

Report of the Corporate Director of Planning & Community Services

Address	452, 456, 460-470 (EVENS) AND LAND REAR OF BATH ROAD LONGFORD
Development:	Erection of a part 3/4/5/6-storey 498-bedroom hotel with ancillary meeting rooms, bar and restaurant facilities, 179 parking spaces at grade and basement levels, creation of a new access from the A4 Colnbrook By-Pass, cycle parking and landscaping; erection of 6 two-storey three-bedroom houses with associated amenity space and car parking; and use of No.470 Bath Road for hotel related/residential purposes (including demolition of Nos.452 and 460-468 (even) Bath Road.)
LBH Ref Nos:	65419/APP/2009/2715
Drawing Nos:	D0 001 Rev. P1 (Site Location Plan) D0 002 Rev. P1 (Block Plan) D0 099 Rev. P1 (Lower Ground Floor - Undercroft Level) D0 100 Rev. P1 (Ground Floor Plan) D0 101 Rev. P1 (1st Floor Plan) D0 102 Rev. P1 (2nd Floor Plan) D0 103 Rev. P1 (3rd Floor Plan) D0 104 Rev. P1 (4th Floor Plan) D0 105 Rev. P1 (5th Floor Plan) D0 106 Rev. P1 (6th Floor Plan) D0 107 Rev. P1 (Roof Plan) D00201 Rev. P1 (South/North Elevation) D00202 Rev. P1 (West/East Elevation) D0 211 Rev. P1 (South/North Elevation) D0 212 Rev. P1 (West/East Elevation) D0 301 Rev. P1 (Section A-A & B-B) D1 099 Rev. P1 (Hotel - Lower Ground Floor Plan - Undercroft) D1 100 Rev. P1 (Hotel - Ground Floor Plan) D1 101 Rev. P1 (Hotel - 1st Floor Plan) D1 102 Rev. P1 (Hotel - 2nd Floor Plan) D1 103 Rev. P1 (Hotel - 3rd Floor Plan) D1 104 Rev. P1 (Hotel - 4th Floor Plan) D1 105 Rev. P1 (Hotel - 5th Floor Plan) D1 106 Rev. P1 (Hotel - 6th Floor Plan) D1 107 Rev. P1 (Hotel - 7th Floor Plan - Roof Plant Level) D1 201 Rev. P1 (Hotel - South/North Elevation) D1 202 Rev. P1 (Hotel - West/East Elevation) D1 301 Rev. P1 (Hotel - Section A-A & B-B) D2 100 Rev. P1 (Residential - Ground Floor Plan) D2 101 Rev. P1 (Residential - 1st Floor Plan) D2 102 Rev. P1 (Residential - Roof Plan) D2 201 Rev. P1 (Residential - Elevations North/West/South/East) D2 211 Rev. P1 (Residential - Elevations North/West/South/East) D2 301 Rev. P1 (Residential - Sections) S0 100 Rev. P1 (Existing - Location Plan) S0 200 Rev. P1 (Existing - Context Elevations) Design and Access Statement dated December 2009 Planning Statement dated November 2009

Statement of Community Involvement dated December 2009
Energy Strategy dated November 2009
Environmental Statement - Volume 1 dated November 2009
Environmental Statement - Volume 2: Heritage, Townscape, Landscape &
Visual Assessment dated November 2009
Environmental Statement - Volume 3: Transport Assessment dated
November 2009
Environmental Statement - Volume 4: Appendices dated November 2009
Environmental Statement - Non Technical Summary dated November 2009

Date Plans Received: 10/12/2009 **Date(s) of Amendment(s):**

Date Application Valid: 10/12/2009

1. SUMMARY

This application seeks full planning permission for the redevelopment of land, including nos. 460-468 Bath Road and land to the rear, to provide a 498-bedroom hotel with ancillary meeting rooms, bar and restaurant facilities. A new access would be created off the A4 Colnbrook By-Pass and associated car parking and landscaping, including a linear landscaped corridor alongside the river at the site's western boundary, would be provided. The plot comprising 452 Bath Road would be redeveloped to provide six 3-bedroom dwellings with associated parking and amenity space, which would off-set the demolition of nos.460-468 Bath Road. 456 Bath Road, a Grade II Listed Building known as 'The Stables' and 470 Bath Road, a locally listed building, would be retained for hotel related residential purposes.

A number of documents have been submitted in support of the application, including an Environmental Impact Assessment, which has been submitted in accordance with The Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 1999. This assesses the likely magnitude and significance of the effects of the development on the environment and addresses issues relating to townscape and views (including the built heritage), archaeology, ecology, transport/highways, noise and vibration, air quality, flood risk, contamination, waste, economic and social effects, sustainability and energy, and cumulative impacts. It concludes that the development would have a negligible impact upon the environment.

Despite this, several concerns are raised over the scheme and its impact on the surrounding area. Significant concern is raised over the location of the development within land designated as Green Belt within the Hillingdon Unitary Development Plan Saved Policies (September 2007) and, whilst the benefits of the scheme, in terms of landscaping improvements and enhancement of the river corridor are acknowledged, this is not considered to be sufficient to justify the loss of this Green Belt land.

In addition, concern is raised over the visual impact of the proposal, particularly on the character and appearance of the sensitive Bath Road frontage. Further information also needs to be submitted in order to demonstrate the development will be fully inclusive.

Objections have been received from the Environment Agency because the Flood Risk Assessment submitted with the application is considered to be insufficient and does not provide a suitable basis for assessment of the flood risks associated with the site to be

assessed against.

The proposal fails to comply with relevant UDP and London Plan policies and, accordingly, refusal is recommended.

2. RECOMMENDATION

REFUSAL for the following reasons:

1 NON2 Principle of development

The proposed development would result in the unacceptable loss of Green Belt land contrary to the aims of Policy 3D.9 of the London Plan (Consolidated with Alterations since 2004), Policies OL1 and OL4 of the Hillingdon Unitary Development Plan Saved Policies (September 2007) and guidance contained within Planning Policy Guidance 2: Green Belts.

2 NON2 Impact on adjacent Green Belt

The proposed development, by reason of its siting, layout, scale and design, would appear as a prominent and overbearing feature, clearly visible in the surrounding area, to the detriment of the openness and visual amenities of nearby Green Belt land, contrary to Policy 3D.7 of the London Plan (Consolidated with Alterations since 2004), Policy OL5 of the Hillingdon Unitary Development Plan Saved Policies (September 2007) and guidance contained within Planning Policy Guidance 2: Green Belts.

3 NON2 Street scene

The proposed development by reason of its scale and design would appear as a prominent and incongruous feature when viewed in short and longer distance views from the Bath Road and the A4 Colnbrook By-Pass. It would appear as out of keeping with the character and appearance of surrounding development and detrimental to the visual amenities of the respective streetscenes. The proposed development particularly fails to appropriately reflect the historic character of this part of the Bath Road. Accordingly, the proposal is contrary to policies BE13, BE19, BE35 and BE36(ii) of the Hillingdon Unitary Development Plan Saved Policies (September 2007).

4 NON2 Trees/Landscaping/Ecology

The development makes inadequate provision for the long-term retention of trees in proximity to the buildings and associated structures and hard-surfaces, the loss of which would, in addition to the direct loss of trees, be detrimental to the visual amenity and arboreal/wooded character of the locality and the Green Belt. In addition the scheme fails to sufficiently demonstrate that the development would adequately protect and enhance the natural environment and river corridor. Accordingly, the scheme is contrary to policies BE34, BE38 and EC1 of the Hillingdon Unitary Development Plan Saved Policies (September 2007), Policy 3D.14 of the London Plan and guidance in Planning Policy Statement 9: Biodiversity and Geological Conservation.

5 NON2 Flood risk

The Flood Risk Assessment submitted with the application does not comply with the requirements set out in Annex F of Planning Policy Statement 25 (PPS 25). The submitted Flood Risk Assessment does not therefore, provide a suitable basis for assessment to be made of the flood risks arising from the proposed development. In

particular, the information provided suggests that the proposed development will cause an unacceptable risk of surface water flooding to people and property elsewhere, contrary to Policies OE7 and OE8 of the Hillingdon Unitary Development Plan Saved Policies (September 2007) and guidance contained within Planning Policy Statement 25: Development and Flood Risk.

6 NON2 Accessibility

The information submitted with the application fails to sufficiently demonstrate that the development would be fully inclusive and meet the needs of disabled staff and visitors, contrary to Policies R16 and AM13 of the Hillingdon Unitary Development Plan Saved Policies (September 2007).

7 NON2 Planning obligations

The applicant has failed to provide a contribution towards the improvement of services and facilities as a consequence of demands created by the proposed development, including contributions towards construction training, hospitality training, public realm, air quality and highway works. The scheme therefore conflicts with Policy R17 of the Hillingdon Unitary Development Plan Saved Policies (September 2007) and the Council's Supplementary Planning Document on Planning Obligations (2008).

INFORMATIVES

1 I52 Compulsory Informative (1)

The decision to REFUSE planning permission has been taken having regard to all relevant planning legislation, regulations, guidance, circulars and Council policies, including The Human Rights Act (1998) (HRA 1998) which makes it unlawful for the Council to act incompatibly with Convention rights, specifically Article 6 (right to a fair hearing); Article 8 (right to respect for private and family life); Article 1 of the First Protocol (protection of property) and Article 14 (prohibition of discrimination).

2 I53 Compulsory Informative (2)

The decision to REFUSE planning permission has been taken having regard to the policies and proposals in the Hillingdon Unitary Development Plan Saved Policies (September 2007) set out below, including Supplementary Planning Guidance, and to all relevant material considerations, including the London Plan (February 2008) and national guidance.

