



UNION 4 PLANNING

Applicant: Airpets

**Site Address: Airpets, Spout Lane North,
Heathrow TW19 6BW**

New security perimeter fencing and access gates

PLANNING STATEMENT

November 2025



UNION4
PLANNING

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Project: Perimeter security fencing and access gates

Applicant: Airpets

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1.0 Introduction

- 1.1 This Planning Statement has been prepared by Union4 on behalf of Airpets, regarding the land at Spout Lane North TW19 6BW.
- 1.2 The application proposes:

'New security perimeter fencing and access gates.'
- 1.3 The site comprises approx. 1.5ha. and is used for a range of uses including pet quarantine and animal transport, storage, offices and residential.
- 1.4 In accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004, this Planning Statement provides an assessment of the proposals against the Development Plan and other material considerations, including the National Planning Policy Framework ('NPPF').
- 1.5 The Planning Statement comprises the following sections:
 - Section 1 – Introduction – brief details of the proposed development and explanation of the contents of the sections in this Planning Statement
 - Section 2 – Site Location and Description provides a detailed description of the site and its surroundings
 - Section 3 – Planning History; provides details of key planning applications for the site
 - Section 4 – Proposed Development: provides a detailed description and explanation of the proposed development.
 - Section 5 – Planning Policy Assessment: sets out the planning policy framework against which the application should be assessed and provides a detailed justification for the development against applicable planning policies and taking account of all other material considerations.
 - Section 6 – Summary and Conclusion: summarises the key benefits of the proposed development and the reasons why planning permission should be granted.
- 1.6 The drawings and documents submitted with this minor planning application comprise:
 - Planning Statement – Union 4 Planning Ltd
 - Application drawings by Cardo architects:
 - Site Location Plan
 - Block Plan
 - Perimeter Fence Plan
 - Proposed Fence System

- Proposed Security Gates
- Tree survey and Arboricultural Impact Assessment by Mark Welby
- Technical Note on access by Civilistix Ltd
- Access engineering layout and vehicle tracking plans by Civilistix Ltd
- Proposed landscaping scheme by ACD Environmental

1.7 These are considered to provide the appropriate level of detail for this minor application.

2.0 Site Location and Description

Site Location and Description

- 2.1 The site is bounded by Stanwell Moor Road (A3044), Spout Lane North and Bedfont Court.
- 2.2 Spout Lane lagoon is situated to the south, Heathrow Airport to the east and a range of commercial and residential uses to the south-west and north. To the west is the Colne Valley, with the River Colne running in a north-south direction, beyond which is the M25.
- 2.3 The site is situated close to M25 junction 14 and very close to Heathrow Airport.

Figure 1: Site Location



Source: Google Earth 2025

- 2.4 The site has two vehicular access points, both from Spout Lane North. Due to the road network in this location, Spout Lane North can only be accessed via Stanwell Moor Rd.
- 2.5 The site contains fourteen buildings, two of which are in residential use (in the south-western corner of the site). There are three office buildings, accommodating Airpets, Travel Vet and for Airpets Border Post.
- 2.6 The site is largely covered in hardstanding, however there is a large grassed area on the south-eastern side of the site, which is used as an animal exercise area.
- 2.7 Most of the buildings are single storey and inefficiently laid out on the site.

- 2.8 The site does not lie within a Conservation Area and there are no protected trees (TPO's) on the site.
- 2.9 The site is not within an area identified as at risk of flood from any sources. In terms of pluvial flood risk, the land falls within Flood Zone 1 on the Environment Agency Flood Map and is at very low risk of flooding from surface water.
- 2.10 The site is within the London Borough of Hillingdon. According to data from the Metropolitan Police, Hillingdon is the borough where the most pets are stolen. Security of the site has been compromised on a number of occasions with trespassers climbing the current low-level fences. Whilst theft of animals is a serious problem, there are also other reasons for improving the security of the site.
- 2.11 Legislation governing the movement and control of pets and wildlife now requires strictly defined levels of security to ensure the health and safety of the public, staff and animals. Existing fences are not compliant and need to be upgraded.
- 2.12 Airpets is a licenced quarantine premises and one of the licencing requirements (Article 9 of the Rabies (Importation of Dogs, Cats and Mammals) Order 1974) is to have a 3m perimeter fencing to prevent the escape of animals, the entry of non-quarantine animals and the unauthorised entry of persons.

