# Planning, Design & Access Statement

In respect of:
**Khalid Jamal**

Chaplin House
Widewater Place
Moorhall Road
Harefield
UB9 6NS

November 2026

**Prepared by**

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# 1 INTRODUCTION

1.1 This Planning, Design and Access Statement (PDAS) has been prepared by Planning Clarity on behalf of Khalid Jamal (the Applicant) and forms part of a full planning application submitted to the London Borough of Hillingdon as the local planning authority (LPA) in respect of Widewater Place Business Centre, Moorhall Road, Harefield UB9 6NS.

1.2 Planning permission (ref: 76643/APP/2025/436) was refused in August 2025 for the conversion of a section of office car park spaces fronting Musgrove House within Widewater Place Business Centre to a hand car wash facility ['Original Scheme'].

1.3 A subsequent application (ref. 7664/APP/2026/457) was submitted in March 2026 for the conversion of 5no. office car parking spaces into hand car wash, including the installation of a canopy fronting Chaplin House. This application sought to overcome the reasons for refusal of the original scheme. On 12th May, the LPA advised that additional information relating to flood and drainage and landscaping were required to support the application and advised the Applicant to withdraw the application. The application was subsequently withdrawn on 13th May.

1.4 A further application (ref: 76641/APP/2026/1411) was submitted in June 2026 for the conversion of 5 office car parking spaces into hand car wash, including the installation of a canopy on Moorhall Road, however, the Applicant decided to withdraw the application in September 2026.

1.5 This application seeks to planning permission for the conversion of 5 office car parking spaces into hand car wash, including the installation of a canopy on Moorhall Road. This PDAS details the nature of the application site and the surrounding area and the site history, explains the proposals, lists the relevant development plan policies and associated guidance, followed by an assessment of the proposals against those policies, guidance, and any other material planning considerations. It concludes that the Proposed Scheme complies with the national, regional and statutory development plan policies, overcomes the previous reasons for refusal, and should be granted of planning permission.

1.6 In addition to this PDAS, the application is supported by a Heritage Statement prepared by Squire Heritage Consulting, Flood Risk and Drainage Strategy Report prepared by RCD Consultants, and the following drawings prepared by Jorge Salman Architects Ltd, GraftinGarders Ltd, and RCD Consultants Ltd.:

**Table 1: Application Drawing Schedule**

| Ref. | Title | Scale | Status |
|---|---|---|---|
| 2546_P001 | Existing Site Plan | 1:100@A3 | For Approval |
| 2546_P010 | Existing Block Plan | 1:200@A3 | For Approval |

| | | | |
|---|---|---|---|
| 2546_P101 | Proposed Site Plan | 1:100@A3 | For Approval |
| 2546_P110 | Proposed Layout Plan | 1:200@A3 | For Approval |
| 2546_P201 | Existing South Elevation | 1:200@A3 | For Approval |
| 2546_P202 | Existing West Elevation | 1:100/1:200@A3 | For Approval |
| 2546_P221 | Proposed South Elevation | 1:200@A3 | For Approval |
| 2546_P222 | Proposed West Elevation | 1:100/1:200@A3 | For Approval |
| 2546_P223 | Proposed Materials | 1:100@A3 | For Approval |
| 1111-2605-CIV-10-P1 | Proposed Drainage Layout | 1:100@A1 & 1:200@A3 | For Approval |
| 1111-2605-CIV-50-P1 | Proposed Drainage Construction | 1:25@A1 & 1:50@A3 | For Approval |
| 26 67859 LEMP 001 | Proposed Landscape & Ecology Management Plan | 1:250@A2 | For Approval |

## 2 SITE CONTEXT AND RELEVANT PLANNING HISTORY

**Application Site**

2.1 The Application Site is shown on the Existing Site Plan drawing no. 2540_P001 and forms part of the existing car park area serving Chaplin House, one of three blocks within the Widewater Place Business Centre. Widewater Place is a purpose-built office park located north of Moorhall Road, within the authoritative boundary of the London Borough of Hillingdon.

2.2 The Application Site comprises 3no. purpose built office buildings; Musgrove House and Chaplin House fronts Moorhall Road with Norgine House located to the rear of the Site. Residential development is located to north of the Site and the Grand Union Canal runs along the western boundary. Prior Approval was given in June 2024 for the change of use of Musgrove and Norgine Houses from offices (Use Class E(g)(i)) to residential flats (Use Class C3) (Application for Prior Approval under Schedule 2, Part 3, Class MA of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended)). The conversions have not been implemented.

2.3 The Site is bound by a dense tree belt along the western and northern boundaries and there is also tree planting along Moorhall Road, all screening the visibility of the buildings from the surrounding area.

2.4 Car parking spaces serve the buildings, and forming part of the curtilages, are located to the north, east, south and west of the buildings. Access into the site is via the southern boundary, along Moorhall Road.

2.5 The Site is located within 50 metres of a stream that flows into a nearby lake and is also within the Widewater Lock Conservation Area. The Site is on a former potentially contaminated land use identified as Works (Various) as well as within 250m of landfill buffer.

**Relevant Planning History**

2.6 Planning permission ref: 76643/APP/2025/436 for the conversion of office car park to hand car wash facility on Moorhall Road was refused for the following reasons:

1. By virtue of the scale, siting and utilitarian appearance of the proposed canopy and storage container, the development would appear as an incongruous and ad-hoc feature within the Widewater Business Centre. The introduction of these structures, together with the intensified commercial activity associated with the car wash, would undermine the character of the business park and be visually harmful. In addition, the development would detract from the rural setting and significance of the Widewater Lock Conservation Area, resulting in less than substantial harm to its character and appearance. The proposal would therefore be contrary to Policies BE1 and

HE1 of the Hillingdon Local Plan: Part One Strategic Policies (2012), Policies DMHB 1, DMHB 4, DMHB 11 and DMHB 12 of the Hillingdon Local Plan: Part Two - Development Management Policies (2020), Policies HC1, D3 and D4 of the London Plan (2021), and the National Planning Policy Framework (2024).