OL1	Green Belt - acceptable open land uses and restrictions on new development
OL2	Green Belt -landscaping improvements
OL5	Development proposals adjacent to the Green Belt
EC1	Protection of sites of special scientific interest, nature conservation importance and nature reserves
EC3	Potential effects of development on sites of nature conservation importance
EC5	Retention of ecological features and creation of new habitats
BE3	Investigation of sites of archaeological interest and protection of archaeological remains
BE8	Planning applications for alteration or extension of listed buildings

BE9	Listed building consent applications for alterations or extensions
BE10	Proposals detrimental to the setting of a listed building
BE12	Proposals for alternative use (to original historic use) of statutorily listed buildings
BE13	New development must harmonise with the existing street scene.
BE15	Alterations and extensions to existing buildings
BE18	Design considerations - pedestrian security and safety
BE19	New development must improve or complement the character of the area.
BE20	Daylight and sunlight considerations.
BE21	Siting, bulk and proximity of new buildings/extensions.
BE22	Residential extensions/buildings of two or more storeys.
BE23	Requires the provision of adequate amenity space.
BE24	Requires new development to ensure adequate levels of privacy to neighbours.
BE34	Proposals for development adjacent to or having a visual effect on rivers
BE35	Major development proposals adjacent to or visible from major road and rail connections to Heathrow and central London
BE36	Proposals for high buildings/structures in identified sensitive areas
BE38	Retention of topographical and landscape features and provision of new planting and landscaping in development proposals.
OE1	Protection of the character and amenities of surrounding properties and the local area
OE5	Siting of noise-sensitive developments
OE7	Development in areas likely to flooding - requirement for flood protection measures
OE8	Development likely to result in increased flood risk due to additional surface water run-off - requirement for attenuation measures
OE11	Development involving hazardous substances and contaminated land - requirement for ameliorative measures
H3	Loss and replacement of residential accommodation
H5	Dwellings suitable for large families
R16	Accessibility for elderly people, people with disabilities, women and children
R17	Use of planning obligations to supplement the provision of recreation, leisure and community facilities
A6	Development proposals within the public safety zones around Heathrow or likely to affect the operation of Heathrow or Northolt airports
T2	Location of tourist accommodation and conference facilities
T4	Hotels, guest houses and other tourist accommodation - location, amenity and parking requirements
AM2	Development proposals - assessment of traffic generation, impact on congestion and public transport availability and capacity
AM7	Consideration of traffic generated by proposed developments.
AM9	Provision of cycle routes, consideration of cyclists' needs in design of highway improvement schemes, provision of cycle parking facilities
AM13	AM13 Increasing the ease of movement for frail and elderly people and people with disabilities in development schemes through

(where appropriate): -
(i) Dial-a-ride and mobility bus services
(ii) Shopmobility schemes
(iii) Convenient parking spaces
(iv) Design of road, footway, parking and pedestrian and street furniture schemes

AM14 New development and car parking standards.

AM15 Provision of reserved parking spaces for disabled persons

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The following advice has been provided by the Environment Agency:

- Surface Water Drainage

It is promising to see that the proposed development addresses the requirements for water recycling and also incorporates green roofs. However, the FRA needs to show calculations that the surface water discharge from the developed site will mimic that of an undeveloped Greenfield site, up to and including a 1 in 100 year critical duration storm with an appropriate allowance for climate change.

This is supported by Hillingdon's SFRA and Policy 4A.14 Sustainable Drainage (Page 213) of The London Plan (Spatial Development Strategy for Greater London, Consolidated with Alterations since 2004 (GLA February 2008), which states that:

"Developers should aim to achieve greenfield run off from their site through incorporating rainwater harvesting and sustainable drainage."

The Agency's criteria is that surface water discharge from the developed site should mimic that of an undeveloped greenfield site, up to and including a 1 in 100 year critical duration storm event. Greenfield run off rates are generally between 2 - 8 l/s/ha for storm events up to the critical 1 in 100 year return period event.

A sustainable approach to the surface water drainage system is required, however storage may need to be provided on site to achieve the above criteria. We expect the use of Sustainable Drainage Systems (SuDS) to be maximised, with any barriers to their use clearly detailed.

Please submit drainage layout plans showing any attenuation ponds, soakaways and other SuDS features. Where infiltration forms part of the proposed stormwater system such as infiltration trenches and soakaways, soakage test results and test locations are to be submitted in accordance with BRE digest 365. Calculations should also be submitted to demonstrate how the system operates during a 1 in 100 year critical duration storm event, with an appropriate allowance for climate change in line with PPS25.

- Access Requirements

It is recommended that an access gate to the south of the site off Bath Road is provided to allow access for the Environment Agency's emergency vehicles to the river. As discussed in previous meetings, we would be happy to view other options should you wish to recommend any alternative.

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You are advised that should you choose to submit a revised scheme for this development, full justification for the loss of parking at the Abbey Business Centre should be provided within your Transport Assessment.

3. CONSIDERATIONS

3.1 Site and Locality

The application site comprises an approximately 2 hectare irregularly shaped plot located on the north side of Bath Road, and to the south of the A4 Colnbrook By-Pass dual carriageway in Longford.

The southern part of the site, fronting Bath Road, currently accommodates a number of residential buildings. These include 470 Bath Road, a locally listed two-storey detached property with ancillary gardens and garage; 460 to 468 Bath Road (even), a row of two-storey terraced houses with associated gardens and garages to the rear; 456 Bath Road, known as 'The Stables', a Grade II Listed two-storey detached house and stable block with ancillary gardens; and 452 Bath Road, a two-storey detached house with ancillary grounds. All of these buildings appear to be vacant and/or derelict. Notably 454 Bath Road does not form part of the application site. The southern part of the site also incorporates the existing access road to the adjacent Abbey Business Centre. Notably 454 Bath Road does not form part of the application site.

To the rear of these properties is an area of overgrown land which is currently unmanaged and heavily littered, and also comprises disused portacabin type buildings. This continues into the north west corner of the site, which fronts the Colnbrook By-Pass, and is designated as Green Belt within the Hillingdon Unitary Development Plan Saved Policies (September 2007).

The north east corner of the site comprises an area of car parking which is currently used by the Abbey Business Centre. It also comprises a narrow strip of landscaping in front of the Abbey Business Centre, fronting the road.

The site is bounded to the north by the A4 Colnbrook By-Pass dual carriageway, beyond which is a row of residential properties, the Harmondsworth Detention Centre and the Colnbrook Immigration Removal Centre. The British Airway's 'Waterside' building, set within an extensive parkland setting and located within Harmondsworth Moor, lies to the north west. Immediately to the west the site is bounded by the Duke of Northumberland River, beyond which is the Waterlife Centre, a site comprising a mix of uses including a waterlife and reptile centre and hand car wash. The site is bounded to the south by Bath Road beyond which is 501 Uxbridge Road, a detached property which accommodates the Littlebrook Nursery, Longford Cottage, a Grade II Listed residential property, Margaret Cassidy House, a three-storey hostel used by semi-independent youths, and the Thistle Hotel. Commercial office buildings, a health club, and Abbey Business Centre lie to the east.

Notably, several properties within the immediately surrounding area benefit from extant planning permissions for hotel use. Margaret Cassidy House, to the south of the site, was granted planning permission for the redevelopment of the site for a 127 bedroom hotel and ancillary uses in March 2008. Planning permission was granted for the redevelopment of the Thistle Hotel site to provide two hotels comprising 250 bedrooms

and 353 bedrooms respectively, with ancillary uses, in September 2009; and in June 2009 planning permission was granted for the redevelopment of Longford House, to the east of the application site, to provide a 400 bedroom hotel and ancillary uses.

The majority of the site falls within the developed area as shown on the Hillingdon Unitary Development Plan Proposals Map. However, the north west corner (just under 0.4 hectares as measured on the Council's GIS mapping system) is designated as Green Belt and the southern part of the site accommodates both locally listed and Grade II Listed properties. The adjacent Duke of Northumberland River falls within a Nature Conservation Site of Metropolitan or Borough Grade I Importance, and the Longford Village Conservation Area lies approximately 115m to the west. Land immediately to the west and north west falls within the Colne Valley Regional Park, and the Heathrow Airport boundary is located to the south. The A4 Colnbrook By-Pass is designated as a Strategic Route and the entire site falls within an Air Quality Management Area.

3.2 Proposed Scheme

This application seeks full planning permission for the redevelopment of the site to provide a 498 bedroom hotel with ancillary facilities, car parking and landscaping; six residential properties with ancillary car parking and amenity space; associated accesses; and use of nos. 456 and 470 Bath Road for residential and/or hotel use. The development would include the demolition of nos. 460-468 (even) Bath Road.

The proposed hotel would be located towards the western side of the site and would extend almost the entire north-south length of the plot. It would be characterised by four linear elements, positioned in an east/west direction, which would be linked by subserviently designed blocks. It would range in height from 2/3 storeys fronting Bath Road, to 6 storeys towards the middle of the site, and would provide 29,976m² of internal floorspace. Each floor of the hotel would comprise the following:

- Lower Ground Floor/Undercroft Level - Plant and store rooms/back of house areas; refuse storage; nine meeting rooms of varying sizes; kitchen; WC facilities; 162 car parking spaces, including 17 disability standard spaces; 16 motorcycle spaces.
- Ground Floor - Hotel lobby and reception area; two small retail units; WC facilities; fitness zone; restaurant; kitchen; store rooms; waste refuse compaction area and deliveries/servicing area; 17 car parking spaces, including one disability standard space; 35 bedrooms.
- First Floor - Mezzanine restaurant; administrative areas/offices; bars, including sports bar and wine bar; 46 bedrooms; staff room; store rooms.
- Second Floor - 122 bedrooms; linen/store rooms; and two sky gardens.
- Third Floor - 113 bedrooms; linen/store rooms.
- Fourth Floor - 102 bedrooms; linen/store rooms.
- Fifth Floor - 66 bedrooms; linen/store rooms.
- Sixth Floor - 14 bedrooms.

A new access only into the site would be created from the westbound carriageway of the A4 Colnbrook By-Pass. This would be the only access to the hotel. All vehicles would exit the site via the existing Abbey Business Centre access onto Bath Road.

Parking for a total of 179 cars (162 within the basement and 17 at grade level), including 18 disability standards spaces would be provided. The basement car park would only be able to be accessed via the A4 Colnbrook By-Pass. 60 bicycle parking spaces are proposed and would be provided for across the site. 15 spaces would be provided within the existing Grade II Listed outbuilding towards the south of the site, 15 spaces would be

provided in a covered parking area to the north of the hotel, and 30 spaces would be provided within a covered cycle store adjacent to 452 Bath Road.

A drop-off and pick-up zone for coaches, buses, cars and taxis would be provided outside the main entrance to the hotel. This area would accommodate parking for up to two coaches and five taxis.

In terms of the existing residential properties along the Bath Road frontage, the terraced houses at nos. 460-468 (even) would be demolished to accommodate the hotel building. The existing locally listed building at the south western most corner of the plot would be retained and used as accommodation linked to the hotel operation. Similarly, the Grade II Listed Building at 456 Bath Road would also be used for hotel related accommodation. The existing Grade II outbuilding associated with this property would accommodate 15 cycle parking spaces and shower and changing facilities.

The proposal seeks to realign the Green Belt to provide a landscaped riverside corridor along the western boundary of the site. This would be opened for public access providing a link between Longford Village to the south and Hamondsworth Moor to the north. The garden of the Grade II Listed Building would be re-landscaped to provide an area of hardstanding and seating for hotel guests as well as additional soft landscaping where considered necessary.