3.0 Planning History

- 3.1 The site is referred to as Willowslea Farm Kennels on the Council's register. A summary of the most relevant applications is set out below:
- 3.2 **Application 55936/APP/2020/1008**
- 3.3 Use of the building as offices for the operation of the Airpets business including the minibus service used to transport clients/pets to and from their homes and/or to and from Heathrow Airport including parking of a minibus on the site (Application for a Certificate of Lawful Development for an Existing Development). Approved 15th June 2020.
- 3.4 **Application 55936/APP/2021/2345**
- 3.5 Replacement and upgrade of perimeter safety and security fencing, including secondary fencing and gates to separate secure exercise areas located within the site. Approved 20th August 2021.

4.0 Proposed Development

4.1 The application proposes:

'New security perimeter fencing and access gates.'

4.2 The Applicant, Airpets, is required by law to maintain stringent infection control procedures. This includes ensuring that animals brought to the site for the purposes of quarantine do not escape and/ or spread disease.

4.3 To adhere to these requirements and improve safety and security at the site entrance, a new security fence is proposed around the site perimeter and a new gated access is proposed at the main entrance from Spout Lane North. The application follows a previous approval for perimeter security fencing. This is due to a detailed site survey, which identified that the northern and western site boundaries (in particular), were inaccurately plotted. Thus, the fencing approved in 2021 is in the wrong position. In addition, the opportunity is being taken to upgrade the main site access, to meet modern requirements and deliver accessibility and safety improvements.

4.4 Vehicular access would be from Spout Lane North, as currently.

5.0 Planning Policy Assessment

5.1 This section considers the planning policies and legislative framework which together provide the context within which a planning application would be considered. It identifies the national, regional and local policies, which are contained within statements of Government policy and the Development Plan for the area, or which may otherwise be material to the consideration of the proposed development.

NPPF and the Development Plan

5.2 The overall planning policy context is set by the National Planning Policy Framework (2024) and by the Development Plan which in this case comprises the following:

- The London Plan (2021)
- Hillingdon Local Plan Part 1 Strategic Policies (2012)
- Hillingdon Local Plan Part 2 Development Management Policies and Site Allocations and Designations (2020).

5.3 There is a statutory requirement to review Local Plans at least every 5 years to consider whether they need to be updated. The Council has committed to a review of the Local Plan, but at the time of writing, a draft Plan has yet to be published. The most recent Local Development Scheme (LDS, February 2025), indicates that a Regulation 18 consultation draft Plan would be published in October/ November 2025.

5.4 The site does not lie within a Neighbourhood Plan Area.

National Planning Policy Framework (2024)

5.5 The National Planning Policy Framework (NPPF 2024, amended 2025) explains that the purpose of the planning system is to contribute to the achievement of sustainable development. This includes building a strong, responsive and competitive economy, supporting strong, vibrant and healthy communities and protecting and enhancing our environment. Paragraph 8 sets out the three overarching objectives to sustainable development as follows:

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

5.6 The NPPF retains a “*presumption in favour of sustainable development*”, with Paragraph 11 stating that “*For decision-taking this means ... approving development proposals that accord with an up-to-date development plan without delay.*”

5.7 Section 6 sets out the government’s aims to build a strong, competitive economy. Paragraph 85 states 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...*”

5.8 Section 8 refers to ‘promoting healthy and safe communities.’ Paragraph 91 states that “*planning policies and decisions should aim to achieve healthy, inclusive and safe places.*

5.9 Section 9 refers to sustainable transport with paragraph 116 stating that “*development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.*”

5.10 Section 11 refers to ‘making effective use of land’ with paragraph 128 stating that “*planning policies and decisions should support development that makes efficient use of land, taking into account:*

