

fluid planning

**Parrs Yard
Bath Road
UB7 0EW**

**Terminal 5 Park and Ride
Planning Statement
0437**

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Aerial photography 2013 to the present day

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1. Introduction

- 1.1 This statement has been prepared on behalf of Maple Parking (*'the applicant'*) on the proposed re-use of a former freight and transport storage depot to an express park and ride service for Heathrow Airport Terminal 5. Maple Parking is the largest independent provider of combined airport meet and greet, and park and ride services in the United Kingdom. Their operation now extends to seven airports and one port.
- 1.2 The application site is the former Saints Transport Ltd, Parrs Yard, Bath Road, West Drayton, UB7 0EW (*'the Site'*). Searches online suggest there is no recent planning history for the site. At Appendix A to this statement are Google Earth aerial photographs from 2013 to the present day. These demonstrate the continuous use of the site for the block parking and storage of HGV freight bodies. The point being that irrespective of the original planning history the past use of the site is, on the balance of probability, immune from enforcement action and now the basis against which the determination of this application must be made. The Site is also clearly previously developed land (*'PDL'*) in accordance with the definition explained at Annex 2 to the National Planning Policy Framework (*'Framework'*).

The proposal

- 1.3 Airport car parking is generally accepted as a Sui Generis use class. The proposal aims to provide a high quality, bus-based, public transport route linking a park and ride site to Terminal 5. Use of the Site as a new multi-modal transport interchange including park and ride reflects a clear increase in demand for alternative options to access the Terminal. This is a demand driven proposal. The new car park is located off the M25 Junction 14. Two Euro 6 Ultra Low Emission Zone (*'ULEZ'*) compliant Optare MetroCity buses will provide express bus transfer every 10-15 minutes with a journey time to Terminal 5 of less than 5 minutes. The service is a timetable registered bus service registered with Transport For London and able to access Terminal 5 via the dedicated bus spur linking the Bath Road Stanwell Moor Road roundabout with Wright Way leading to Terminal 5.
- 1.4 The Site allows for the parking of 200 cars on site in a managed block formation. On site infrastructure includes entrance and exit camera tunnels with barrier controlled access, a bus shelter and two portacabin office units. The Proposal makes use of the existing hardstanding and on site infrastructure including the access.

Technical documents

- 1.5 This planning statement addresses the material planning matters and is supported by an Air Quality assessment produced by Anderson Acoustics. GTA Civils have also prepared a Transport Statement to address highway safety and capacity matters associated with the use. Both documents address the relevant development plan policies.

Summary of planning considerations

- 1.6 The Site is located within the Borough of Hillingdon. The land is free of environmental, flood risk and landscape designations. However, it does fall within the Metropolitan Green Belt. As such, the material planning considerations can be summarised as:
- Whether the unauthorised use constitutes inappropriate development in the Green Belt, having regard to the effect on the openness and purposes of the Green Belt;
 - The effect on highway safety;
 - The effect on air quality;
 - Sustainable transport choices and compatibility with Heathrow Airport; and,
 - Whether the harm by reason of inappropriateness, and any other harm, would be clearly outweighed by other considerations. If so, whether this would amount to the very special circumstances required to justify the unauthorised use.

2. Planning Considerations

- 2.1 Section 70(2) of the Town and Country Planning Act 1990 (as amended) requires the decision maker to take account of (a) the provisions of the development plan, (b) local finance considerations, and (c) any other material considerations. Section 38(6) of the Planning and Compulsory Purchase Act requires determination of applications to be in accordance with the plan unless material considerations indicate otherwise.
- 2.2 The development plan is formed of the following policy documents:
- National Planning Policy Framework (*'Framework'*);
 - London Plan (adopted March 2021) (*'London Plan'*);
 - A Vision for 2026 Local Plan: Part 1 Strategic Policies (adopted November 2012) (*'LP1'*); and,
 - London Borough of Hillingdon Local Plan Part 2 Development Management Policies (adopted 16 January 2020) (*'LP2'*).