2. The application fails to provide sufficient technical details to demonstrate how foul and surface water run-off, including detergents, oils, and suspended solids from the proposed car wash use would be effectively managed. Given the proximity of the site to trees, a watercourse and downstream lake, it has not been satisfactory demonstrated that the development would not result in increased flood risk, pollution of the water environment, or harm to the capacity of the wider drainage network . The proposal is therefore contrary to Policies DMEI 9 and DMEI 10 of the Hillingdon Local Plan, Policies SI5, SI12 and SI13 of the London Plan (2021), and paragraph 174 of the NPPF (2024).

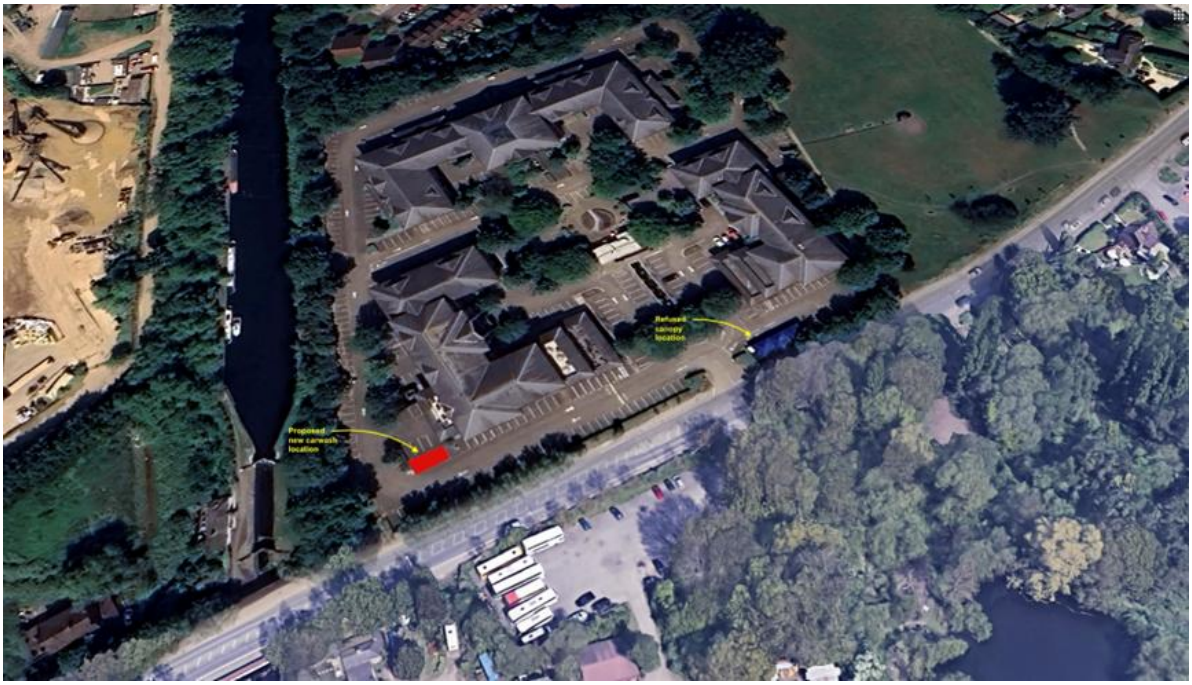
3. The proposed car wash, including the siting of a canopy and storage container, is located in close proximity to established trees and hedging along the site frontage, which contribute positively to the character of the site and the setting of the Widewater Lock Conservation Area. In the absence of an Arboricultural Impact Assessment to demonstrate that the development would not adversely affect the health, stability or long-term retention of these trees and hedging, the proposal fails to establish that the landscaping features would be adequately protected. The proposal is therefore considered contrary to Policies BE1 and HE1 of the Hillingdon Local Plan: Part One - Strategic Policies (2012), Policies DMHB 4, DMHB 11 and DMHB 14 of the Hillingdon Local Plan: Part Two - Development Management Policies (2020), and the National Planning Policy Framework (2021).

## 3 PROPOSED SCHEME

3.1 Planning Permission is sought for :

*"conversion of 5no. office car parking spaces into hand car wash, including installation of canopy and landscaping on Moorhall Road"* (the Proposed Scheme).

3.2 The proposed car wash facility will be located at the west corner of the site adjacent to Chaplin House as shown on the Proposed Site Plan drawing no. 2540_P101A. It will be set back from the Widewater Place Business Centre boundary fronting Moorhall Road as shown coloured **Red** in **Figure 1** below. Figure 1 also shows the location of the originally refused scheme coloured **Blue**.




3.3 The proposed design and materials are shown on the Proposed Materials drawing no. 2540_P223. The main feature of the car wash facility is the provision of a bespoke purpose built lightweight, well-proportioned, and semi-transparent structure supported by slim frames with all structural members finished in RAL 7040 'Window grey'.

3.4 The proposed car structure measures approximately 15.8m long, 4.7m wide and 3.3m high at its highest point. Polycarbonate, semi-obscure panels will be used to clad both the sides and roof of the structure. Two small cabins will be located within the car-wash canopy structure for use by staff and

for storage only. These will be lockable containers and painted in the same colour as the canopy structure RAL 7040 ‘Window grey’.