- a) the identified need for different types of housing and other forms of development, and the availability of land suitable for accommodating it;*
- b) local market conditions and viability;*
- c) the availability and capacity of infrastructure and services – both existing and proposed – as well as their potential for further improvement and the scope to promote sustainable travel modes that limit future car use;*
- d) the desirability of maintaining an area’s prevailing character and setting (including residential gardens), or of promoting regeneration and change; and*
- e) the importance of securing well-designed, attractive and healthy places.”*

5.11 Section 13 relates to the Green Belt. paragraph 154 states that development in the Green Belt is inappropriate unless it is for (amongst other things):

“*... g) limited infilling or the partial or complete redevelopment of previously developed land (including a material change of use to residential or mixed use including residential), whether redundant or in continuing use (excluding temporary buildings), which would not cause substantial harm to the openness of the Green Belt.*”

5.12 The proposed perimeter fencing and access gates are required for the purposes of safety and security associated with the existing use of the site (as an animal quarantine facility etc.). A

previous application (ref. 55936/APP/2021/2345) for perimeter safety and security fencing (etc.) was approved in 2021 on the basis that whilst there would inevitably some adverse impact on the openness of the Green Belt, this would be limited (by virtue of the position of the fencing and the use of weldmesh fencing) and very special circumstances exist, which were found to outweigh the impact on openness.

5.13 It is asserted that the difference between the approved and now proposed perimeter fencing and access gates would not cause substantial harm to the openness of the Green Belt and therefore it is not necessary to demonstrate very special circumstances for the proposed development.

5.14 Notwithstanding this, very special circumstances exist for the proposed perimeter fencing and access gates.

The London Plan

5.15 The London Plan was adopted in 2021 and covers the greater London area, which includes Hillingdon.

5.16 Relevant London Plan policies are as follows:

GG1 Building strong and inclusive communities

GG2 Making the best use of land

GG3 Creating a healthy city

GG5 Growing a good economy

GG6 Increasing efficiency and resilience

Policy SD1 Opportunity Areas (site is adjacent to the Heathrow Opportunity Area)

Policy D3 Optimising site capacity through the design-led approach

Policy D11 Safety, security and resilience to emergency

Policy D12 Fire safety

Policy G2 London's Green Belt

Policy G5 Urban greening

Policy G7 Trees and woodlands

Policy SI 1 Improving air quality

Policy SI 2 Minimising greenhouse gas emissions

Policy SI 13 Sustainable drainage

Policy T4 Assessing and mitigating transport impacts

Policy T5 Cycling

Policy T6 Car parking

Policy T7 Deliveries, servicing and construction

Policy T8 Aviation

5.17 In this case, there is a clear benefit to the health and well-being of the community by providing the proposed security fencing and access gates. This is because the application site receives and keeps animals from abroad, where they may present a risk of infection to the resident population if they escape (before it has been confirmed whether they are infected).

5.18 The relevant London Plan policies on Good Growth (i.e. GG1 - 3, 5 & 6), support the proposal in principle. The proposal uses brownfield land, whilst protecting the Green Belt (through the open design of the fencing, which maintains openness by allowing visibility through the fence) and minimising the risk of potential negative impacts on health. Policy GG5 supports the growth of a good economy by promoting its strength and potential and Policy GG6 supports proposals that make London a more resilient city. The Policy states that development must create a safe and secure environment, which is resilient to the impact of emergencies. Whilst the proposal is very similar to previous applications for perimeter security fencing, this scheme includes an upgraded pedestrian and vehicular access, which will significantly improve the security and resilience of the facility. The needs of the applicant have changed since the previous applications and the security of the site access has become more important. As a result, an 'air lock' system is proposed to avoid the potential for an animal to escape whilst a vehicle or pedestrian is entering (or leaving), the site. It also improves resilience where maintenance of a gate (or pair of gates) is required. Given the gates are in frequent use, there is a regular need for maintenance, which impacts on the operation of the facility. This reduces its efficiency and creates security risks.

5.19 As a result, two pairs of bi-folding gates are proposed, in the same system as the security fencing. This provides a coherent appearance with the fencing and enables visibility through the gates (see figure 2 below).