Whether the unauthorised use constitutes inappropriate development in the Green Belt, having regard to the effect on the openness and purposes of the Green Belt

- 2.3 Airport parking is akin to open storage as it is likely to involve vehicles being present at the site in significant numbers for variable periods of time from a few days to a few weeks. However, substantial areas of the Site, and as demonstrated at Appendix A using aerial photography, was occupied by HGV trailer bodies parked close together in rows, with smaller areas left between the rows for access purposes. Therefore, the Site is of a size capable of accommodating a substantial number of vehicles irrespective of their type. And ultimately, large parts of the site surface are likely to remain covered by vehicles for most of the time.
- 2.4 The Site is located on land sandwiched between Stanwell Moor Road to the east, Bath Road to the south, and the M25 to the west. Inevitably, the landscape character is dominated by nationally significant road, and airport transport related infrastructure.
- 2.5 Chapter 13 of the Framework deals with protecting Green Belt land. Paragraph 137 states that the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open, and that the essential characteristics of Green Belts are their openness and their permanence. Paragraph 138 states that the Green Belt serves five purposes, of which the purposes relevant to this application are (a) to check the unrestricted sprawl of large built-up areas (b) to prevent neighbouring towns merging into one another, and (c) to assist in safeguarding the countryside from encroachment.
- 2.6 Paragraph 147 states that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. Paragraph 148 then states that when considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. It goes on to say that “very special circumstances” will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.
- 2.7 In terms of national policy Paragraph 149 of the Framework confirms the construction of new buildings as inappropriate in the Green Belt but does identify exceptions. This exception includes part (g) which goes on to exempt:

“149. A local planning authority should regard the construction of new buildings as

inappropriate in the Green Belt. Exceptions to this are:

[...]

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

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

[...]”

- 2.8 Paragraph 150 to the Framework then confirms other specific forms of development are not inappropriate in the Green Belt provided they preserve its openness and do not conflict with the purposes of including land within it. These other forms require assessment of whether the change of use underparts preserves openness. The exemption relevant to this Proposal is:

“(e) material changes in the use of land (such as changes of use for outdoor sport and recreation, or for cemeteries and burial grounds);

[...]”

- 2.9 In this case, both the structures and overall nature of the use for the parking and storage of private motor vehicles require assessment in the round.

- 2.10 The Framework defines “previously developed land” at Annex 2 (Glossary) as follows (with emphasis added):

“Previously developed land: Land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure. This excludes: land that is or was last occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill, where provision for restoration has been made through development management procedures; land in built-up areas such as residential gardens, parks, recreation grounds and allotments; and land that was previously developed but where the remains of the permanent structure or fixed

surface structure have blended into the landscape.”

- 2.11 In this case, the whole Site should be considered previously developed land under the definition above.
- 2.12 The assessment of whether or not the redevelopment of the PDL area for a park and ride facility would preserve openness evidently requires acknowledgement that the lawful use of the land is for the block parking of freight bodies. Central to this consideration is whether the proposed storage areas for private motor vehicles would have a materially different impact upon the openness of the Green Belt compared to the storage of HGV freight bodies. Of relevance to this consideration is the vast scale of storage allowed across the Site and the materially smaller difference in volume between private motor vehicles and HGV bodies.
- 2.13 On a proper assessment, it is submitted that the proposed use cannot be materially distinguished in impact from the lawful use. And if it can, then it should be judged as less impactful by reason of lesser volume. If in the alternative the Council concludes that the development is inappropriate development the Applicant proceeds that very special circumstances arise as a consequence of the conclusion that the change of use, specifically comparison between stored freight bodies would not be materially different or visually discernible to cars in this location.
- 2.14 On consideration of the structures now located on site, their modest scale, read against the backdrop of the more extensive estate, means there is no perceivable impact on the openness of the Green Belt. This is especially so, given freight bodies are larger than the structures now in place. The buildings therefore, comply with paragraph 149, part (g) and do not have a greater impact. Individually, or cumulatively the buildings do not result in a greater impact on the openness of the Green Belt than might happen if the use reverted to the storage of freight.
- 2.15 Consideration of the proposal against National policy finds no conflict. LP1 Policy EM2: Green Belt, Metropolitan Open Land and Green Chains has also been assessed to consider whether conflict with local policy exists. No conflict exists because the policy explains that:

“The Council will seek to maintain the current extent, hierarchy and strategic functions of the Green Belt, Metropolitan Open Land and Green Chains.

