

CENTRE OF EXCELLENCE FOR AIRSIDE SUPPORT VEHICLES PLANNING STATEMENT

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Appendix 1

ALTERNATIVE SITES

Quality Assurance

Site name:	Former Sipson Garden Centre
Client name:	Lewdown Holdings Ltd & Automania Garage Services
Type of report:	Planning Statement
Prepared by:	Christian Milner MPlan (Hons) MRTPI
Signed	<i>Christian Milner</i>
Date	December 2023
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Date	December 2023



1.0 Executive Summary

1.1 Bidwells LLP is instructed by Lewdown Holdings and Automania Garage Services (hereafter 'AGS') Ltd to seek submit a full planning application in relation to a proposed "Centre of Excellence for Airside Support Vehicles" on their land holdings to the north of Heathrow Airport.

1.2 The proposed description of development is:

"The development of a Centre of Excellence for Airside Support Vehicles, consisting of a service building with 7no. service bays and 1no. storage bay, a two-storey office building, with associated hardstanding, parking, a wash bay, plant, solar PVs, landscaping and drainage."

1.3 The site covers approximately 17 acres (7ha) of land 1km north of Heathrow Airport along the M4, just north east of Sipson village. Although designated as Green Belt, the site is very enclosed and previously developed land, with the former Sipson Garden Centre.

1.4 In 2010 a large area of the site was illegally occupied by squatters in a permanent camp, protesting against the proposed third runway at Heathrow. This activity caused significant damage to the site and amenity problems for local residents. Our client has undertaken site clearance work at great expense and has now secured the site. Key to ensuring its security over the longer term is the provision of a sustainable lawful use and the associated natural surveillance this provides.

The Need

1.5 Lewdown Holdings Ltd is working in partnership with AGS who are seeking to develop a Centre of Excellence to enable them to achieve electrification of their airside support vehicle fleet by 2030.

1.6 AGS is a family-owned business which has been involved in the aviation sector for over 45 years, expanding rapidly since 2011. AGS is a key supplier to London Heathrow airport, in providing emergency breakdown and recovery of all airside assets, and also servicing and repair of all equipment associated with the airfield. AGS' business is vital to the airport's operational resilience.

1.7 The proposals seek to secure permission for a development is intrinsically linked to the decarbonisation of airside operations at the UK's busiest airport, Heathrow.

1.8 Up to 8,000 vehicles have licences to operate airside at Heathrow Airport, of which only circa 300 are owned by Heathrow Airport itself, with the remainder are operated by airlines, ground-handlers and other companies leased from companies such as AGS.

1.9 Heathrow's "Net Zero Plan" outlines that by 2030 all airside support vehicles are to be electrified in support of zero emissions. This facility will be critical in enabling AGS to enable this transition to zero emissions airside vehicles as electric vehicle maintenance and repairs cannot be

accommodated on AGS' main site. In addition, it is essential to the long term commercial interests of AGS to be able to continue servicing Heathrow.

- 1.10 AGS need to identify a new self-contained site and under the terms of the Ground Operators Licence, this must be within 2km of the Airport. The need is growing, and Land at the Former Sipson Garden Centre has been identified as a preferred location. This facility in this location is essential to the operation of Heathrow Airport and this is considered an important public benefit, particularly as it contributes the UK's pathway to net zero.
- 1.11 Not only will this proposal play a fundamental role in the decarbonisation of airside support vehicles at Heathrow, but it will also ultimately it will be zero carbon in operation of both the vehicles maintained and the operation of the building. This is achieved by the energy strategy incorporating generous amounts of Solar PVs. Therefore, green energy will supply green vehicles.
- 1.12 AGS will partner with Mercedes-Benz Group AG in the delivery of the centre. It is expected that the Centre will create upwards of 30 new skilled jobs. Supporting this growth is an aspiration to establish a local apprenticeship scheme in partnership with local education institutions. This is considered a considerable public benefit.

The Proposals

- 1.13 The proposals will feature a 446.9 sq.m two-storey office building. This incorporates a reception, meeting room, kitchen, drivers rest room, office space and toilets. Next to and abutting the office element is principal service centre formed of 8no bays of 6.60m wide by 19m deep each, which amounts to 1,003 sq.m and will accommodate vehicles up to 11m long with appropriate space front and rear for access.
- 1.14 The proposals have sought to position the building on part of the site has been occupied by the existing garden centre buildings. The proposed buildings have been positioned and orientated to follow the existing kinked boundary of the site and therefore reduce the proposed building's prominence as much as possible.
- 1.15 The core hours of opening will be 07:00 – 18:00 Monday – Friday. However, airside vehicle recovery can be required 24/7 so there will be intermittent use outside of these hours.
- 1.16 Pre-application consultation with the LB Hillingdon and the local resident's association has taken place in support of developing these proposals.
- 1.17 The proposals are considered to meet the exception set out in paragraph 154(g) of the NPPF (December 2023) which allows for:

'limited infilling or the partial or complete redevelopment of previously developed land, whether redundant or in continuing use (excluding temporary buildings), which would:

- *not have a greater impact on the openness of the Green Belt than the existing development; or*

- *not cause substantial harm to the openness of the Green Belt, where the development would re-use previously developed land and contribute to meeting an identified affordable housing need within the area of the local planning authority.*

1.18 However, there are important public benefits which amount to Very Special Circumstances.

Very Special Circumstances

1.19 There are many public benefits to the proposed development. The key considerations are outlined below:

- The site is previously developed and is in a poor state of appearance.
- The site's security is threatened and a long-term sustainable occupation for passive/natural security minimises this risk and the greater harm and disruption that it may cause.
- The proposed development will contribute to UK PLC as a result of its direct support for the UK's busiest airport.
- There is no sequentially preferable location currently available for the proposed operation and there is a justification for the locational proximity to the airport and AGS' existing operations.
- That the development will be Zero Carbon in operation.
- That the embodied Carbon of the development will be minimised via a fabric first approach.
- That the development will not result in a detrimental visual impact given its context.
- That the development offers substantial enhancement to the site's landscape both visually, and in respect of ecological value/ biodiversity net gain.
- That the development will result in additional local employment, including opportunity for skilled training and apprenticeships schemes in associated within the local education authority and local institutions.

1.20 This Planning Statement and the accompanying technical reports evidence these very special circumstances.

1.21 A search of alternative sites has been undertaken within 2km of the boundary of Heathrow Airport and within 3km from AGS' Bath Road site. None of the sites were available and appropriate for use.

1.22 A full environmental audit of the site has taken place and there are no impacts which are adverse or cannot be mitigated. The principle of development is therefore considered acceptable.

2.0 Introduction

2.1 Bidwells LLP is instructed by Lewdown Holdings Ltd and AGS to seek submit a full planning application in relation to a proposed “Centre of Excellence for Airside Support Vehicles” on their land holdings to the north of Heathrow Airport.

2.2 The proposed description of development is;

“The development of a Centre of Excellence for Airside Support Vehicles, consisting of a service building with 7no. service bays and 1no. storage bay, a two-storey office building, with associated hardstanding, parking, a wash bay, plant, solar PVs, landscaping and drainage.”

2.6 This application follows pre-application consultation with London Borough of Hillingdon (LBH), the local community and other stakeholders.

2.7 This Planning Statement provides supporting information in respect of the proposed development and a planning policy review, and highlights key issues and considerations which the applications will be determined against. It aims to assist the local planning authority in reaching a considered determination of the application.

Submission Documents

2.8 In addition to this Planning Statement (including Greenbelt Statement and Alternative Sites Assessment) prepared by Bidwells, the following documents and drawings have been prepared by our team consultants:

DELIVERABLE	PREPARED BY
Application Forms	Bidwells
CIL Form	Bidwells
Drawings <ul style="list-style-type: none"> Proposed site plan (Dwg. 10760.01 Rev M) Location plan and existing site (Dwg. 10760.02) Existing building elevations (Dwg. 10760.03) Overall plans and elevations (Dwg. 10760.04 Rev F) Office plans and elevations (Dwg. 10760.05 Rev E) 	BCM

<ul style="list-style-type: none"> • Service building floor plan (Dwg. 0760.06 Rev D) • Service building elevations (Dwg. 10760.07 Rev A) • Sections (Dwg. 10760.08) • Roof plan (Dwg. 10760.09) • Existing building floor plans (Dwg. 10760.10) • South elevation (Dwg. 10760.11) 	
Design and Access Statement	BCM
Air Quality Assessment	Global Air Quality
Arboricultural Impact Assessment	SJ Stephens Associates
Archaeological Assessment	Hawk Heritage
Biodiversity Net Gain Report	Temple Group
Preliminary Ecological Assessment	Temple Group
Energy Statement	Hydrock
Circular Economy Statement	Hydrock
Whole Life Carbon Report	Hydrock
Flood Risk & Drainage Strategy	Motion
Water Cycle Study	Motion
Glint and Glare Study	Pager Power
Land Contamination Phase I Report	Ground & Water
Landscape and Visual Impact Assessment	WHLandscape
Landscape Implementation and Management Plan	WHLandscape
Landscape Proposals Plan (Dwg no. DWG-1621-01)	WHLandscape
Urban Greening Factor Plan (Dwg no. DWG-1621-02)	WHLandscape

Healthy Streets Transport Assessment	Paul Basham Associates
Travel Plan	Paul Basham Associates
Operational Management Plan	Paul Basham Associates
Delivery and Servicing Plan	Paul Basham Associates
Noise Assessment	Air and Acoustics
Outline Construction Waste Management Plan	KaNect
Pre-Demolition Audit	KaNect
Operational Waste Management Plan	
Outline Construction and Demolition Method Statement	

3.0 Site and Surroundings

- 3.1 The site covers approximately 17 acres (7ha) of land 1km north of Heathrow Airport along the M4, just northeast of Sipson village. Although designated as Green Belt, the site is very enclosed. The site is partially previously developed with the former Sipson Garden Centre occupying just under a hectare. The existing development consists of hardstanding and dilapidated structures associated with the previous use, the wider site within our client's ownership consists of informal scrub/grassland.
- 3.2 The site is bounded to the north by the existing Holiday Inn site and to the east by the M4, beyond which lies a sand and gravel quarry operated by London Concrete. To the south beyond the additional land within our client's ownership lies Sipson Lane. The existing residential properties along Sipson Road forms the most southern part of the western boundary, while the rest of the western boundary is occupied by the site's frontage onto Sipson Road, the existing vehicular access onto the site and the Plough Inn.



Figure 1 - Aerial view of the site and locality

- 3.3 In 2020, the site obtained planning permission for redevelopment as a Garden Centre. These proposals included space for 95 cars which generated 354 daily trips.
- 3.4 In 2010 a large area of the site was illegally occupied by squatters in a permanent camp, protesting against the proposed third runway at Heathrow. This activity caused significant damage to the site and amenity problems for local residents. Our client has undertaken site clearance work at great expense and has now secured the site. Key to ensuring its security over the longer term is the provision of a sustainable lawful use and the associated natural surveillance this provides.