3.5 A drainage strategy is also proposed for the car wash facility. The drainage design is shown on the submitted Proposed Layout drawing no. 111-2605-CIV-10-P1 and the construction details are shown on drawing no. 111-2605-CIV-50-P1. The proposal involves attenuation in the form of cellular storage tanks and washdown separator with connecting pipework and inspection chambers.

3.6 It is also proposed to provide additional native tree planning within the existing landscape strip along the boundary fence line with Moorhall Road, as shown on the Proposed Landscape & Ecology Management Plan drawing no. 26 67859 LEMP 001. Trees and vegetation presently growing within the strip include five early mature Ash, planted equidistant apart, with patchy native hedging below. The proposal landscaping enhancements will see the planting of one semi mature Field Maple located toward the western end of the G1 and infill planting of the existing hedge with native species. Planting a semi-mature tree as well as increasing the density of the native hedging will immediately increase screening for the site, as well as providing habitat for insects and nesting birds. Artificial hedge fencing will be used to clearly define site boundaries and provide screening between those using the site and the surrounding business park parking.

3.7 Ecological enhancements will include the installation of two bird boxes and three habitat log piles, both aimed at increasing insect, bird, and general wildlife activity along the strip.

## 4 PLANNING POLICY CONTEXT

4.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the Development Plan unless material considerations indicate otherwise.

4.2 This section sets out the planning policy context for the Proposed Scheme. The national, regional and local planning policies relevant to the Proposed Scheme are contained in the reasons for refusal of the original scheme and are listed below and are set out in full in section 5.

**National Planning Policy Framework**

4.3 The National Planning Policy Framework 2026 (NPPF) sets out the government's planning policies for plan-making and for making decisions on development proposals in England and how these are expected to be applied.

4.4 This version replaces the previous National Planning Policy Framework published in March 2012, revised in July 2018, February 2019, July 2021, September 2023, December 2023 and December 2024.

4.5 Paragraph 3 confirms that *"The national decision-making policies in this Framework are a material consideration in making these decisions and should be read alongside the policies in the development plan. Planning decisions must also reflect relevant international obligations and statutory requirements, as must the preparation of development plans."*

4.6 Paragraph 15 of the NPPF states *"The purpose of the planning system is to contribute to the achievement of sustainable development, by managing the use and development of land in the long-term public interest."* Paragraph 17 states *"Achieving sustainable development means that the planning system has three overarching objectives in providing for the homes, commercial development, facilities and infrastructure which society needs. These objectives are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across all three):*

*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 community facilities, public service infrastructure and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and*

*c. An environmental objective – to support efforts to mitigate and adapt to climate change, including moving to a low carbon economy; and to protect and enhance our natural, built and historic environment, including making effective use of land, improving biodiversity, using natural resources prudently, and minimising waste and pollution."*

4.7 At national level, the National Planning Policy Framework 2024 (NPPF) was revised in response to the proposed reforms to the NPPF and other changes to the planning system consultation on 12 December 2024 and sets out the government's planning policies for England and how these are expected to be applied.

4.8 The most relevant chapters and policies of the NPPF are:

- Chapter 5 'Meeting the challenge of climate change' - Policy CC3 Adaptation to climate change
- Chapter 12 'Making effective use of land' - Policy L2 Making effective use of land
- Chapter 14 'Achieving well-designed places' - Policy DP3 Key principles for well-designed places;
- Chapter 18 'Managing flood risk and coastal change' - Policies F4 Assessing flood risk for decision-making and F8 Sustainable drainage systems and watercourses
- Chapter 20 'Conserving and enhancing the historic environment' - Policies HE5 Assessing effects on heritage assets and HE6 Proposals affecting designated heritage assets

<u>The London Plan 2021</u>

4.9 The London Plan 2021 is the Spatial Development Strategy for Greater London. It sets out a framework for how London will develop over the next 20-25 years and the Mayor's vision for Good Growth.

4.10 The Plan is part of the statutory development plan for London, meaning that the policies in the Plan should inform decisions on planning applications across the capital. Borough's Local Plans must be in 'general conformity' with the London Plan, ensuring that the planning system for London operates in a joined-up way and reflects the overall strategy for how London can develop sustainably, which the London Plan sets out.

4.11 The relevant London Plan (LP) Policies are:

- D3 – Optimising site capacity through the design-led approach
- D4 – Delivering good design
- HC1 - Heritage conservation and growth
- SI5 – Water Infrastructure
- SI12 – Flood risk management
- SI13 – Sustainable drainage

**Statutory Development Plan**

4.12 At local level, two sections of Hillingdon's Local Plan forms the council's future development strategy for the borough. It sets out a framework and detailed policies to guide planning decisions and it's the starting point for considering whether planning applications should be approved.

4.13 The Local Plan Part 1 adopted in 2012 sets out the overall level and broad locations of growth up to 2026. It comprises a spatial vision and strategy, strategic objectives, core policies and a monitoring and implementation framework with clear objectives for achieving delivery. These policies are supported by more detailed policies and allocations set out in the Local Plan Part 2 adopted in 2020. The Part 2 policies comprise Development Management Policies, Site Allocations and Designations and the Policies Map. They deliver the detail of the strategic policies set out in the Local Plan Part 1.

4.14 The relevant Local Plan Part 1 Strategic Policies (SP) are:

- BE1 – Built Environment
- HE1 – Heritage

4.15 The relevant Local Plan: Part Two - Development Management (DM) policies are:

- DMHB 1 – Heritage Assets
- DMHB 4 – Conservation Areas
- DMEI 9 – Management of Flood Risk
- DMEI 10 – Water Management, Efficiency and Quality
- DMHB 11 – Design of New Development
- DMHB 14 – Trees and Landscape
- DMEI 12 – Streets and Public Realm

## 5 PLANNING ASSESSMENT

5.1 Section 70(2) of the Town and Country Planning Act 1990 (as amended) and Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning applications are determined in accordance with the development plan unless material considerations indicate otherwise. This section identifies the main planning considerations arising from the development plan applicable to this application as well as the material considerations warranting the grant of planning permission for the Proposed Scheme.