Figure 2: Image of bi-folding gates proposed for Airpets



Source: SpeedMaster

5.20 The benefit of bi-folding security gates is their ability to open and close quickly and smoothly. This provides a significant benefit to site security (which is the main objective), whilst also saving on space requirements within the site. This is a secondary objective, due to the position of the access and existing buildings on the site.

5.21 The proposal is also supported by Policy D11, which explains that '*Development proposals should maximise building resilience and minimise potential physical risks...*' and '*include measures to design out crime...*' The former is a key objective of the proposal, with the latter (designing out crime), being a secondary benefit of the scheme. The proposal has carefully considered these matters from the outset and, in accordance with Policy D12, incorporates appropriate fire safety measures, which are:

- The provision of suitably positioned unobstructed outside space for fire appliances and suitable access for emergency vehicles
- Measures to minimise the potential for a fire to spread
- The provision of suitable and convenient means of escape

5.22 The London Plan identifies various Opportunity Areas, which are designated to '*fully realise their growth and regeneration potential.*' Opportunity Areas are designated for their ability to deliver significant growth in housing, jobs and infrastructure. In this case, the site is adjacent to the Heathrow Opportunity Area. The proposal supports the efficient operation of the existing business. It also facilitates improved access by walking and cycling.

5.23 In terms of design, Policy D3 requires a design-led approach. The Policy explains that spaces and buildings should maximise opportunities for urban greening. As shown on the landscaping plan, significant planting is proposed to enhance the appearance of the site, assist with urban greening (in accordance with Policy G5) and improve biodiversity.

5.24 Policy G2 protects the Green Belt, in which the site is situated. The Policy explains that development proposals that harm the Green Belt should be refused unless there are very special circumstances. Notwithstanding our strong view that the development is 'appropriate' and VSC's are not required, the following would comprise VSC's, if required. As with the previous scheme for security perimeter fencing, these VSC's can be summarised as:

- The facility is of a highly specialist nature and needs to adapt to new and more stringent legislation and logistical requirements
- There are insufficient such facilities available in the UK. This facility is ideally located to serve Heathrow airport, with minimum off-airport travel distance, reducing risks
- There is an ongoing and permanent need to comply with national legislation in respect of animal health and security during their stay and during the transit process. It is not anticipated that such legislation will become any less onerous over time
- The current level of security of the site is not acceptable. Security has been compromised on a number of occasions with trespassers being able to enter the site. Equally important is that legislation and licensing of the site requires security from within as well - so that potentially dangerous and/ or sick animals cannot escape and or contaminate other animals and people
- Dogs must be allowed to properly exercise, off a lead, not just walked with a lead for exercise. Dogs must also be kept separate from other animals whilst in quarantine conditions. Fences are the only way of keeping animals safe and secure when running free

5.25 The land has been previously developed. It is well enclosed from the wider Green Belt, particularly to the north and west. The heavily built up western area of Heathrow Airport is immediately to the east of Stanwell Moor Road, which is adjacent to the eastern boundary of the site. There are also existing previously developed sites, in commercial and residential use, to the north, south and west of the site, but these are not visible from Stanwell Moor Road. In addition, the only views from the public realm into the site are from Stanwell Moor Road. No wider views are possible beyond the site. As a result, the impact on openness from development on the site is already limited.

5.26 Notwithstanding this, planning permission has previously been granted for perimeter security fencing. This has been implemented, with fencing erected in the south-eastern section of the site,

further restricting views from Spout Lane North and Stanwell Moor Road. The proposed perimeter security fencing is in a very similar position and to the same height as the approved fencing and would therefore have no greater impact on the openness of the Green Belt. This element of the proposed development should be considered appropriate in the Green Belt as it would not cause substantial harm to the openness of the Green Belt (as required by NPPF paragraph 154 (g)).

- 5.27 The same conclusion can be reached for the proposed access gates. Whilst there is a view into the site from Spout Lane North, this is primarily of the existing buildings and the security fencing (see Google streetview images in figures 3 and 4 below). The top of the trees around the site (and other buildings i.e. Terminal 5), would continue to be visible (as currently).
- 5.28 Due to the design of the proposed access gates (figure 2), the existing view into the site would remain with the proposed access gates in position. As a result, the proposed access gates would not cause substantial harm to the openness of the Green Belt.
- 5.29 It is concluded that the proposed development would not harm the openness of the Green Belt in this location and therefore comprises appropriate development.

