

Planning, Design & Access Statement

In respect of:
Khalid Jamal

Chaplin House
Widewater Place
Moorhall Road
Harefield
UB9 6NS

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Prepared by

Planning Clarity LLP

planningclarity.co.uk

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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’]. This Planning Application seeks to overcome the reasons for refusal of the original scheme by proposing a similar development but now fronting Chaplin House, also located within the business centre.
- 1.3 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.
- 1.4 In addition to this PDAS, the application is supported by a Heritage Statement prepared by Squire Heritage Consulting, Water Runoff Calculations prepared by RCD Consultants, and the following drawings prepared by Jorge Salman Architects 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

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 20 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).

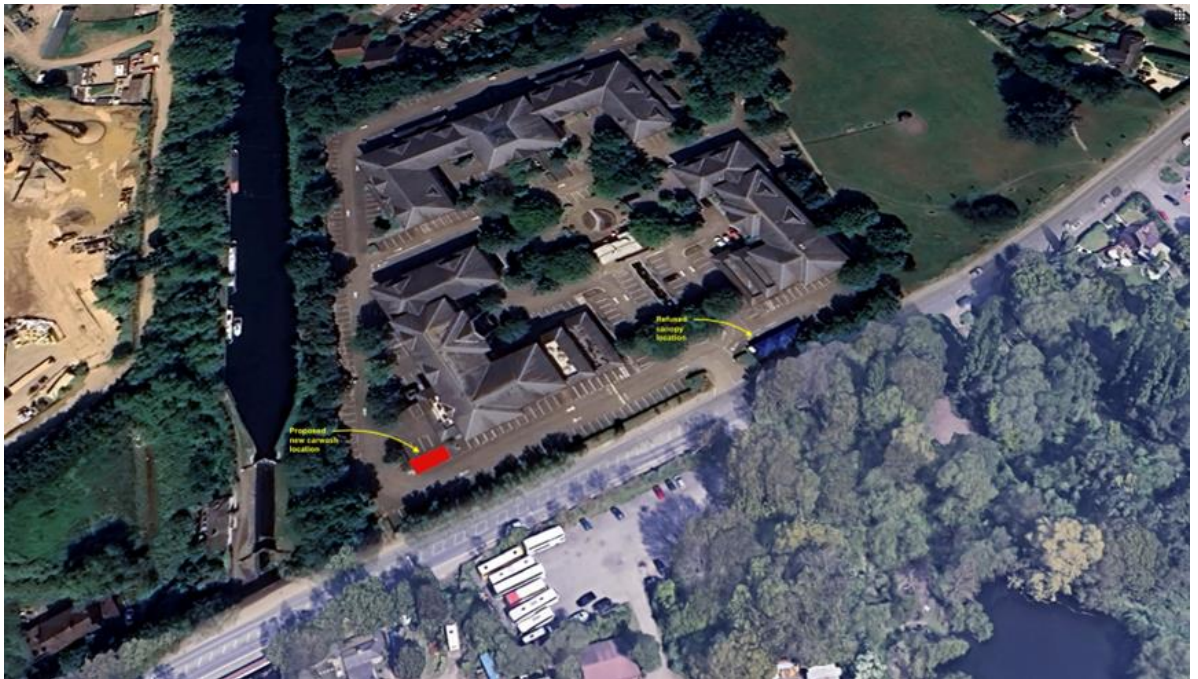
2. The application fails to provide sufficient technical details to demonstrate how foul and surface water run-off, including detergents, oils, and suspended solids from the proposed car wash use would be effectively managed. Given the proximity of the site to trees, a watercourse and downstream lake, it has not been satisfactorily 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 :

“the conversion of office car park spaces to provide a hand car wash facility involving installation of bespoke canopy on Moorhall Road” (the Proposed Scheme).

3.2 The proposed Car wash facility will now 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 surface water drainage strategy is also proposed for the car wash facility. It 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 involve the installation of an attenuation tank and washdown separator with connecting pipework and inspection chambers.
- 3.6 It is also proposed to plant additional Cherry Laurel bushes along the boundary fence line with Moorhall Road.

4 PLANNING POLICY CONTEXT

4.1 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 are set out in full in section 5.

National Planning Policy Framework

4.2 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.

