



Quod

1071
Southampton
Road East,
Heathrow

Planning Statement

APRIL 2026

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1 Introduction

- 1.1 This Planning Statement has been prepared by Quod on behalf of Tritax London Logistics Fund (“TLLF”) in support of an application seeking full planning permission for the redevelopment of the former Gate Gourmet Catering base at 1071 Southampton Road East, Heathrow (‘the Site’). Specifically, the application seeks permission for the following:

“Demolition of existing structures and building slab to enable the erection of a building for use within Class B2 and/or B8, with ancillary Class E(g), along with associated structures, car and cycle parking, landscaping, access alterations and other associated works”

- 1.2 The Site is located within the cargo area of Heathrow Airport and represents an opportunity to bring a vacant brownfield site back into active airport-related use.
- 1.3 The Applicant has entered into an Agreement for Lease with Worldwide Flight Service Limited; a global air cargo, passenger and ground handling organisation. The core function of the proposed development will be for the receipt, build, security screen and dispatch of air cargo, acting as the essential interface between Heathrow’s aircraft and land transport on behalf of Airlines and Freight Forwarders.
- 1.4 The development represents a significant economic investment of circa £21m and will create in the region off 100 new jobs for people living within the borough. The proposals improve the visual amenity of the Site, whilst also ensuring the operation of the airport is safeguarded.
- 1.5 Pre-application engagement has been undertaken with London Borough of Hillingdon (hereafter referred to as “LBH” or the “Council”), Heathrow Airport property, planning and ground operations teams, as well as other key stakeholders.
- 1.6 The purpose of this Planning Statement is to analyse the conformity of the proposals with the relevant planning policies of the adopted Development Plan, having regard to relevant material considerations.
- 1.7 The remaining sections of this Statement are as follows:
- Section 2 describes the factual background to the Site and surrounding context, including the relevant planning history;
 - Section 3 provides a summary of the application proposals;
 - Section 4 summarises the pre-application consultation and engagement that has been undertaken;
 - Section 5 identifies the relevant planning policy context;
 - Section 6 assess the key planning considerations; and
 - Section 7 provides overall conclusions.

2 Factual Background

- 2.1 This section of the Statement provides an overview of the factual background applicable to the proposals including a description of the Site and surrounding area, and an overview of relevant planning history details.

Site and Surrounding Area

- 2.2 The Site is located to the south of Heathrow Airport within the LBH.
- 2.3 The Site is bound by Southampton Road East to the north, a multi-storey car park (MSCP) to the east, the Southern Perimeter Road to the south and Stansted Road to the west. The Site extends to approximately 5.6 acres.
- 2.4 The Site was previously occupied by Gate Gourmet, who prepared and provided catering for consumption on British Airways aircraft. The Gate Gourmet building consisted of a single two storey industrial building, reaching approximately 13 metres in height. The building footprint accommodated around 75% of the Site, with servicing, circulation and external storage located to the south and east.
- 2.5 The siting of the building was dictated at that time by the presence of the Public Safety Zone for the cross wind runway (operational at that time) which cut across the south western part of the Site. The cross wind runway is no longer in use and as such the Public Safety Zone is no longer operational.
- 2.6 This building has since been demolished in preparation for the redevelopment of the Site. The building slab remains, along with several small structures to the east of the Site.
- 2.7 The Site is accessed from Southampton Road East to the north east, with a secondary entrance/exit to the south west off Stansted Road.
- 2.8 The London Underground Piccadilly line tunnel passes across the north east corner of the Site, connecting Hatton Cross and Terminal 4 to the Central Terminal Area. Heathrow Express tunnel is located to the north and east, and does not cross the Site.
- 2.9 The buildings in the immediate vicinity of the Site are industrial in style and of varying scales and heights. To the east is a modern five level multi-storey car park extending to approximately 15m in height. Immediately north of the car park and south of Southampton Road East is a substation and vent shaft which is understood to be connected to the Heathrow Express.
- 2.10 To the west, beyond Stansted Road, are large warehouses occupied by Swissport Cargo Services and Dnata.
- 2.11 To the north of the Site, beyond Southampton Road East and Sealand Road, sits the IAG World Cargo Campus, which comprises a series of cargo related buildings. The largest of which, the Ascentis building, is approximately 35m in height (six storeys), situated to the north west of the Site. To the west of the IAG World Cargo Campus is the 'horseshoe' cargo complex.

- 2.12 The wider area to the north and east is characterised by operational activities associated with Heathrow Airport, including Terminal 4 to the east. To the south, beyond the Southern Perimeter Road, the Duke of Northumberland's River and Bedfont Road, locates a complex of industrial warehouses known as Dnata City. Further west is the village of Stanwell.
- 2.13 In summary, the Site is located to the south of Heathrow Airport and previously contained an industrial warehouse occupied by Gate Gourmet. This has recently been demolished. The immediate surrounding area represents the airport's cargo hub and consists of a number of large warehouse facilities.

Relevant Planning History

- 2.14 Prior to the Boundary Commission review in 1994, the Site fell within the administrative boundary of Spelthorne Borough Council - it then subsequently fell within the boundary of the LBH. Records from that time relating to the Site are unavailable online.

Site

- 2.15 Table 1 below summarises the planning history details for the Site based on the available online records.
- 2.16 Details relating to the original erection of the building on the Site are not available.
- 2.17 In November 2012 permission (Ref No: 51743/APP/2012/1781) was granted for a two storey extension to the south eastern corner of the building which was previously on the Site, comprising a net additional area of 1,596sqm (GIA).
- 2.18 The Officer's Report to Committee explains that in May 1990 Spelthorne Borough Council agreed that the following comprised permitted development (Ref: MISC/90/6/Air/C) "*Erection of a building for use in connection with catering facilities for occupation by British Airways*". This is likely to be building that previously resided on the Site.
- 2.19 In relation to the principle of the extension, the Officer's Report concludes:
- "Policy A4 states that development directly related to the operation of Heathrow Airport should be located within the airport boundary. The proposed extension to the Gate Gourmet building is directly related to the operation of the airport and is located within its boundary. Therefore, the principle of the proposed development is considered acceptable".*
- 2.20 No increase in car parking was proposed as it was anticipated that the existing provision could absorb any associated increase in vehicle numbers. The Officer's Report notes that existing staff would either come to Site by public transport or park within the existing airport car park P5 to the east of Sealand Road. The Report explains that the Gate Gourmet development was issued a number of parking permits for car park P5 by BAA, but there would be no increase in parking permits as a result of this proposal.
- 2.21 In commenting on the impact of the proposal on the character and appearance of the area, the Officer's Report to committee explains that the existing building's curved roof "*was a reflection of safeguarding constraints in existence at the time which required the design of the building*

to be such as to comply with height limitations applicable along the edges of the Public Safety Zone”.

2.22 Prior approval was secured in August 2022 to demolish the existing building. The demolition was undertaken in May 2025.

Table 1: Planning History for the Site

Application Reference	Site Address	Status	Proposal
51743/B/99/0256	1071 Southampton Road, Hounslow	Approved 17 Mar 1999	Erection of canopy over new roller shutter door detail with existing ramp reduced in length to form dock platform.
51743/APP/2010/2568	1071 Southampton Road, Hounslow	Approved 31 Dec 2010	Installation of condenser units at roof level to north and south elevations, involving external staircase to south elevation (Retrospective application)
51743/APP/2012/1781	1071 Southampton Road, Hounslow	Approved 06 Nov 2012	Erection of two storey extension, including part demolition of existing building and associated works
51743/APP/2022/1969	1071 Southampton Road, Hounslow	Approved 4 Aug 2022	A Prior Notification Application submitted under Schedule 2, Part 11, Class B of the Town and Country Planning (General Permitted Development) (England) Order (2015) (as amended) for the full demolition of the main building and the associated structures within 1071 Southampton Road East.

