provided), supporting active travel while reflecting the low workforce number and the industrial nature of the site.
- The introduction of a clearly defined waste storage area further improves site management and demonstrates compliance with Hillingdon’s commercial waste expectations. The provision of a fenced bin enclosure to accommodate two Euro bins is provided to ensure that waste can be stored safely on site, with flexibility for collection by a licensed contractor in the future.
- Pedestrian access remains safe and level, and public transport services located within reasonable distance ensure continued accessibility for staff and contractors.

5.91 Taking the above into consideration, the Transport Statement concludes:

*“The proposed development is acceptable in transport and highways terms, and there are no transport related reasons why the planning application should not be supported.”*

5.92 Based on this information the proposals do not lead to any transportation issue and do not conflict with paragraph 115 of the NPPF.

## **Environmental Considerations**

### **Flooding and Drainage**

#### Flood Risk

5.93 It is acknowledged that the River Colne passes approximately 8m to the east of the site, with Mayfields Lake forming the western boundary and Bigley Ditch located beyond. The Environment Agency’s Flood Map for Planning confirms that the site lies within Flood Zones 2 and 3 and is therefore at risk of fluvial flooding.

5.94 The site’s former use as a standalone residential dwelling constitutes “more vulnerable” development in flood risk terms. The proposed vehicle storage use falls within the “less vulnerable” classification. As such, the development results in a mixed vulnerability scenario, with a reduction in overall vulnerability when compared to the former wholly residential use.

5.95 It is noted that recent site works, including clearance and the introduction of hardstanding, have locally altered ground levels. However, the application proposals include a comprehensive regrading of the site to ensure that appropriate floodplain storage capacity is maintained and that there is no increase in flood risk elsewhere.

5.96 Similarly, existing boundary treatments do not allow for the free flow of surface water. The proposals therefore include the replacement of these barriers with permeable palisade fencing, together with associated planting, to facilitate the unobstructed movement of floodwater across the site.

5.97 In accordance with national planning policy, the application is supported by a site-specific Flood Risk Assessment (FRA) and Surface Water Drainage Strategy, prepared by Nicola Sugg, which assesses the existing and proposed conditions and sets out appropriate mitigation measures.

5.98 Whilst the Flood Risk Assessment should be read in full alongside this Planning Statement, it draws the following conclusions and sets out a series of recommendations:

- The development is limited to a change of use, with no new built development proposed; as such, the Sequential and Exception Tests are not required;
- A review of all potential sources of flooding has been undertaken, informed by Environment Agency modelled data for the River Colne;

- The 2012 Lower Colne Modelling and Mapping Study confirms that the majority of the site is at high risk of fluvial flooding (>1.0% AEP) and does not benefit from formal flood defences;
- During the design flood event (1.0% AEP plus climate change), flooding is predicted across much of the site, with a peak flood level of 24.09mAOD and relatively shallow flood depths generally less than 300mm.

5.99 In recognition of the flood risks affecting the site, the FRA recommends a series of mitigation measures including:

- Reinstatement of original ground levels, where necessary, with the use of appropriate permeable surfacing to maintain floodplain capacity and avoid displacement of floodwater;
- Replacement of existing solid boundary treatments with open fencing (e.g. palisade) to prevent obstruction of overland flow routes;
- Incorporation of flood-resilient construction measures to the existing dwelling up to 24.39mAOD (300mm above the design flood level);
- Registration with the Environment Agency's Flood Warning Service and preparation of a Flood Warning and Evacuation Plan;
- Secure storage of any potential contaminants (e.g. fuels and oils) above 24.39mAOD to minimise pollution risk during flood events;
- Review of the 8m easement from the River Colne and, where necessary, obtaining a Flood Risk Activity Permit for any works within this zone.

5.100 The recommendations are agreeable and the development will be carried out in full accordance with the mitigation measures.

#### Drainage and Water Quality

5.101 The development proposals are primarily limited to a change of use, with no significant increase in built form.

5.102 Notwithstanding this, the proposals incorporate a range of measures to support sustainable drainage and to preserve water quality. These include:

5.103 Roof water (from existing dwelling) will, where possible, be directed to rainwater butts or tanks for reuse on site, including for grounds maintenance;

5.104 All external areas will be finished with permeable surfacing. Existing hardcore will be removed and re-levelled to original levels, with a permeable system (e.g. cellular paving with gravel infill) to allow water to soak into the ground and prevent increased runoff;

5.105 Fuels, oils and other potential contaminants will be stored and disposed of in accordance with relevant regulations.