Notwithstanding this, Green Chains will be reviewed for designation as Metropolitan

Open Land in the Hillingdon Local Plan: Part 2- Site Specific Allocations LDD and in accordance with the London Plan policies.

[...]

Any proposals for development in Green Belt and Metropolitan Open Land will be assessed against national and London Plan policies, including the very special circumstances test.

[...]”

- 2.16 LP2 Policy DMEI 4 Development in the Green Belt again mirrors National policy stating that:

“A) Inappropriate development in the Green Belt and Metropolitan Open Land will not be permitted unless there are very special circumstances.

B) Extensions and redevelopment on sites in the Green Belt and Metropolitan Open Land will be permitted only where the proposal would not have a greater impact on the openness of the Green Belt and Metropolitan Open Land, and the purposes of including land within it, than the existing development, having regard to:

i) the height and bulk of the existing building on the site;

ii) the proportion of the site that is already developed;

iii) the footprint, distribution and character of the existing buildings on the site;

iv) the relationship of the proposal with any development on the site that is to be retained; and

v) the visual amenity and character of the Green Belt and Metropolitan Open Land.”

- 2.17 The consistency between National and local policy on Green Belt matters is apparent. Adding further weight to the Applicant’s position that the Proposal has no greater impact is how the Courts consider the openness of the Green Belt.

Case law

- 2.18 The applicant's consideration of case law is supported by the case law. In Euro Garages Ltd v Secretary of State for Communities and Local Government [2018] EWHC 1753 (Admin) 11 Jul 2018, [2019] P.T.S.R. 526 the High Court considered the meaning of "which would not have a greater impact on the openness of the Green Belt than the existing development", in relation to a different exception to that under consideration here, but applicable by analogy as it deals, in general terms, with the issue of proportionality in relation to an existing building. In particular, it made the point that openness is to be assessed in relation to the Green Belt, rather than just the site.

"21 "Openness" is not a defined term but, in my view, it is clear in this context that it is openness of the Green Belt that must be considered not the site as such...

"23 ...in the context of the exceptions under paragraph 89, for there to be a greater impact on the openness of the Green Belt there must be something more than just some change to the environment. In each of the instances under the bullet points, it is contemplated that there will be some change to what is presently there. But, despite that change, the openness of the Green Belt will be preserved (bullet point [2]) and/or there will not be a "disproportionate" addition or something "materially larger": bullet points [3] and [4]...Whether or not there is a greater impact is a matter of judgment.

24 I would not wish to decide, for all purposes, that the concepts of not having a greater impact on the openness of the Green Belt and of preserving the openness of the Green Belt are identical. Having said that, there is an obvious reason why the wording in different paragraphs and bullet points differs. Where there is no existing development, consideration must be given to whether the development preserves the openness of the Green Belt. Where there is some existing development, the openness of the Green Belt has not been wholly preserved and there will necessarily have been some impact on the openness of the Green Belt already...

29 ...a mere change in the current build is not sufficient to establish that there is a greater impact on the openness of the Green Belt. Put another way, whether the openness of the Green Belt is preserved, or conversely harmed, is not simply a question of whether something, which by definition has a spatial impact, is to be built. Further, the question of whether the openness of the Green Belt is preserved

will generally involve an assessment of the visual or perceived impact.”

2.19 In *R (Samuel Smith Old Brewery) v North Yorkshire County Council* [2020] UKSC 3, the Supreme Court also emphasised that assessment of openness is a multi-factored exercise, to be conducted in-the-round, and on a case-by-case basis.

2.20 In *John Turner v SoS CLG* [2016] EWCA Civ 466 the Court of Appeal held that:

“14. The concept of “openness of the Green Belt” is not narrowly limited [...]The word “openness” is open-textured and a number of factors are capable of being relevant when it comes to applying it to the particular facts of a specific case. Prominent among these will be factors relevant to how built up the Green Belt is now and how built up it would be if redevelopment occurs (in the context of which, volumetric matters may be a material concern, but are by no means the only one) and factors relevant to the visual impact on the aspect of openness which the Green Belt presents”.