Two landscaped courtyards or 'sky gardens' would also be provided at second storey level, one within the north block, and one within the central block of the hotel complex. In addition sunken courtyard gardens would be provided towards the front portion of the building and hard and soft landscaped areas would be provided along the eastern facade and used as spill out/seating areas for the hotel. The hotel would also comprise a significant portion of green/brown roofs.

No 452 Bath Road would be redeveloped to provide six 2-storey 3-bedroom houses with associated amenity space and 9 car parking spaces, to replace the existing dwellings which would be lost at nos.460-468 Bath Road. A single detached dwelling would front Bath Road, with the remaining five houses forming an 'L' shaped terrace to the rear. A new access would be provided from Bath Road to serve these properties and the parking courtyard.

3.3 Relevant Planning History

Comment on Relevant Planning History

There is no previous planning history relating to the entire application site. However, notably there have historically been a number of applications for minor alterations and extensions to some of the existing residential properties. In addition, planning records suggest that during 1996 and 1997 enforcement action was taken over the use of land to the rear of no.470 (locally listed building) for the parking of lorries. Records also suggest that enforcement action was taken over the use of land to the rear of no. 464 Bath Road for vehicle repairs/maintenance during 1994, and at 452 Bath Road during 2006.

Notably all the properties on the site now appear to be vacant and in a poor state of repair. No.460 Bath Road has suffered from recent fire damage.

4. Planning Policies and Standards

Hillingdon Unitary Development Plan Saved Policies (September 2007)
London Plan (Consolidated with Alterations since 2004)

Planning Policy Statement 1 (Delivering Sustainable Development)
 Planning Policy Guidance 2 (Green Belt)
 Planning Policy Statement 3 (Housing)
 Planning Policy Statement 4 (Planning for Sustainable Economic Growth)
 Planning Policy Guidance 13 (Transport)
 Planning Policy Guidance 15 (Planning & the Historic Environment)
 Planning Policy Guidance 16 (Archaeology and Planning)
 Planning Policy Statement 22 (Renewable Energy)
 Planning Policy Guidance 24 (Planning & Noise)
 Planning Policy Statement 25 (Development & Flood Risk)
 Good Practice Guide on Planning for Tourism
 Council's Supplementary Planning Guidance - Noise
 Council's Supplementary Planning Guidance - Air Quality
 Council's Supplementary Planning Guidance - Community Safety by Design
 Council's Supplementary Planning Guidance - Planning Obligations
 Supplementary Planning Document - Residential Layouts
 Supplementary Planning Document - Accessible Hillingdon

UDP / LDF Designation and London Plan

The following UDP Policies are considered relevant to the application:-

Part 1 Policies:

- | | |
|--------|--|
| PT1.1 | To maintain the Green Belt for uses which preserve or enhance the open nature of the area. |
| PT1.6 | To safeguard the nature conservation value of Sites of Special Scientific Interest, Sites of Metropolitan Importance for Nature Conservation, designated local nature reserves or other nature reserves, or sites proposed by English Nature or the Local Authority for such designations. |
| PT1.7 | To promote the conservation, protection and enhancement of the archaeological heritage of the Borough. |
| PT1.9 | To seek to preserve statutory Listed Buildings and buildings on the Local List. |
| PT1.10 | To seek to ensure that development does not adversely affect the amenity and the character of the area. |
| PT1.12 | To avoid any unacceptable risk of flooding to new development in areas already liable to flood, or increased severity of flooding elsewhere. |
| PT1.14 | To not normally grant planning permission for a change from residential use. |
| PT1.16 | To seek to ensure enough of new residential units are designed to wheelchair and mobility standards. |
| PT1.28 | To encourage the provision of a range of hotel and conference facilities provided development does not harm the environment. |
| PT1.30 | To promote and improve opportunities for everyone in Hillingdon, including in particular women, elderly people, people with disabilities and ethnic minorities. |
| PT1.32 | To encourage development for uses other than those providing local services to locate in places which are accessible by public transport. |
| PT1.39 | To seek where appropriate planning obligations to achieve benefits to the |

community related to the scale and type of development proposed.

Part 2 Policies:

OL1	Green Belt - acceptable open land uses and restrictions on new development
OL2	Green Belt -landscaping improvements
OL5	Development proposals adjacent to the Green Belt
EC1	Protection of sites of special scientific interest, nature conservation importance and nature reserves
EC3	Potential effects of development on sites of nature conservation importance
EC5	Retention of ecological features and creation of new habitats
BE3	Investigation of sites of archaeological interest and protection of archaeological remains
BE8	Planning applications for alteration or extension of listed buildings
BE9	Listed building consent applications for alterations or extensions
BE10	Proposals detrimental to the setting of a listed building
BE12	Proposals for alternative use (to original historic use) of statutorily listed buildings
BE13	New development must harmonise with the existing street scene.
BE15	Alterations and extensions to existing buildings
BE18	Design considerations - pedestrian security and safety
BE19	New development must improve or complement the character of the area.
BE20	Daylight and sunlight considerations.
BE21	Siting, bulk and proximity of new buildings/extensions.
BE22	Residential extensions/buildings of two or more storeys.
BE23	Requires the provision of adequate amenity space.
BE24	Requires new development to ensure adequate levels of privacy to neighbours.
BE34	Proposals for development adjacent to or having a visual effect on rivers
BE35	Major development proposals adjacent to or visible from major road and rail connections to Heathrow and central London
BE36	Proposals for high buildings/structures in identified sensitive areas
BE38	Retention of topographical and landscape features and provision of new planting and landscaping in development proposals.
OE1	Protection of the character and amenities of surrounding properties and the local area
OE5	Siting of noise-sensitive developments
OE7	Development in areas likely to flooding - requirement for flood protection measures
OE8	Development likely to result in increased flood risk due to additional surface water run-off - requirement for attenuation measures

OE11	Development involving hazardous substances and contaminated land - requirement for ameliorative measures
H3	Loss and replacement of residential accommodation
H5	Dwellings suitable for large families
R16	Accessibility for elderly people, people with disabilities, women and children
R17	Use of planning obligations to supplement the provision of recreation, leisure and community facilities
A6	Development proposals within the public safety zones around Heathrow or likely to affect the operation of Heathrow or Northolt airports
T2	Location of tourist accommodation and conference facilities
T4	Hotels, guest houses and other tourist accommodation - location, amenity and parking requirements
AM2	Development proposals - assessment of traffic generation, impact on congestion and public transport availability and capacity
AM7	Consideration of traffic generated by proposed developments.
AM9	Provision of cycle routes, consideration of cyclists' needs in design of highway improvement schemes, provision of cycle parking facilities
AM13	AM13 Increasing the ease of movement for frail and elderly people and people with disabilities in development schemes through (where appropriate): - (i) Dial-a-ride and mobility bus services (ii) Shopmobility schemes (iii) Convenient parking spaces (iv) Design of road, footway, parking and pedestrian and street furniture schemes
AM14	New development and car parking standards.
AM15	Provision of reserved parking spaces for disabled persons

5. Advertisement and Site Notice

- 5.1** Advertisement Expiry Date:- **17th February 2010**
- 5.2** Site Notice Expiry Date:- Not applicable

14th January 2010

6. Consultations

External Consultees

Consultation letters were sent to 243 local owner/occupiers and the Longford Residents' Association. The application was also advertised by way of site and press notices. Three letters of objection have been received which raise the following concerns:

- i) Additional traffic from hotel service providers and staff through Longford Village.
- ii) This will add to the volume of traffic created by T5 (Hotel Hoppa Buses, mini-buses, taxis & chauffer vehicles).
- iii) Threat to the tranquillity of Longford Island which is in a conservation area.
- iv) When purchasing a property here the Council was contacted regarding any proposed planning applications for the area, but the Council advised that there were none. The Council would have been aware of this application some time ago and, as such, has misled new residents and their solicitors for its own gain and profit.
- v) The Government are supposed to be making a stand on Global warming. However, not content with the existing expansion of Heathrow Airport the Council is now proposing a third runway.
- vi) There are 10-15 existing hotels along Bath Road.
- vii) The area will become more congested with more traffic and less parking.
- viii) Impacts on wildlife.
- ix) The Council's consultation letter states that boundary disputes and property values are not taken into consideration when making decisions of planning applications. This is because Council staff do not live in the constituent and therefore the application will not affect their way or quality of life.

In addition the following objection has been received on behalf of the Thistle Hotel:

"Flood Risk

The Environment Agency (EA) has formally objected to the application (18.01.10) on the grounds that the submitted Flood Risk Assessment (FRA) does not provide a suitable basis for assessment to be made of the flood risks arising from the proposed development. Of particular concern to both the EA and my client is that the applicants FRA suggests that the proposed development will cause an unacceptable risk of surface water flooding to people and property elsewhere.

Circular 04/2006 introduced a Flooding Direction, which came into effect from 1 January 2007 and sets out the requirements of the Town and Country Planning (Flooding) (England) Direction 2007. It requires local planning authorities to notify the Secretary of State of any application for major development within an identified flood risk area, where it is minded to grant permission against advice on flood risk grounds from the Environment Agency.

My client is fully aware of the existing critical drainage problems in the area, themselves having to overcome resolute concerns surrounding surface water flooding from the EA in regard to the recently approved application for the redevelopment of the Thistle Hotel. This necessitated an element of redesign and reduction in the density of the building and surface areas prior to formal determination to integrate extensive surface water run-off strategy works.

It would appear that the applicant's failure to address the formal EA objection prior to a formal determination may be as a result of it not actually being achievable to install the required surface water attenuation system specifically utilising SUDS techniques which the EA would prefer to see. The inability/lack of desire to overcome this issue would indicate that the site is over-developed and that it is not practically possible to undertake the required works. As such, the proposed

development will cause an unacceptable risk of surface water flooding to people and property elsewhere, and on this basis any commitment to surface water run-off strategy works to overcome the EA's objection should be undertaken prior to a formal decision and is a material planning consideration that is not suitable to be subject of a planning condition.

Impact of intensification of hotel development on the immediate area

Unlike the recently approved Thistle Hotel which comprised the redevelopment of an existing hotel site, the proposed hotel represents the introduction of a new hotel which will lead to the proliferation of hotel development impacting on the character of the immediate area. There will be an impact on the Bath Road Conservation Area, an overdevelopment of the site in proximity to sensitive listed buildings and an inappropriate response to the more sensitive residential environment of Longford Village.

The ES and application supporting documents do not consider the cumulative visual impact on Bath Road arising as a result of the application proposals, the 4/5 storey hotel at 420 bath road and Margaret Cassidy House."