4.3 The 2024 version was amended on 7 February 2025 to correct cross-references from footnotes 7 and 8 and amend the end of the first sentence of paragraph 155 to make its intent clear. For the avoidance of doubt the amendment to paragraph 155 is not intended to constitute a change to the policy set out in the Framework as published on 12 December 2024.

4.4 This revised framework replaces the previous NPPF published in March 2012, revised in July 2018, updated in February 2012, revised in July 2021, updated in September 2023 and revised in December 2023.

4.5 Paragraph 7 of the NPPF states *“the purpose of the planning system is to contribute to the achievement of sustainable development”*. Paragraph 8 states *“achieving sustainable development means that the planning system has three overarching objectives (economic, social and environmental), which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives).”* However, paragraph 9 states these *“are not criteria against which every decision can or should be judged”* and *“decisions should also take local circumstances into account, to reflect the character, needs and opportunities of each area”*.

4.6 On sustainable development, paragraph 8 states *“Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives):*

a) an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support

growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;

*b) a **social objective** – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities’ health, social and cultural well-being; and*

*c) an **environmental objective** – to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy. “*

4.7 Paragraph 9 states *“These objectives should be delivered through the preparation and implementation of plans and the application of the policies in this Framework; they are not criteria against which every decision can or should be judged. Planning policies and decisions should play an active role in guiding development towards sustainable solutions, but in doing so should take local circumstances into account, to reflect the character, needs and opportunities of each area.”*

Further, paragraph 10 states *“So that sustainable development is pursued in a positive way, at the heart of the Framework is a presumption in favour of sustainable development (paragraph 11)”*. Paragraph 11 states *“Plans and decisions should apply a presumption in favour of sustainable development.*

4.8 Paragraph 12 states: *“The presumption in favour of sustainable development does not change the statutory status of the development plan as the starting point for decision making. Where a planning application conflicts with an up-to-date development plan...permission should not usually be granted. Local planning authorities may take decisions that depart from an up-to-date development plan, but only if material considerations in a particular case indicate that the plan should not be followed.”*

4.9 The most relevant sections of the NPPF are:

- 11. Making effective use of land
- 12. Achieving well-designed places
- 14. Meeting the challenge of climate change, flooding and coastal change
- 15. Conserving and enhancing the natural environment

The London Plan 2021

- 4.10 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.
- 4.11 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.
- 4.12 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

- 4.13 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.
- 4.14 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.
- 4.15 The relevant Local Plan Part 1 Strategic Policies (SP) are:
- BE1 – Built Environment
 - HE1 – Heritage

4.16 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 Section 11 'Making effective use of land' sets out the Government's stance on the effective use of land. Paragraph 125 states "*Planning policies and decisions should:*

a) encourage multiple benefits from both urban and rural land, including through mixed use schemes and taking opportunities to achieve net environmental gains – such as developments that would enable new habitat creation or improve public access to the countryside;

d) promote and support the development of under-utilised land and buildings,..."

5.4 The Government's approach to design is set out in section 12 'Achieving well-designed places' of the NPPF. Paragraph 131 advises that great importance should be attached to achieving good design within new developments which is a key aspect of sustainable development, while outlining the need for the creation of high quality, beautiful and sustainable buildings and places.

5.5 Further, paragraph 136 states "*Trees make an important contribution to the character and quality of urban environments, and can also help mitigate and adapt to climate change. Planning policies and decisions should ensure that new streets are tree-lined, that opportunities are taken to incorporate trees elsewhere in developments*".

5.6 Paragraph 139 states that *"development that is not well designed should be refused, especially where it fails to reflect local design policies and government guidance on design, taking into account any local design guidance and supplementary planning documents such as design guides and codes. Conversely, significant weight should be given to:*

(b) outstanding or innovative designs which promote high levels of sustainability, or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings".

London Plan

5.7 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..."*

5.8 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"*

5.9 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

5.10 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”

5.11 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

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

Context and location

- 5.13 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.
- 5.14 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.”*
- 5.15 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.
- 5.16 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.
- 5.17 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.

- 5.18 Given the above, the proposed use will result in an effective use of land thereby complying with NPPF paragraph 125 (a) and (d), and London Plan Policy D3 - Optimising site capacity through the designed approach.
- 5.19 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.”*
- 5.20 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 part A of Policy DMHB 14 – Trees and Landscape.