5.2 The main issues for consideration are as follows:

- Design and Impact on the Character and Appearance of the Area;
- Heritage Significance; and
- Sustainable Drainage and Water Management

**Design and Impact on the Character and Appearance of the Area**

**National Policy**

5.3 The objectives of the policies contained within Chapter 12 'Making effective use of land' is to promote the effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions.

5.4 Policy L2: Making effective use of land states:

*"1. Substantial weight should be given to the benefits where a development proposal would achieve one or more of the following:*

*b. Making better use of vacant and underutilised land and buildings (such as: by bringing back into residential use empty homes and other suitable buildings; converting space above shops; redeveloping underutilised retail and business sites; and building on or above service yards, lock-ups, car parks and other transport infrastructure which are no longer required);"*

5.5 The Government's approach to design is set out in chapter 14 'Achieving well-designed places' of the NPPF. The objective of the policies in this chapter is to promote high quality, healthy, inclusive and sustainable places, through setting clear expectations about design outcomes and the use of relevant tools and processes.

5.6 Policy DP3: Key principles for well-designed places states:

*"1. Development proposals should respond to their context (the history, character and features of their site and its setting), so that they integrate with and enhance their surroundings; such as through the arrangement of development plots and buildings, the use of materials and architectural features, and the restoration, reuse and integration of heritage assets."*

5.7 Further, Policy N3: Trees in new development of chapter 19 'Conserving and enhancing the natural environment' states:

*"1. In recognition of the benefits which trees can provide for biodiversity, climate change mitigation and adaptation, and the character and quality of the built environment, development proposals should:*

*a. Make new streets tree-lined (unless there are strong reasons why this would be inappropriate in specific streets), and incorporate trees in other suitable locations, such as in parks and through the provision of community orchards;"*

**London Plan**

5.8 The Mayor's policies on design are contained in Chapter 3 'Design' of the London Plan. Policy D3 – 'Optimising site capacity through the design-led approach' refers to a design led approach. It states *"All development must make the best use of land by following a design-led approach that optimises the capacity of sites, including site allocations. Optimising site capacity means ensuring that development is of the most appropriate form and land use for the site. The design-led approach requires consideration of design options to determine the most appropriate form of development that responds to a site's context…"*

5.9 On Quality and Character, Policy D3 states *"Development should respond to the existing character of a place by identifying the special and valued features and characteristics that are unique to the locality and respect, enhance and utilise the heritage assets and architectural features that contribute towards the local character"*

5.10 On Delivering good design, Policy D4 states *"Design and access statements submitted with development proposals should demonstrate that the proposal meets the design requirements of the London Plan."*

**Statutory Development Plan Policies**

5.11 Local Plan Part 1 SP Policy BE1 states *"The Council will require all new development to improve and maintain the quality of the built environment in order to create successful and sustainable neighbourhoods, where people enjoy living and working and that serve the long-term needs of all residents. All new developments should:*

*1. Achieve a high quality of design in all new buildings, alterations, extensions and the public realm which enhances the local distinctiveness of the area, contributes to community cohesion and a sense of place;*

*2. Be designed to be appropriate to the identity and context of Hillingdon's buildings, townscapes, landscapes and views, and make a positive contribution to the local area in terms of layout, form, scale and materials and seek to protect the amenity of surrounding land and buildings, particularly residential properties"*

5.12 The following Local Plan: Part Two – DM policies are also relevant:

DMHB 11 – Design of New Development states *"A) All development, including extensions, alterations and new buildings will be required to be designed to the highest standards and, incorporate principles of good design including:*

*i) harmonising with the local context by taking into account the surrounding:*

- *scale of development, considering the height, mass and bulk of adjacent structures;*
- *building plot sizes and widths, plot coverage and established street patterns;*
- *building lines and setbacks, rooflines, streetscape rhythm, for example, gaps between structures and other streetscape elements, such as degree of enclosure;*
- *architectural composition and quality of detailing;*
- *local topography, views both from and to the site; and*
- *impact on neighbouring open spaces and their environment.*

*ii) ensuring the use of high quality building materials and finishes;*

*v) landscaping and tree planting to protect and enhance amenity, biodiversity and green infrastructure."*

DMEI 12 – Streets and Public Realm states *"A) Development should be well integrated with the surrounding area and accessible. It should:*

*ii) ensure public realm design takes account of the established townscape character and quality of the surrounding area;*

*iii) include landscaping treatment that is suitable for the location, serves a purpose, contributes to local green infrastructure, the appearance of the area and ease of movement through the space;"*

DMHB 14 – Trees and Landscape states *"A) All developments will be expected to retain or enhance existing landscaping, trees, biodiversity or other natural features of merit."*

**Compliance with Policy**

5.13 The Application is supported by a Planning Design and Access Statement, in accordance with London Plan Policy D4.

Context and location

5.14 The location for the Proposed Scheme has been informed by the existing access to the business centre and the dense tree belt along the western and northern boundaries and tree vegetation along Moorhall Road which screen the visibility of the buildings from the surrounding area.