It should be noted that a Statement of Community Involvement has been submitted in support of the application. This outlines the consultation the applicant has carried out with local residents prior to submission of the application. Letters were sent to 1,600 residents/stakeholders in June 2009 and an exhibition was held at the Abbey Business Centre on 6 July. Letters were also sent to ward councillors, committee and cabinet members and the local MP. Residents were asked to complete tick-box questionnaires regarding the development, and nine responses were received which were mostly positive. The Statement confirms that one resident added further comments which raised concerns over increased traffic, hoppa buses, pollution during construction, and impacts on the river and wildlife.

GREATER LONDON AUTHORITY
To be reported at Committee.

TRANSPORT FOR LONDON

The nearest stretch of Transport for London Road Network (TLRN) to the site is the A4 Colnbrook Bypass, which bounds the northern edge of the site and is proposed to form the site access. The nearest stretch of Strategic Road Network (SRN) is over 3 kilometres away.

The site is served by 2 bus routes (81, 423) accessible from Bath Road adjacent to the Heathrow Thistle Hotel, to the south of the site. A further 2 bus stops, Colnbrook Bypass (westbound) and Duke's Bridge (eastbound) are on the A4 Colnbrook Bypass where route 350 can be accessed. These 4 bus stops are within a 400m walking distance of the site. The closest London Underground and National Rail services are accessed from Heathrow Terminal 5 via bus route 423. Piccadilly Line and Heathrow Express services are accessible from the Terminal with trains departing every 8-10 minutes and every 15 minutes respectively.

Correspondingly, the site has a Public Transport Accessibility Level (PTAL) of 1b on a scale of 1 to 6, where 1 is lowest and 6 is the highest.

The site is also currently served by 2 Heathrow Hoppa bus routes via the Thistle Hotel which offer links between Bath Road and Heathrow Terminal 1, 2, 3 (H4) and Heathrow Terminal 5 (H51). Although, as these are non-TfL services they are not included within the PTAL assessment. On 28th January 2009 a pre-planning application meeting was held with TfL officers regarding the

redevelopment proposals.

- Policy

Since the pre-application meeting in February 2009, the London Plan: consultation draft replacement has been published and is now a material consideration. This should be referenced within the TA.

- Trip Generation

The first principle approach of using surveys from similar sites is welcome and the Marriot Hotel is an acceptable site.

- Proposed access from the A4 Colnbrook Bypass

TfL agrees in principle with the proposed access from the A4 subject to detail design as part of the s278 agreement that will be between TfL and the developer. The new access will require suitable pedestrian facilities such as tactile paving. TfL welcomes the inclusion of a Stage 1 safety audit and is in agreement that all the points raised can be mitigated through the detailed design process.

- Car Parking

179 car parking spaces are proposed for the hotel development (17 at surface level and 162 in the basement). Of these 18 will be allocated for disabled users. This is acceptable.

9 car parking spaces are proposed for the 6 residential units, giving a ratio of 1.5 while this lies within the maximum London Plan standards and TfL requests a reduction to a more acceptable level of 1 space per unit.

A number of electric vehicle charging points should be provided on the site available to all users in line with the London Plan: consultation draft replacement (October 2009) and the Electric Vehicle Delivery Plan for London (May 2009).

It is unclear from the TA as to whether there is a specific staff car parking allocation and this needs to be clarified. Furthermore, there is no information in the TA detailing how the car park will operate and a car park management plan as discussed at pre-application should be provided.

It is noted that 16 motorcycle parking spaces will be provided in the basement for the hotel development.

- Cycle Parking

The intention to provide 60 secured and covered cycle parking spaces for the hotel with showering and changing facilities for staff is welcome. TfL recommends CCTV coverage as an added security measure for at grade cycle parking. Cycle parking for the residential unit should be provided; TfL standards are 2 spaces per 3+ bed dwelling. The final number of spaces will need to be clarified in order to ensure general conformity with London Plan Policy 3C.22 Improving conditions for cycling and London Plan: consultation draft replacement (October 2009) Policy 6.9 Cycling.

- Cycling, walking and accessibility

Pedestrian and cycle isochrones have been provided as requested, although they lack details regarding what sort of facilities e.g. schools and GPs are located within these areas. The site benefits from the shared footway/cycleway along both sides of the A4 Colnbrook-by-pass.

- Public transport

The TA adequately demonstrates that the development proposal due to its nature and location is unlikely to give rise to unacceptable impacts on public transport services. It is welcome that this development would be served by the Airport Hoppa Bus Service.

- Coaches

TfL appreciate that coaches have been taken into account within the TA, but would like to take this opportunity to remind the applicant that although 12m single deck coaches still form the majority of coaches, operators tend to favour larger vehicles which can be a maximum of 15m long and/or double deck therefore this type of vehicle should be provided for in terms of both length and height.

- Taxis

The taxi provision outlined in the TA is satisfactory to TfL.

- Travel plans

The submitted travel plan has failed its ATTrBuTE evaluation as additional information is required in relation to travel plan targets, the action plan and funding.

The targets provided in the travel plan are not specific, for example they do not indicate the amount by which the proportion of staff travelling to the hotel by single occupancy vehicle will be reduced by and are therefore not considered SMART. To enable more specific targets to be developed, baseline modal split information needs to be produced for the site, this will enable interim targets to be set that can be finalised after the initial travel survey.

An Action Plan needs to be included in the Travel Plan that includes short, medium and long term actions, along with timescales and responsibilities. In addition, details need to be provided on how the travel plan will be funded, including the implementation of measures, the role of the Travel Plan Coordinator and the monitoring programme. These measures should all be secured through the Section 106 agreement.

- Freight and Servicing

TfL welcomes the applicant's commitment within the TA to produce both a Delivery and Servicing Plan (DSP) and Construction Logistics Plan (CLP). TfL is satisfied that the production of these plans can be subject to a planning condition if Planning Approval is granted in order to ensure general compliance with London Plan Policy 3C.25 Freight strategy and London Plan: consultation draft replacement (October 2009) Policy 6.14 Freight.

- Summary

In conclusion, TfL requires clarification on the car park allocation, a car park management plan to be secured by condition and reduction in residential parking; clarification of the proposed residential cycle parking levels, further work to bring the travel plan up to TfL standard and both the DSP and CLP to be secured by condition.

BAA SAFEGUARDING

No objection subject to conditions regarding bird hazard management, landscaping, lighting and renewable energy, and an informative regarding cranes.

NATIONAL AIR TRAFFIC SERVICES

No objection.

ENGLISH HERITAGE

The site lies in an area where archaeological remains may be anticipated. There is a substantial quantity of prehistoric and Saxon/Medieval remains in the vicinity, reflecting the intensive settlement and occupation of the Heathrow and Longford areas in those times. Of particular relevance to this site is that documentary sources reveal that it was in use as a coaching inn since the 16th century, and there is cartographic evidence for buildings across the Bath Road frontage in

the early post-medieval period. A limited archaeological evaluation was conducted on the north-eastern area of the site in 1996, where limited remains from this period were encountered, but a higher volume and significance should be anticipated along the road frontage. The proposed development may, therefore, affect remains of archaeological importance.

It is not considered that any further work need be undertaken prior to determination of this planning application but that the archaeological position should be reserved by attaching a relevant condition to any consent granted under this application.

THAMES WATER

Waste Comments - Following initial investigation, Thames Water has identified an inability of the existing waste water infrastructure to accommodate the needs of this application. Should the Local Planning Authority look to approve the application, an appropriate condition requiring the submission of a drainage strategy, detailing any on and/or off site drainage works, should be attached.

Surface Water Drainage - With regard to surface water drainage it is the responsibility of a developer to make proper provision for drainage to ground, water courses or a suitable sewer. In respect of surface water it is recommended that the applicant should ensure that storm flows are attenuated or regulated into the receiving public network through on or off site storage. When it is proposed to connect to a combined public sewer, the site drainage should be separate and combined at the final manhole nearest the boundary. Connections are not permitted for the removal of Ground Water. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required. This is to ensure that the surface water discharge from the site shall not be detrimental to the existing sewerage system.

Thames Water would recommend that petrol/oil interceptors be fitted in all car parking/washing/repair facilities. Failure to enforce the effective use of petrol/oil interceptors could result in oil-polluted discharges entering local watercourses.

Thames Water recommends the installation of a properly maintained fat trap on all catering establishments. Thames Water further recommends, in line with best practice for the disposal of Fats, Oils and Grease, the collection of waste oil by a contractor, particularly to recycle for the production of bio diesel. Failure to implement these recommendations may result in this and other properties suffering blocked drains, sewage flooding and pollution to local watercourses.

Water Comments - With regard to water supply, this comes within the area covered by the Veolia Water Company.

Supplementary Comments - Thames Water request the developers contact them to discuss the requirements of this development. It may be necessary to undertake investigations into the impact of the development on the sewers. This study will need to be funded by the developers and on average may take 12 weeks to complete.

ENVIRONMENT AGENCY

In the absence of an acceptable Flood Risk Assessment (FRA) the Environment Agency OBJECTS to the grant of planning permission and recommends refusal. The FRA submitted with this application does not comply with the requirements set out in Annex F of Planning Policy Statement 25 (PPS 25). The submitted FRA does not therefore, provide a suitable basis for assessment to be made of the flood risks arising from the proposed development. In particular, the information provided suggests that the proposed development will cause an unacceptable risk of surface water flooding to people and property elsewhere.

HIGHWAYS AGENCY

No objection.

Internal Consultees

URBAN DESIGN OFFICER

The site is located within the indicative boundary for the wider hinterland of the Heathrow North and South Opportunity Area. The area is bounded by Bath Road to the south, the Colnbrook Bypass to the north and Duke of Northumberland River to the west. The north west part of the site is situated in the Green Belt.

The Duke of Northumberland River is a landscape element of strategic importance from a spatial, aesthetic, recreational and ecological point of view. The potential of the watercourse is well reflected in the layout in the scheme, which improves physical and visual accessibility to the watercourse and its setting, by providing a new open space along the river, by connecting the riverbank with a network of open green areas within the site, and by linking the river course with adjacent open green areas to the south and north of the western boundary, in accordance with the Blue Ribbon Network policies.

The existing context and character of this major development site varies considerably from very large scale, commercial developments along the A4, to the humble, vernacular heritage buildings which are interspersed along the Bath Road frontage. Extensive pre-application advice has been given in terms of urban design and conservation aspects throughout the design process of this scheme. The general layout of the scheme is considered to reflect and respond positively to this gradual, however profound, change of context. From an urban design point of view the scheme is considered to respond sensitively to the contrasting and complex context in terms of scale, height and massing as with regards to the commercial parts of the scheme.