Surrounding Area

2.23 Table 2 provides an overview of relevant planning history details on surrounding sites. A summary of the key elements is provided below.

520B Southern Perimeter Road

2.24 In November 2010 planning permission Ref No: 57331/APP/2010/2038 was granted on land immediately west of the Site (known as 520B Southern Perimeter Road) for “*Rebuilding of an existing cargo transit shed with ancillary office accommodation*” as a result of fire damage.

2.25 The application approved the rebuild of an industrial building in B1/B2/B8 use of approximately 7,600 sqm and 16m in height.

- 2.26 The Officer's Report to Committee explained that the proposed use of the building as a cargo transit warehouse was directly related to the operation of the airport and, accordingly, the proposal was considered to fully comply with UDP Policy A4.
- 2.27 The Report found that given the context of the proposed building, in close proximity to buildings of similar and greater heights, the building would not be detrimental to the visual amenity of the street scene or this part of the airport.

Car Park Site

- 2.28 In August 2009 permission Ref No 65688/APP/2009/1274 was granted for a 240 bedroom, 6 storey hotel and two drive-through restaurants on land immediately west of the Site and south of the substation/vent shaft.
- 2.29 The LBH's online records do not provide a copy of the decision notice or Officer's Report to Committee.
- 2.30 The Applicant's (Arora) Design and Access Statement states:

"The principle of development is considered acceptable. Policy A4 of the UDP Saved Policies 2007 requires directly related airport development to be located on airport and excludes unrelated aviation development. Hotels close to Heathrow are almost entirely related to the airport's operation as they principally provide overnight accommodation for airline passengers, but they are not classified as directly related. In the supporting text to Policy A4 it states 'Hotels and conference facilities may be appropriate if suitable land is available inside the airport boundary. There is currently no indication that insufficient land is available inside the airport boundary. There remains much vacant land awaiting development at the Hatton Cross development area and there is considerable scope for further land use efficiencies in the form of decked parking of which relatively little has been implemented to date.'"

- 2.31 In respect of the proposed drive-through restaurants, the Design and Access Statement explains their intention to serve on-airport employees primarily working at the Heathrow Airport Cargo Area. Although there are no other drive-through restaurants within the airport there are 2 McDonald's restaurants on the A4 Bath Road adjacent to the north side of the airport which are used extensively by workers either directly employed in airport services or indirectly employed e.g. taxi drivers.
- 2.32 In March 2016 outline planning permission Ref No: 65688/APP/2016/94 was granted for the erection of a car park, for use by Gate Gourmet and British Airways Staff. The Officer's Report to Committee is not available online.
- 2.33 Condition 10 limits the car park to 1,022 spaces and specifically to employees at Gate Gourmet and British Airways:

"No more than 1,022 parking spaces in total shall be provided on the multi storey car park (MSCP) hereby approved. These car parking spaces shall only be used by employees at Gate Gourmet and British Airways.

A maximum of 280 of these car parking spaces (all ground floor and part first floor) shall be used by employees at Gate Gourmet working at the Gate Gourmet Airline Catering Facility,

Southampton Road East, Heathrow Airport. A maximum of 742 car parking spaces shall be used for British Airways staff working at the British Airways cargo site, Southampton Road East, Heathrow Airport.”

- 2.34 This permission followed an earlier application (Ref No: 65688/APP/2015/142) submitted in January 2015 for a 9-storey car park on the site, comprising an additional 1,018 spaces for commercial use. The application remains underdetermined.
- 2.35 In addition, there remains an undetermined application (Ref No: 65688/APP/2018/1751) submitted in May 2018 for 4 additional levels on top of the existing car park.
- 2.36 In September 2021 a section 96a application Ref No: 65688/APP/2021/2709 was approved for non-material amendments to Conditions 2, 3, 10 and 13 of planning permission ref 65688/APP/2015/142 (relating to the MSCP to the east of the Site) to allow the 280 car parking spaces to be used by those working in connection with business operations at the Site (rather than limited to Gate Gourmet). The wording now states:

“No more than 1,022 parking spaces in total shall be provided on the multi storey car park (MSCP) hereby approved. These car parking spaces shall only be used by employees at land known as Building 1071 and British Airways. A maximum of 280 of these car parking spaces (all ground floor and part first floor) shall used by those employees working in connection with business operations at land known as Building 1071, Southampton Road East, Heathrow Airport. A maximum of 742 car parking spaces shall be used for those working in connection with business operations at the BA Cargo Campus site by those working in connection with business operations at the BA Cargo Campus site, Southampton Road East, Heathrow Airport”

IAG World Cargo Campus

- 2.37 In November 1996 permission Ref no: 50045A/95/1043 was granted for the redevelopment of the World Cargo Centre incorporating the erection of a new freight centre and three storey office building (comprising 88,838sqm of floorspace).
- 2.38 In July 2005 permission Ref No: 50045/APP/2005/35 was granted for a 7,180sqm premium products cargo building and erection of a two tiered car deck to the east of the main IAG World Cargo building. A certificate of lawful development was secured in December 2010 to extend the cargo building.
- 2.39 In January 2017 permission Ref No: 50045/APP/2016/2081 consented the erection of a new 11,520 sqm cargo handling facility to meet demand for priority and temperature controlled freight services, to the east of the building approved in July 2005.
- 2.40 The existing site accommodated 679 car parking spaces which the proposed development would replace. The application explained that 420 spaces would be relocated to the MSCP consented to the east of the Gate Gourmet site. The remaining spaces were retained on the application site. As such Condition 4 prevented occupation of the building until an agreement was reached between the applicant (IAG), Arora Group and British Airways to secure 420 car parking spaces in the MSCP at Sealand Road for the lifetime of the development.
- 2.41 Condition 5 requires that the building be used only for purposes within Use Class B8.

2.42 In December 2019 permission Ref No: 50045/APP/2019/3417 was granted for the demolition of an existing single storey structure known as the triangle building and erection of a 912sqm building that would link the New Premia building with the existing Premia building under Use Class B8.

Table 2 Planning history of surrounding area

Application Reference	Site Address	Status	Proposal
50045A/95/1043	BA World Cargo Centre, Southampton Road, Heathrow Airport	Approved 15 Nov 1996	Redevelopment of World Cargo Centre incorporating the erection of a new freight centre and three storey office building (comprising 88,838sqm of floorspace), access alterations and road improvements, new two level car park, new surface car park and lorry park, erection of entrance canopies, booths and associated landscaping (involving demolition of all buildings on site)
50045/APP/2005/35	British Airways World Cargo Centre Sealand Road Heathrow Airport	Approved 14 Jul 2005	Erection of a 7,180sqm premium products cargo building; erection of a two tiered car deck and alterations to existing car park layout resulting in provision of 71 additional car parking spaces; alterations to existing site access arrangements and provision of landscaping.
65688/APP/2009/1274	Land Adjacent to 1071 Southampton Road, Hounslow	Approved 08 Aug 2009	Erection of 240 bedroom 6 storey hotel and two drive through restaurants. Outline application with details of access, appearance, layout and scale. (Restaurant details comprise access and layout).
50045/APP/2010/2621	BA World cargo Premia warehouse, Sealand Road, Heathrow Airport	Approved 10 Dec 2010	Erection of extension to existing warehouse (Application for a Certificate of Lawfulness for a Proposed Development).
65688/APP/2016/94	Temporary Car Park Site, Sealand Road, Heathrow Airport	Approved 07 Mar 2016	Erection of multi-deck car park for use by Gate Gourmet and British Airways staff (Outline application with details of access, appearance, layout and scale)