#### Summary

5.106 In recognition of the above the FRA and Drainage Strategy confirms that:

*“with the proposed mitigation, the use of land at Willowdene, for vehicle storage, is appropriate and sustainable with regards to flood risk and will not have drainage implications.”*

## Ecology and BNG

### Habitats and Protected Species

5.107 The application is supported by a Preliminary Ecological Appraisal (PEA) prepared by Brooks Ecology, this assesses habitat features on site, the likelihood of protected species being present, and recommends ecological improvement opportunities.

5.108 The PEA comments as follows:

*“The Site is now almost entirely occupied by gravel hard standing supporting minimal vegetation. A single very large oak has been retained to the front of the site, while a standing monolith (c.3.5m) of indeterminate species is retained on the southern boundary. The Site is now found to be of **very limited ecological value...**”*

5.109 Given the part retrospective nature of the works, the appraisal does not recommend any further survey work for protected species including Amphibians; Bats; Birds; Badgers; Hedgehogs; Riparian Mammals; and Reptiles.

5.110 Nevertheless, to deliver ecological enhancement/readdress ecological features which have been lost through the works, the Appraisal recommends the following measures:

- Provision of bands of native scrub and/or tree planting around the site.
- Provision of bird and bat boxes.

5.111 In accordance with these recommendations, the proposals include substantial tree, hedgerow, and shrub planting around the perimeter of the site, together with the provision of a 3m ecological buffer strip along the eastern and western boundaries. These measures will provide habitat, foraging opportunities, and shelter for local wildlife, as well as facilitating movement through and around the site. In addition, bird and bat boxes will be installed in accordance with the recommendations of the supporting ecological assessment.

### Biodiversity

5.112 The National Planning Policy Framework (NPPF) states that local planning authorities (LPAs) in England should identify and pursue opportunities for securing measurable net gains for biodiversity. The Environment Bill has seen the introduction of a mandatory 10% BNG on most new build developments.

5.113 In this instance it is accepted that the site has been subject to almost complete clearance against the pre-development baseline.

5.114 The application is supported by a Biodiversity Net Gain Assessment, which acknowledges that the works have resulted overall net loss of 1.28 Habitat Units and no change in watercourse units. To achieve the mandatory 10% net gain requirement 1.63 units will need to be secured.

5.115 Notwithstanding efforts to address the loss of habitat through the introduction of ecology buffers, scrub and extensive perimeter planting, it is accepted that biodiversity net gain cannot be achieved onsite; accordingly the units will need to be secured through offsetting, with offsite land Registered with Natural England.

5.116 Our client is agreeable to this approach and would agree to securing this through a legal agreement.

## Noise Impact of the Development

5.117 The application is supported by a Noise Impact Assessment (NIA), prepared by NoiseAir, which is informed by a noise survey of the existing operations on site. It should, however, be noted that the noise environment

is expected to improve as a result of the proposals, particularly following the cessation of vehicle sales and servicing activities, which are typically more intensive in nature.

5.118 The NIA, draws the following conclusions:

- *The predominant noise is considered to be from the general manoeuvring of vehicles around the development site; however it is considered that this is generally focussed within the centre third of the site and also noise emissions from the car store where general vehicle servicing activities take place.*
- *A noise survey has been conducted to characterise and quantify the noise levels emissions from the development site at the nearest noise sensitive receptors.*
- *A BS 4142:2014+A1:2019 assessment has been conducted with respect to the identified noise sources and noise emissions from the development site. Given all elements it is considered that during the daytime the specific noise source is likely to present as a low impact.*

5.119 Accordingly, it is concluded that the proposed development would not give rise to unacceptable noise impacts and is compliant with relevant national, regional, and local planning policy.

### Air Quality

5.120 The NPPF seeks to prevent new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by unacceptable levels of air pollution.

5.121 London Plan Policy SI 1 seeks to improve air quality. It requires developments to be at least Air Quality Neutral and to use design solutions to prevent or minimise increased exposure to existing air pollution. All, major development proposals must also be supported by an Air Quality Assessment.