Although the principle of and the general layout of the 6 residential houses is supported from an urban design point of view, the detailed building design, although amended, is considered to require further work to fully integrate with the existing local vernacular in Bath Road, in particular with regards to the overall proportions, the excessive building depth, the lack of proper gables, roof and eaves detailing to overcome the bulky yet unarticulated appearance. The proposed residential dwellings are considered to be excessively wide, lack traditional detailing such as strong gable features and typical low eaves, whilst the roof construction is considered too shallow. As a result the residential part of the scheme gives a bulky, yet unarticulated, and anonymous appearance, which fails to convince, and misses the opportunity to fully integrate with the local vernacular tradition.

Comment: The Urban Design Officer's comments do not cover Green Belt impact, nor do they attempt to, they cover purely the architectural merits of the proposal.

CONSERVATION OFFICER

(N.B. These observations are confined entirely to the heritage considerations pertaining to the Bath Road frontage).

The quality of the existing buildings on and around the Bath Road frontage is particularly high. They include the listed building at No.452, part 16th century and once an inn; its listed 17th/early 18th century outbuilding; and the locally listed early/mid 19th century villa at No. 470, which stands by the river. Opposite is the listed Longford Cottage, also of 16th century.

The streetscene is of an outer suburban, low density, domestic nature, characterised by dense planting and trees. On the site itself, the front boundary walls, riverside trees, and the incidental

gaps and views between buildings to the gardens and trees behind, provide a semi-rural setting for the listed and locally listed buildings, and for the more recent buildings around them, built in the vernacular idiom, some with replica timber framing. The listed building at No. 452 is sited at right angles to the road, extending deep into the site, whilst the little outbuilding on its front boundary is single storey and forms a very attractive corner to its curtilage.

That part of the hotel proposed on the Bath Road frontage, would allow for the retention of the Listed Buildings at No. 452 and the locally listed building at No. 470. It would extend only a little wider than the footprint of the existing terrace of five houses, retain the existing set back from the road and reintroduce a garden wall. However, the third floor, albeit set in from the side elevations, would have a bulky and vertical appearance.

A roof storey should observe the architectural hierarchy, being set back from the frontage, and subordinate in its height and detailing, to the principal floors. However, this roof storey would be constructed in the same plane as the principal front elevation, be of the same height, or higher, with huge windows matching those on the lower floors. Although timber cladding has been introduced to soften the appearance of this storey, it is considered that it would serve to draw attention to its height and bulk, which would loom over the existing buildings to either side of it.

In terms of the heritage considerations on this site, the scale, bulk, and massing of the Bath Road frontage, and indeed the larger monolithic blocks behind it, would detract from the setting of the listed, locally listed, and vernacular type buildings surrounding it. Most importantly, this would be true of those views obtained from the immediate roadside, and from the public footpath opposite. However, it is considered that the proposal would also adversely affect views looking west towards the river and from the Bath Road bridge east.

Conclusion - Unacceptable, amendment needed to third storey and basement lightwell.

HIGHWAY ENGINEER

The site is located on the northern side of Bath Road, which is an unclassified road. The proposals include the creation of a new access from the A4 Colnbrook Bypass for entry only into the site. Vehicles would manoeuvre through the site from north to south and egress using the existing Abbey Business Centre access.

The A4 Colnbrook Bypass is part of the Transport for London Route Network.

A total of 179 car parking spaces are proposed for the hotel (17 spaces at surface level and 162 at basement level), including 18 spaces proposed for disabled users.

16 motorcycle parking spaces are proposed at the basement level. 60 cycle parking spaces are proposed at surface level.

The PTAL rating for the site is 1; the site therefore has a low accessibility to public transport.

Given the low PTAL level, and size and type of the residential units, car parking should be provided at 2 spaces per unit.

In addition to the information requested by TfL, the applicant should also provide information on loss of car parking associated with Abbey Business Centre and the resulting impact on the surrounding area.

ENVIRONMENTAL PROTECTION UNIT

- Air Quality

The following information was submitted with the application as part of the Environmental Statement, which had implications for air quality:

- Chapter 10 Air Quality, Environmental Statement Volume 1, Heathrow West Hotel (November 2009)
- Chapter 10.1 APPLE Dust Risk Assessment, and Chapter 10.2 Air Quality Model, Environmental Statement Volume 4: Appendices Part 2, Heathrow West Hotel (November 2009)
- Energy Strategy, Heathrow West Hotel, Bath Road (November 2009)

The proposed development is within the declared AQMA and in an area currently exceeding the European Union limit value for annual mean nitrogen dioxide. The development proposal also includes the introduction of 6 new houses into an area of poor air quality. The air quality assessment in the Environmental Statement (ES) indicates that the area around the development will continue to exceed the EU limit value levels both with and without the development. There is a small but significant increase in the pollution levels with the development.

As the development is in and will cause increases in an area already suffering poor air quality a Section 106 obligation for £25,000 should be sought for contribution to the air quality monitoring network in the area.

Five sensitive receptors have been identified as being sufficiently close to the site so as to be potentially impacted by the construction phase, including a residential property immediately adjacent on three sides to the development site. The ES states: Prior to commencement of construction activities agreement would be reached with the London Borough of Hillingdon to ensure that potential for adverse environmental effects on local receptors is minimised. This document must be submitted to the LPA for approval prior to any works commencing at the site. The plan should follow the risk assessment approach as outlined in the GLA Best Practice guide and ensure all appropriate mitigation measures are employed to protect existing sensitive receptors, including where relevant a dust monitoring strategy.

The air quality assessment took into consideration the use of CCHP and boiler plants. The ES states low NO_x burners will be adopted for the boiler and CCHP units, with dry NO_x emissions levels of 70mg/kWh. The use of this or a less polluting alternative is supported. It is assumed the air quality assessment was based on the gas-fired CCHP referred to in the Energy strategy. Should the choice of renewable energy source change to biomass or biofuel this may require a further air quality assessment.

The air quality assessment in the ES states that it took into consideration the transport assessment in chapter 8 of the ES and ES: Volume 2 Transport Assessment (actually volume 3). If there is a requirement for any changes in the transport assessment, further air quality assessment may be required.

The Green Travel Plan referred to in the ES should prioritise the use of low emission/zero emission vehicles including the provision of electric vehicle infrastructure. A baseline study and quantification of the reductions in emissions achieved by the travel plan should be requested.

- Noise

New Hotel Accommodation:

According to Hillingdon's Supplementary Planning Document on noise, it is the responsibility of the developer to ensure satisfactory noise levels inside hotels. However, should approval be granted it is recommended an informative advising on adequate sound insulation is attached.

New residential development:

The Environmental Statement (ES) section 9.6.5 relates to suitability of the site for the residential uses forming part of the development. The development would provide residential uses at 452 Bath Road, whilst the listed building at 456 Bath Road and the building of local interest at 470 Bath Road would be retained for uses that may include residential uses. The noise survey carried out as part of the ES places the proposed residential sites in Noise Exposure Category C of PPG24 Planning and Noise. This is consistent with the published aircraft noise contours for Heathrow airport. The corresponding advice in PPG24 for NEC category C is:

Planning permission should not normally be granted. Where it is considered that permission should be given, for example because there are no alternative quieter sites available, conditions should be imposed to ensure a commensurate level of protection against noise.

In deciding whether to permit the proposed residential uses, it should be noted that there are existing residential uses at 454 to 470 Bath Road. Also, the proposed new residential properties at 452 Bath Road would replace existing residential uses. Furthermore, the ES claims that satisfactory internal noise levels can be provided in the proposed residential properties by suitable sound insulation. If it is decided to permit the proposed residential use, an appropriate condition should be attached to require the applicant to submit a scheme for protecting the proposed residential development from road traffic, air traffic and other noise.

Noise generated by use of the proposed development:

ES section 9.6 contains an assessment of the potential noise impacts of the completed development. The noise generating uses considered are plant and machinery, hotel leisure functions, and increased road traffic, as discussed below.

Plant and machinery:

ES section 9.6.2 contains an assessment of noise from the proposed gas-fired combined cooling and heating and power (CCHP) and other mechanical plant proposed at the development. In order to control noise from these uses appropriate conditions should be attached to any approval.

Hotel leisure functions:

ES section 9.6.3 states that the major noise-producing activities associated with the proposed development are likely to be related to leisure functions, such as amplified music at wedding receptions. The ES suggests that amplified music from these functions should be controlled by adequate sound insulation of the building. With this provision, and provided proper management measures are adopted (including use of a noise limiter if necessary), it is not expected that noise from amplified music would be a problem. It is noted that the nearest noise sensitive properties are some distance away. Nevertheless, should approval be granted, a condition requiring the applicant to submit a noise control scheme for the control of noise emission from function rooms at the proposed development to neighbouring noise sensitive premises, should be attached.

Road traffic:

ES section 9.6.4 contains an assessment of the effects of increases in road traffic associated with the development. It is concluded that increases in road traffic would be of negligible significance.

Deliveries/ refuse collections:

There is no detailed assessment in the ES of noise from deliveries and refuse collections. However, ES section 3.5 states that vehicular access for deliveries/refuse collections would be from the westbound carriageway of the A4 Colnbrook Bypass. It would seem that facilities for dealing with deliveries/refuse will be provided within the hotel. In view of the distance to the nearest noise sensitive properties, it would seem that noise from deliveries/refuse collections should not be a problem.

Demolition and construction:

ES section 9.3.3 Table 9.1 proposes criteria for noise from demolition and construction of 75 dB LAeq,T during 0800 to 1800 hours Monday to Saturday, and 0800 to 1300 hours Sunday. It is considered that noise from demolition and construction should be controlled to lower noise levels, for example, 65 dB LAeq,1h during those working hours.

ES section 9.5 contains an assessment of the effects of demolition and construction. The assessment contains predicted LAeq,1h noise levels at seven neighbouring receiver locations. Table 9.8 gives the predicted noise levels from demolition. These noise levels are generally not significantly above 65 dB LAeq,1h, although 67 dB is predicted at Little Brook Nursery. The ES claims that the effects of demolition will be adverse, short-term, local and temporary and of minor significance. Table 9.9 gives predicted noise levels from excavation. The highest of these predicted noise levels is 71 dB at 454 Bath Road. This is of some concern because the property concerned is an existing residential property. Table 9.10 gives predicted noise levels from piling activities. The highest of these predicted noise levels is 71 dB at Abbey Business Centre. This would be of less concern in view of its business use. The ES claims that the effects of excavation and piling will be adverse, short-term, local and temporary and of minor to moderate significance. The ES claims that effects at the most affected sensitive receptors (454 Bath Road and Abbey Business Centre) can be reduced to minor significance by using mitigation. The ES also claims that noise impact from construction traffic will be of negligible significance.