2.21 The Supreme Court ruled authoritatively on meaning and application of the concept of “openness” within the Green Belt, in *R (Samuel Smith Old Brewery) v North Yorkshire County Council* [2020] UKSC 3. The case law confirms that:

- The visual quality of the landscape is not in itself an essential part of the openness for which the Green Belt is protected (paragraph 5).
- Rather, openness is the counterpart of urban sprawl, linked to the purposes of the Green Belt, and not necessarily a statement about the about the visual qualities of the land. Applying this broad policy concept is a matter of planning judgment, not law (paragraph 22).
- Nor does openness imply freedom from any form of development (paragraph 22).
- The concept of openness means the state of being free from buildings. It is open textured and a number of factors are capable of being relevant (paragraph 25).

2.22 It follows from the above authorities that the task in a case like this is to consider the ‘marginal’ impact on the openness of the Green Belt of the proposed development in relation to the existing use of the land, rather than the total impact on openness of the proposed development because the openness of the Green Belt has already, to some extent, been harmed. Because the block parking of private motor vehicles is of a lesser volume than freight bodies, logically, there can be no greater harm on openness of the Green Belt.

The effect on highway safety

2.23 Chapter 9 to the Framework explains the approach to promoting sustainable transport with paragraph 110 onwards clarifying the how development proposals should be assessed. Paragraph 111 clear states that *“Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.”*. Paragraph 113 requires that development resulting in significant amounts of movements should be supported by a transport statement. GTA Civils have prepared a Transport Assessment for these reasons.

2.24 The London Plan policy T4 mirrors the Framework and states:

“[...]

B When required in accordance with national or local guidance, transport assessments/statements should be submitted with development proposals to ensure that impacts on the capacity of the transport network (including impacts on pedestrians and the cycle network), at the local, network-wide and strategic level, are fully assessed. Transport assessments should focus on embedding the Healthy Streets Approach within, and in the vicinity of, new development. Travel Plans, Parking Design and Management Plans, Construction Logistics Plans and Delivery and Servicing Plans will be required having regard to Transport for London guidance.

[...]” [emphasis added]

2.25 LP policy T1 deals with the matter of accessible locations to ensure development is located in appropriate locations:

“The Council will steer development to the most appropriate locations in order to reduce their impact on the transport network. All development should encourage access by sustainable modes and include good cycling and walking provision.

The Council will ensure access to local destinations which provide services and amenities.

The Council will promote active travel through improvements to Hillingdon’s public rights of way.”

- 2.26 Although the Site is outside of the boundary to Heathrow Airport, policy T4 explains usefully the principle that improvements to public transport can be policy compliant:

“Recognising the economic importance of the airport to the borough this Hillingdon Local Plan: Part 1-Strategic Policies will support the sustainable operation of Heathrow within its present boundaries and growth in the Heathrow Opportunity Area by facilitating improvements to public transport and cycle links, enhancing the public transport interchange to provide the opportunity for a modal shift from the use of private cars and from short haul air to sustainable transport modes and providing transport infrastructure to accommodate economic and housing growth whilst improving environmental conditions, for example noise and local air quality for local communities.” [emphasis added]

- 2.27 LP2 policies then goes on to consider the specific impacts of the proposal on the local highway network. Policy DMT1 concerns management of transport impacts in a sustainable fashion with no adverse impacts on the wider environment.

“A) Development proposals will be required to meet the transport needs of the development and address its transport impacts in a sustainable manner.

[...]

v) have no significant adverse transport or associated air quality and noise impacts on the local and wider environment, particularly on the strategic road network.

B) Development proposals will be required to undertake a satisfactory Transport Assessment and Travel Plan if they meet or exceed the appropriate thresholds. All major developments that fall below these thresholds will be required to produce a satisfactory Transport Statement and Local Level Travel Plan. All these plans should demonstrate how any potential impacts will be mitigated and how such measures will be implemented.

- 2.28 Policy DMT2 on highway impacts predominately concerns highway safety. In this case, safety is to be assessed against the historic use of the Site.