- 3.5 Lewdown Holdings Ltd are working in partnership with AGS (Automania Garage Services) who are seeking to develop a Centre of Excellence to enable them to achieve electrification of their airside servicing vehicles by 2030.
- 3.6 AGS is a family-owned business which has been involved in the aviation sector for over 45 years, expanding rapidly since 2011. AGS is a key supplier to London Heathrow airport, in providing emergency breakdown and recovery of all airside assets, and also servicing and repair of all equipment associated with the airfield. AGS' business is vital to the airport's operational resilience.
- 3.7 In February 2022, Heathrow published its Net Zero Plan. See: <http://bitly.ws/CTeg>. Whilst there is a pathway to achieving Zero Carbon Flight by 2050, the airport has set a strategy for addressing the less challenging issues of its buildings, infrastructure, and ground operations by mid-2030. The emerging development proposals will assist in this aim, and this is a material planning consideration of weight which should be considered a very special circumstance.
- 3.8 AGS currently employs over 70 people at its Bath Road site, which focusses on servicing and maintaining airside and other commercial vehicles. Due to capacity constraints at its operations, it is not possible to provide the facilities required for electric vehicles within the current estate. Furthermore, the combination of combustion engines and electric vehicles are not compatible due to health and safety concerns, and the challenge of seeking the necessary insurance. In addition, the maintenance of an electric fleet of vehicles often requires different tools and machinery.
- 3.9 Therefore, there is a need to identify a new self-contained site and under the terms of the Ground Operators Licence, this must be within 2km of the Airport. The electric vehicle (EV) facility needs to be separate from the internal combustion engine facility (ICE) for safety and insurance purposes, beyond this, different skills and tools are often required for the maintenance of EVs. The need is growing, and Land at the Former Sipson Garden Centre has been identified as a preferred location. This facility in this location is essential to the operation of Heathrow Airport and this is considered an important public benefit, particularly as it contributes the UK's pathway to net zero.
- 3.10 AGS will partner with Mercedes-Benz Group AG in the delivery of the centre. It is expected that the Centre will create upwards of 30 new jobs. Supporting this growth is an aspiration to establish a local apprenticeship scheme in partnership with local education institutions. This is considered a considerable public benefit.

4.0 Planning History

- 4.1 A search of LB Hillingdon's online planning register reveals a number of historic planning applications for the site, which are considered to be of relevance to the proposed development:

REFERENCE	PROPOSAL	STATUS
67666/APP/2021/2977	Proposed use of site for specialist vehicle storage area for a temporary period of 2 years.	Refusal May 2022
APP/2019/1245	Reinstatement of Garden Centre (Use Class A1) with replacement buildings, outdoor sales areas, hard-standing, associated car parking and landscaping	Approved June 2020
APP/2016/3835	Scoping Opinion	-
APP/2016/1831	Request a formal screening opinion under the Town & Country Planning (Environmental Impact Assessment) Regulations 2011, as amended.	-
APP/2015/2413	Mixed use development comprising up to 53 residential units (Use Class C3/C2) and associated private and public open space, pedestrian and vehicular access and parking, including demolition of garden centre (Outline application)	Refusal Dec 2015
APP/2013/1579	Mixed use development comprising of 53 residential units (Use Class C3), 3 light industrial commercial units (maximum 450 sqm total) (Use Class B1), neighbourhood community centre (Use Class D1), and 2 retail units (150 sqm each) (Use Class A1), together with associated private and public open space, pedestrian and vehicular access and parking, including the demolition of existing garden centre (Application for outline planning permission with all matters reserved apart from access)	Refusal Oct 2013
K/93/3037	Erection of two non-illuminated advertisement hoardings	Refusal Aug 1993

Garden Centre Planning Permission

- 4.2 The site has a recently lapsed permission for the "Reinstatement of Garden Centre (Use Class A1) with replacement buildings, outdoor sales areas, hard-standing, associated car parking and landscaping". The permission expired on 26th June 2023, but nevertheless remains a material planning consideration. This was acknowledged within pre-application advice received.



Figure 2 – The now lapsed, approved Proposed Site Plan for the previously approved application to reinstate the garden centre use (App ref. APP/2019/1245)

Planning Designations

4.3 Below is an extract of the adopted polices map, with the approximate location of the site indicated by the yellow star.

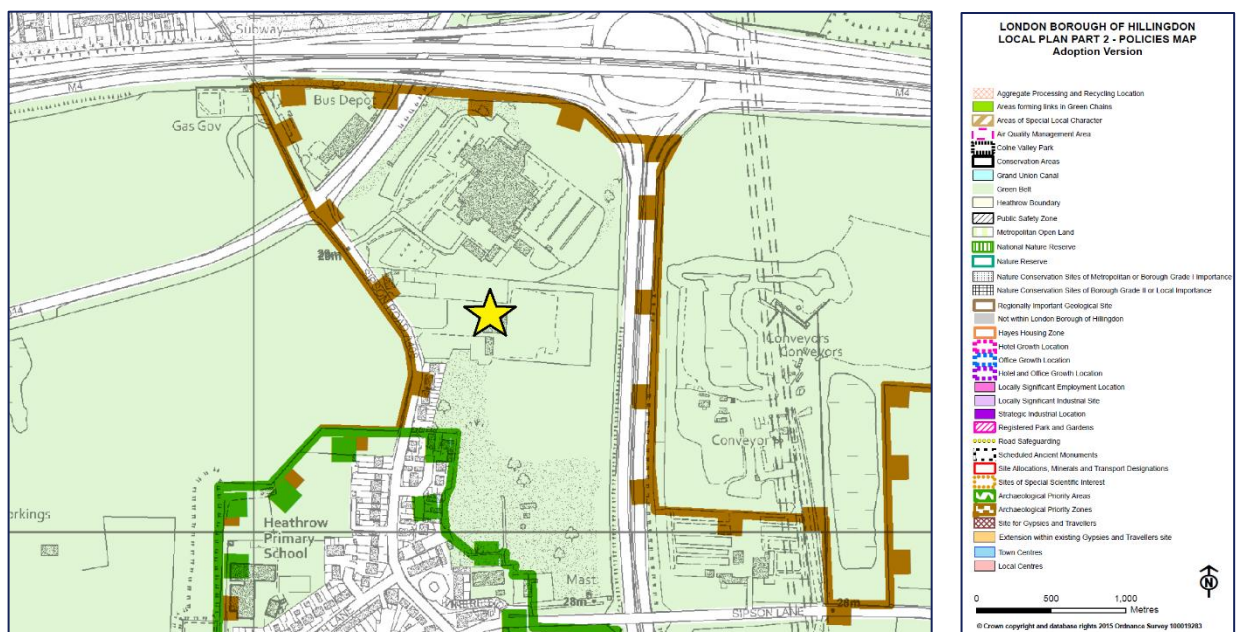


Figure 3 - LB Hillingdon Local Plan Part 2 Policies Map (approximate site location identified by a yellow star)

Key Designations

- Green Belt
- Archaeological Priority Zone
- Flood Zone 1 (lowest risk)

- 4.4 The site is not covered by any designations indicating ecological or geological value, nor are there any sites of ecological importance near to the application site.

5.0 The Proposals

5.1 This application seeks planning permission for:

“The development of a Centre of Excellence for Airside Support Vehicles, consisting of a service building with 7no. service bays and 1no. storage bay, an ancillary two-storey office building, with associated hardstanding, parking, a wash bay, plant, solar PVs, landscaping and drainage.”

5.2 The purpose of the proposed development is to provide a facility for the servicing and repair of electric airside support vehicles. Up to 8,000 vehicles have licences to operate airside at Heathrow Airport. Around 300 of these are owned by Heathrow Airport, the remainder are operated by airlines, ground-handlers and leased from companies such as AGS.

5.3 The proposal is considered to fall under Use Class B2 of the Town and Country Planning (Use Classes) Order 1987 (as amended).

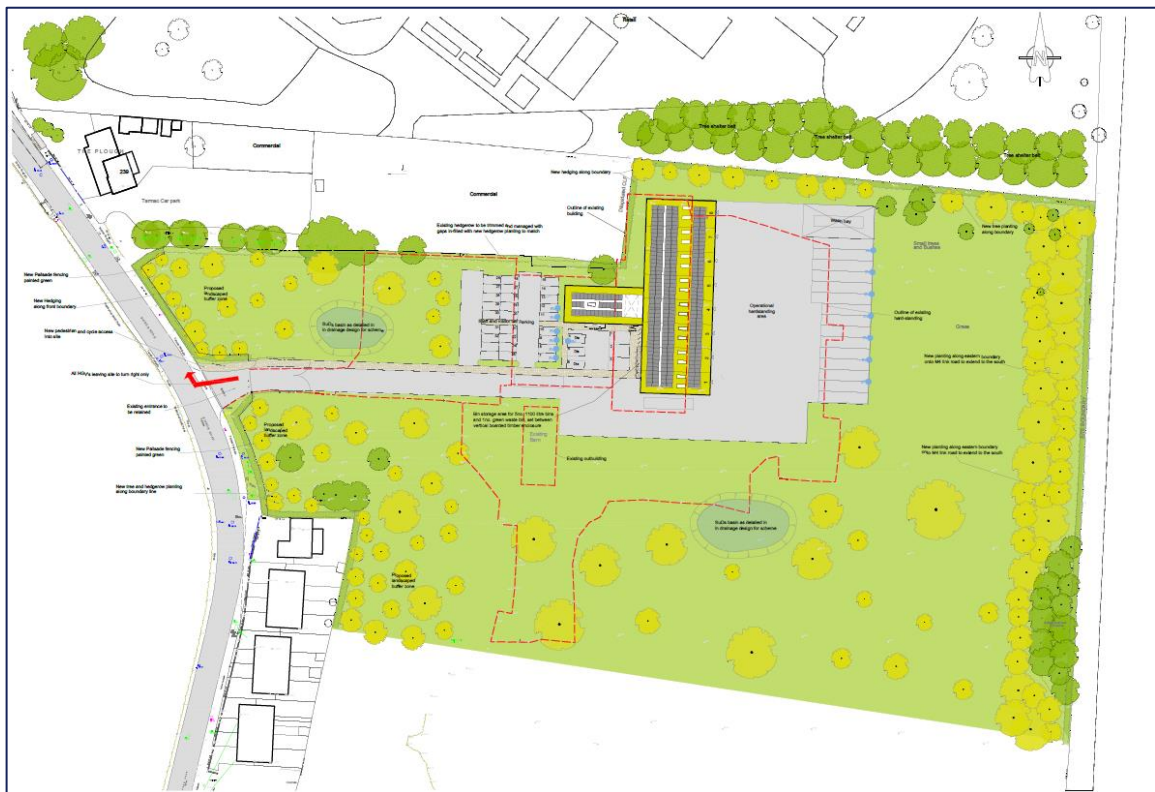


Figure 4 – The current Proposed Site Plan

Design and Layout

5.4 The proposals will feature a two-storey office building. This incorporates a reception, meeting room, kitchen, drivers rest room, office space and toilets. The office element is located near to the entrance to the site, with staff and visitor parking located to the west and south. The block shown provides the required 446.9 sq.m (GIA) of office space and associated ancillary uses, split over two floors.

- 5.5 Next to and abutting the office element is principal service centre formed of 8no bays of 6.60m wide by 19m deep each, which amounts to 1,003 sq.m and will accommodate vehicles up to 11m long with appropriate space front and rear for access.
- 5.6 The proposals have sought to position the building on part of the site has been occupied by the existing garden centre buildings. The proposed buildings have been positioned and orientated to follow the existing kinked boundary of the site and therefore reduce the proposed building's prominence as much as possible.