ES section 4.1 recommends use of a planning condition requiring a Construction Environmental Management Plan (CEMP) securing best practice in relation to demolition and construction. According to ES section 9.5.8, a range of mitigation measures would be incorporated into the CEMP. These measures include use of a 2.4 metre high hoarding on the external boundaries of the construction site, and the use of silenced plant and equipment whenever possible. Accordingly, should approval be granted the submission of a CEMP should be secured by way of condition.

In order to give specific advice on controlling nuisance from demolition and construction work, an informative regarding the control of environmental nuisance from construction work should be attached should approval be granted.

Conclusion:

No objections are raised subject to imposition of the conditions and informatives as above.

- Contamination

The following documents were submitted with the application in relation to land contamination:

- Chapter 12 Soil and Ground Contamination (consisting of a desk study), Environmental Statement Volume 1, Heathrow West Hotel (November 2009)
- Chapter 12.1 Envirocheck Report, Environmental Statement Volume 4: Appendices Part 2, Heathrow West Hotel (November 2009) (1996 Albury report missing in appendices)

The contamination chapter consisted of a review of the contamination policies, historical map information for the site and surrounding area, Envirocheck information and limited ground investigation information for some of the site from 1996 (not all information indicated as being included in the appendices appears to have been provided). The ground investigation identified quite high levels of benzo(a)pyrene on parts of the site. The limited gas monitoring carried out at the site in 1996 did not indicate significant levels of gas, however key data was missing from the gas monitoring information.

Based on the above information and the proposal for the hotel, which includes a basement car park, risk from the various sources identified has been determined to be negligible. The report does however indicate there may be contamination in some parts of the site which have not been investigated and identifies potential sources of contamination based on the historical use, which

includes the area of the electricity substation and possible hydrocarbon contamination from vehicles, parked and stored on site, and recommends further investigations are carried out at the site.

The standard contaminated land condition should be attached to any permission that may be given. It appears further ground and gas investigation works may be undertaken at the site, and this information is required to determine if remedial works are required at the site.

TREES/LANDSCAPE OFFICER

Overall, the scheme is unacceptable in terms of Saved Policy BE38 of the UDP, because it makes inadequate provision for the long-term retention of trees in proximity to the buildings and associated structures and hard-surfaces, the loss of which would, in addition to the direct loss of trees, be detrimental to the visual amenity and arboreal/wooded character of the locality (and the Green Belt).

S106 OFFICER

Proposed heads of terms:

- The provision of a 10-year Green Travel Plan to be prepared in accordance with TfL guidance and to include a bond of £20,000.
- That the applicant enters into a S278 agreement for any/all works on the highway that may include provision of a pedestrian crossing, signage, road markings, dropped kerbs, tactile paving, etc.
- A scheme to be submitted to and approved by the Council detailing how construction training will be provided to Hillingdon residents, or a contribution towards construction training for Hillingdon residents in the sum of £2,500 for every £1 million construction cost.
- A scheme to be submitted to and approved by the Council detailing how hospitality training will be provided to Hillingdon residents, or a contribution towards hospitality training for Hillingdon residents in the sum of £400 per employee.
- A contribution of £25,000 towards the management of air quality within the vicinity of the site.
- A contribution of £50,000 towards public realm improvements within this area.
- 5% of total cash contributions secured towards the management and monitoring of the resulting agreement.

POLICY AND ENVIRONMENTAL PLANNING

The London Plan sets out the Mayor's strategic objective for the future of Green Belt Land in London and aims to ensure that Green Belt is maintained and protected.

Policy 3D.9 sets out the Mayor's strategic objective for the future of Green Belt Land in London and aims to ensure that Green Belt is maintained and protected. The London Plan states that there is a general presumption against inappropriate development in the Green Belt, and such development should not be approved unless in very special circumstances. Alterations to green belt boundaries should be considered through the DPD process in accordance with government guidance in PPG2

Under the terms of UDP Policy OL1 development in the Green Belt is not acceptable unless it is agriculture, cemetery or recreation related. The proposal does not meet these criteria.

Additionally, Policy OL5 only permits development adjacent to or conspicuous from the Green Belt if it would not harm the character and appearance of the Green Belt. Officers would also need to be satisfied that the proposed scheme would not harm the character and appearance of the Green Belt.

As part of the evidence base for the LDF, and in response to representations for land to be removed from the Green Belt, the Council assessed the section of Green Belt at 470 Bath Road against a number of criteria. The Assessment concluded that the 470 Bath Road site does not meet any of the purposes of Green Belt land and does not safeguard the countryside, and recommended the removal of the Green Belt designation. This recommendation will be taken forward through the Site Allocations DPD consultation process. The Site Allocations DPD is due for adoption in summer 2012 and until this time the site will remain within the Green Belt and the proposals remain contrary to green belt policy.

The proposals are currently unacceptable as they are contrary to Green Belt policy. Alterations to the Green Belt designation on this site will be considered through the DPD process.

ACCESS OFFICER

The proposed facility will be subject to the Disability Discrimination Act 1995 (amended 2005) because it will provide a service to the public. It should be noted that reasonable adjustments to practices, policies and procedures, auxiliary aids, and physical features should be fully considered and specified as part of the design brief to ensure that disabled people receive the same level of service.

The applicant is reminded of the duties set out in the Disability Discrimination Act 1995 (as amended 2005), with regard to employment and service provision. Whilst an employer's duty to make reasonable adjustment is owed to an individual employee or job applicant, the responsibility of service providers is to disabled people at large, and the duty is anticipatory. The failure to take reasonable steps at this stage to facilitate access will therefore count against the service provider, if/when challenged by a disabled person. It is therefore recommended that the applicant takes full advantage of the opportunity that this development offers, to improve the accessibility of the premises to people with mobility and sensory impairments.

It is considered that the Design & Access Statement and accompanying plans lack the necessary detail to ensure that the proposed hotel will allow disabled people equal choice, safety and spontaneity as non disabled people. Revised plans and an amended Design & Access Statement should be submitted prior to any planning approval.

WASTE SERVICES

The dwelling houses should incorporate into their design storage provision for an average of 2 bags of recycling and 2 bags of refuse per week plus three garden waste bags every 2 weeks.

All internal roadways within the development should be of sufficient strength to support the weight of a standard refuse collection vehicle (40 tonnes max).

Adequate access/space must be provided on site for the manoeuvring of refuse vehicles. A refuse vehicle measuring 12.4m by 2.5m by 4m will require a turning circle of at least 21m.

All residential properties should be provided with food waste grinders as part of their kitchen sink unit to allow residents to indirectly recycle their food waste by grinding it and washing it down into the waste water system for composting by the relevant water company.

SUSTAINABILITY OFFICER

- Ecology

The application was submitted with an environmental statement (ES) as part of the environmental impact assessment (EIA) regulations. Ecology was included within chapter 7 of volume 1 of the

ES, and the habitat and species surveys were included within chapters 7.1 to 7.4 of the ES volume 4 part 1.

PPS9 requires development to promote and enhance biodiversity on sites. The development is situated next to the Duke of Northumberland River. This provides an ideal opportunity to promote and enhance the environmental setting of the development site. The information provided with the application does not sufficiently demonstrate that the development is protecting and importantly enhancing the natural environment. The Hotel guests present a possible strain on the existing habitats and accordingly appropriate mitigation is required.

The application does not comply with Policy 3D.14 of the London Plan.

- Flood Risk

Objection on the grounds of development and flood risk.

The majority of the built development will be located within flood zone 2 as shown on the Environment Agency's flood zone map. Flood zone 2 is described as being between a 1% and 0.1% (1:100year and 1:1000year) flood event.

Planning policy statement sets out a sequential approach to managing new development and flood risk. All development should ideally be located within Flood Zone 1. Where development is proposed outside this zone, an applicant must demonstrate that there is no other reasonably available land to locate the development.

If development is proposed in flood zones 2 or 3 then the applicant must demonstrate application of the sequential test.

The information provided by the applicant does not satisfy either the requirements of the sequential test or the principals of PPS25. Paragraph 6.3 of the applicant's flood risk assessment attempts to apply the sequential test to the development. However, it uses a table that does not appear in any of the guidance and is geared towards a successful application without the submission of supporting data.

The information is therefore inadequate to demonstrate application of the sequential test as set out in PPS25.

The development is therefore contrary to the policies of PPS25

- Energy

Objection as the development does not meet the London Plan requirement for 20% of the whole energy use to come from renewables.

The energy strategy is focussed around a gas fired CCHP plant. This is not a form of renewable energy. The energy strategy states that only 2.5% of the energy requirement will come from renewable energy sources.

Heathrow Airport is a significant contributor to carbon emissions. It has also encouraged an intensification of commercial and industrial uses, which all contribute heavily to the carbon footprint in the Borough. In addition, the area has deteriorating air quality. The 20% renewables requirement outlined in the London Plan is specifically to help reduce the impact new development has on carbon emissions. Insufficient information has been provided with the application to demonstrate why it is not feasible to attain a 20% renewables target. It is also important to note that the London Plan requires 'whole energy use' to be assessed. This does not appear to have been done for this development.

The proposals do not comply with Policy 4A.7 of the London Plan.

7. MAIN PLANNING ISSUES

7.01 The principle of the development

Pt1.28 and Policy T4 of the Hillingdon Unitary Development Plan Saved Policies September 2007 encourage appropriate hotel and conference facility provision in the borough. In addition the London Plan 2008 identifies a need for a net increase of 40,000 hotel rooms across London, and the provision of new visitor facilities in London is encouraged by Policy 3D.7. The Greater London Authority Hotel Demand Study (2006) also identifies a need for additional hotel accommodation in London, the majority of which would be required by 2012. Therefore there is no objection per se to the provision of hotel development in this part of the borough.

Nevertheless, part of the site falls within the Green Belt and it is therefore necessary for the applicant to demonstrate that a case of very special circumstances exists if an exception is to be made to established Green Belt policy. In support of the application, the applicant has submitted a PPG2 Justification Statement. This argues that the development would provide significant benefits, including the creation of a linear riverside corridor; enhancements to the ecology and biodiversity of the site and surrounding area; provision of local employment and training opportunities; and refurbishment and re-use of a listed building. In addition it argues that the Green Belt area has been eroded and is now physically and visually isolated from surrounding Green Belt by built development, and has failed to stop the encroachment of development from the east. It does not provide recreational or leisure facilities and no longer functions as an areas of Green Belt resulting in its proposed deletion in the Council's Draft Core Strategy.