Application Reference	Site Address	Status	Proposal
50045/APP/2016/2081	IAG Cargo Campus, Sealand Road, Heathrow Road TW6 3FD	Approved 05 Jan 2017	Erection of a new 11,520 sq.m (GIA) cargo handling facility (B8 use), ancillary buildings totalling 330 sq.m and associated works including changes to site access and reconfiguration of landside and airside parking.
50045/APP/2004/2080	Land To The East Of British Airways World Cargo Centre Southampton Road	Approved 20 Feb 2018	Retention of 23 pre-fabricated buildings for use as office/rest room (and removal of 2 others)
50045/APP/2019/3417	IAG Cargo Campus, Sealand Road, Heathrow Road TW6 3FD	Approved 12 Dec 2019	Demolition of existing single storey structure known as the triangle building and erection of a 912sqm (GEA) building that will link the New Premia building with the existing Premia building (Use Class B8).
75283/APP/2019/3932	Heathrow Cargo Centre, 580 Sandringham Road, Heathrow Airport, TW6 3SF	Approved 02 Jan 2020	Demolition of existing canopy structure (Prior Notification under Schedule 2, Part 11, Class B of the Town and Country Planning (General Permitted Development) Order 2015 (as amended).
65688/APP/2021/2709	1071 Southampton Road, Hounslow	Approved 23rd September 2021	Non material amendment to Conditions, 2, 3, 10 and 13 of planning permission ref 65688/APP/2015/142 for Erection of multi-deck car park for use by Gate Gourmet and British Airways staff (outline application with details of access, appearance, layout and scale) to allow the 280 car parking spaces to be used by those working in connection with business operations at land known as Building 1071, Southampton Road East, Heathrow
65688/APP/2018/1751	Multi storey car park, Sealand Road, Heathrow Airport, TW6 3FD	Undecided	Extension to the existing 5 level Multi Storey Car Park at Sealand Road, Heathrow Airport to provide 4 additional levels of car parking for use as airport passenger parking (Outline Application seeking approval of access, appearance, layout and scale).

Application Reference	Site Address	Status	Proposal
65688/APP/2015/142	Temporary Car Park Site, Sealand Road, Heathrow Airport	Undecided	Installation of a multi-deck car park to provide 9 levels of parking to provide 280 staff car parking spaces for the neighbouring Gate Gourmet Building, 742 staff car parking spaces for workers at the adjacent BA World Cargo Centre with the remainder (1,018) spaces to be a commercial car park (Outline Application seeking approval of access, appearance, layout and scale).

Summary

- 2.43 In summary, the Site is located to the south of the airport, in an area predominantly used for cargo purposes. The IAG World Cargo Centre is located to the north, with numerous industrial sheds to the west. A MSCP bounds the Site to the east.
- 2.44 Based on material available, it would appear that the building which was previously located on the Site was erected under permitted development powers in May 1990. Permission was secured in November 2012 for a two-storey extension to the south eastern corner of the building; however, it wasn't constructed.
- 2.45 The site to the east was previously consented for a hotel, but more recent permissions for a car park have resulted in the MSCP on site today. A live application for a 4-storey extension to the car park remains undetermined. The car park is limited to 1,022 spaces of which a maximum of 280 are allocated to employees working in connection with business operations at the Site.
- 2.46 The warehouse units to the west of the Site were originally delivered under permitted development rights, but the building immediately to the west was redeveloped under a permission secured in 2010 as a result of fire damage.

3 Proposed Development

- 3.1 The proposals comprise the demolition of the existing structures/building slab and the erection of a 'Cargo Transit Shed' for occupation by Worldwide Flight Service Limited; a global air cargo, passenger and ground handling organisation. The core function of the development will be for the receipt, build, security screen and dispatch of air cargo, acting as the essential interface between Heathrow's aircraft and land transport on behalf of Airlines and Freight Forwarders.
- 3.2 The proposal consists of a single warehouse building orientated north/south through the central portion of the Site, with a service yard on both the eastern and western elevations. Access into the Site is retained to the northeast from Southampton Road East, with egress retained onto Stansted Road to the southwest. A clockwise one-way route passes along the southern edge of the Site to allow access between the service yards and the site exit via Stansted Road.
- 3.3 Alterations to the access junction include the tightening of the radius on the western side of the bellmouth and amended tactile paving. These adjustments will result in a reduced crossing width for those people crossing the bellmouth, and a more legible crossing point for those with mobility issues.
- 3.4 The proposed building operates over ground floor (extending to approximately 9,810sqm GIA), with an undercroft office/staff welfare at first and second floor levels, and plant above. The warehouse reaches a max of circa 17.2 which is consistent with the adjacent Swissport and Dnata buildings.
- 3.5 The proposals comprise a flexible mix of Use Class B2 (General Industrial) and/or Use Class B8 (Storage or Distribution) floorspace, along with ancillary Class E(g) (Commercial, Business and Service). The building, along with associated structures including gatehouses at the ingress/egress extend to 11,706sqm (GEA) in total, split as follows:
 - Ground floor – 9,810sqm
 - First floor – 550sqm
 - Second floor - 550sqm
 - Plant – 3,010sqm
- 3.6 The proposal includes 10 on-site parking spaces; 4 for disabled users and 6 for visitors and operational users (i.e. Department for Transport or other airport related inspections) located to the north east via a dedicated access. Staff car parking spaces continue to be provided within the adjacent MSCP.
- 3.7 Covered shared cycle storage is provided with safe pedestrians routes connecting it to the main entrance.
- 3.8 The existing trees beyond the Site to the south are unaffected and areas of soft landscaping are proposed to the north of the Site, creating an attractive green entrance area.
- 3.9 Full details of the proposals are contained within the Design and Access Statement.

4 Pre-application Engagement

- 4.1 The application proposals are submitted following a period of consultation with LBH officers and key stakeholders. A summary of this pre-application engagement is provided below.

LBH

- 4.2 The submission of this planning application has followed pre-application consultation with LBH officers.
- 4.3 In October 2024, a formal request for pre-application advice was submitted to LBH which explained the approach to the proposed redevelopment of the Site. Feedback was obtained on a variety of matters including the principle of the use, flooding, transport, design and landscaping, and the scope of the planning application was agreed with the Council.
- 4.4 Following a review of the feedback, amendments were made to the scheme in direct response to the comments received. These updates were set out in a 'Response Schedule' which was sent to LBH in February 2026, along with updated plans and other additional information.
- 4.5 During a meeting that took place on 19 February, Planning Officers noted that the updated proposals had responded positively to LBH's previous comments. Officers considered that the proposed height, appearance and materiality of the building were acceptable, and that the proposals successfully integrated into the surrounding context.
- 4.6 It was queried whether the 280 car parking spaces provided within the adjacent MSCP were secured for the previous building that had recently been demolished. In a follow-up email to LBH, Quod confirmed that application ref. 65688/APP/2021/2709 had amended the extant permission for the MSCP to allow the spaces to be used by those working in connection with business operations at land known as 'Building 1071, Southampton Road East, Heathrow'. As such, these spaces are secured for the future occupiers of the Site.
- 4.7 In a follow-up meeting on 16 April, it was suggested by LBH that the existing MSCP parking arrangement should be altered to reduce the number of permitted spaces that can be used by business occupiers of the Site. In an email dated 27 April, it was confirmed by Quod that the Applicant does not consider such changes or restrictions to be required or reasonable in planning terms. This is attached at **Appendix 1**.
- 4.8 No concerns were raised on any other aspect of the proposals. Written feedback is still awaited from LBH.

Key Stakeholders

- 4.9 Dialogue has been ongoing during the months leading up to submission of the application with a number of key stakeholders including:
- HAL – engagement with Heathrow Airport Limited (HAL) including verbal and written correspondence has been undertaken to ensure compatibility with airport operations.