5.15 It has also been informed by the detailed site and historical appraisal carried out by Squire Heritage Consulting; the details of which are found in the Heritage Statement. The appraisal states at section 3.1 that *"the principal building on the site is a multi-storey purpose-built office block representative of late-20th-century corporate architecture. The structure is constructed in buff brickwork, with dark-framed ribbon glazing and a distinctive wide-eaved, pitched roof, features that collectively emphasise horizontal form and provide a robust, low-profile massing. The building's appearance is functional and consistent with the commercial uses in the surrounding area, prioritising practicality and a cohesive corporate aesthetic over architectural ornamentation."*

5.16 The siting and design of the Proposed Scheme is a direct response to this appraisal; the proposed car wash facility will be contemporary in design which will complement the functional appearance of the purpose built office blocks. The proposed location has been carefully selected to keep traffic away from the entrance to Widewater Place car park therefore achieving a low impact solution which has minimal views from Moorhall Road, due to its low height and the existing boundary vegetation. In doing so, this positioning allows greater flexibility for vehicle entry and exit to the main entrance to Widewater Place, and therefore would not undermine the character and function of the business park.

5.17 Given the site location within the Widewater Lock Conservation Area, and its proximity to Moorhall Road, the design intent demonstrates that a 'light-touch' structural addition within the west corner of Widewater Place car park area, and being designated as a small area for the car wash facility, would work in accordance with the site limitations and will have a minimal impact on its surroundings.

5.18 The business park currently suffers from low occupancy owing to the increase in home working due to the pandemic and very few allocated spaces are utilised by staff on a daily basis. This was acknowledged by Hillingdon's Highway Authority in their response to the originally refused scheme where no objections were raised to the use of a section of the car park for a car wash facility on traffic generation and highway safety grounds.

5.19 Given the above, the proposed use will result in an effective use of land thereby complying with NPPF Policy L2 (b), and London Plan Policy D3 - Optimising site capacity through the design-led approach.

5.20 Section 3.1 of the Heritage Statement also concludes that *"in its current form, the business centre contributes to a low-rise, landscaped commercial character, with no designated heritage assets within its immediate curtilage. Its architectural and townscape qualities are modern, forming part of a broader area not defined by historic fabric but by controlled, well-greened commercial development. As such, while the site sits within the wider historic landscape of the locality, its heritage sensitivity is low, and its contribution to the significance of nearby heritage assets is limited and indirect."*

5.21 By providing a suitably lightweight, well-proportioned, and semi-transparent structure, the impact on the immediate surroundings will be kept to a minimum with visual aspects from Moorhall Road controlled by additional 1.8m high Cherry Laurel bushes along the boundary fence line, and the considered proportions of the proposed car wash structure. The additional planting along Moorhall Road will further enhance and improve the pavement views to the site, and create a suitable visual barrier from the car wash facility to the main road, therefore complying with NPPF Policy N3 and part A of Policy DMHB 14 – Trees and Landscape.

<u>Layout</u>

5.22 The orientation and positioning of the car wash facility allows for a controlled entry and exit without creating bottlenecks or unsafe pedestrian areas. As referred to in the Proposed Layout Plan drawing no. 2564_P110B, the vehicle entry and exit routes clearly use the extensive turning areas already found within the car park area at the east end of the site.

5.23 Cars waiting to enter the car wash facility can do so via the east end of the structure once they have been requested to by the car wash staff. Waiting areas are located within parking bays adjacent to and opposite the car wash area and will allow the continued use of the car park in normal running circumstances.

Scale

5.24 In recognition of the comments made within Reason for Refusal 1, the proportions of the car wash facility have been kept to a minimum, including the perceived roof height. The maximum height of the car was structure will not exceed 3.3m high.

5.25 When viewed from Moorhall Road, and with the implementation of 1.8m high cherry Laurel bushes, the impact on the street scene will be minimised as far as practicable with sightlines being controlled, as illustrated on the Proposed Materials Plan drawing no. 2540_P223.

Appearance

5.26 In contrast to the original scheme, the proposed structure is intended to be as lightweight in construction and aesthetics as possible with all structural members and cabins finished in RAL 7040 'Window grey'.

5.27 As mentioned previously, polycarbonate, semi-obscure panels would be used to clad both the sides and roof of the structure. In doing so, these materials ensure that the structure and canopy are viewed more discretely yet allowing natural light and ventilation throughout.

5.28 The provision of a polycarbonate roof allows significant levels of daylight into the car wash area. This ensures that there are lines of visibility through the car wash area, further enhancing the 'lightness' of the feel and aesthetics when viewed from all angles.

5.29 Given the proposed lightweight nature and aesthetics of the overall car port structure, which is in stark contrast to the originally refused scheme which included dark blue roof canopies, high level flags located above the canopies (which were clearly a visible distraction from Moorhall Road), along with the solid façade panels facing the main road, the proposals within this application provide a solution which is more respectful of the historic setting and character of the conservation area and views from Moorhall Road itself.

5.30 Given the relocated position of the proposed car wash facility and the planting of approximately 1.8m high Cherry Laurel bushes along the boundary fence with Moorhall Road, it is considered that there

will be minimal to negligible visible aspects of the structure when viewed from Moorhall Road. This demonstrates that the Proposed Scheme will integrate satisfactorily into the immediate surrounding townscape and street scene, in accordance with NPPF DP3(1) and Policy DMEI 12.

5.31 It has been clearly demonstrated that the revised proposals have been carefully designed to minimise impact in this historically sensitive area. The proposed car wash structure is well designed and will complement the commercial character of this part of the Widewater Conservation Area. As such the Applicant contends that the Proposed Scheme will comply with Policies BE1 of the Hillingdon Local Plan: Part One Strategic Policies (2012), Policies DMHB 11, DMHB 12 and DMHB 14 of the Hillingdon Local Plan: Part Two - Development Management Policies (2020), Policies D3 and D4 of the London Plan (2021), and the National Planning Policy Framework (2026).