Despite the applicant's argument, it is not considered that sufficient special circumstances exist to justify an exception to established and current Green Belt policy. The applicant makes reference to the Draft Core Strategy (dated 2005 and revised in 2007), which will eventually form part of the Council's Local Development Framework (LDF). However, this document has not been formally adopted and there have been numerous changes in policy since that time. Notably, the Council is due to carry out further consultations on its Core Strategy and Proposals Map later this year. The potential removal of the site from the Green Belt would be taken forward through the Site Allocations DPD consultation process. This is due for adoption in summer 2012. Until such time as that document is formally adopted, very limited weight can be given to it, particularly given potential changes that could occur following consultation, and the proposal must be assessed against current planning policies.

The applicant argues that the site does not meet the Green Belt objectives set out in PPG2 and, as such, no longer forms a Green Belt function. However, PPG2 makes it clear that the extent to which land fulfils these objectives is not a material factor in the inclusion of land within the Green Belt or for its continued protection stating that:

"although Green Belts often contain areas of attractive landscape, the quality of the landscape is not relevant to the inclusion of land within a Green Belt or to its continued protection. The purposes of including land in Green Belts are of paramount importance to their continued protection and should take precedence over the land use objectives."

It goes on to state that the 'essential characteristic of Green Belts is their permanence' and that 'their protection must be maintained as far as can be seen ahead.'

The aims of PPG2 are reiterated in the London Plan and the Hillingdon Unitary Development Plan Saved Policies (September 2007) (UDP). Policy 3D.9 of the London Plan states that 'there is a general presumption against inappropriate development in the green belt, and such development should not be approved except in very special circumstances.' Policies OL1 and OL2 of the UDP seek to protect the Green Belt from inappropriate development, stating clearly that the Local Planning Authority will not grant planning permission for new buildings, or the change of use of existing buildings, other than for uses associated with agriculture, horticulture, forestry, nature conservation, open air recreational facilities or cemeteries. Notably these policies seek to limit the number and scale of buildings permitted, and, together with Policy OL5, which relates to developments adjacent to or conspicuous from the Green Belt, seek to enhance the visual amenities of the Green Belt.

Whilst it is acknowledged that the existing Green Belt at this site is currently poorly maintained, the aims and objectives of PPG2, the London Plan and Policies OL1, OL2 and OL5 of the UDP are clear that the protection of existing areas of Green Belt is of paramount importance. It is not considered that the applicant has demonstrated sufficient special circumstances to justify an exception to established Green Belt policy and, as such, the principle of the development cannot be supported in this location.

7.02 Density of the proposed development

The London Plan density matrix, and HDAS guidelines relate specifically to residential properties. As such, the density of commercial and industrial schemes needs to be assessed on a case by case basis. The surrounding area is largely characterised by 2-3 storey residential developments to the west, and larger scale commercial developments to the east. Nevertheless, with an internal floor area of 29,976m² and at up to six storeys in height, the proposed hotel would be one of the largest buildings in this locality. Given the sensitive nature of the site, particularly given the location of Listed Buildings along its southern frontage, its design must ensure that it does not appear as over prominent or represent an over development of the site which would appear out of keeping with the character and appearance of the surrounding area. The visual impacts and design of the scheme are assessed later in the report.

In terms of the residential properties, the London Plan density matrix, and HDAS guidelines should be considered. The western side of the site has a Public Transport Accessibility Level (PTAL) of 1a and the eastern part has a PTAL of 1b. The site falls within a suburban area as defined in the London Plan (2008). The London Plan range for sites within a PTAL of O-1 in a suburban area is 150-200 habitable rooms per hectare and 35-55 habitable rooms per hectare. In compliance with the Council's Supplementary Planning Document on Residential Layouts, habitable rooms with over 20m² of floorspace would be counted as two rooms. As such, based on a site area of approximately 1,800m², which the plans indicate would comprise the six replacement residential properties and associated parking and amenity space, this element of the development would have a density of 166.7 habitable rooms per hectare and 33.3 units per hectare. This complies with London Plan guidelines in terms of habitable rooms per hectare. Whilst it is slightly below the guidelines in terms of units per hectare, this level of density is considered to be acceptable for this suburban location on the edge of Longford Village.

7.03 Impact on archaeology/CAs/LBs or Areas of Special Character

Whilst the site does not fall within an Archaeological Priority Area, it does lie in an area with potential for archaeological remains. However, English Heritage have confirmed that they have no objections to the proposal subject to an appropriate condition requiring the applicant to secure the implementation of a programme of archaeological work prior to the commencement of the development.

The site does not fall within a conservation area or area of special local character. The nearest part of the Longford Conservation Area is approximately 115m to the west of the nearest part of the site. However, views of the proposed hotel from the Conservation Area would be largely obscured by tree screening, both adjacent to its boundary and along the western boundary of the application site, and by existing buildings on the adjacent Waterlife Centre site. As such, despite the height of the proposed hotel, it is not considered that it would have any significant impact upon the character or appearance of the conservation area.

The application site comprises an existing locally listed detached residential property towards its south west corner, and a Grade II Listed detached dwelling and outbuilding along its southern boundary. Whilst many of the windows in the locally listed building are boarded up, the garden appears to be relatively well kept, and it is assumed that it has been lived in until relatively recently. However, the Grade II Listed property appears to be derelict. No objections are raised to bringing these buildings back into use for hotel related purposes, although limited details of the exact proposed use and any physical changes which may be required have been provided at this stage. Any changes to the properties would be subject to separate listed building consent.

The front elevation of the proposed hotel building, fronting Bath Road would have a width of approximately 28m, stepping back to approximately 31m and forming the first, and smallest, of four horizontal blocks. This is slightly narrower than the 32m wide footprint of the existing row of five terraces it would replace. At three storeys high (albeit the third storey is set marginally back from the front elevation) it would be approximately 1m taller than the existing terraces. It is set a sufficient distance away from the adjacent listed and locally listed buildings so as not to harm their setting, providing an appropriate design is proposed which would be in keeping with the character and appearance of the wider Bath Road street scene, in addition to these properties.

In terms of visual impact, the ground and first floor would extend in height to just below the ridge of the locally listed building adjacent. Modern in design, it would comprise brick and glass curtain walling, with projecting pavilions with green walls. Although its horizontality would be alien to the surrounding roofscapes, it is considered that this ground and first floor design could nevertheless be accommodated without significant loss to the quality of the streetscene, the exception to this being the lightwell, proposed at the front of the building to light the meeting rooms in the basement. This would be likely to be a visible and discordant element amongst the simple garden frontages along this road.

The third floor, albeit set in from the side elevations, would have a bulky and vertical appearance, and rather than appearing as subordinate to the main front elevation in order to soften its visual impact, it would be constructed in the same plane as the principal front elevation, be of the same height, or higher, than the ground and first floor, and have large windows matching those on the lower floors. Although timber cladding would be introduced to soften the appearance of this storey, it is considered that it would serve to draw attention to its height and bulk, which would loom over the existing buildings to either side of it.

The Council's Conservation Officer has raised significant concerns over the design of this element of the hotel. It is considered that due to its height, bulk and design, this element of the proposed hotel would appear as out of keeping with the character and appearance of the adjacent properties and would have an unacceptable impact upon the Bath Road streetscene and surrounding area. This is demonstrated in the applicant's visual assessment, submitted as part of their Environmental Statement, which shows that the

proposed building would be clearly visible in views along Bath Road, significantly altering the skyline and appearing as a dominant feature within the streetscene.

7.04 Airport safeguarding

BAA Safeguarding and National Air Traffic Services (NATS) have both confirmed that they have no objections subject to relevant conditions and informatives.

7.05 Impact on the green belt

An area of approximately 3,825m² in the north west corner of the site is designated as Green Belt. It is proposed to realign this area to provide a 3,049m² riverside corridor along the western boundary of the site. This area would be opened up for public access, providing an informal link between Longford Village and Harmondsworth Moor to the north. The applicant argues that this corridor would improve the quality of the landscape, and improve the links to adjacent areas of Green Belt. Whilst it is acknowledged, that the existing Green Belt is unkempt; characterised by overgrown and unmanaged vegetation, and heavily littered, and the creation of the linear park would have clear benefits in terms of creating an attractive pedestrian link between nearby Green Belt to the north and south, PPG2 is clear that 'detailed Green Belt boundaries should not be altered or development allowed merely because the land has become derelict.'

The principle of development has been largely discussed in part 7.01 of the report and the applicant's argument that the site is shown as deleted from the Green Belt in the Council's draft Core Strategy is noted. However, as discussed above, at this stage this document is aspirational only and subject to change. Consultations on the Core Strategy are unlikely to take place until later this year, and the document is unlikely to be adopted before 2011. The Site Allocations DPD, which seeks to identify land for future development to help deliver the objectives of the Core Strategy, is due for public consultation in June/July 2010 and unlikely to be adopted before summer 2012. As such, given that these documents are at relatively preliminary stages, the proposal should be assessed against current planning policy as set out in PPG2, the London Plan and the current UDP.

Notwithstanding the above, the visual impact of the proposal on adjacent Green Belt must be taken into consideration. Policy OL1 of the UDP states that only uses associated with agriculture, horticulture, forestry, nature conservation, recreational use or cemeteries will be permitted in the Green Belt, in order to protect its openness and visual amenity. This reflects guidance in PPG2. Policy OL5 of the UDP seeks to protect the Green Belt from nearby development which may prejudice its visual amenity. Given that the development would result in the loss of 3,825m² of Green Belt the development is considered to be totally unacceptable and contrary to current planning policy. Even if the argument that this loss would be off-set by the creation of the proposed linear park was acceptable, there would still be a loss of 776m² of Green Belt.

This is a large site and it is considered that development proposals should seek to retain and enhance the existing Green Belt land in compliance with London Plan and UDP policy and guidance in PPG2, which aim to improve and retain its openness. However, it is noted that even if the Green Belt were to be retained at this site, it is unlikely the erection of an immediately adjacent 6-storey high building would be acceptable.

It is acknowledged that the land immediately to the west of the application site is largely developed and covered in hardstanding. It is nevertheless designated as Green Belt in the UDP and, as such, consideration must be given to the impact of the proposed development on its visual amenities. The applicant's visual appraisal suggests that the proposed hotel would have a 'major beneficial' impact on existing views from this site. However, the images provided clearly show that the existing views from here are open,

characterised by landscaping and tree planting along the river corridor, with the Green Belt beyond, whereas the proposed hotel, which would be up to 6-storeys in height, would appear as a prominent and domineering feature from here, clearly visible and detrimental to the openness and visual amenities of this part of the Green Belt. In addition the Visual Assessment demonstrates that the proposed building would be clearly visible in views from Harmondsworth Moor to the north, which surrounds British Airways' Waterside building. Similarly this would appear as a prominent feature in the currently relatively open views available from here, marring the skyline and detrimental to the visual amenities of this part of the Green Belt.