HAL's Property, Planning and Operations teams have all been consulted. Engagement has included HAL's review of the emerging plans and alterations to the access. No concerns have been raised in respect of the principle of redevelopment at the Site, the proposed building or layout of the development.

- Local Lead Flood Authority - engagement was undertaken to discuss and agree the Drainage Strategy.
- National Air Traffic Services (NATS) – NATS were contacted in March 2026 with regard to potential impacts on the Secondary Surveillance Radar (SSR).
- GLAAS – direct consultation has been undertaken with the Greater London Archaeology Advisory Service (GLAAS) to agree the archaeology strategy. This has included sharing and agreeing the content of the Desk Based Assessment and the Written Scheme of Investigation.
- London Borough of Spelthorne Environmental Health – Officers were contacted to discuss and agree the scope of the noise assessment.

Summary

- 4.10 Overall, the engagement process undertaken by the Applicant has been comprehensive and an invaluable way of gathering information and feedback from the Council and other key stakeholders. The scheme has evolved in response to the feedback received where appropriate.

5 Planning Policy and Guidance

- 5.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that planning applications should be determined in accordance with the development plan, unless material considerations indicate otherwise.
- 5.2 The statutory development plan for the Site consists of the following:
- The London Plan (2021);
 - Hillingdon Local Plan Part 1 Strategic Policies (2012);
 - Hillingdon Local Plan Part 2 Development Management Policies (2020);
 - Local Plan Part 2 Site allocations (2020); and
 - Policies Map (2020).
- 5.3 Material considerations include the National Planning Policy Framework (“NPPF”) (February 2025), National Planning Practice Guidance (“PPG”) and the Airports National Policy Statement (“ANPS”).
- 5.4 LBH is currently gathering preliminary evidence and preparing initial technical documents to support a review of their Local Plan. The LBH issued a call for sites exercise that concluded on 24 June 2024 with a Regulation 18 consultation on the Local Plan expected to follow.
- 5.5 The Hillingdon Local Development Scheme suggests that consultation on the draft plan will take place in Q3/Q4 2026, with Examination starting in Q4 2027. Given the early stage of preparation, the emerging Local Plan cannot be afforded any weight in the decision-making process.
- 5.6 This section is structured to provide a summary of the key policies within the development plan applicable to the redevelopment of the Site, as well as an overview of key material considerations.

Development Plan

London Plan

- 5.7 The London Plan was adopted in March 2021 and sets out the strategic planning framework for London within which individual Boroughs must prepare policies and against which major planning applications will be determined.
- 5.8 Heathrow is identified in the London Plan as an Opportunity Area, with the capacity for 11,000 jobs and a range of opportunities to support the economic growth of London.

- 5.9 London Plan Policy SD1 states that to ensure Opportunity Areas fully realise their growth and regeneration potential, the Mayor will provide support and leadership for the collaborative preparation and implementation of planning frameworks that set out a clear strategy for accommodating growth. It is our understanding that no progress has been made in preparing the Heathrow Opportunity Area planning framework.
- 5.10 The policy also requires that the Boroughs, through Development Plans and decisions, clearly set out how they will encourage and deliver the growth potential of Opportunity Areas and support development which creates employment opportunities and housing choice for Londoners.
- 5.11 Policy GC5 (Growing a good economy) seeks to “*conserve and enhance London’s global economic competitiveness and ensure that economic success is shared amongst all Londoners*”.
- 5.12 Policy E4 (Land for industry, logistics and services to support London’s economic function) requires the provision for the varied operational requirements of B use class.
- 5.13 Policy T8 (Aviation) explains that the Mayor supports the role of the airports serving London in enhancing the city’s spatial growth, particularly within Opportunity Areas well connected to the airports by public transport and which can accommodate significant numbers of new homes and jobs.
- 5.14 Criteria H of Policy T8 states that development proposals relating to general and business aviation activity should only be supported if they would not lead to additional environmental harm or negative effects on health, nor impact on scheduled flight operations.
- 5.15 Heathrow is located within an Air Quality Management Area and the explanatory text to Policy T8 explains that any airport expansion proposals should not worsen existing air quality or contribute to exceedance of air quality limits, nor should they seek to claim or utilise air quality improvements resulting from unrelated Mayoral, local or national policies and actions.
- 5.16 Policy SI1 (Improving Air Quality) requires that development proposals should not lead to further deterioration of existing poor air quality. Development proposals in Air Quality Focus Areas (such as Heathrow) should demonstrate that design measures have been used to minimise exposure.
- 5.17 Policy SI 2 of the London Plan states that major development should be net zero-carbon. This means reducing greenhouse gas emissions in operation and minimising both annual and peak energy demand in accordance with the energy hierarchy.
- 5.18 London Plan Policies HC1, D3 and D4 state that development proposals should be thoroughly scrutinised by borough planning, urban design and conservation tools and that design quality should be maintained throughout the design process.
- 5.19 Policy D14 states that in order to reduce, manage and mitigate noise to improve health and quality of life, residential and other non-aviation development proposals should manage noise through avoiding significant adverse noise impacts on health and quality of life.

- 5.20 London Plan Policy G6 (2021) states that development proposals should manage impacts on biodiversity and aim to secure net biodiversity gain.
- 5.21 The site is located within the Heathrow Archaeological Priority Zone and Policy HC1 states that development proposals affecting heritage assets and their setting should be sympathetic to the assets' significance and appreciation within their surroundings.
- 5.22 Policy D12 of the London Plan (2021) requires the submission of a Fire Safety Statement for all major forms of development proposals.

Local Plan Part 1 (Strategic Policies)

- 5.23 The designations of the Local Plan which are applicable to the Site are as follows:
- Heathrow Boundary
 - Air Quality Management Area
 - Archaeological Priority Zones
- 5.24 The Local Plan places importance on Heathrow Airport in terms of its contribution to the economy and provision of a key gateway as the UK's only hub airport, as well as network rail connections. The vision for the Borough centres economic growth within three specific locations, one of which is Heathrow.
- 5.25 Policy E2 (Location of Employment Growth) states that much of the employment growth proposed for the Borough in the plan period will be directed towards suitable sites, including within the Heathrow Opportunity Area, with the Council seeking to accommodate 9,000 new jobs during the Plan period.
- 5.26 Policy E3 of the Local Plan (Strategic Policies) sets out the strategy for Heathrow Opportunity Area. The policy explains that the Council will prepare a Local Development Document ("LDD") for the Heathrow area to achieve the future growth set out in Table 5.3. This LDD will help manage development and protect land within the Heathrow Airport boundaries for airport-related activities. It will seek to ensure that local people benefit from sustainable economic growth located both within the Airport boundaries and in the perimeter areas.
- 5.27 Table 5.3 states that Heathrow is a crucial influence in attracting new investment to the area. The table indicates that the Council is supportive of the aspirations to deliver a programme of renewal at Heathrow, subject to no further expansion of the airport, and will continue collaborative working with the Airport regarding future uses within and around its boundaries.

Local Plan Part 2 (Development Management Policies)

- 5.28 Policy DMAV2 of the Local Plan Part 2 indicates that development proposals within the boundary of Heathrow Airport will be supported where a number of criteria are satisfied, including that it is a use related to activities at the airport (which includes freight forwarding, air cargo transit sheds, flight catering, airport industry and warehousing, and airport maintenance); there is no detrimental impact to the safe and efficient operation of local and strategic transport networks; air quality policies are satisfied and that there are no other significant environmental impacts.