Hours of Operation

- 5.7 The core hours of operation will be 07:00 – 18:00 Monday – Friday. However, airside vehicle recovery can be required 24/7 so there will be intermittent use outside of these hours.

Landscaping

- 5.8 The green space at the front (western) side of the site will be retained to provide a landscape buffer. Associated with the proposed development, the wider landscape will be managed to deliver biodiversity net gain. This will see the planting of circa 186 trees, including a significant woodland belt will be planted along the eastern boundary onto the M4 link development.
- 5.9 Furthermore, the proposals include the extensive shrub, hedgerow, aquatic and herbaceous planting. This will be complimented by species-rich grassland seeding.

Area Schedule

- 5.10 The following table outlines the area schedule for the proposed development with the previously approved application for the reinstatement of the garden centre as a comparison.

Table 1 - Area Schedule for the proposed scheme including comparison with the previously approved garden centre

Elements	Proposed Centre of Excellence for Airside Support Vehicles
External hardstanding (including carparking, access road and any hard standing)	5687 square metres
Building footprint (GEA)	1,219 square metres (service and office building combined)
Building floorspace (GIA)	1,378 square metres (total) <u>breakdown:</u> service building = 977 square metres office building = 401 square metres
Ridge height	7.50m (service building)

	6.70m (office building)
Eaves height	5.95m (service building) 5.70m (office building)
Buildings Volume	7,884 cubic metres

6.0 Pre-Application Engagement and Statement of Community Involvement

- 6.1 Pre-application engagement with Planning Officer at LB Hillingdon has taken place prior to submission of the application. Formal pre-application discussions commenced in with the submission of a meeting required on 21st April 2023 and the meeting followed on the 26th May 2023.

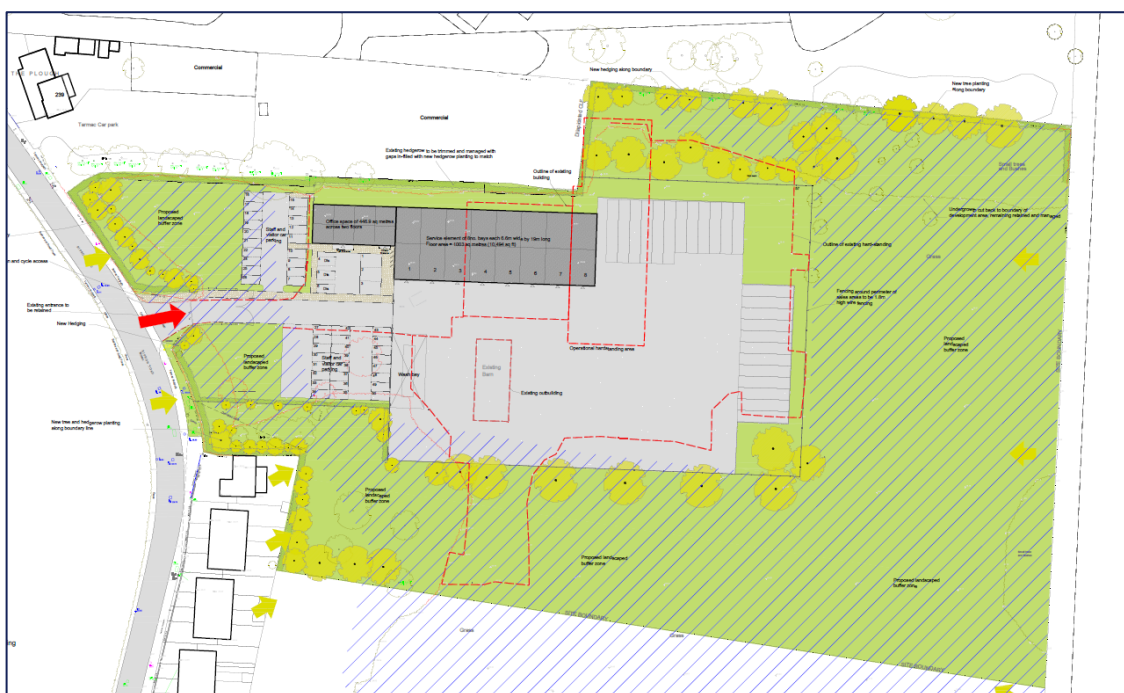


Figure 5 - Initial proposed site plan from the pre-application submission

- 6.2 Since the initial Proposed Site Plan there have been ongoing revisions to the layout plan with input from expert consultants.

CHANGE	RATIONALE
Moving the proposed built form eastwards	<p>This sets back the main frontage on Sipson Road and allows significantly enhanced landscaping proposals which will soften and improve the setting of the site.</p> <p>This included a reduction in the quantity of hardstanding proposed.</p>
Reorientation of the building	<p>Following discussions between the design team it was determined that reorientating the building and forming a T-shape would allow the benefit of utilising the existing mature planting to reduce the prominence of the proposed</p>

	development and provide containment. Furthermore, it provides screening of the proposed parking adjacent to the service building.
Introduction of a green roof	For biodiversity benefit and well enhancing the visual impact of the proposal.
Introduction of rooflights	This allows natural light into the service building while reducing the energy required to light the building.
Incorporation of Solar PVs and Air Source Heat Pumps	Initially there were concerns that providing Solar PVs would cause glint and glare issues. However, a commissioned Glint and Glare Assessment to confirm that they would be acceptable. Due to the proposed development's large renewable energy generation, net zero regulated energy consumption will be achieved, and thus no off-setting is required.
Moved the wash bay location	The wash bay is now located in the northwestern most part of the development. This is to ensure that this element is as positioned as far away from the closest residential property No.241 Sipson Road.
Rationalisation of the proposed parking	The proposals have reduced the quantity and arrangement of the parking to minimise the impact on openness.
Landscaping enhancements	The incorporation of a dense woodland tree belt on the eastern side of the site. Two SuDS ponds have been incorporated as drainage features. The proposed planting details have been further developed.

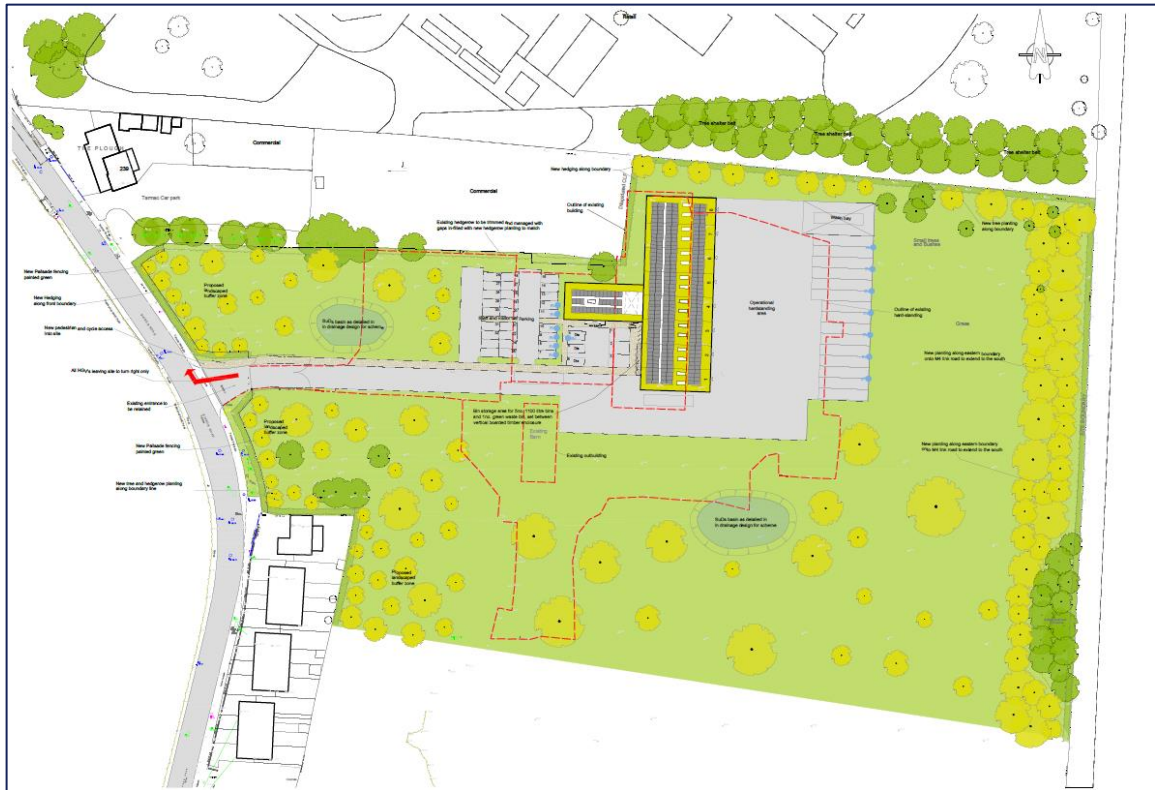


Figure 6 - Current proposed scheme

Community Engagement

- 6.3 As highlighted above the impact on residents have been a key consideration within the development of the proposals. The applicant has reached out the Harmondsworth and Sipson Residents Association (HASRA) and shared the latest iteration of the proposals at that time.
- 6.4 Speaking to a committee member of HASRA, the feedback received to the proposed design and principle of the development was generally positive.

7.0 Planning Legislation and Policy

7.1 This Section provides an assessment of the planning framework within which the proposed development is to be considered and identifies other material considerations relevant to the proposal.

7.2 In identifying the planning framework, consideration has been given to Section 38(6) of the Planning and Compulsory Purchase Act 2004 ("2004 Act"), which states that:

"If regard is to be had to the Development Plan for the purpose of any determination to be made under the Planning Act, the determination must be made in accordance with the Plan, unless material considerations indicate otherwise".

7.3 Adopted and emerging development plan policies have been considered in this section.

Adopted Development Plan

7.4 In accordance with Section 38(6) of the consideration is given below to the adopted Development Plan for the site, which comprises:

- London Plan (2021)
- Local Plan Part 1: Strategic Policies (2012)
- Local Plan Part 2: Development Management Policies (2020)

London Plan (2021)

7.5 The London Plan (2021) sets out the strategic planning aims and policies for London. It includes a city-wide spatial strategy as well as development management policies for key strategic issues.