Layout

- 5.21 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.
- 5.22 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

- 5.23 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 wash structure will not exceed 3.3m high.
- 5.24 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

- 5.25 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'.
- 5.26 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.
- 5.27 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.
- 5.28 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.
- 5.29 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 Policy DMEI 12.

- 5.30 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 (2024).

Heritage Significance

National Policy

- 5.31 The Government's policies on the historic environment are set out in chapter 16 'Conserving and enhancing the historic environment' of the NPPF. On 'Proposals affecting heritage assets', the government advises LPAs' at paragraph 207 that they *"should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance."*
- 5.32 Further, NPPF paragraph 214 advises that *"where a Proposed Scheme will lead to substantial harm to (or total loss of significance of) a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss..."*. Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, NPPF paragraph 215 advises that *"this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use."*

London Plan

- 5.33 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

5.34 The relevant Hillingdon Part 1 and Part 2 policies 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;”*

5.35 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

- 5.36 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.
- 5.37 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 paragraph 215 and London Plan Policy HC1.
- 5.38 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.
- 5.39 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.
- 5.40 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.
- 5.41 In accordance with the test set out in NPPF paragraph 215, 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.

- 5.42 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.
- 5.43 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 (2024).

Sustainable Drainage and Water Management

National Policy

- 5.44 Section 14 'Meeting the challenge of climate change, flooding and coastal change' sets out the Government's policies on climate change. Paragraph 164 advises '*New development should be planned for in ways that:*
- a) avoid increased vulnerability to the range of impacts arising from climate change. When new development is brought forward in areas which are vulnerable, care should be taken to ensure that risks can be managed through suitable adaptation measures, including through incorporating green infrastructure and sustainable drainage systems; and*
 - b) help to reduce greenhouse gas emissions, such as through its location, orientation and design. Any local requirements for the sustainability of buildings in plans should reflect the Government's policy for national technical standards.'*
- 5.45 Paragraph 174 states "*Within this context the aim of the sequential test is to steer new development to areas with the lowest risk of flooding from any source. Development should not be allocated or*

permitted if there are reasonably available sites appropriate for the Proposed Scheme in areas with a lower risk of flooding. The strategic flood risk assessment will provide the basis for applying this test.”

- 5.46 Regarding flood risk, NPPF paragraph 182 states *‘Applications which could affect drainage on or around the site should incorporate sustainable drainage systems to control flow rates and reduce volumes of runoff, and which are proportionate to the nature and scale of the proposal.’*

London Plan

- 5.47 The Mayor’s policies on water management are found in Chapter 9 Sustainable Infrastructures of the London Plan. 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 misconceptions between foul and surface water networks.”*
- 5.48 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”*
- 5.49 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

- 5.50 The relevant Hillingdon policies 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.”*

5.51 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

5.52 The Site does not lie within a flood zone and is less than 1ha in size. As such, a Flood Risk Assessment is not required to support the application.

5.53 The Applicant’s surface water drainage strategy is shown on the submitted Proposed Layout drawing no. 111-2605-CIV-10-P1 and the Proposed Drainage Construction Details drawing no. 111-2605-CIV-50-P1. The design is also supported by the water runoff calculations.

5.54 The excess water from the car wash area will drain into the forecourt washdown separator which in turn will drain into the existing foul manhole. The surface water washdown separator is designed to treat wastewater generated from cleaning vehicles and machinery. It will separate contaminants from the car wash water, preventing pollutants like oil, grease, and silt from entering the drainage system and will help comply with environmental regulations to protect water resources.

5.55 The canopy roof will drain into a cellular storage attenuation tank which will manage stormwater runoff by temporarily storing excess water and gradually releasing it into the existing surface water manhole, helping to prevent flooding and manage surface water effectively.

5.56 The proposed SUDS design is at a level appropriate to the scale and type of Proposed Scheme. It will prevent water discharging into the nearby watercourse and downstream lake and will minimise the risk of pollution and flood risk. 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 (2024).

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 and the proposed surface water drainage strategy will prevent water discharging into the nearby watercourse and downstream lake and will minimise the risk of pollution and flood risk.

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