- 5.29 Policy DMT 7 controls freight development and states that proposals that generate a high number and/or intensity of transport and movements such as those relating to logistics and distribution or freight will be required to demonstrate that:
- they are conveniently located to enable direct routing to the strategic road network; and
 - there is no deleterious impact on residential areas, local air quality levels, local amenity or the highway network.
- 5.30 In respect of the built environment, Local Plan Policy BE1 requires that all development achieves a high quality of design, enhances the local distinctiveness of the area, contributes to community cohesion and a sense of place. Other requirements include making a positive contribution to the local area in terms of layout, form, scale and materials, protecting the amenity of surrounding land and buildings, and improving the attractiveness of public and private places.
- 5.31 Policy EM8 requires all major development within the AQMA to demonstrate air quality neutrality where appropriate and Policy DMEI 1 states that major developments in AQMAs must provide onsite provision of living roofs and/or walls or offsite contributions if not feasible.
- 5.32 In respect of climate change, Policy DMEI 2 requires carbon emissions for Major development to be reduced in line with London Plan targets and to be designed to be able to connect to a Decentralised Energy Network if possible.
- 5.33 Policy DEEI 10 requires the inclusion of sustainable drainage and water efficiency measures, and DMT1 states that development proposals will be required to meet the transport and servicing needs of the development and address its transport impacts in a sustainable manner.
- 5.34 Car and cycle parking should be provided in accordance with Appendix C which identifies a maximum car parking provision of 1 space per 50 – 100 sqm of gross floorspace for B1 uses (now Use Class E(g)) and 2 spaces plus 1 space per 50 – 100 sqm for all other B class uses. Cycle parking for B1 uses is 1 per 250 sqm or 1 per 500 for all other B class uses.

Material Considerations

National Planning Policy Framework (2025)

- 5.35 The National Planning Policy Framework (NPPF) sets out the Government's planning policies for England.
- 5.36 Paragraph 7 of the NPPF sets out the presumption in favour of sustainable development. For decision-taking, this means approving development proposals that accord with an up-to-date development plan without delay.
- 5.37 Paragraph 85 sets out that planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. It confirms that "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.
- 5.38 Paragraph 86 states that planning policies should make the provision for:

“appropriate sites for commercial development which meet the needs of a modern economy should be identified, including suitable locations for uses such as laboratories, gigafactories, data centres, digital infrastructure, freight and logistics.”

- 5.39 Similarly, Paragraph 87 Part B states that decisions should recognise and address the specific locational requirements of different sectors notably:

“storage and distribution operations at a variety of scales and in suitably accessible locations that allow for the efficient and reliable handling of goods, especially where this is needed to support the supply chain, transport innovation and decarbonisation”.

Airports National Policy Statement (2018)

- 5.40 The ANPS was adopted June 2018 and provides the primary basis for decision making on development consent applications for a Northwest Runway at Heathrow Airport. It also acts as an important and relevant consideration in respect of applications for new runway capacity and other airport infrastructure in London and the South East of England.
- 5.41 The ANPS explains that air freight is important to the UK economy. Although only a small proportion of UK trade by weight is carried by air, it is particularly important for supporting export-led growth in sectors where goods are of high value or time critical. Heathrow Airport is the UK's biggest freight port by value.
- 5.42 The ANPS states that the importance of aviation to the UK economy, and in particular the UK's hub status, has only increased following the country's decision to leave the European Union. As the UK develops its new trading relationships with the rest of the world, the ANPS considers it essential that increased airport capacity is delivered, in particular to support development of long haul routes to and from the UK, especially to emerging and developing economies.
- 5.43 The ANPS is currently being reviewed by the Secretary of State for Transport, alongside engagement with Heathrow Airport Limited. Any resulting proposed amendment to the ANPS will be subject to public consultation. However, this consultation is yet to be published.

Summary

- 5.44 Overall, the Site is located within the Heathrow Opportunity Area which is to support the delivery of 11,000 jobs. Local Plan policy specifically supports development proposals at the Site for airport related uses such as air cargo transit sheds.

6 Planning Considerations

- 6.1 This section of the Statement provides an assessment of the proposals against the key policies of the Development Plan, having regard to relevant material considerations.

Key Planning Considerations

Principle of Development

- 6.2 The Site is located within the Heathrow Opportunity Area where the Local Plan and London Plan promote industrial and logistics development that creates employment opportunities.
- 6.3 Policy DMAV2 of the Local Plan specifically supports airport related activity including air cargo transit sheds, flight catering, airport industry and warehousing, and airport maintenance subject to a number of criteria being satisfied, namely:
- there is no detrimental impact to the safe and efficient operation of local and strategic transport networks;
 - air quality policies are satisfied; and
 - that there are no other significant environmental impacts.
- 6.4 The proposals seek the redevelopment of the Site into a new, modern Class B2 and/or Class B8 building for the receipt, build, security screen and dispatch of air cargo. This airport-related use is specifically supported by Policy DMAV2. In respect of the first and second criteria, the application is supported by a Transport Statement and Air Quality Assessment which demonstrate that there are no detrimental transport impacts arising from the development, and that all relevant air quality policies are satisfied.
- 6.5 With regard to the last criteria, a request for an Environmental Screening Opinion was submitted to LBH in October 2025. Following consideration of the screening, LBH confirmed that: *“This urban development project on its own and in combination with other projects, is unlikely to result in significant environmental effects arising from either its construction, or operation, taking account of appropriate mitigation and conventional and proportionate planning controls. The characteristics and significance of the potential impacts of the proposed development would result in localised rather than significant environmental impacts.”*
- 6.6 The NPPF places “*significant weight*” on development that supports economic growth and productivity in particular in suitable locations, such as those near transport hubs and the strategic road network. The recent changes to the NPPF further emphasise this by introducing additional wording to recognise and address the specific locational requirements of different sectors notably “*storage and distribution operations*”.
- 6.7 The principle of a Class B2 and/or Class B8 warehouse at the Site for the proposed airport-related use is therefore fully supported by planning policy. Planning history records for the Site and adjacent sites reinforce the acceptability of the use in this location.

Design and Appearance

- 6.8 London Plan Policies HC1, D3 and D4, as well as Local Plan Policy DMHB 11 require new development to be designed to the highest standards and incorporate principles of good design.
- 6.9 The Site previously contained a warehouse building and is surrounded by a collection of similar buildings that together present an industrialised character. The Site is viewed in the context of the MSCP building to the east and the 6 storey Ascentis building within the IAG World Cargo Centre to the north. Furthermore, existing warehouse buildings of circa 17m in height are located to the west.
- 6.10 The proposed heights and massing (up to circa 17.2m) are therefore well within the context of the surrounding area.
- 6.11 There are no heritage or environmental designations that will be affected by the proposed development.
- 6.12 The Grade II listed Stanwell Farmhouse is located approximately 80 metres to the south of the site and lies on the opposite side of the Duke of Northumberland's River and Longford River. Accounting for the separation distance, the context of the Site which previously included a substantial warehousing building and the presence of intervening landscaping, there will be no detrimental impacts on the setting or significance of this heritage asset.
- 6.13 The nearest residential properties are located some distance to the south, beyond the southern perimeter road and river, and any limited views of the proposed development will be seen in the context of the larger IAG building to the north.
- 6.14 The massing of the warehouse is positioned in a north-south direction, creating separation from the buildings to the east and west. The southern elevation of the building aligns with the neighbouring buildings, creating a consistent building line.
- 6.15 The proposals respond appropriately to the adjacent context so that the building sits comfortably within its setting. This is further evidenced by the 3D visuals included at section 3 of the Design and Access Statement.
- 6.16 Details of the proposed materiality of the building are included at section 3 of the Design and Access Statement. High quality materials, including steel and aluminium in contrasting colours add visual interest to the building and serve to break up the massing of the facades.
- 6.17 The roof design has been carefully considered, with an articulated two-barrel roof providing a 'soft' silhouette and extended eaves making reference to the Heathrow Terminal 5 building. The articulation of the roof creates an elegant form visible from both north and south elevations which face public roads. The roof is also treated as a 'fifth elevation', promoting a low energy approach and featuring curved rooflights, solar thermal and photovoltaic panels, and a covered plant area.
- 6.18 The proposals do not impact the existing trees beyond the Site to the south and additional soft landscaping is proposed to act as a buffer from the adjacent roads. The landscaping design has been carefully considered to provide a functional setting that delineates public, semi-public and operational areas. Soft landscaping is provided at the site entrance which includes hedge

planting to act as a buffer between pedestrian and vehicular areas, as well as a mix of native and ornamental grass planting to soften the building frontage. The planting palette improves the ecological value of the site and contributes towards enhanced biodiversity.