5.122 In accordance with Policy SI 1 an Air Quality Assessment has been prepared by NoiseAir. This assesses the likely effects arising from the proposed development on local air quality during the construction and operational phases and draws the following conclusions:

*“Potential emissions from the Proposed Development were assessed in order to determine compliance with the air quality neutral requirements of The London Plan. There are no new buildings on Site that require substantial heating needs and the predicted annual trips is well below the calculated TEB for the Site, as outlined in the London Plan guidance. As such, the proposals can be considered to be air quality neutral from both a Transport Emissions and Building Emissions perspective.”*

5.123 Any dust emissions arising during the operational phases of the works, including site regrading to achieve appropriate flood storage capacity, will be managed through the implementation of a Construction Management Plan (CMP). The CMP will incorporate appropriate mitigation measures, such as wheel washing, the controlled storage of materials, and dust suppression techniques. The submission and approval of a CMP can reasonably be secured by way of planning condition.

5.124 Based on this information, It is considered that the Proposed Development complies with national and local policy for air quality.

### Ground Conditions

5.125 The application is supported by a Phase I Preliminary Risk Assessment, prepared by Swan Environmental Services (SES). This considers the ground conditions of the site and potential contaminants present.

5.126 The report draws the following conclusions:

- Potential contamination sources are considered, at this stage if present, to be localised

- It is the opinion of SES that the site represents a Low to Moderate risk with respect to contaminated land liability issues. Therefore, the findings of this report should not prevent successful redevelopment of the Site following a suitable site investigation exercise.
- The potential land contamination issues identified are not considered significant enough to prevent development of the site for the proposed residential/commercial use, subject to appropriate mitigation measures.

5.127 The recommendations proposed by SES, including the preparation of a Phase 2 Intrusive Ground Investigation and undertaking of an asbestos survey can be controlled by condition.

## 6. Heads of Terms

6.1 The below are the heads of terms pursuant to the application:

- Biodiversity Habitat Credits

## 7. Conclusions in the Planning Balance

7.1 Having regard to the above, we briefly consider the overall planning balance that needs to be weighed when considering the application proposals.

7.2 As explained in the policy section of this Statement, the NPPF (Paragraph 11) sets the basis on which planning decisions should be made having regard to the status of the Development Plan. It starts by confirming the presumption in favour of sustainable development as set out below:

*“Plans and decisions should apply a presumption in favour of sustainable development;*

*For decision-making this means:*

*c) approving development proposals that accord with an up-to-date development plan without delay; or*

*d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:*

*i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for refusing the development proposed; or*

*ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination.”*

7.3 The proposals represent a sustainable form of development, which accords with the Development Plan when read as a whole and is consistent with the overarching objectives of the NPPF. The scheme secures the formalisation and improvement of an existing unlawful use, delivering a well-managed and visually enhanced site that responds positively to its context.

7.4 The proposals also deliver clear economic benefits. The development responds to a demonstrated need for land-extensive, lower-value employment uses, particularly in the vehicle storage and ancillary automotive sector. Such uses are increasingly displaced from higher-value industrial locations around Heathrow and SIL/LSIS areas but remain vital to the local economy. By providing a flexible and operationally suitable site for the storage of vehicles, the proposals support small-scale employment, maintain an essential link to an off-site car dealership, and ensure that higher-value industrial land can be retained for uses that require it. These factors align with NPPF paragraphs 85–86, London Plan objectives to support economic competitiveness, and Hillingdon Local Plan Policies E6 and DM2 on supporting SMEs and non-designated employment sites.

7.5 In addition, the proposals deliver clear environmental benefits, including the rationalisation of the site layout, removal of ad hoc structures, introduction of permeable surfacing, and significant new planting along the perimeter of the site. These measures will enhance the visual appearance of the site and improve biodiversity over and above the existing scenario.

7.6 The proposals also ensure the floodplain capacity is reinstated through the regrading of the site, ensuring that flood risk is appropriately managed and that there is no increase in flood risk elsewhere.

7.7 Importantly, the development has been demonstrated to comprise Grey Belt land and, for the reasons set out in Section 5, does not constitute inappropriate development within the Green Belt. The site is contained, represents infill development, and does not give rise to harm to the purposes of the Green Belt.

- 7.8 The proposals will not give rise to any unacceptable impacts in terms of residential amenity, noise, highways, or environmental considerations. Indeed, the cessation of more intensive activities such as vehicle sales and servicing will result in an overall reduction in potential impacts when compared to the existing situation.
- 7.9 In conclusion, the proposals represent a sustainable, well-designed, and economically beneficial development that accords with both the Development Plan and national planning policy. Any potential adverse impacts are minimal and are outweighed by the significant environmental, operational, and economic benefits delivered by the scheme.



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