7.6 Of principal importance to the proposals are policies:

- Policy GG5: Growing a good economy
- Policy E4: Land for industry, logistics and services to support London's economic function
- Policy E7: Industrial intensification, co-location and substitution
- Policy D4: Delivering good design
- Policy D5: Inclusive design
- Policy D11: Safety, security and resilience to emergency
- Policy D12: Fire Safety
- Policy D13: Agent of Change
- Policy D14: Noise
- Policy G2: London's Green Belt
- Policy G7: Trees and woodlands

- Policy SI2: 'Minimising greenhouse gas emissions'
- Policy SI2: 'Minimising greenhouse gas emissions'
- Policy G5: 'Urban greening'
- Policy G6: 'Biodiversity and access to nature'
- Policy T8: 'Aviation'

Local Plan Part 1: Strategic Policies (2012)

- Policy NPPF1: Presumption in favour of sustainable development
- Policy BE1 (Built environment)
- Policy E1: Managing the Supply of Employment Land
- Policy E2: Location of Employment Growth
- Policy E3: Strategy for Heathrow Opportunity Area
- Policy E6: Small and Medium-Sized Enterprises (SME)
- Policy E7: Raising Skills
- Policy EM1: Climate Change Adaptation and Mitigation
- Policy EM2: Green Belt, Metropolitan Open Land and Green Chains
- Policy EM8: Land, Water, Air and Noise
- Policy EM11: Sustainable Waste Management
- Policy T1: Accessible Local Destinations
- Policy T4: Heathrow Airport
- Policy CI1: Community Infrastructure Provision

Local Plan Part 2 - Development Management Policies (2020)

- Policy DME 2: Employment Sites Outside Designated Employment Areas
- Policy DMT 1: Managing Transport Impacts
- Policy DMT 2: Highways Impacts
- Policy DMT 5: Pedestrians and Cyclists
- Policy DMT 6: Vehicle Parking
- Policy DMHB 7: Archaeological Priority Areas and Archaeological Priority Zones
- Policy DMHB 11: Design of New Development
- Policy DMHB 14: Trees and Landscaping
- Policy DMEI 1: Living Walls and Roofs and Onsite Vegetation
- Policy DMEI 2: Reducing Carbon Emissions
- Policy DMEI 4: Development in the Green Belt or on Metropolitan Open Land
- Policy DMEI 7: Biodiversity Protection and Enhancement

- Policy DMEI 9: Management of Flood Risk
- Policy DMEI 10: Water Management, Efficiency and Quality
- Policy DMEI 12: Development of Land Affected by Contamination
- Policy DMEI 14: Air Quality
- Policy DMCI 7: Planning Obligations and Community Infrastructure Levy
- Policy DMAV 2: Heathrow Airport

Supplementary Planning Documents (SPDs)

- Planning Obligations SPD

National Planning Policy Framework (NPPF)

- 7.7 The NPPF is a key material planning consideration. It is underpinned by a presumption in favour of sustainable development. We have used the December 2023 version for our assessment.

8.0 Green Belt Statement

- 8.1 London Plan Policy G2 “London’s Green Belt” states that:
- “A The Green Belt should be protected from inappropriate development:*
- 1) development proposals that would harm the Green Belt should be refused except where very special circumstances exist,*
 - 2) subject to national planning policy tests, the enhancement of the Green Belt to provide appropriate multi-functional beneficial uses for Londoners should be supported.*
- B Exceptional circumstances are required to justify either the extension or de-designation of the Green Belt through the preparation or review of a Local Plan.”*
- 8.2 Local Plan Policy DMEI 4 outlines that inappropriate development in the Green Belt and Metropolitan Open Land will not be permitted unless there are very special circumstances.
- 8.3 Part B goes on to state that “*extensions and redevelopment on sites in the Green Belt and Metropolitan Open Land will be permitted only where the proposal would not have a greater impact on the openness of the Green Belt and Metropolitan Open Land, and the purposes of including land within it, than the existing development, having regard to:*
- i) the height and bulk of the existing building on the site;*
 - ii) the proportion of the site that is already developed;*
 - iii) the footprint, distribution and character of the existing buildings on the site;*
 - iv) the relationship of the proposal with any development on the site that is to be retained; and*
 - v) the visual amenity and character of the Green Belt and Metropolitan Open Land.”*

Table 2 - Assessment against Policy DMEI 4

POLICY DMEI 4 ASSESSMENT		
i)	The height and bulk of the existing building on site	<p>The height of the approved garden centre has a maximum ridge height of 6.47m this compares to 7.50m for the proposed development. The volume of the proposed building is 7,884 cubic metres compares to 6,921 cubic metres for the previously approved garden centre.</p> <p>Table 3 below provides a comparison of the areas and volumes.</p>
ii)	The proportion of the site that is already developed	<p>The site is previously developed land which is occupied by the former Sipson Garden Centre and the associated hard surfaces.</p>

iii) The footprint, distribution and character of existing buildings on site	The proposed footprint of the building is located wholly within previously developed land. Furthermore, the proposals provide a reduction in hard surfaces compared to both the existing site and the approved garden centre scheme.
iv) The relationship of the proposal with any development on the site that is to be retained; and	The proposal will not see the retention of the existing development on site.
v) The visual amenity and character of the Green Belt and MOL	While the site is Green Belt there are a series of elements and/or features which significantly detract from the overall landscape and scenic quality of the area, most notably Heathrow airport and the major transport network which dominates the study area.

8.4 The NPPF (2023) states that “a local planning authority should regard the construction of new buildings as inappropriate in the Green Belt” (paragraph 154). However, seven exceptions to this policy are set out, including:

- a) buildings for agriculture and forestry;
- b) the provision of appropriate facilities (in connection with the existing use of land or a change of use) for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments; as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it;
- c) the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building;
- d) the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces;
- e) limited infilling in villages;
- f) limited affordable housing for local community needs under policies set out in the development plan (including policies for rural exception sites); and
- g) limited infilling or the partial or complete redevelopment of previously developed land, whether redundant or in continuing use (excluding temporary buildings), which would:
 - not have a greater impact on the openness of the Green Belt than the existing development; or
 - not cause substantial harm to the openness of the Green Belt, where the development would re-use previously developed land and contribute to meeting an identified affordable housing need within the area of the local planning authority.

- 8.5 Paragraph 156 goes on to states that: *“When located in the Green Belt, elements of many renewable energy projects will comprise inappropriate development. In such cases developers will need to demonstrate very special circumstances if projects are to proceed. Such very special circumstances may include the wider environmental benefits associated with increased production of energy from renewable sources”*.

Appropriate Development

- 8.6 Although the site is set within the Green Belt, the development is not considered inappropriate due to the proposals being located on wholly previously developed land which would not have a greater impact on the openness of the Green Belt than the existing development.
- 8.7 It has previously been confirmed that the redevelopment of the site as a Garden Centre under permission 67666/APP/2019/1245, as an existing developed site in the Green Belt, would not constitute inappropriate development and that due to its siting, scale and design, the proposal would not result in harm to the openness of the Green Belt.
- 8.8 The 2019 application for the garden centre (which lapsed in June 2023) included over 7,000 sq.m of external hardstanding comprising a mix of foundations, sales space and car parking area as well as other hard standing. The table below compares the approved garden centre scheme with the proposed Centre of Excellence for Airside Support Vehicles.

Table 3 - A breakdown of the building areas (m2) and volume (m3) (as existing, as approved and as proposed)

Elements	Approved Garden Centre	Proposed Centre of Excellence for Airside Support Vehicles	Net Difference
External hardstanding (including carparking, access road and any hard standing)	7,144 square metres	5,687 square metres	-1,457 square metres (-20.4%)
Building footprint (GEA)	2,186 square metres (main building)	1,219 square metres (service and office building combined)	-967 square metres (-44.2%)
Ridge height	6.47m (main building)	7.50m (service building) 6.70m (office building)	+1.03m (+15.9%)
Eaves height	2.50m (main building)	5.95m (service building) 5.70m (office building)	+3.45m (+138%)
Buildings Volume	6,921 cubic metres	7,884 cubic metres	+ 963 (+13.9%)

- 8.9 In this respect, the proposed development will occupy a smaller overall footprint in respect of both hard standing and buildings. However, associated with the specific requirements of the operations proposed, an increased ridge and eaves height is proposed to accommodate the necessary clearance. In this respect, there is an increase in volume. Please refer to Table 3 for a full breakdown of the proposed dimensions, areas and volumes.

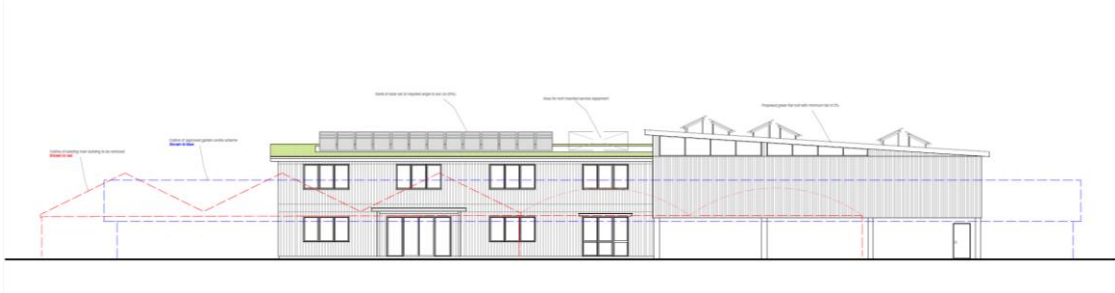


Figure 7 - An extract of drawing ref. 10760.11, showing the outline of the approved garden centre scheme in blue and the existing garden centre in red.

- 8.10 The Figure above shows the proposed building form with the outline of the existing garden centre and the approved garden centre scheme (application ref. APP/2019/1245). Furthermore, the Figure below features a dashed red line showing the extent of the existing hardstanding and garden centre buildings. The proposed development is significantly smaller in terms of both the area of hardstanding and the building footprints.

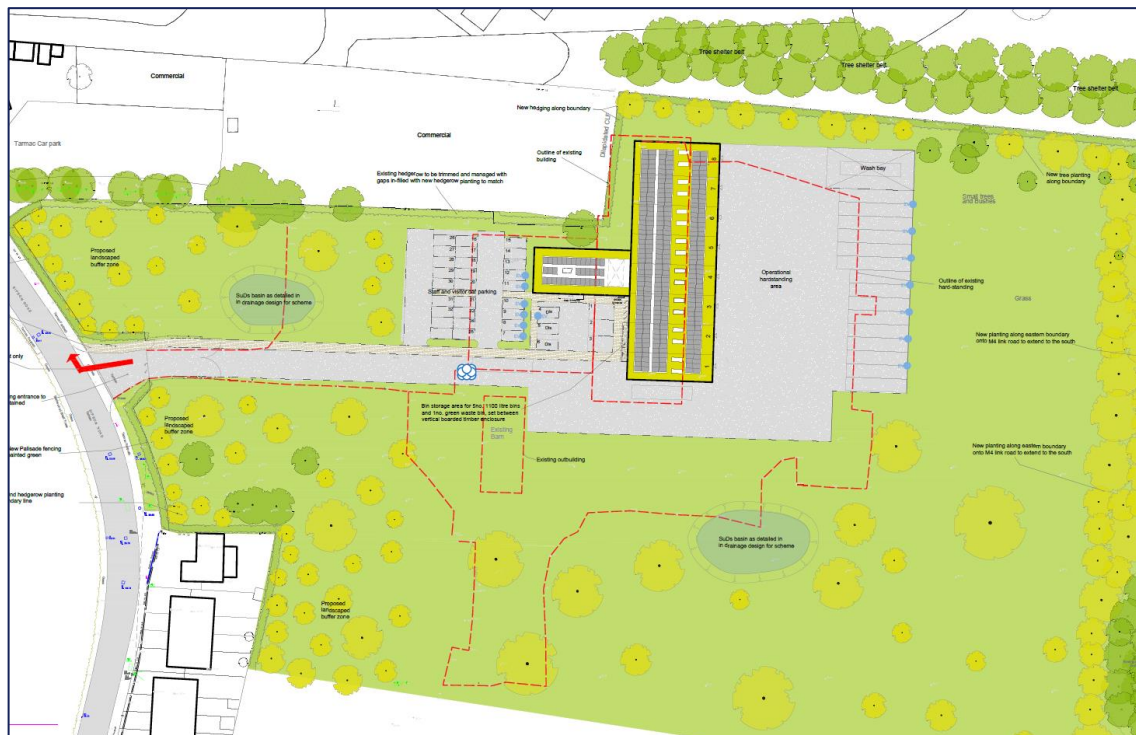


Figure 8 - The Proposed Site Plan, the red dashed line shows the outline of the existing hardstanding and building footprints.