**Heritage Significance**

**National Policy**

5.32 The Government's policies on the historic environment are set out in chapter 20 'Conserving and enhancing the historic environment' of the NPPF. The objective of the policies in this chapter is to conserve and enhance the historic environment. Heritage assets are an irreplaceable resource, and range from sites and buildings of local historic value to those of the highest significance, such as World Heritage Sites which are internationally recognised to be of Outstanding Universal Value. These assets should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations.

5.33 NPPF Policy NE5: Assessing effects on heritage assets advises that:

*"1. Development proposals affecting heritage assets should be accompanied by an assessment of the significance of the assets affected (including any contribution made by their setting) and of the potential effect of the proposal on their significance. The level of detail should be proportionate to the assets' importance and no more than is necessary to understand the potential effect of the proposal on their significance. The relevant historic environment record should be referred to in making this assessment, and appropriate expertise employed where necessary.*

*2. Assessments of the potential effects of development proposals on the significance of heritage assets (including through effects on their setting) should identify whether proposals would be likely to:*

*a. Have a positive effect, which is where the significance of a heritage asset would be enhanced, or better revealed; or*

*b. Have no effect on the significance of a heritage asset; or*

*c. Result in harm to the significance of a heritage asset, either from work affecting the asset itself or from development within its setting. The degree of harm should be identified: substantial harm would occur where the development proposal would seriously affect a key element of the asset's significance; or*

*d. Cause the total loss of the significance of a heritage asset."*

5.34 Further Policy HE5 states:

*"1. When considering the potential effect of a development proposal on the significance of a designated heritage asset, substantial weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential effect amounts to a positive effect, harm, substantial harm, or total loss of its significance.*

*4. Where a development proposal would harm the significance of a designated heritage asset the effect on the asset and its significance should be weighed against any public benefits resulting from the proposal. Important public benefits can include securing the long-term reuse of a vacant or underused listed building, and enabling energy efficiency and low carbon heating measures to be employed."*

**London Plan**

5.35 The Mayor's policies on the historic environment are set out in chapter 7 Heritage and Culture of the London Plan.

Policy HC1 Heritage conservation and growth states *"C Development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings. The cumulative impacts of incremental change from development on heritage assets and their settings should also be actively managed. Development proposals should avoid harm and identify enhancement opportunities by integrating heritage considerations early on in the design process;"*

**Statutory Development Plan Policies**

5.36 The relevant Hillingdon Part 1 and Part 2 polices are as follows:

HE1 – Heritage states *"The Council will 1. Conserve and enhance Hillingdon's distinct and varied environment, its settings and the wider historic landscape, which includes:*

- *Designated heritage assets such as statutorily Listed Buildings, Conservation Areas and Scheduled Ancient Monuments;"*

5.37 DMHB 1 – Heritage Assets states *"A) The Council will expect development proposals to avoid harm to the historic environment. Development that has an effect on heritage assets will only be supported where:*

*i) it sustains and enhances the significance of the heritage asset and puts them into viable uses consistent with their conservation;*

*ii) it will not lead to a loss of significance or harm to an asset, unless it can be demonstrated that it will provide public benefit that would outweigh the harm or loss, in accordance with the NPPF;"*

DMHB 4 – Conservation Areas states *"New development, including alterations and extensions to existing buildings, within a Conservation Area or on its fringes, will be expected to preserve or enhance the character or appearance of the area. It should sustain and enhance its significance and make a positive contribution to local character and distinctiveness. In order to achieve this, the Council will:*

*A) Require proposals for new development, including any signage or advertisement, to be of a high quality contextual design. Proposals should exploit opportunities to restore any lost features and/or introduce new ones that would enhance the character and appearance of the Conservation Area.*

*B) Resist the loss of buildings, historic street patterns, important views, landscape and open spaces or other features that make a positive contribution to the character or appearance of the Conservation Area; any such loss will need to be supported with a robust justification."*

**Compliance with Policy**

5.38 The submitted Heritage Statement prepared by Squire Heritage Consulting assesses the significance of Widewater Lock, the character of the Widewater Lock Conservation Area, and the effects of a

revised proposal for a small car wash facility located at the landscaped edge of Widewater Place Business Centre.

5.39 The heritage assessment concludes that the Proposed Scheme introduces a modest form of development within the setting of the Widewater Lock Conservation Area. In its unmitigated form, this change would give rise to less than substantial harm, deriving from minor visual intrusion and limited erosion of the area's rural character. Through a combination of recessive design, reinforced, retained and increased planting, the use of muted materials, and the careful siting of the facility behind the established hedgerow, the level of harm is reduced to the very low end of the less-than-substantial spectrum, consistent with the expectations of NPPF Policy HE6(4) and London Plan Policy HC1.

5.40 The revised design responds directly to the heritage sensitivities identified in the first reason for refusal of the original scheme. It maintains the landscaped frontage, avoids dominance within key public views, and integrates effectively with the wider business park context. As such, it avoids any meaningful disruption to the established rural edge and canal-side setting.

5.41 This mitigation-led design approach:

- reduces perceived industrial character;
- preserves and enhances the existing landscape edge;
- minimises visual presence in public views; and
- ensures compatibility with the Conservation Area's character and appearance.

5.42 Overall, the proposal is assessed to result in a very low level of less than substantial harm, significantly reduced from the original scheme. In heritage terms, the proposal accords with national, regional, and local policy expectations and preserves the character and appearance of the Conservation Area.