Figure 3: View of Airpets existing vehicular access (from Spout Lane North)



Source: Google streetview (2025)

Figure 4: View of Airpets existing vehicular access (from Spout Lane North)



Source: Google streetview (2025)

- 5.30 Policy G7 explains that existing trees of value should be retained, wherever possible. A tree survey has been undertaken and accompanies this application. This finds that two low quality trees are to be removed to facilitate the proposals. Both are category C trees, situated on the northern site boundary (T24 & T25), behind an existing building. Neither tree exceeds 5m in height. New tree planting is proposed around the site, as indicated on the proposed landscaping plan.
- 5.31 In accordance with Policy SI 1, the proposed development would not lead to a further deterioration of air quality, create any new areas that exceed air quality limits, or create an unacceptable risk of high levels of exposure to poor air quality. The proposed development is air quality neutral and the proposed fencing may provide some localised benefits in terms of air quality.
- 5.32 In accordance with Policy SI 13, the proposed development would not alter the existing surface water drainage arrangements, which are infiltration to the ground at source. The small increase in impermeable surfacing at the site access is necessary to enable safety (for pedestrians and vehicles) and vehicle manoeuvrability into the site.
- 5.33 In accordance with Policy T4 a technical note on the proposed access improvements accompanies this application. This finds that the existing access compromises safety due to poor visibility and vehicle tracking characteristics. As noted above, the new access significantly improves safety. No changes are proposed to the number of vehicle movements to the site.

5.34 As shown in the attached access technical note, the proposal makes provision for a separate access into the site for pedestrians and cyclists. This significantly improves their safety, which helps remove a barrier to cycling, as set out in Policy T5. Existing secure cycle parking within the site will be retained. As a result, the proposal is fully in accordance with Policy DMT1.

5.35 No additional car parking spaces are proposed. As a result, the relevant parts of policies T6 and T7 supports the proposed development, as it significantly improves provision for deliveries, servicing and emergency access.

5.36 Part H of Policy T8 is relevant to the proposal as it relates to general and business aviation activity. As identified above, this proposal for security perimeter fencing and new access gates would not result in additional environmental harm or negative effects on health. Indeed, the proposal is more likely to deliver positive effects on health by improving the security and resilience of the site and removing a barrier to cycling to and from the site. The proposal has no impact on scheduled flight operations.

5.37 It is concluded that the proposed development is fully in accordance with the relevant policies of the London Plan.

Local Plan

5.38 The Local Plan Part 1 (Strategic Policies) sets out the plan for the future development of the Borough in the period 2011 to 2026. The Local Plan Part 2 (Development Management Policies and Site Allocations and Designations) provides further and more detailed planning policies to use in determining planning applications.

5.39 Relevant planning policies from the adopted Local Plan are as follows:

Local Plan: Strategic Policies

- Policy NPPF1: Presumption in favour of sustainable development
- Policy E2: Location of employment growth
- Policy HE1: Heritage
- Policy BE1: Built Environment
- Policy EM1: Climate Change Adaptation and Mitigation
- Policy EM2: Green Belt, Metropolitan Open Land and Green Chains
- Policy EM6: Flood Risk Management
- Policy EM7: Biodiversity and Geological Conservation
- Policy EM8: Land, Water, Air and Noise
- Policy T1: Accessible Local Destinations

5.40 Policy NPPF1 reflects the presumption in favour of sustainable development, as set out in the NPPF. The Policy explains that the Council will always work pro-actively with applicants jointly to find solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area.

5.41 The site is adjacent to the Heathrow Opportunity Area, which is identified as an area of growth in the Local Plan. Whilst this application does not specifically create any new jobs, it delivers material benefits that safeguard the existing jobs provided at the site.