“Policy DMT 2: Highways Impacts Development proposals must ensure that:

i) safe and efficient vehicular access to the highway network is provided to the

Council's standards;

ii) they do not contribute to the deterioration of air quality, noise or local amenity or safety of all road users and residents;

iii) safe, secure and convenient access and facilities for cyclists and pedestrian are satisfactorily accommodated in the design of highway and traffic management schemes;

iv) impacts on local amenity and congestion are minimised by routing through traffic by the most direct means to the strategic road network, avoiding local distributor and access roads; and

v) there are suitable mitigation measures to address any traffic impacts in terms of capacity and functions of existing and committed roads, including along roads or through junctions which are at capacity.”

- 2.29 The submitted Transport Assessment deals more thoroughly with these matters in a technical sense and demonstrating policy compliance. The main reason being the comparable impact versus freight traffic using the site. As a result, on the basis of the evidence and in the context of the local highway, the proposed use can safely be accommodated on this section of highway.

The effect on air quality

- 2.30 Paragraph 186 to the Framework explains that decisions should take account of air quality, including the cumulative impacts from sites in the local area. Specifically, support for improvement carries material weight “*Opportunities to improve air quality or mitigate impacts should be identified, such as through traffic and travel management, and green infrastructure provision and enhancement.*”. Local policies provide further considerations and on airport related development policy T8 to the LP2 goes on to require that:

“[...]

B The environmental and health impacts of aviation must be fully acknowledged and aviation-related development proposals should include mitigation measures that fully meet their external and environmental costs, particularly in respect of noise,

air quality and climate change. Any airport expansion scheme must be appropriately assessed and if required demonstrate that there is an overriding public interest or no suitable alternative solution with fewer environmental impacts.”

- 2.31 The supporting text within LP2 at paragraph 4.16 states on emissions that:

“[...] This growth needs to be managed carefully to ensure there are no more adverse impacts on air quality and the targets for reductions in carbon dioxide emissions in accordance with London Plan Policy 5.2 are met.

[...]”

- 2.32 On climate change, policy EM1 Climate change adaptation and mitigation states:

“The Council will ensure that climate change mitigation is addressed at every stage of the development process by:

[...]”

6. Targeting areas with high carbon emissions for additional reductions through low carbon strategies. These strategies will also have an objective to minimise other pollutants that impact on local air quality. Targeting areas of poor air quality for additional emissions reductions.

[...]”

- 2.33 Policy EM8 on land, water, air and noise then deals specifically with air quality.

“All development should not cause deterioration in the local air quality levels and should ensure the protection of both existing and new sensitive receptors.

All major development within the Air Quality Management Area (AQMA) should demonstrate air quality neutrality (no worsening of impacts) where appropriate; actively contribute to the promotion of sustainable transport measures such as vehicle charging points and the increased provision for vehicles with cleaner transport fuels; deliver increased planting through soft landscaping and living walls and roofs; and provide a management plan for ensuring air quality impacts can be kept to a minimum.

The Council seeks to reduce the levels of pollutants referred to in the Government's National Air Quality Strategy and will have regard to the Mayor's Air Quality Strategy. London Boroughs should also take account of the findings of the Air Quality Review and Assessments and Actions plans, in particular where Air Quality Management Areas have been designated.

The Council has a network of Air Quality Monitoring stations but recognises that this can be widened to improve understanding of air quality impacts. The Council may therefore require new major development in an AQMA to fund additional air quality monitoring stations to assist in managing air quality improvements.

[...]” [emphasis added]

- 2.34 This proposal is by reason of a site area less than one hectare does not fall within the definition of a major planning application. However, policy DMEI 14 Air Quality applies to all development proposals stating:

“A) Development proposals should demonstrate appropriate reductions in emissions to sustain compliance with and contribute towards meeting EU limit values and national air quality objectives for pollutants.

B) Development proposals should, as a minimum:

i) be at least “air quality neutral”;

ii) include sufficient mitigation to ensure there is no unacceptable risk from air pollution to sensitive receptors, both existing and new; and

iii) actively contribute towards the improvement of air quality, especially within the Air Quality Management Area.”

- 2.35 Operation phase air quality and climate change impacts are calculated fully by Anderson Acoustics air quality team. The effect of climate change impacts and air quality during operation is considered as Not Significant with the embedded mitigation measures in place. As such, the Proposal accords with policies EM8 and DMEI 14 along with the Framework's overarching policies.