- 8.11 This does not result in an automatic conflict with development plan policy. The decision maker would need to take a judgement of the impact upon openness.

Impact on Openness

- 8.12 Openness is capable of having a spatial aspect as well as a visual aspect, as set out by the Supreme Court decision in *R (Samuel Smith Old Brewery (Tadcaster) and others) v North Yorkshire County Council* [2020] UKSC 3¹.
- 8.13 Recent case law and Appeal decisions have reiterated that openness is an ‘open textured concept’ not limited to a purely volumetric assessment. For instance, in a recent Appeal Decision in 2023 on the site of Hotel Felix, Cambridgeshire (Appeal Reference: APP/W0530/W/22/3307903) the Inspector reiterated as follows:
- “Caselaw has established that the concept of openness of the Green Belt is not narrowly focused on a purely volumetric approach, but other factors may be relevant too. It has also established that openness is a broad concept of policy not law; applying the policy imperative of preserving openness requires realism and common sense; the word ‘openness’ is open textured, and a number of factors are capable of being relevant, including visual as well as physical and spatial impacts. In other words, it is wrong to always assume an increase in volume will necessarily always have a significant impact on openness”* (paragraph 18)
- 8.14 The term ‘greater impact on openness’ was reviewed in the judgement of *Euro Garages Ltd v The Secretary of State for Communities and Local Government & Anor* [2018] under then paragraph 89 of the 2012 Framework. In this case, the courts found that it was an error of law to treat any change as having a greater impact on the openness of the Green Belt rather than considering the harm, if any, wrought by the change (see in particular paragraph 34).
- 8.15 In spatial terms, it is not considered the spatial extent of the Green Belt would be to any significant extent diminished by the proposed development; it is however accepted that there would be an inevitable loss in the spatial extent of the Green Belt as a result of the minor increase in the volume of the new buildings, although the footprint is smaller, as is the area of built development.
- 8.16 However, in line with the *Euro Garages* case, it is necessary to assess the extent to which there is a ‘greater impact’ on the basis of a consideration of harm, rather than merely a degree of change. The proposal should be viewed in the context of the twelve-storey Holiday Inn building directly adjacent to the site to the north, with less discrete massing. This building will continue to dominate the view post development.
- 8.17 Several visualisations have been prepared by WHLandscape and incorporated into Appendix 4 of the Landscape and Visual Impact Assessment. These show the built form but are not rendered in the final materials.
- 8.18 The Figure below shows the form of the proposed development as viewed from internally within the site with the Holiday Inn visible in the background.

¹ Available at: <https://www.supremecourt.uk/cases/uksc-2018-0077.html>



8.19

Figure 9 - A visualisation showing the built form from within the site (note: the proposal is an shape to provide context of the form, for the materials and fenestration please refer to the proposed drawings and Design & Access Statement).

8.20

The perceived spatial impact on Green Belt openness created by the extension would overall on balance be no greater than the existing development.

8.21

Visual impacts on the openness of the Green Belt are mitigated due to the site's strong visual containment. Since the pre-application meeting the proposed orientation and layout has been altered to take advantage of the containment provided by the established site boundary tree cover to the north.

8.22

The proposals include the planting of a significant boundary hedgerow fronting Sipson Road, this is accompanied by the strategic planting of 186 trees to provide visual screening when viewed from the site boundaries. This will provide good visual containment and screens the site from public vantage points. The Figure below shows the building in situ, the positioning of the building means that the northern most part of the service building is contained and barely visible from Sipson Road.



Figure 10 -Visualisation as viewed from the Sipson Road entrance.

8.1 In support of the submission WHLandscape have prepared a Landscape & Visual Impact Assessment which concludes the development will have an overall Moderate/Minor effect on the landscape's openness. The overall level of effect is determined to reduce to "Minor" at year 15 following the maturity of the proposed landscaping strategy.

8.2 The LVIA concludes: *"As a result of the assessment of landscape and visual effects, it has been determined that, due to the removal of an area of largely incongruous built form, coupled with the site's high level of containment within the local landscape, the proposed development can be successfully integrated into the landscape of the study area.*

The proposed development will not be significantly detrimental to any of the key characteristics or descriptions of the site and the surrounding landscape as identified in this document. Furthermore, the proposals will have no greater effect on the openness of the Green Belt than both the existing and approved garden centre developments. Post-mitigation the proposed development will have a Minor effect, with the effect on specific receptors being notably reduced as mitigation continues to mature.

8.3 *Taking account of the proposed landscape mitigation recommendations, the proposed development can be undertaken in compliance with the relevant guidance and policies in the NPPF, with the application meeting the criteria for appropriate development within the Green Belt as listed in paragraph 154. Bullet Point g of the NPPF. Furthermore, it complies with The London Plan 2021, and the Hillingdon Local Plan, Parts 1 and 2."*

- 8.4 There is a relevant appeal decision² relating to a proposal in the Green Belt on a similarly well-contained site in a London Borough located approximately 600m northwest of this site. This was a scheme in LB Hillingdon for the demolition of an existing car wash and the development of a drive-thru coffee shop where the Inspector considered that despite the increased building footprint created by the proposed drive-thru, there would be limited harm to the wider Green Belt in respect of diminishing its spatial extent beyond the existing site. This was largely due to the containment afforded by the site's landscaped bunds (refer to paragraphs 13 and 14 in particular).
- 8.5 Overall, there will not be a greater impact on openness than the existing development due to the character, location, and visibility of the site. Exception G is therefore considered met.

Very Special Circumstances

- 8.6 Even if the proposals are considered to comprise inappropriate development in the Green Belt, it is considered there is a robust case for Very Special Circumstances which justify the principle of the proposed development.
- 8.7 The test set out at paragraph 153 of the NPPF is: "when considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. 'Very Special Circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations".
- 8.8 However, if the decision maker were to disagree with this justification and considers that the development is inappropriate it is noted that very special circumstances could be set out to outweigh the potential harm to the Green Belt by reason of inappropriateness. The very special circumstances case would include:
- a. The site is previously developed and is in a poor state of appearance.
 - b. The site's security is threatened and a long-term sustainable occupation for passive/ natural security minimises this risk and the greater harm and disruption that it may cause.
 - c. The proposed development will contribute to UK PLC as a result of its direct support for the UK's busiest airport.
 - d. There is no sequentially preferable location currently available for the proposed operation and there is a justification for the locational proximity to the airport.
 - e. That the development will be Zero Carbon in operation.
 - f. That the embodied Carbon of the development will be minimised via a fabric first approach.
 - g. That the development will not result in a detrimental visual impact given its context.
 - h. That the development offers substantial enhancement to the site's landscape both visually, and in respect of ecological value/ biodiversity net gain.

² Appeal Ref: APP/R5510/W/19/3229922 (Heathrow Service Station, Shepiston Lane, Hayes UB3 1RW)

- i. That the development will result in additional local employment, including opportunity for skilled training and apprenticeships schemes in associated within the local education authority and local institutions.

9.0 Alternative Sites Assessment

- 9.1 Due to capacity constraints at its operations, it is not possible to provide the facilities required for electric vehicles within the current estate. Furthermore, the combination of combustion engines and electric vehicles are not compatible due to health and safety concerns, and the challenge of seeking the necessary insurance. In addition, the maintenance of an electric fleet of vehicles often requires different tools and machinery.
- 9.2 Therefore, there is a need to identify a new self-contained site and under the terms of the Ground Operators Licence, this must be within 2km of the Airport. The electric vehicle (EV) facility needs to be separate from the internal combustion engine facility (ICE) for safety and insurance purposes, beyond this, different skills and tools are often required for the maintenance of EVs. The need is growing, and Land at the Former Sipson Garden Centre has been identified as a preferred location. This facility in this location is essential to the operation of Heathrow Airport and this is considered an important public benefit, particularly as it contributes the UK's pathway to net zero.
- 9.3 As part of the pre-application discussions, it was agreed that an Alternative Sites Assessment would be prepared in support of the application. The scope of the assessment has been determined by the following parameters:

PARAMETERS	ADDITIONAL CONTEXT
Availability	The site must be on the market for sale or lease and available.
Minimum Size of Service Building	1,000 square metres – to provide the space required to operate.
Associated Hard Standing	Required to enable vehicles to be temporarily store while awaiting service or the ordering of specific parts.
Ancillary Office Building/Facilities	Necessary for operations.
Maximum 2km from the boundary of Heathrow Airport	To comply with the Ground Operators Licence.
Maximum of 3km from AGS' Bath Road site and north of the Airport's northern boundary	This is to ensure that there can be synergy between the Bath Road HQ and the proposed site.
Be Suitable	Be suitable to accommodate all types of vehicles to be serviced on site.

- 9.4 The Figure below show the search area with the parameters annotated.

9.5 Key

- The blue rectangle represents the existing Bath Road AGS site.
- The red line to the north depicts the 2km radius from Heathrow Airport's boundary.

- The blue line boundary depicts a 2km radius from the existing Bath Road AGS site.
- The purple line represents a 3km radius buffer from the existing Bath Road AGS site.
- To enable working synergy with the Bath Road site, the search area is north of Heathrow Airport's northern boundary.
- The shaded grey area represents the selected search area for alternative sites.



Figure 11 - The shaded (grey) area represents the selected search area for suitable alternative sites including a buffer zone

9.6 A search has been undertaken within the area highlighted in the Figure above. The two main factors that determined the search area was the requirement for the site to be within 2km of the boundary of Heathrow Airport's boundary to meet the terms of the Ground Operators Licence. The sites by virtue of them featuring in this table are within 2km of the boundary of Heathrow Airport and within 3km from AGS' Bath Road site and north of the Airport's northern boundary. There are sites available on the market that meet the search area parameters. It has been determined that none of the sites were available and appropriate for use for the reasons set out within the table below:

Site Ref	Location	Availability	Permissible Use	Size	Other Comments
A	Unit 13 Saxon Way Trading Estate, Heathrow³ West Drayton, UB7 0LW	Available – For Lease	B2/B8	822 sq m (including office??)	Inadequate parking for the proposed operation, additional space is required to enable vehicle storage while awaiting servicing. Not sufficient in terms of the office
B	476 Bath Road, Longford, West Drayton, UB7 0ED⁴	Under Offer – For Sale	B2, C3 and E	1.5 acres	Current buildings on site are not suitable for requirements. Parts of the site are classified as green belt
C	E L Warren & Sons, Riverview, Donkey Lane, Riverview, The Common, West Drayton, UB7 7HQ⁵	Available – For Lease Only	B2/B8	1,328 sq m (warehouse) 2508 sq m (hardstanding)	Roof height is too low to accommodate the needs of the operator – strange shape and layout not suitable for the end operator. Office space – not sufficient

³ <https://propertylink.estatesgazette.com/property-details/6889703-unit-13-saxon-way-trading-estate-heathrow#>

⁴ <https://www.novaloca.com/commercial-land/for-sale/west-drayton/longford/222448?search=true>

⁵ https://www.rightmove.co.uk/properties/141245528#/?channel=COM_LET

D	Unit C Horton Close, West Drayton, UB7 8EB⁶	Available – For Sale	B2/B8	535 sq m	Roof height is too low to accommodate the needs of the operator
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- 9.7 The site at the Former Sipson Garden Centre is operationally viable in terms of meeting the requirements of the end operator. The applicants AGS and Lewdown Holdings Ltd have an agreement in place which makes the prospect of the development materialising both viable and deliverable.
- 9.8 The developed proposal is very specific to the end operator and their requirements. In terms of the service building's dimensions, it has been created to provide an optimised layout internally each service bay has a separate access door, with enough clearance to accommodate HGVs which are the largest type of vehicle that could be maintained on site. Furthermore, it has optimal depth to host the vehicles and the accompanying apparatus required to maintain the airside vehicles.