5.42 The proposal meets the relevant requirements of Policies BE1 and EM1, by:

- Incorporating a clear network of routes – a separate pedestrian and cycle access is proposed adjacent to the vehicular access, improving the accessibility and sustainability of the site; and
- Creating a safe and secure environment

5.43 As noted above, the proposal should be considered as appropriate development in the Green Belt. Notwithstanding this, very special circumstances have been identified justifying the need for the development. As a result, it is asserted that the proposal complies with the requirements of Policy EM2, which requires proposals for development in Green Belt to be assessed against national and London Plan policies.

5.44 The site is not in an area at risk of flooding. As a result, it complies with Policy EM6, which directs new development away from flood zones 2 and 3. Surface water from the very limited additional hardstanding will drain into the ground via infiltration, in accordance with the drainage hierarchy.

5.45 The site is not designated for its nature conservation interest and the proposed development preserves and enhances biodiversity through planting new trees, as indicated on the proposed landscaping plan. As a result, the proposal meets the relevant requirements of Policy EM7.

5.46 In accordance with Policy EM8 and as noted above, the proposal would not result in the deterioration of air quality.

5.47 Whilst the existing use of the site is not unduly sensitive to noise and the proposal does not generate noise impacts itself, it is anticipated those proposed fences with timber lath infill would have a positive effect on reducing the impact of noise generated at the site (i.e. from dogs barking). The land is not contaminated and the proposal does not have any impact on water resources. As a result, the proposal is entirely in accordance with Policy EM8.

5.48 As noted above, the proposal improves access by pedestrians and cyclists, in accordance with Policy T1.

Heritage

5.49 Policy HE1 explains that the Council will conserve and enhance Hillingdon's historic environment. There are no designated heritage assets within 700m of the site. The nearest designated heritage assets are two listed buildings - Old Oak Cottage and The Croft, both grade II (on Horton Road and Colne Reach), in Stanwell Moor, south-west of the site. Due to the distance from the site and intervening built development, no impact on these heritage assets is envisaged.

5.50 The site lies within a designated Archaeological Priority Zone. It is not envisaged the proposed perimeter security fence would have any impact on buried artefacts, due to the very limited groundworks required to erect the fence. The same applies to the new access gates, the majority of which would be erected on land that has already been hardsurfaced. This leaves a very small area within the site that is proposed to be hardsurfaced, with new fencing and gateposts erected. Given the very small area involved and the very limited ground incursion required, it is considered extremely unlikely that the proposal would have any impact on archaeology and thus an archaeological assessment is not required.

Other site constraints

5.51 The Council has made various Article 4 Directions that affect various locations in the Borough and types of development. Most of the Article 4 Directions relate to changes of use and the protection of employment land. As a result, these are not relevant to the proposed development. There is one Article 4 Direction that is relevant to the site, which is the restriction to single storey rear extensions to dwellinghouses. This is not relevant to the proposal.

6.0 Summary and Conclusion

- 6.1 This Planning Statement has been prepared by Union4 Planning on behalf of Airpets in respect of the proposed perimeter security fencing and new access gates at the site.
- 6.2 This statement finds that the proposals would deliver appropriate development in the Green Belt to meet an identified pressing need for security fencing and access gates. The proposals are appropriate development in the Green Belt as they would not harm the openness of the Green Belt in this location. The proposals are therefore in accordance with paragraph 154 g) of the NPPF. Notwithstanding this, very special circumstances have been identified, should the Council consider it necessary for these to be demonstrated, to enable the application to be approved.
- 6.3 Otherwise, the proposal is very minor in nature, with no significant adverse impacts identified. Indeed, multiple benefits are identified that comprise material considerations in favour of granting planning permission. These include:
 - Improving security and resilience
 - Improving access and safety, for all site users, including in emergencies
 - Deterring crime
 - Enhancing landscaping
 - Providing a minor reduction from the impact of noise
- 6.4 It has been demonstrated that the proposed development complies with all relevant national, London Plan and local planning policies and therefore the presumption in favour of sustainable development applies. It is clear that the material considerations in favour of granting planning permission greatly outweigh any minor adverse impact.
- 6.5 It is concluded that the proposed development should be granted planning permission without delay.