5.43 In accordance with the test set out in NPPF Policy HE6(4), weighing up the benefits and impacts of the Proposed Scheme for Hillingdon to consider in determining this application, the Applicant contends that the proposed car wash facility offers a series of public benefits that are relevant to the NPPF balancing exercise, particularly in the context of safeguarding the heritage significance of the Widewater Lock Conservation Area. Economically, the scheme supports local employment and contributes to the continued vitality of Widewater Place Business Centre, ensuring the long-term viability and management of this commercial site.

5.44 The most significant benefits, however, relate directly to heritage conservation. The Proposed Scheme strengthens the landscaped boundary along Moorhall Road through enhanced hedge

planting, reinforcing one of the Conservation Area's defining characteristics: its green, vegetated edge. By replacing an underused hardstanding area with a discreet, purpose-built structure set behind planting, the Proposed Scheme reduces visual impact and prevents future ad-hoc additions that could accumulate harm. The proposal is designed to be visually recessive, ensuring modern commercial activity remains subordinate to the historic canal corridor, protecting the rural tranquillity and long sightlines that contribute to the area's special interest.

5.45 Overall, the development offers measurable public benefits that help conserve and enhance key heritage characteristics while improving the site's functionality and environmental performance. As such, it is considered that the Proposed Scheme will comply Policy HE1 of the Hillingdon Local Plan: Part One Strategic Policies (2012), Policies DMHB 1 and DMHB 4 of the Hillingdon Local Plan: Part Two - Development Management Policies (2020), Policy HC1 of the London Plan (2021), and the National Planning Policy Framework (2026).

**Sustainable Drainage and Water Management**

**National Policy**

5.46 Chapter 18 'Managing flood risk and coastal change' sets out the Government's policies on climate change. The objective of the policies in this chapter is to minimise risks to development arising from all sources of flooding and coastal change, taking into account the impacts of climate change, by steering development away from areas of risk, ensuring that development will be safe for its lifetime without increasing flood risk elsewhere, and incorporating sustainable drainage systems where appropriate.

5.47 Policy F4: Assessing flood risk for decision-making states:

*"2. In Flood Zone 1, a site-specific flood risk assessment should inform and accompany all development proposals involving:*

*a. Sites of one hectare or more;*

*b. Land which has been identified by the Environment Agency as having critical drainage problems; and*

*c. Land identified in a strategic flood risk assessment or the Flood Map for Planning as being at risk of flooding from any source, whether now or in the future.*

*3. Site-specific flood risk assessments should be appropriate to the scale, nature, and location of development and should, where relevant, support an assessment of whether a development proposal satisfies the sequential and exception tests set out in policies F5 and F6."*

5.48 Policy F8: Sustainable drainage systems and watercourses states:

*"1. Development proposals which could affect drainage on or around the development site should incorporate sustainable drainage systems to control flow rates and reduce volumes of runoff, in ways which are proportionate to the nature and scale of the proposal. The systems employed should provide multifunctional benefits where possible, facilitating improvements in water quality, biodiversity and amenity."*

**London Plan**

5.49 The Mayor's policies on water management are found in Chapter 9 Sustainable Infrastructures of the London Pan. Policy SI5 – Water Infrastructure states *"E Development proposals should:*

*1) seek to improve the water environment and ensure that adequate wastewater infrastructure capacity is provided;*

*2) take action to minimise the potential for misconnections between foul and surface water networks."*

5.50 SI12 – Flood risk management states *"C Development proposals should ensure that flood risk is minimised and mitigated, and that residual risk is addressed. This should include, where possible, making space for water and aiming for development to be set back from the banks of watercourses"*

5.51 SI13 – Sustainable drainage states *"Development proposals should aim to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible. There should also be a preference for green over grey features, in line with the following drainage hierarchy: 1) rainwater use as a resource (for example rainwater harvesting, blue roofs for irrigation)*

*2) rainwater infiltration to ground at or close to source*

*3) rainwater attenuation in green infrastructure features for gradual release (for example green roofs, rain gardens)*

*4) rainwater discharge direct to a watercourse (unless not appropriate)*

*5) controlled rainwater discharge to a surface water sewer or drain*

*6) controlled rainwater discharge to a combined sewer"*

**Statutory Development Plan Policies**

5.52 The relevant Hillingdon polices are as follows:

DMEI 9 – Management of Flood Risk states *"E) Proposals that fail to make appropriate provision for flood risk mitigation, or which would increase the risk or consequences of flooding, will be refused."*

DMEI 10 – Water Management, Efficiency and Quality states *"A) Applications for all new build developments (not conversions, change of use, or refurbishment) are required to include a drainage assessment demonstrating that appropriate sustainable drainage systems (SuDS) have been incorporated in accordance with the London Plan Hierarchy (Policy 5.13: Sustainable drainage).*

*B) All major new build developments, as well as minor developments in Critical Drainage Areas or an area identified at risk from surface water flooding must be designed to reduce surface water run-off rates to no higher than the pre-development greenfield run-off rate in a 1:100 year storm scenario, plus an appropriate allowance for climate change for the worst storm duration. The assessment is required regardless of the changes in impermeable areas and the fact that a site has an existing high run-off rate will not constitute justification.*

*E) Proposals that would fail to make adequate provision for the control and reduction of surface water run-off rates will be refused."*

**Compliance with Policies**

5.53 The Site lies within Flood Zone 1 however it is less than 1ha in size and is not at risk of flooding. However, in response to the comments received from the Local Lead Flood Authority (LLFA), a Flood Risk and Drainage Strategy Report has been provided to support the application to demonstrate that the Proposed Scheme will not increase flood risk and will provide a betterment over the existing drainage arrangement.