⁶ <https://www.novaloca.com/industrial-unit/for-sale/west-drayton/unit-c-horton-close/233347?search=true>

10.0 Planning Analysis

Principle of Development

- 10.1 Policy DMAV 2 (Heathrow Airport) of the Local Plan relates to development within the Heathrow Airport boundary, which the site is not, however the preamble states that “the Council’s policies aim to ensure that development related to the current operation of the airport is managed to reduce environmental impacts. This also includes proposals related to the airport but operating outside the boundary (such as car parking) that contribute to air quality issues and traffic congestion.”
- 10.2 London Plan Policy E7 (Industrial intensification, co-location and substitution) states that development proposals should “*encourage the intensification of business uses in Use Classes B1c, B2 and B8 occupying all categories of industrial land*”.
- 10.3 Local Plan Policies 1 outlines key strategic policies and objectives for Hillingdon. The following strategic objectives are considered the most relevant to our proposals:
- 10.4 **SO23:** Develop and implement a strategy for the Heathrow Opportunity Area, in order to ensure that local people benefit from economic and employment growth and social and environmental improvements including reductions in noise and poor air quality.
- The site falls within the designated Heathrow Opportunity Area and is identified for 13,000 new homes and 11,000 new jobs. The proposals will assist with the reduction of the airports operational emissions.
- 10.5 **SO24:** Optimise the potential employment and educational benefits of Heathrow airport for local residents.
- AGS will be recruiting from the local area more than 30 personnel to support that growth. The expansion will include high value employment: a mix of administrative and technical staff as well as airport operations staff.
- 10.6 **SO25:** Maintain support for operational uses within the existing airport boundary that do not increase environmental impacts and continue to reduce existing impacts.
- These proposals will make a vital contribution to the decarbonisation of Heathrow’s operations and resultantly reduce the existing impacts including NOx emissions.
- 10.1 The proposals seek to redevelop the former Sipson Garden Centre which is a previously developed site within the Greenbelt.
- 10.2 Planning Permission was granted on the site in June 2020 for the reinstatement of the Garden Centre with replacement buildings, outdoor sales areas, hardstanding, associated car parking and landscaping. This permission has now lapsed, however, due to Ansell Garden Centre being

located circa 500m to the west of the site it is considered that there is not significant demand for a second garden centre in such close proximity.

- 10.3 The purpose of the proposed development is to provide a facility for the servicing and repair of electric airside support vehicles. Up to 8,000 vehicles have licences to operate airside at Heathrow Airport. Around 300 of these are owned by Heathrow Airport, the remainder are operated by airlines, ground-handlers and other companies leased from companies such as AGS.

- 10.4 Heathrow is looking to decarbonise its airside operations; this is a key aim as outlined in the Airport's 'Net Zero Plan'. Measures include the implementation of an airside ultra-low emission zone which come into effect in 2025. It is imperative that AGS develop a facility for the maintenance of an electric vehicle fleet in order to assist Heathrow with achieving their target for the decarbonisation of airside travel. Furthermore, for AGS to remain commercially viable and to be able to fulfil future contracts this will be an absolute necessity.

- 10.5 Due to capacity constraints at their existing operations, it is not possible to safely provide these facilities within their current estate. Furthermore, the combination of combustion engines and electric vehicles are not compatible due to health and safety concerns, and consequent insurance issues. In addition, the maintenance of an electric fleet of vehicles often requires different tools and machinery.

Employment

- 10.6 Local Plan Policy E7 (Raising Skills) states that:

“The Council will ensure a range of training and employment opportunities are linked with the development of major sites for both construction phases and end use occupiers, and through liaising with local colleges and businesses to ensure workforce development initiatives and training programmes reflect skill requirements in the workplace. The Council will engage with local businesses and universities to link high end jobs and green jobs in the borough with higher education courses. The Council will promote Hillingdon as a destination for visitors and tourists and ensure that local residents have access to jobs within related industries”

- 10.7 Currently employing 70 people at their Bath Road site, they are facing an increase in workload from the airport in the coming months and will be recruiting from the local area to support that growth. The expansion will include high value employment: a mix of business support and technical staff as well as airport operations staff.

- 10.8 To support this growth AGS is seeking to establish a local apprenticeship scheme in partnership with local education institutions. AGS have identified a skill shortage for electric vehicle servicing due to the relative infancy of the sector. Therefore, the training and development of new employees is going to be key to servicing the electric airside needs of Heathrow. AGS is willing to agree an Employment and Skills Plan as part of the S106 Agreement, this is considered to be a significant public benefit. Furthermore, this is wholly in line with Local Plan Policy E7 as outlined above, by ensuring that local residents will have access to skilled “green” jobs and training as part of the proposed development, in a burgeoning sector critical to achieving the UK Government's Net Zero ambitions.

Design

- 10.9 Policy DMHB 11 (Design of new development) of the Local Plan provides design considerations further to those noted in Strategic Objective SO2 in the Local Plan Part 1.
- a) All development is required to be designed to the highest standards and incorporate principles of good design including harmonising with local context; ensuring the use of high quality materials and finishes and maximises the sustainability of internal layout and design; protecting features of positive value within and adjacent the site; and landscape and tree planting.
 - b) Development proposals should not adversely impact on amenity, daylight and sunlight of adjacent properties and open space.
 - c) Design will be required to safeguard the redevelopment of adjoining sites with development potential, and for major proposals master plans and design codes are expected to be prepared and agreed with the Council.
 - d) Sufficient provision for well-designed internal and external storage space for waste with suitable access for collection 6.36 London Plan Policy D3 (Optimising site capacity through the design-led approach) establishes a design-led approach to optimising a sites capacity. This means ensuring that development is of the most appropriate form and land use for the site. Form and layout of buildings and spaces should enhance local context by positively responding to local distinctiveness.
- 10.10 Policy D4 (Delivering good design) explains that Masterplans and design codes can be used to bring forward development that delivers high quality design and place-making. Design and Access Statements should deliver compliance with London Plan design requirements. Design quality should be retained through to development completion.
- 10.1 Policy D5 (Inclusive design) expects development proposals to achieve the highest standards of accessible and inclusive design and for Design and Access Statements submitted with proposals to include an inclusive design statement.
- 10.2 Next to and abutting the office element is principal service centre formed of 8no bays of 6.60m wide by 19m deep each, which amounts to 1,003 sq.m and will accommodate vehicles up to 11m long with appropriate space front and rear for access.
- 10.3 The proposals have been designed to repurpose a dilapidated brownfield site, while enhancing the wider site with a comprehensive landscaping strategy. The space has been designed to accommodate the end operator's specific needs. This includes the dimensions of the proposed service bays being of suitable dimensions to host the range of vehicles that the site will accommodate.
- 10.4 To support the pack of drawings BCM have prepared a Design & Access Statement.

Airport Safeguarding

- 10.5 Local Plan Policy DMAV 1 (Heathrow Airport) states:

“A) The Council will support the continued safe operation of Heathrow Airport and RAF Northolt and will consult with the airport operator on proposals in the safeguarded areas. Proposals that may be a hazard to aircraft safety will not be permitted.

B) In consultation with the Airport Operator, the Council will ensure that:

- i. areas included in Airport Public Safety zones are protected from development which may lead to an increase in people residing, working or congregating in these zones; and*
- ii. sensitive uses such as housing, education and hospitals are not located in areas significantly affected by aircraft noise without acceptable mitigation measures”*

10.6 The site is located within the 3km perimeter of Heathrow Airport and is sited circa 6.92km away from RAF Northolt.

10.7 The proposals are commensurate in height and the neighbouring Holiday Inn to the north is significantly taller than the proposed building.

10.8 The proposal is not considered contrary to Policy DMAV 1 of the Hillingdon Local Plan: Part 2 (2020).

Glint and Glare

10.9 The proposals include Solar Photovoltaics (Solar PVs) on the roof of the Office and Service Buildings. A key consideration is the potential glint/glare impact on the aviation. In support of the application Pager and Power have prepared a Glint and Glare Assessment to understand if there would be any impact from the incorporation of the Solar PVs on aviation operations.

10.10 The Assessment takes into account two receptors, firstly the Air Traffic Control Tower (ATC Tower). The Assessment found that no solar reflections are geometrically possible towards the ATC Tower. Therefore, no impact is predicted and mitigation is not required.

10.11 The second receptor are the aviation approach paths to Heathrow Airport.

“Solar reflections are geometrically possible towards sections of the 2-mile approach paths for runways 09L, 27R, 09 (Proposed) and 27 (Proposed). Glare is predicted with an intensity of ‘low potential for temporary after-image’ which is acceptable in line with the associated guidance (Appendix D) and industry standards.

No solar reflections are geometrically possible towards the 2-mile approach paths for runways 09R and 27L. No impact is predicted, and no mitigation is required.

Overall, a low impact is predicted, and mitigation is not required.”

10.12 Overall, the Assessment concludes that there are no significant impacts are predicted upon aviation activity associated with London Heathrow Airport and mitigation is not required.

Flood Risk

- 10.13 Policy DMEI 9 (Management of Flood Risk) relates to development proposals in Flood Zone 2 and 3. The application site is in Flood Zone 1 however in the context of the proposed development and to ensure good practice a flood risk assessment has been provided with this application.
- 10.1 Policy SI13 (Sustainable drainage) sets out that proposals should aim to achieve greenfield runoff rates and sets a preference for green over grey features in line with the policies defined drainage hierarchy. Development proposals for impermeable surfacing are acceptable where it has been demonstrated that they can be shown to be unavoidable.
- 10.2 London Plan Policy SI12 looks to ensure that developments minimise and mitigate flood risk and address any residual flood risk. Local Plan Policy DEMI9 relates to Flood Zones 2 & 3 only.
- 10.3 The site is wholly located within Flood Zone 1, this has the lowest probability of flooding. Motion have prepared a Flood Risk Assessment and Drainage Strategy (FRADS) in support of the planning application.