Access, Circulation and Car Parking

- 6.19 National, regional and local planning policy seeks to ensure that there are no unacceptable impacts on highways. The application is supported by a Transport Statement which assesses the proposals against their contribution to traffic generation and impact on congestion, having regard to the present and potential capacity of public transport.
- 6.20 In respect of trip generation, conversations have been held with the prospective occupiers to understand the potential activity. This has taken into account airport related activity as well as staff shift patterns from a nearby site. The Transport Statement sets out the forecast levels of activity associated with the redeveloped Site and the net change in vehicular trip generation compared to the agreed baseline. It is demonstrated that the forecast vehicle trip generation associated with the proposed development will be lower than that associated with the baseline in both peak hours and, as such, traffic modelling is not required.
- 6.21 A revised access arrangement has been designed following feedback from LBH. This allows for up to five HGVs to be queuing on approach to enter the Site and provides sufficient stacking space without leading to blocking of the car park access, noting that only 18 HGVs are forecast to enter the site in the peak hour (on average one every three to four minutes).
- 6.22 Car parking for the existing Site is served from 280 spaces within the MSCP to the east. The extant planning permission for the car park (as amended by application ref 65688/APP/2021/2709) specifically allows for up to 280 spaces to be used in connection with the Site. As a result, the proposals only provide visitor, disabled and operational spaces on-site.
- 6.23 Six disabled bays will be provided by the main entrance, located so that they reduce the walking distance to the building compared to the MSCP. The other four bays are provided for operational requirements associated with the facility, e.g. border control checks and drop-offs. These spaces will be set out to allow for future conversion to disabled spaces in the future if required. All spaces within this parking area will be provided with access to an EV charging point.
- 6.24 It is proposed to provide a total of 24 long-stay cycle parking spaces and 12 short-stay spaces, in line with London Plan standards. For long-stay provision, 18 of the spaces would be in the form of two-tier racks, with the remaining six provided using Sheffield stands which would include the ability to accommodate up to two non-standard bikes. The short-stay provision will be in the form of Sheffield stands with the ability to accommodate at least one non-standard bike. The mix of cycle parking is in line with TfL advice.
- 6.25 Ingress and egress utilises existing points of access, with clearly demarked circulation across the Site. Minor adjustments are proposed to the main access junction off Southampton Road East which will improve pedestrian connectivity and also increase the stacking capacity within the site for vehicles accessing the secure area.

- 6.26 All roads within the airport are owned and operated by Heathrow Airport Limited and, as such, the implications of any development on the airport road system are for Heathrow Airport Limited to assess. Pre-application engagement has been undertaken with the ground operations team and no concerns were raised.
- 6.27 The Site and surrounding area can be accessed by various public transport modes, including via the Central Terminal Area (bus and rail) and Hatton Cross London Underground station, and is well connected in the wider pedestrian and cycle network.
- 6.28 The planning application is accompanied by an Outline Travel Plan and Construction Management Plan detailing transport measures to minimise staff vehicle trips to the Site and the construction programme of the development respectively.
- 6.29 In light of the above, the proposals will not have any detrimental impact on the surrounding road network, and are well served by public transport facilities. The development proposals are therefore acceptable in transport terms and align with relevant national, regional, and local policy.

Other Planning Matters

Air Quality

- 6.30 Policy SI 1 states that development proposals must be at least air quality neutral. Development should use design solutions to prevent or minimise increased exposure to existing air pollution and make provision to address local problems of air quality in preference to post-design or retro-fitted mitigation measures. Major development proposals (+1000sqm) must be accompanied by an Air Quality Assessment to show how the development will not lead to further deterioration of existing poor air quality.
- 6.31 Heathrow is located within an Air Quality Focus Area where proposals should demonstrate that design measures have been used to minimise exposure to poor air quality.
- 6.32 The policy requires development proposals to ensure that where emissions need to be reduced to meet the requirements of air quality neutral or to make the impact of development on local air quality acceptable, this is done on-site. Where it can be demonstrated that emissions cannot be further reduced by on-site measures, off-site measures to improve local air quality may be acceptable, provided that equivalent air quality benefits can be demonstrated within the area affected by the development.
- 6.33 An Air Quality Assessment has been submitted in support of the application which demonstrates that the proposals comply with the relevant policy and guidance tests.

Energy & Sustainability

- 6.34 London Plan Policy SI 2 requires major development proposals (+1,000sqm) to be net zero carbon, which means reducing greenhouse gas emissions in operation and minimising both annual and peak energy demand in accordance with the energy hierarchy.
- 6.35 In line with the London Plan and Heathrow's Cargo Strategy, the proposals contain various sustainability initiatives to reduce the development's carbon footprint. As set out in the Energy

and Sustainability Statement, these sustainability features will allow for a 104% carbon reduction from a base Part L 2021 compliance build, representing a 28.6 tonne reduction in annual CO2 emissions. The development is compliant with Policy SI2 through use of passive measures, an AHSP system and Photovoltaic Panels (PV) which result in an overall 116% energy reduction from Part L.

- 6.36 Other passive design features include energy efficient lighting, submetering of relevant areas, upgrading of 'U' values and occupancy sensing in relative areas.
- 6.37 To reduce the energy demand of the development as well as help to conserve water resources within the local area, it is anticipated that the fit-out works will provide for sanitary fittings which will be water efficient through measures such as dual flush toilets and low flow taps.
- 6.38 In addition, the development will encourage sustainable transport. The Site benefits from good public transport accessibility, and dedicated cycle storage will be provided to promote active travel and reduce reliance on private vehicles.
- 6.39 The incorporation of these energy and sustainability measures allows for the proposed development to be deemed sustainable and compliant with local, regional and national policy.

Impact on Amenity

- 6.40 The Site is bordered by commercial development within Heathrow Airport and as a result the redevelopment of the Site will not impact such neighbouring uses in terms of overlooking or overshadowing.
- 6.41 There are no residential properties in close proximity to the Site, with the nearest residential properties located approximately 225m to the south separated by the Southern Perimeter Road, Duke of Northumberland River Longford River and Bedfont Road. As a result, and due to the predominant industrial nature of the surrounding area, the proposals will not have any impact on neighbouring properties.
- 6.42 Notwithstanding this, a Noise Assessment has been prepared as requested by LBH. This confirms that noise from the proposed development will be within acceptable levels at the nearest noise sensitive properties.

Archaeology

- 6.43 The Site is within the Heathrow Archaeological Priority Zone, a designated area of archaeological interest particularly (but not exclusively) for pre-roman remains.
- 6.44 A Desk-based Assessment (DBA) accompanies the application, along with a Written Scheme of Investigation (WSI). These were prepared in 2022 when the proposals were still in the development stage to ensure early consideration of archaeological potential at the Site.
- 6.45 The DBA considers that the Site has moderate to high potential for prehistoric remains and a moderate potential for agricultural remains dating to the late medieval and post medieval period, with low potential for all other periods. Archaeological investigation is therefore recommended to determine the nature, extent and significance of any archaeological remains.