Sustainable transport choices and compatibly with Heathrow Airport

- 2.36 Policy NPPF1: National Planning Policy Framework - Presumption in Favour of Sustainable Development explains the approach to development proposals where there are no specific policies, or those policies are out of date:

“When considering development proposals the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework.

[...]

Where there are no policies relevant to the application or relevant policies are out of date at the time of making the decision then the Council will grant permission unless material considerations indicate otherwise – taking into account whether:

Any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole; or

Specific policies in that Framework indicate that development should be restricted.”

- 2.37 Review of the Hillingdon Development plan confirms no direct policies exist to control off airport parking. The applicant is aware that Heathrow Airport is subject to a car parking cap imposed as part of the Terminal 5 planning permission issued by the Secretary of State. In the decision to allow Terminal 5 the Secretary of State imposed a planning condition limiting the number of on-airport car parking spaces within BAA's main car parks to 42,000 spaces. This condition limits the amount of car parking at Heathrow Airport and helps encourage a modal shift of airport users away from cars and onto public transport. It is understood that the airport has not yet provided the maximum 42,000 spaces permitted within the cap and it is proposed this location works within that cap and in any case is not materially large enough to undermine the overarching objectives.

- 2.38 In general terms, LP2 policy T2 on public transport interchanges holds some relevance stating that:

“The Council will facilitate improved public transport interchanges at Uxbridge,

Hayes, West Drayton, Heathrow Airport, West Ruislip and other locations as appropriate in the future. These interchanges will accommodate measures to encourage subsequent shorter journeys to be completed on foot or by cycle.”

- 2.39 In combination with on airport parking, this proposal would not conflict with the Framework which states that it should be ensured that appropriate opportunities to promote sustainable transport modes can be taken up, that development can achieve safe and suitable access to the site for all users, and that any significant impacts from the development on the transport network (in terms of capacity or congestion) or on highway safety can be cost effectively mitigated to an acceptable degree.
- 2.40 Weighing in favour of this Proposal is the limiting of congestion at the Terminal and therefore the proposal offers another small benefit to sustainable transport choices and is compatible with Heathrow Airport.

Whether the harm by reason of inappropriateness, and any other harm, would be clearly outweighed by other considerations. If so, whether this would amount to the very special circumstances required to justify the unauthorised use.

- 2.41 The assessment of whether or not the redevelopment of the PDL area for a park and ride airport shuttle would preserve openness evidently requires acknowledgement that the lawful use of the land is a freight and distribution yard. It is both the applicant's opinion that the proposed use cannot be materially distinguished in impact from the lawful use.
- 2.42 If it is not considered that the proposal falls within the 149 (g) and 150 (e) Green Belt exceptions (which it is considered would fly in the face of the case law, as set out), then there are very special circumstances justifying the grant of permission. In the alternative if the development is judged as inappropriate development the applicant respectfully proceeds that very special circumstances arise as a consequence of the conclusion that the change of use, specifically comparison between stored freight would not be materially different or visually discernible from this proposal. The very unique nature of the site and the proposal, means that the development has less impact on openness of the Green Belt and without any greater impact on highway safety, capacity and air quality. These reasons constitute the required very special circumstances.

3. Summary

- 3.1 As set out, the issues arising out of this Proposal on this Site centres on the acceptability of the change of use to park and ride facility within a properly identified area of PDL.
- 3.2 As explained within this statement are two significant conclusions; first that the impact of the development within the PDL area does not have an impact on openness and that very special circumstances could be made out in light of all the facts of the case if required. Secondly, the highways issues and locational concerns about the site can be set aside in light of the evidence produced with the Transport Statement and Air Quality Assessment.
- 3.3 The only remaining issue is in the nature of a proposed park and ride operation, in an off airport location. It is submitted that this Site, with limited parking provision, has no material impact on the surface access arrangements and aspirations for a sustainable modal shift away from private cars.
- 3.4 In light of all the above, the Council is respectfully asked to grant planning permission for the use as described and within the PDL area to the Site.

Appendix A

Aerial photography 2013 to the present day

19 July 2013



31 December 2014



25 March 2017



23 June 2018



10 April 2020



16 July 2021