Drainage

- 10.4 Policy SI13 of the London Plan sets out that proposals should aim to achieve greenfield run-off rates and sets a preference for green over grey features in line with the policies defined drainage hierarchy. Development proposals for impermeable surfacing are acceptable where it has been demonstrated that they can be shown to be unavoidable. Local Plan Policy DMEI 10 outlines that a drainage assessment demonstrating that appropriate sustainable drainage systems (SuDS) should be incorporated in accordance with the London Plan Hierarchy.
- 10.5 The site is within Flood Zone 1 (the lowest probability of flooding) and the FRADS prepared by motion, confirms that there is low risk of all types of flooding. Furthermore, Ground and Water undertook infiltration testing to underpin the proposed drainage strategy, this is appended to the FRADS).
- 10.6 In terms of the drainage strategy, site-specific BRE365 compatible infiltration tests there is strong confidence that groundwater will not be a constraint to the discharge of surface water by infiltration. The FRADS outlines that:

Therefore, the proposed drainage strategy is for surface water to be positively drained to two separate SuDS basins, which will be set in the uppermost alluvial clay geology. These SuDS basins will provide surface water attenuation, as well amenity, biodiversity and pollution mitigation benefits. Each of these SuDS basins will drain at a restricted rate to a geocellular soakaway set within the dry river terrace gravels and these will use infiltration to discharge the site's surface water to ground. The locations of the proposed SuDS basins are shown on the proposed site plan."

- 10.7 The proposed drainage strategy therefore accords with London Plan Policy SI12.

Landscape Visual Impact Assessment

- 10.1 WHLandscape have prepared a Landscape Visual Impact Assessment.
- 10.2 The sensitivity of the study area is considered to be low, with the Green Belt described as having “limited public access” and a “generally degraded appearance”.
- 10.3 The LVIA concludes that:
- “As a result of the assessment of landscape and visual effects, it has been determined that the development will have an overall *Moderate/Minor* effect.”
- 10.4 The LVIA should be referred to key consideration when assessing the greenbelt impact, see Section 8.0 of this Planning Statement for the full Greenbelt Assessment.

Landscaping

- 10.1 The proposals have been developed to provide a comprehensive and ambitious landscaping scheme for the site that will provide great biodiversity and screening benefits.
- 10.2 The green space at the front (western) side of the site will be retained to provide a landscape buffer. Associated with the proposed development, the wider landscape will be managed to deliver biodiversity net gain. This will see the planting of circa 186 trees, including a significant woodland belt will be planted along the eastern boundary onto the M4 link development. Two SuDS ponds have been incorporated into the landscaping of the site, one to the west of the built development and one to the south.
- 10.3 Furthermore, the proposals include the extensive shrub, hedgerow, aquatic and herbaceous planting. This will be complimented by species-rich grassland seeding. As part of the application WHLandscape have prepared a comprehensive landscape strategy of which details can be found in the Landscape Implementation and Management Plan.

Trees

- 10.4 In respect of trees, reflecting the requirements of London Plan Policy G7, the aim of the project has been to avoid tree loss if possible, by the careful siting of the building extensions and structures.
- 10.5 Policy DMHB 14 (Trees and landscaping) expects landscape, trees and other natural features of merit to be retained and for proposals to provide a landscape scheme appropriate to the character of the area. Where proposals would affect existing trees an accurate tree survey will be required to show how the trees will be protected. Where trees are removed, replanting on-site or contributions to offsite provision must be provided.
- 10.6 SJ Stephens have prepared an Arboricultural Impact Assessment and Tree Protection Plan in support of the application. This has been informed by a tree survey which was undertaken on site. Overall seven trees that have been identified for removal, six of which are dead, almost dead or infected. In addition, a sycamore (G7) has been identified for removal to allow adjacent trees to develop.

- 10.7 As highlighted above, the proposals include significant tree planting of circa 186 new trees to more than compensate for the proposed loss of the seven poor quality trees that have been identified for removal.

Biodiversity

- 10.8 London Plan Policy G6 (Biodiversity and access to nature) expects development proposals to manage biodiversity and achieve biodiversity net gain. Similarly Local Plan Policy DMEI 7 outlines that the design and layout of new development should retain and enhance any existing features of biodiversity or geological value within the site. Furthermore, Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021) makes it mandatory for development to achieve a biodiversity net gain of 10% from January 2024.
- 10.9 Temple Group have prepared a Biodiversity Net Gain Assessment. The Assessment finds that:
- “the habitats within the proposed development has the potential to achieve a net gain of **4.40** Habitat Units. This equates to a percentage gain of **47.07%** Habitat Units. The linear habitats have the potential to achieve a net gain of **7.02** units, equating to a percentage gain of **1387.68%**”*
- 10.10 Therefore, the proposals can achieve a net gain way in excess of the forthcoming requirements. It is considered that the proposed development will have great benefit to biodiversity, vastly improving the existing environment.

Urban Greening

- 10.11 An Urban Greening Factor calculation has been included within the Landscape Statement which resulted in a score of 0.559 which is significantly in excess of the target of 0.3 for predominately commercial developments as outlined by London Plan Policy G5 (Urban greening).
- 10.12 It is considered that the proposals have taken significant steps to ensure that high quality landscaping and greening of the site can be achieved, therefore, on balance, it is considered that the proposed development by virtue of greatly exceeding the policy requirements, accords with the Development Plan.

Noise

- 10.13 Policy D13 (Agent of change) places the responsibility for managing the impact of noise on the new development. This requires that if a noise-generating use is located close to noise-sensitive uses, the building or activity should be designed to protect existing users from noise impacts; or if the proposal is close to a noise-generating use, they should be designed in a way to protect new occupiers.
- 10.14 Policy D14 (Noise) expects development proposals to manage noise in-line with the Agent of change principle; avoid significance adverse noise impacts on health and quality of life; mitigate and minimise existing impacts of noise without placing unreasonable restrictions on existing noise-generating uses; improve and enhance the quality of acoustic environment and promote

appropriate soundscapes; separate new noise sensitive development from major noise sources, or where that is not possible to control potential adverse effects; and promote new technologies/improved practices to reduce noise.

- 10.15 Local Plan Policy EM8 (Land, water, air and noise) stipulates that the Council will seek to ensure that noise sensitive development and noise generating development are only permitted if noise impacts can be adequately controlled and mitigated.
- 10.16 The proposed development will be used for the repair of electric airside vehicles and by their nature electric vehicles are much quieter in operation than their traditional combustion counterparts.
- 10.17 During the pre-application stage the proposals have developed from , there have been several design changes that have been incorporated to ensure that the proposed development has the least possible impact on the nearest sensitive noise receptors (the residential properties on Sipson Road to the southeast).
- 10.18 The orientation of the building is such that the roller doors to the Service Building now face eastwards towards the M4 which will reduce noise spill, furthermore the building has also moved further away from the residential properties.
- 10.19 In addition, the proposed wash bay has been relocated to the most northwestern part of proposed hardstanding to ensure this is located as far as practicably possible from the residential properties.
- 10.20 Air and Acoustic Consultants have prepared a Noise Assessment to support the application and ensure compliance with the relevant policies.

Air Quality

- 10.21 Local Plan Policy EM8 (Land, water, air and noise) stipulates that new development should not cause deterioration in local air quality levels and ensure the protection of existing and new sensitive receptors.
- 10.22 London Plan Policy SI1 (Improving air quality) expects new development proposals to be at least Air Quality Neutral. An Air Quality Assessment (AQA) is required for major proposals, therefore an assessment has been prepared by Global Air Quality in support of the application.
- 10.23 The AQA assessed both the construction and operational impacts associated with the proposed development. The Assessment concluded that:

*“Through good site practice and the implementation of suitable mitigation measures, the impact of dust and PM10 releases will be effectively minimised, and **the residual dust impacts are expected to be negligible**”.*

“A review of local air quality monitoring data has been undertaken to determine whether future users of the proposed development will be exposed to poor air quality. The proposed

*development is a commercial scheme and therefore there will be no long-term exposure. The measured NO₂ and PM₁₀ concentrations in the area are well below the short-term air quality standards and therefore **the proposed development will not introduce new exposure to poor air quality.***

- 10.24 However, the proposals are not considered air quality neutral when assessed against the benchmarked trip rate. Therefore, this may need to be offset may through appropriate mitigation measures or a financial contribution.

Land Contamination

- 10.25 Local Plan Policy DME1 12 stipulates that proposals on contaminated land will require mitigation.
- 10.26 Ground and Water have undertaken a Phase 1 Desk Study in support of the application to identify potential sources of contamination. This Phase I Desk Study comprises a Tier 1 Preliminary Risk Assessment, under Land Contamination Risk Management (LCRM).
- 10.27 The Desk study has revealed the following potential sources of contamination onsite:
- Potential for Made Ground (associated with historical construction/demolition onsite)
 - Agricultural Contamination (Sipson Garden Centre and Orchid)
 - Former garden centre/nursery
 - Bunded diesel tank
- 10.28 Offsite - The Desk study has revealed the following potential sources of contamination within the site's environs:
- Potential ground-gas generating features
- 10.29 It is recommended that as part of Phase II that an intrusive ground investigation is undertaken at the site to evaluate the risk that contaminants of concern within the soils and groundwater may affect end-users. This could be secured by a suitably worded condition.

Sustainability

- 10.30 London Plan (2021) Policy T8 'Aviation', Part B states that:
- "The environmental and health impacts of aviation must be fully acknowledged and aviation-related development proposals should include mitigation measures that fully meet their external and environmental costs, particularly in respect of noise, air quality and climate change..."*
- 10.31 Airside service vehicles form a considerable element of the environmental costs when operating an airport. Paragraph 5.28 of the Airports National Policy Statement (2018) stated that:
- "Air quality impacts are generated by all types of infrastructure development to varying degrees, and the geographical extent and distribution can cover a large area. At Heathrow Airport in 2015,*

aircraft movements were modelled to have contributed 17% on average to local NOx concentrations at nearby roadside locations. Road transport, by comparison, accounted for 64% of NOx concentrations in the same areas. Off-road transport and mobile machinery (a category which would include airside vehicles) contributed 5%”

- 10.32 Furthermore, paragraph 10.8.3 of the London Plan states that “Heathrow airport’s current operations are already a cause of concern for hundreds of thousands of Londoners, with its significant noise impacts and contribution to illegal levels of air pollution”. To address these issues, in February 2022 Heathrow Airport published their “Net Zero Plan”, Goal 7 ‘Net zero goals on the ground’ relates to airport vehicles:

“We have already announced plans for an ultra-low emissions zone for airside vehicles from 2025. Our goal by 2030 is for all vehicles airside to be zero emission. Some of the more specialist vehicles may not have alternatives available by then. For them, we will promote biodiesel as an interim measure.”

- 10.33 It is imperative that AGS has a facility that enables them to assist Heathrow with achieving their target for the decarbonisation of airside vehicles. Furthermore, for AGS to remain commercially viable and to be able to continue fulfilling frameworks at Heathrow the company needs to transition their vehicle fleets.
- 10.34 This application is supported by a suite of sustainability documents that have been prepared by Hydrock including an Energy Strategy, Whole Life Carbon Assessment and a Circular Economy Statement. These demonstrate how the development responds to the development plan with a particular emphasis upon the London Plan 2021 standards which are widely regarded as being at forefront of planning policy in sustainability terms.
- 10.35 Policy SI2 (Minimising greenhouse gas emissions) sets out that major development should strive to be net-zero carbon through being ‘lean’, ‘clean’, ‘green’ and ‘seen’. For major development proposals an energy strategy is required, and an on-site reduction of 35% or more beyond the Building Regulations must be demonstrated.
- 10.36 An outlined Energy Statement has been submitted with the application to satisfy the requirement in Policy SI2 of the London Plan, adopting Be Lean, Be Green and Be Clean hierarchy principles. The energy strategy has followed the energy hierarchy methodology of the London Plan and has resulted in the following carbon reduction or measures or measures for each stage:
- Be Lean – **17% reduction** from passive design features.
 - Be Clean – The development will be designed to be able to **connect to a future Decentralised Energy Network**.
 - Be Green – **482% reduction** from renewable energy generation.