- 6.46 The WSI sets out the methodology for these investigations which comprise the excavation of seven archaeological trenches within the Site. Once complete, the results of the investigations will inform a mitigation strategy for any archaeological remains that would be affected by the development (if applicable).
- 6.47 The DBA and WSI were shared with GLAAS in 2022 who gave agreement to the proposed WSI. The content of these documents remains consistent with the proposals and as such they were re-issued to GLAAS in January 2026. GLAAS confirmed via email on 7 January 2026 that the WSI remains acceptable (please refer to **Appendix 2**).
- 6.48 It is anticipated that a condition will be attached to the permission which requires the archaeological investigation to be carried out in accordance with the WSI prior to below-ground works commencing on Site.

Airport Safeguarding

- 6.49 Policy DMAV 1 of the Local Plan seeks to ensure the safe operation of Heathrow Airport and states that the Council will consult with the airport operator on proposals in the safeguarded areas.
- 6.50 As set out at section 4 of this Statement, the proposals have been developed alongside close engagement with Heathrow Airport Ltd to ensure that the operation of the airport is not impacted detrimentally. In addition consultation has been undertaken with NATS. To inform this engagement, PagerPower were commissioned to advise on safeguarding, and an Aviation Impact Assessment and Solar PV Glint and Glare Study are submitted in support of the application.
- 6.51 The Aviation Impact Assessment considers that the proposal will have a low impact with respect to aviation activity at Heathrow Airport. The proposed development is not predicted to significantly impact the radar and communication navigation and surveillance equipment, the obstacle limitation surfaces, or the instrument flight procedures. Furthermore, no significant impacts are predicted with respect to military operations, licenced airports, and unlicensed airfields, and as such, no further analysis or mitigation is recommended.
- 6.52 The Solar PV Glint and Glare Study assesses the potential effects of glint and glare from the proposed rooftop solar PV upon aviation activity associated with the airport. The Study concludes that solar reflections are not predicted to be geometrically possible towards the Air Traffic Control Tower, and towards the 2-mile approach paths for runways 09L/27R, 09R/27L, and the proposed runway 09P/27P, are of an acceptable intensity. As such, no impact is predicted and mitigation is not required.
- 6.53 A Wildlife Hazard Plan has also been prepared by Bird Strike Management Ltd. This reviews likely attractants, along with commitments to design modifications and the implementation of bird management actions to manage bird attraction that could be generated by the development. A plan is provided for both the Construction Phase and Operational Phase of the development.
- 6.54 The design of the scheme has been developed cognisant of this Plan and implementation of the remaining recommended bird management actions will ensure that no additional flight safety risk arises from this development.

- 6.55 When taken together, these documents evidence that the proposals will not have any detrimental impacts on the operation of the airport in accordance with Policy DMAV 1.

Biodiversity

- 6.56 As part of the Environment Act 2021, applicable planning applications need to demonstrate that they will deliver biodiversity net gain of at least 10%. There are however exceptions to this requirement if the development proposals don't meet the specified thresholds. This includes the 'de minimus' exemptions where the BNG requirements do not apply if the development does not impact a priority habitat; and impact less than 25 square metres (5m by 5m) of on-site habitat or 5 metres of on-site linear habitats such as hedgerows.
- 6.57 A BNG Technical Note has been prepared by MKA Ecologists following a site survey. This confirms that the Site comprises developed land which is sealed surface with contains no additional habitats. As this habitat type has very low distinctiveness within the BNG Statutory Metric, it is allocated a score of zero. The proposals therefore meet this 'de minimus' exemption test so mandatory 10% BNG does not apply.
- 6.58 Nevertheless, London Plan Policy G6 (2021) aims for all developments to secure net biodiversity gain and Policy DMEI 7 of the Local Plan states that the design and layout of new development should retain and enhance any existing features of biodiversity or geological value within the site. Whilst there aren't any existing features, consideration has been given to enhancing the biodiversity at the Site.
- 6.59 Soft landscaping is limited by the operational requirements of the industrial use, and airport safeguarding constraints which include avoiding planting types which may attract birds to the Site. However, an area of landscaping is proposed to the north east of the Site which incorporates a mix of native and ornamental grass planting. This serves to enhance the biodiversity value of the Site and improve visual amenity, whilst ensuring that the species selected will not attract birds to the airport and increase the risk of bird strike incidences.

Contamination

- 6.60 Given the Site has been subject to potentially contaminative activities related to Heathrow Airport, a Preliminary Risk Assessment has been undertaken, consisting of a desk study to assess the potential for contaminant sources. The desk study was also undertaken to identify possible sensitive environmental receptors that may be at risk from sources, if present, within the locality of the Site.
- 6.61 The report considers there to be a Low to Moderate risk to end users from contaminants within shallow soils and from hazardous ground gas. The Duke of Northumberland's River and Longford River to the south of the Site are considered likely to be in hydraulic continuity with the Taplow Gravel beneath the site, and as such, the risk to controlled waters is considered to be Low to Moderate.
- 6.62 A series of recommendations are proposed to address the identified risks. These include intrusive investigations and geotechnical testing and sampling, followed by the preparation of a remediation strategy should this be deemed necessary. It is anticipated that appropriately worded conditions will be attached to the permission requiring these details to be submitted prior to below ground works commencing on site to limit any risk to human health.

Flood Risk and Drainage

- 6.63 Policy EM6 of the Local Plan states that applicants must demonstrate that Flood Risk can be suitably mitigated and Policies DMEI 9, DMEI 10 and DMEI 11 seek to ensure that new development incorporates appropriate measures to mitigate against any potential risk of flooding.
- 6.64 The Site lies within Flood Zone 1 and is at a low risk of flooding, however given the size of the Site, which exceeds 1ha in area, a Flood Risk Assessment (FRA) is required. A Drainage Strategy is also required that gives priority to the inclusion of sustainable drainage measures.
- 6.65 The FRA and Drainage Strategy have been prepared by Bayham Meikle. The FRA demonstrates that all types of flood risk at the Site are either Very Low or Low, save for groundwater risks which are Low/Moderate. The assessment considers that the only action required is with regard to run-off.
- 6.66 A Drainage Strategy has been developed to address this risk, which includes design mitigation in the form of attenuation storage, permeable paving and Flow Control. The proposed surface water system will discharge to cater for 1 in 100 year plus 40% climate change event and discharge into a private Heathrow asset in close proximity to the Southern Perimeter Road.
- 6.67 As the existing Site previously had no flow control measures or attenuation storage, the addition of these improvements will mitigate surface water runoff and prevent flooding of the Site in accordance with the policy tests set out within the Local Plan.
- 6.68 The development is classed as Less Vulnerable usage, and the proposed development is in Flood Zone 1 and meets the sequential test and therefore an exception test is not required.

Fire Safety

- 6.69 Policy D12 of the London Plan (2021) requires the submission of a Fire Safety Statement for all major forms of development proposals.
- 6.70 A Fire Statement has therefore been prepared by OFR which demonstrates how the proposals respond to the requirements of London Plan Policy D12 while also aligning with the principles of Schedule 1, Part B (Fire Safety) of the Building Regulations 2010 (as amended).
- 6.71 The Statement considers means of escape, passive and active fire safety, and access and facilities for firefighting. It is confirmed that the proposals provide a design in line with Policy D12, as well as Policy D5(B5) of the London Plan. Furthermore, the proposals will comply with the functional requirements of Part B of the Building Regulations once the detailed design is developed.

Arboriculture

- 6.72 The application is supported by an Arboricultural Impact Assessment which demonstrates that all trees are retained and that measures will be in place to ensure trees are protected during construction activities.