5.54 The report assesses flood risk and proposes a drainage strategy for a new carwash replacing 5no. parking spaces in an existing 100% impermeable carpark (approx. 0.007 ha). It has been prepared in accordance with the NPPF, CIRIA SUDS Manual, London Plan, and Hillingdon Council requirements.

5.55 The Proposed Scheme will not increase flood risk or runoff volume, and the drainage strategy centred on below-ground attenuation and flow control, meets all relevant planning and environmental standards. The risk of pollution and groundwater contamination is low, and a clear maintenance plan is in place to ensure ongoing system performance.

5.56 The proposed car wash is an enclosed facility, with wastewater collected separately and discharged to the existing foul drainage network. A water recycling system will also be incorporated to minimise foul discharge volumes. Consequently, whether the car wash is operating or not it has no bearing on the surface water runoff generated by the proposed development.

5.57 Furthermore, the proposed car wash occupies an existing impermeable area, and there will be no increase in impermeable coverage. Although the existing private surface water drainage arrangements have not been fully established, and we cannot confirm whether attenuation or flow restrictions are currently provided, the proposed drainage strategy introduces both attenuation storage and restricted discharge rates.

5.58 Our calculations demonstrate that peak surface water discharge will be reduced from a calculated pre-development rate of 4.4 l/s to just 0.3 l/s during the 1 in 100 year storm event plus 40% climate change allowance.

5.59 The proposed development therefore represents a substantial betterment on the existing drainage arrangements and will significantly reduce peak loading on the downstream surface water network.

5.60 Further, a Surface Water Management Plan will not be required because the submitted Flood Risk Assessment and Drainage Strategy Report already incorporates an exceedance strategy under Section 3.1, with the associated flood exceedance plan included in Appendix E. This identifies the anticipated overland flow routes in the event that the proposed drainage system becomes overwhelmed.

5.61 The report also incorporates a management and maintenance strategy for the proposed SuDS infrastructure under Section 7 and Appendix F.

5.62 It is therefore considered that the Flood Risk Assessment and Drainage Strategy Report already addresses the management of surface water during exceptional rainfall events.

5.63 Given that the development does not increase impermeable coverage, substantially reduces peak surface water discharge and incorporates an exceedance strategy, there is additional benefit in having a separate backup system.

5.64 As such, it is considered that the Proposed Scheme will comply with Policies DMEI 9 and DMEI 10 of the Hillingdon Local Plan, Policies SI5, SI12 and SI13 of the London Plan (2021), and the NPPF (2026).

## 6 SUMMARY AND CONCLUSION

6.1 This application seeks to overcome the reasons for refusal of the originally scheme for the provision of a car wash facility at Widewater Place Business Centre.

6.2 The location for the Proposed Scheme has been informed by the existing access to the business centre and the dense tree belt along the western and northern boundaries and tree planting along Moorhall Road, which screen the visibility of the buildings from the surrounding area.

6.3 It has also been informed by the detailed site and historical appraisal by Squire Heritage Consulting; details of which are found in the Heritage Statement.

6.4 The main feature of the car wash facility will be the provision of a bespoke purpose built lightweight, well-proportioned, and semi-transparent structure supported by slim frames with all structural members finished in RAL 7040 ‘Window grey’.

6.5 The proposed car wash structure will measure 15.8m long, 4.7m wide and 3.3m high at its highest point. Polycarbonate, semi-obscure panels will be used to clad both the sides and roof of the structure. Two small cabins will be located within the car-wash canopy structure for use by staff for storage only. These will also be painted in the same colour as the canopy structure RAL 7040 ‘Window grey’.

6.6 The Proposed Scheme will represent an effective use of land. Its location has been carefully selected to keep traffic away from the entrance to Widewater Place car park therefore achieving a low impact solution which has minimal views from Moorhall Road, due to its low height and the existing boundary vegetation. In doing so, this positioning allows greater flexibility for vehicle entry and exit to the main entrance to Widewater Place, and therefore would not undermine the character and function of the business park.

6.7 The Heritage Assessment concludes that the proposal will result in a very low level of less than substantial harm, significantly reduced from the original scheme. In heritage terms, the proposal accords with national, regional, and local policy expectations and preserves the character and appearance of the Conservation Area.

6.8 The harm identified is at the **very lowest end of the “less than substantial” range**. It is:

- limited solely to the setting of the Conservation Area;
- fully reversible;

- softened by established and enhanced planting;
- negligible in key public viewpoints; and
- confined to an already commercialised corner of the business park.

6.9 Against this, the proposal delivers **genuine and sustained public benefits**:

- supports local employment and contributes to the continued vitality of Widewater Business Centre, ensuring the long-term viability and management of this commercial site; and
- strengthens the landscaped boundary along Moorhall Road through enhanced hedge and tree planting, reinforcing one of the Conservation Area's defining characteristics: its green, vegetated edge.

6.10 Given the site location within the Widewater Lock Conservation Area, and its proximity to Moorhall Road, the design intent demonstrates that a 'light-touch' structural addition within the west corner of Widewater Place car park area, and being designated as a small area for the car wash facility, would work in accordance with the site limitations and would minimise any impact on its surroundings.

6.11 No existing trees will be affected by the Proposed Scheme. The proposal landscaping will enhancement the appearance of the street scene and provide habitat for insects and nesting birds.

6.12 The proposals will not increase flooding and will prevent water discharging into the nearby watercourse and downstream lake. In fact, the Proposed Scheme incorporates a drainage betterment over the existing arrangements through:

- attenuation via cellular storage;
- controlled discharge via flow control; and
- introduces a formalised drainage infrastructure.

6.13 This application is considered to overcome the reasons for refusal of the original scheme, and the comments raised by the LLFA. It complies with national, regional and local planning policies, and therefore, Planning Permission should be granted.