The results of the Building Regulations Part L (2021) compliance calculations shows that **net zero regulated energy consumption for the site will be achieved, and thus no off-setting is required**. This meets national and local policy requirements.

Whole life carbon and Circular Economy

10.37 Policy SI7 (Reducing waste and supporting the circular economy) seeks to promote a circular economy by incorporating these principles into the design of new developments (see also Policy D3).

10.38 Overall Whole Life Carbon results, as shown in the Tables below, are in line with GLA benchmark targets for the modules of Whole Life Carbon Assessment.

Table 4 - Overall whole life carbon results for the Sipson Development (Hydrock Assessment)

	WLC EMISSIONS (TONS CO ₂ E)	WLC EMISSIONS (KGCO ₂ E/SQM GIA)
Proposed Development	1652	1210

Table 5 - Summary of whole life carbon breakdown for the Sipson development (Hydrock Assessment)

WHOLE LIFE CARBON SCOPE	MODEL DESIGN (KGCO ₂ E/M ² GIA)	WLC BENCHMARK (KGCO ₂ E/M ² GIA)
A1-A5 (Product Stage + Construction Stage)	899	<950
B1-B5 (In-Use Stage)	273	<450
C1-C4 (End of Life Stage)	38	
B6 (Operational Energy)	700	
B7 (Operational Water)	9	

10.39 A circular economy is based on the following principles, all driven by design and support the application of the waste hierarchy: Building in Layers, Designing out Waste, Designing for Longevity, Designing for Adaptability or Flexibility, Designing for Disassembly; and Using Systems, Elements or Materials that can be Reused or Recycled.

Transport and Servicing

- 10.40 NPPF paragraph 114 stipulates 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.
- 10.41 Local Plan Policy DMT 1 (Managing Transport Impacts) seeks to ensure transport needs of the development and address its transport impacts in a sustainable manner.
- 10.42 In support of the application Paul Basham Associates have prepared the following transport documents:
- Healthy Streets Transport Assessment
 - Travel Plan
 - Delivery and Servicing Plan
 - Operational Management Plan
- 10.43 The Transport Assessment concludes that the development will generate way fewer trips than the consented use and should therefore represent an improvement to highway safety and operation.

Access

- 10.44 Local Plan Policy DMT 2 (Highway Impacts) outlines that development proposals must ensure that safe and efficient vehicular access to the highway network is provided to the Council's standards.
- 10.45 The proposals will retain the existing access used by the former garden centre from Sipson Road (A408) to the west of the site.
- 10.46 Swept path analysis has been undertaken which shows that the proposed entrance would be able to receive 16.5m long articulated vehicles. The security gates to the development have been positioned to allow a larger vehicle to enter from Sipson Road and not overhang the carriageway while waiting for permission to enter the site. Please refer to the swept path analysis drawings included within the supporting Transport Assessment.
- 10.47 All HGVs will access and exit the site via the roundabout to the north on Sipson Road. This will eliminate any HGVs passing through Sipson village.

Parking

- 10.48 Policy DMT 6 (Vehicle parking) requires development proposals to comply with parking standards (Appendix C Table 1 to the Plan) or the Council may agree to vary the requirements where the variance where this would not give rise to a deleterious impact on street parking, congestion or local amenity; and/or a transport appraisal and travel plan has been approved and parking accords with its recommendations. All car parks should provide spaces for wheelchair users and those with restricted mobility.

- 10.49 Policy DMT 5 (Pedestrians and cyclists) requires safe, direct and inclusive access to be provided for pedestrians and cyclists on the site, connecting it to the wider network.
- 10.50 Policy T5 (Cycling) looks to secure appropriate levels of cycle parking which should be fit for purpose, secure and well-located. Table 10.2 sets out the minimum cycle parking standards for long-stay and short-stay parking for different use classes.
- 10.51 Policy T6 (Car parking) explains that developments that are not car-free, should be designed to provide the minimum necessary parking. Maximum standards for non-residential disabled persons parking are set out at policy T6.5 (Table 10.6). All operational parking should make provision for infrastructure for electric or other Ultra-Low Emission Vehicles and adequate provision should be made for deliveries and servicing and emergency access.
- 10.52 The following parking provision is proposed:
- 28no. general staff and visitor parking spaces (including 6no. EV charging points)
 - 3no. accessible spaces (including 1no. EV charging point)
 - 3no. loading bays
 - 15no. parking spaces for larger vehicles (formed of 6no. for 16.5m articulated vehicles, and 9no. that measure 13.5m long) – these are to hold vehicles while they await servicing. This includes 7no. EV Charging points, each of which can be access from 2 bays.
- 10.53 The level of car parking has been informed by the London Plan standards, considering the nature of the use, existing travel patterns and the occasional planned use for training. Disabled and enlarged bays are provided in accordance with London Plan standards. The parking is further justified with the Transport Assessment.

Cycle Parking

- 10.54 Based on London Plan standards the proposed development will be required to provide 3 long-stay cycle spaces and 1 short-stay/visitor spaces. 4 Sheffield Stands are identified on the proposed site layout, providing 8 spaces.
- 10.55 Therefore, the proposals provide cycle parking in excess of the relevant standards.

Refuse

- 10.56 The proposals incorporate storage space for 5 x 1100L refuse bins (2 x general recycling, 2 x cardboard recycling and 1 x landfill). In addition, a 120L food waste bin will be provided. The bin store will be located on the western side of the service building, located within a timber clad bin store with gate access.
- 10.57 Refuse vehicles of varying sizes will be able to momentarily wait at the southern end of the building while collecting waste.

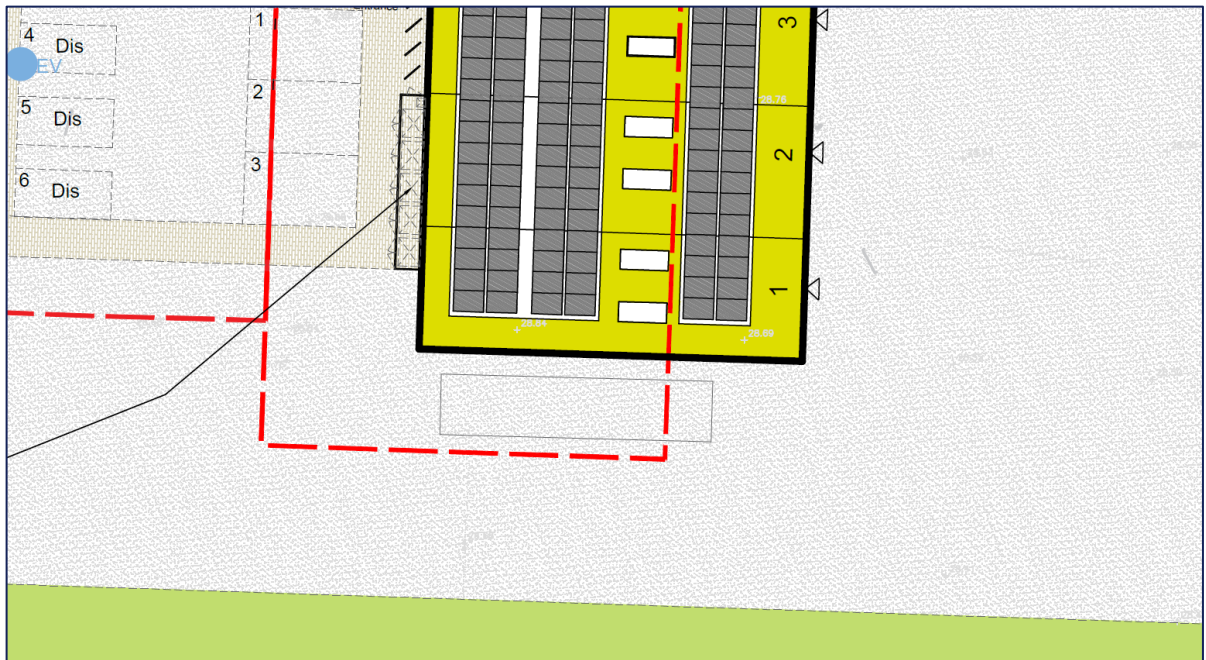


Figure 12 - An extract of the Proposed Site Plan with the proposed bin store adjoining the western elevation of the service building with the grey box to the south of the building indicating where the refuse vehicles will stop.

Archaeology

- 10.58 Local Plan Policy DMHB 8 (Archaeological Priority Areas and Archaeological Priority Zones) states that:

“The Council, as advised by the Greater London Archaeological Advisory Service, will ensure that sites of archaeological interest within or, where appropriate, outside, designated areas are not disturbed. If that cannot be avoided, satisfactory measures must be taken to mitigate the impacts of the proposals through archaeological fieldwork to investigate and record remains in advance of development works. This should include proposals for the recording, archiving and reporting of any archaeological finds.”

- 10.59 Local Plan Policy Maps identify the site as falling within an Archaeological Priority Zone. Therefore, in support of the application an Archaeological Desk-Based Assessment has been undertaken by Hawk Heritage. This concluded that:

“Given the potential for Neolithic, Bronze Age and Roman remains of moderate significance and the potential of the new structures to impact upon those remains, albeit in limited areas, the LPA may wish to recommend further archaeological work to record any remains prior to their loss during development if planning permission is granted. The previous investigations within the site can be taken as an evaluation of the site and the presence of the existing greenhouses, containers and lorry park precludes any other investigations at present. These works could be secured by a suitably worded planning condition”

- 10.60 A condition requiring a Stage 1 written scheme of investigation (WSI) was attached the application for the reinstatement of the garden centre. This was a two-tiered condition that

depending on the outcome of the WSI a Stage 2 WSI may be required. The applicant would be minded to accept a similar appropriately worded condition.

Ecology

- 10.61 Policy DMEI 7 (Biodiversity Protection and Enhancement) states that if development is proposed on or near to a site considered to have features of ecological or geological value, applicants must submit appropriate surveys and assessments to demonstrate that the proposed development will not have unacceptable effects.
- 10.62 The site is not covered by any statutory or non-statutory nature conservation designations. However, the site is circa 4.9km of the South-west London Waterbodies Ramsar and Special Protection Area. In addition, the site is within the Impact Risk Zone of three Sites of Scientific Interest (SSSI).
- 10.63 As part of the application Temple Group have been instructed to prepare a Preliminary Ecological Appraisal, this comprises of a Phase 1 habitat survey, protected species assessment and an ecological evaluation of the site. Various additional surveys are recommended as a result of the assessment. It is anticipated that any requirements for further survey work could be secured by condition.

Fire Safety

- 10.64 Policy D12 (Fire Safety) requires all proposals to achieve the highest standards of fire safety and ensure that they identify suitably positioned unobstructed outside space; are designed to incorporate appropriate features to reduce risks to life and serious injury in the event of a fire; are constructed in an appropriate way to minimise risk of fire spread; provide suitable and convenient means of escape; and develop a robust strategy for evacuation. A Fire Strategy has been prepared by 3-FE in support of the application which satisfies the requirements of policy D12.
- 10.65 Some minor internal changes were implemented as part of the design process to ensure compliance.

APPENDIX 1

ALTERNATIVE SITES

The respective brochures are submitted separately as PDFs.