Summary

- 6.73 In summary, the application proposals for the redevelopment of the Site for airport-related Class B2 and/or B8 with ancillary Class E(g) are fully supported by adopted planning policy as well as material considerations and are consistent with the land uses previously consented on this and adjacent sites.
- 6.74 The design and layout of the emerging proposals is consistent with the airport related industrial/commercial character of the surrounding area, and of a height/massing, form and materiality that is reflective of the immediate context.
- 6.75 The proposals accommodate onsite car parking for visitors, disabled and operational users, with staff parking available within previously consented and secured car parking spaces in the adjacent MSCP. Having regard to the nature of the proposed use compared to that previously consented, the proposals will not cause harm to the local or strategic transport network, and the Site is accessible by public transport.
- 6.76 The proposals will not cause any impact to neighbouring uses, with the nearest residential properties located 225m to the south beyond road and river infrastructure. Furthermore, the proposals provide a positive response to all other relevant technical matters.

7 Conclusion

- 7.1 This Planning Statement describes the proposals for the redevelopment of 1071 Southampton Road East to provide a replacement modern warehouse for use as a cargo transit shed for occupation by a global air cargo, passenger and ground handling organisation.
- 7.2 As explained within this Statement, adopted policies of both the London Plan and LBH support the redevelopment of the Site for airport related purposes, noting its location adjacent to Heathrow Airport as well as the strategic road network. The proposals reflect the uses within the surrounding area, which clearly establishes the principle of development in the location.
- 7.3 The proposals represent a significant investment in the borough and will enable economic benefits to be delivered to a currently vacant and under-utilised brownfield site, as well as the generation of circa 100new employment opportunities.
- 7.4 Pre-application engagement with LBH, Heathrow Airport Limited and other key stakeholders has informed the proposals, ensuring the relevant airport safeguarding requirements are met, and that the proposals are consistent with all relevant adopted planning policy and guidance.
- 7.5 In accordance with the NPPF, the proposals should be approved without delay.

APPENDIX 1

From: [Louise Hambleton](#)
To: [Mike Kemp](#)
Cc: [Phil Murphy](#)
Subject: 1071 Southampton Road East
Date: 27 April 2026 07:54:00

Dear Mike

Further to our call last week with yourself and Ed, we have considered the feedback regarding the Council's views in respect of the existing offsite car parking arrangements associated with the adjacent MSCP.

We understand that the Council is suggesting that this existing arrangement should be altered to reduce the number of permitted spaces that can be used by business occupiers of our site to align with parking standards in the 2021 London Plan parking standards. We have carefully considered the Council's suggestion, but we do not consider such changes or restrictions to be required or reasonable in planning terms for the following reasons:

- The MSCP benefits from an extant lawful permission.
- As you are aware, on 23 September 2021 the Council approved an NMA (ref 65688/APP/2021/2709) to the extant MSCP permission (ref 65688/APP/2016/94) which amended various conditions, including condition 10, which states:

"No more than 1,022 parking spaces in total shall be provided on the multi storey car park (MSCP) hereby approved. These car parking spaces shall only be used by employees at land known as Building 1071 and British Airways. A maximum of 280 of these car parking spaces (all ground floor and part first floor) shall [be] used by those employees working in connection with business operations at land known as Building 1071, Southampton Road East, Heathrow Airport. A maximum of 742 car parking spaces shall be used for those working in connection with business operations at the BA Cargo Campus site by those working in connection with business operations at the BA Cargo Campus site, Southampton Road East, Heathrow Airport."

- Condition 10 (as amended) places express restrictions and requirements on the owner/operator of the MSCP so that the 280 spaces are only to be used by those working in connection with business operations at the site.
- As part of the September 2021 NMA, the Council also introduced a new Condition (numbered 5 on the NMA) which states: *"This application and the changes to condition 2,3,10 and 13 shall apply to any future permissions to vary the original planning permission ref: 65688/APP/2016/94. The reasons for each condition also remain as per the original consent"*. This new condition makes clear that the Council considers the specific parking restrictions and allocations for use by our site must be maintained for the lifetime of the MSCP development, including in the event that that permission is further varied in future.
- We note that the current version of the London Plan was adopted in March 2021 prior to the submission and approval of the NMA. As such, the NMA was determined on the basis of the same parking standards which apply today. We are not aware of any other changes to the Development Plan or other material considerations since July 2021 (when the NMA application was submitted) which would justify a different arrangement.
- In any event, since (i) the MSCP is operating lawfully under its existing permission; (ii) the MSCP land is under different ownership; and (iii) no new development is proposed for MSCP land – we can see no planning reason to amend the red line boundary to include the MSCP

land in our application.

In light of the above, we do not propose to make any changes to the emerging planning application for the redevelopment of our site in respect of the way it benefits for the use of offsite car parking in the adjacent MSCP.

Kind regards
Louise

APPENDIX 2

From: [Dave Taylor](#)
To: [Louise Hambleton](#)
Subject: FW: 1071 Southampton Road TW6 3AQ
Date: 17 March 2026 14:38:36
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image238908.png](#)
[image128713.png](#)
[image050560.png](#)
[1071 Southampton Road DBA.pdf](#)

Hi Louise

See Sandy's email below. Also attached is the 2021 DBA.

Thanks
Dave

Dave Taylor (he/him/his) | Project Manager | 07841 340541 | dtaylor@mola.org.uk

MOLA (Museum of London Archaeology) | 46 Eagle Wharf Road | London | N1 7ED | www.mola.org.uk



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From: Kidd, Sandy <Sandy.Kidd@HistoricEngland.org.uk>
Sent: 07 January 2026 09:51
To: Dave Taylor <dtaylor@mola.org.uk>
Subject: RE: 1071 Southampton Road TW6 3AQ

This Message originated outside your organisation.

Happy New Year Dave,

Your client has signed our Enhanced Services Agreement and Alexander Feaver has asked me to follow up with MOLA to confirm agreement with the proposed trenching strategy at this site near Heathrow.

As you know we agreed an evaluation WSI with Stew Hoad back in January 2022. As far as I am concerned that is still acceptable so please can you either confirm you are going to implement that or suggest amends if necessary?

Also, do you have a timescale for implementation yet? I would need a couple of weeks' notice to book in a monitoring visit.

Regards

Sandy Kidd MCIfA
Team Leader (GLAAS)
London & South East Region
Historic England
07760 456812



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From: Kidd, Sandy
Sent: 22 September 2025 14:55
To: 'Dave Taylor' <dtaylor@mola.org.uk>
Subject: RE: 1071 Southampton Road TW6 3AQ

Hi Dave, our trenches are located to examine areas not disturbed by utilities whereas the GI are located to find those utilities so I don't see how one can replace the other. As far as I understand it your client is still at pre-app stage and had been asked to enter into an EAS agreement to cover the evaluation. I will need to get that re-costed if the evaluation is progressing.

Regards

Sandy Kidd MCIfA
Team Leader (GLAAS)
London & South East Region
Historic England
07760 456812

From: Dave Taylor <dtaylor@mola.org.uk>
Sent: 19 September 2025 12:36
To: Kidd, Sandy <Sandy.Kidd@HistoricEngland.org.uk>
Subject: 1071 Southampton Road TW6 3AQ

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Hi Sandy

This project that Stew Hoad created a WSI for back in 2022 (attached) has come back online and the client has asked if any of the proposed trenches can be replaced with the locations of GI investigations for utilities to double up. We think that TR7 could be replaced with UT1 & 2, and the top half of TR 1 replaced with UT6.

I have attached the GI plan so you can see those locations.

Let us know what you think

Kind Regards

Dave

Dave Taylor (he/him/his) | Project Manager | 07841 340541 | dtaylor@mola.org.uk

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