Notably the Visual Assessment acknowledges that 'the proposed development will have a direct and permanent effect on the Green Belt located on the development site' and it is clear that the applicant is relying on the creation of the proposed linear park to off-set these impacts. However, regardless of the benefits the creation of the linear park could provide, this is not sufficient to off-set the loss of the existing Green Belt at the application site, or the visual impact it would have on the character, openness and visual amenities of surrounding Green Belt land to the west and north.

7.07 Impact on the character & appearance of the area

The impact of the development on the Bath Road street scene and on the Green Belt has been addressed in parts 7.03 and 7.05 of the report respectively.

As discussed above, and whilst officers have raised concerns over its design, the part of the hotel fronting Bath Road would only be three-stories in height and has been designed to reflect aspects of the smaller scale residential and historical character of Longford Village. The building progressively steps up in height and scale towards the north of the site to reflect the more commercial character of the A4 Colnbrook By-Pass.

The element of the building fronting the A4 would measure approximately 19m high by 62.5m wide and would be clearly visible from the A4 and surrounding area. This compares to a height of only approximately 14m for the adjacent Abbey Business Centre. It is acknowledged that the plans indicate the Abbey Business Centre would have a width of 83m, however, due to the reduced height, variation in roof form and articulation of the front elevation this building does not appear as overly dominant or out of character with the surrounding area. The application site lies on the edge of the built up area of Bath Road, and to the west of the site the land is significantly more open, characterised by large swathes of Green Belt. Whilst there are large buildings in relatively close proximity to the application site, including the Harmondsworth Detention Centre and Colnbrook Immigration Removal Centre to the north and Waterside, British Airways' headquarters building, to the north west, these buildings are set well back from the street frontage and, accordingly, their visual impact is limited. Notably the large Waterside building is set within a parkland setting, set over 100m back from the road and, as such, has limited visual impact compared to the proposed hotel. Similarly the large scale Harmondsworth Detention Centre and Colnbrook Immigration Removal Centre buildings are set well back from the road, behind residential properties and areas of car parking, which reduces their visual impact.

Whilst there are hotels and offices of more comparable height and scale to the proposal further east along the A4, that area is much more commercial in character, than this part of Bath Road, which is much more open and typically characterised by much smaller scale developments. The proposed building would be clearly visible from the east and west along the A4 and from the surrounding area, and would appear as a prominent and incongruous feature within the A4 streetscene, detrimental to the visual amenities of the

area.

In terms of the Bath Road street scene, the applicant's Visual Assessment shows that the building would be clearly visible in short and long distance views along the road, particularly to the west. Whereas the part of Bath Road to the east of the application site is characterised by commercial buildings, to the west it is characterised by low level residential properties, many with relatively green frontages. Particularly in views from the west it is considered that the proposed hotel would appear as a prominent feature which would be out of keeping with the character and appearance of the streetscene and surrounding area and detrimental to the visual amenities of the locality. In closer views it is considered that, due to its design, it would be particularly out of keeping with the character of the surrounding historical buildings, to the detriment of the visual amenities of the street scene. This issue has been discussed further in part 7.03 of the report.

In terms of the residential properties, no objections are raised to their size, scale or layout. However, in terms of their detailed design this does not appear to reflect the character and appearance of existing residential properties within the locality and, as such, it is considered that further work needs to be carried out on their design to ensure they are visually acceptable in this location. This is discussed further in part 7.11 of the report.

7.08 Impact on neighbours

The nearest residential property to the proposed development is 454 Bath Road, which is located along the northern side of Bath Road between the existing Grade II Listed Building, forming part of the application site, and 452 Bath Road, which would be demolished and redeveloped to provide the proposed six new dwellings. The property benefits from mature tree planting around its site boundaries.

The Grade II Listed Building and its garden would be retained and brought back into use for hotel related accommodation purposes. Given that its use would not change significantly, it is not considered that this would have any significant detrimental impact on the amenity of no.452 Bath Road, and, in addition to existing landscaping, it would significantly screen views of the hotel beyond.

To the east, the existing large detached residential property would be redeveloped to provide six residential dwellings. However, these would be located so as to maximise their distance from the existing property and, given the extensive tree screening around this property, together with the distance between the properties it is considered they would have a limited impact on residential amenity.

There would be no issues regarding overlooking, loss of light or overshadowing, and notably no objections have been received from officers in the Council's Environmental Protection Unit regarding potential noise or disturbance impacts. Accordingly it is not considered that the proposed development would have a significant impact on the residential amenity of occupiers of no.454 Bath Road sufficient to justify refusal.

Residential properties are also located to the west of the application site beyond the Duke of Northumberland River. However, significant screening would be provided by existing and proposed landscaping along the river corridor, and by the proposed linear part along the western boundary of the site and, as such, it is not considered that the proposal would have any significant impact upon the residential amenity of occupiers of those properties.

The A4 Colnbrook By-Pass dual carriageway provides a significant barrier between the application site and properties to the north and, accordingly it is not considered that the

scheme would have any significant detrimental impact on the residential amenity of occupiers of these properties in terms of noise, disturbance, or overlooking. Whilst the development would be clearly visible from the front windows of these properties, given the nature of this part of the A4, which is largely characterised by large scale commercial development, the barrier provided by the A4, and landscaping which would be provided along the northern boundary of the hotel site, it is not considered that it would harm the outlook from these properties so significantly so as to justify refusal.

To the south, of the site, the development would be visible from both Margaret Cassidy House and Longford Cottage, on the southern side of Bath Road. However, from here the scale of the proposed development is broken up by existing buildings along the site's southern boundary, and the scheme is smaller in scale in order to try and reflect the more residential nature of this part of Bath Road. As such, whilst concerns have been raised over the design and visual impact of the proposal on the Bath Road street scene, it is not considered that the development would have a significant impact on the residential amenities of these properties.

Notably no objections have been received from residential properties directly adjoining or overlooking the application site.

7.09 Living conditions for future occupiers

Policies relating to living conditions largely relate to residential developments, and there are no specific guidelines relating to hotel guest accommodation. Nevertheless, issues such as overlooking and privacy should be considered.

Overlooking could occur from the inward facing windows. However, the windows could be treated to prevent direct overlooking into the affected rooms and given the transient nature of hotel guests this is not considered to be a significant concern sufficient to justify refusal. As such, should approval be granted it is recommended that a condition requiring the submission of details to prevent privacy impact is attached.

In terms of the residential properties, the Council's Supplementary Planning Document on Residential Layouts states that a minimum of 81m² internal floor space should be provided for two-storey three-bedroom houses. Four of the properties would have internal floor areas of approximately 91.4m² and two of the properties would have internal floor areas of approximately 94.6m². This exceeds these guidelines.

The Council's Supplementary Planning Document on Residential Layout states that a minimum of 60m² external amenity space should be provided for 3-bedroom houses. With private garden areas ranging from approximately 64.4m² to well over 100m² the proposal exceeds these guidelines.

The applicant has submitted a Daylight, Sunlight and Overshadowing report as part of the Environmental Statement. This assesses the sunlight and daylight impact of the proposed hotel and dwellings on existing development, the daylight and sunlight amenity of the proposed new dwellings, and also the impact of the proposed hotel on the proposed new dwellings. It concludes that there would be no detrimental impact on existing or proposed developments in terms of loss of light or overshadowing and that relevant BRE guidelines are met in each case.

In terms of potential overlooking issues relating to the proposed residential properties, the nearest existing property, no.454 Bath Road, is located over 21m away to the west, which exceeds guidance regarding overlooking as set out in the Council's Supplementary

Planning Document on Residential Layouts. In addition, this property would be significantly screened by existing trees and vegetation around its site boundary.

The layout of the proposed dwellings has been designed so that no habitable rooms directly face or overlook each other and, as such, it is not considered that the positioning of the properties would have any detrimental impact on the residential amenity of future occupiers.

7.10 Traffic impact, Car/cycle parking, pedestrian safety

For the hotel, undercover parking for 17 vehicles, including one disability standard space, would be provided at surface level towards the rear of the building. Parking for 162 cars, including 17 disability standard spaces, would be provided in the basement with access and egress via a one-way ramp. This would provide a total of 18 (10%) disability standard spaces in compliance with current Council policy, and 179 car parking spaces. 16 motorcycle parking spaces would also be provided within the basement.

A total of 60 cycle parking spaces would be provided across the site, 15 within the listed outbuilding towards the southern side of the site, where shower and changing facilities would also be provided, 15 within a covered parking area to the north of the hotel, and 30 within a covered shelter along the pedestrian route into the site adjacent to 452 Bath Road. Whilst the exact location is not clear from the plans, there is sufficient space for provision of this on site and further details would be required by way of condition should approval be granted.

A deliveries and surfacing area, with access to the waste refuse area and goods lifts, would be provided at ground floor level adjacent to the car parking area.

A drop-off and pick-up zone for coaches, buses, cars and taxis would be provided outside the main entrance to the hotel. This would accommodate parking for up to two coaches and five taxis. This is considered to be acceptable and notably no objections have been raised by Transport for London on these grounds. Further details of this area would be required by way of condition should approval be granted.

The primary hotel access to the hotel site would be via a new slip-road from the west-bound carriageway off the A4 Colnbrook By-Pass. Vehicles approaching along the east-bound carriageway would need to proceed past the site and return along the west-bound carriageway via a nearby existing roundabout, located opposite McDonalds approximately 250m to the east of the proposed new access. This one-way access would continue through the site, providing access to the car parking and servicing areas, and hotel entrance forecourt, before converging with the existing shared Abbey Business Park route which would provide egress from the site.

In terms of number of parking spaces, there are no specific guidelines within the UDP Saved Policies September 2007 or the London Plan 2008 and, as such, it is for the applicant to justify the number of spaces in their Transport Assessment. The applicant's Transport Assessment confirms that the quantum of parking spaces and level of resultant traffic movements would not cause an adverse impact on the highway network. Notably Transport for London have confirmed that this level of parking is acceptable and have raised no objections regarding highway safety.

Transport for London encourage the provision of electric charging points in compliance with policies within the draft London Plan, and suggest that further details should be provided regarding how the car park will operate by way of a parking management plan.

These details could be secured by way of condition should approval be granted. This would also seek to ensure that the car park was not used for long-stay parking whilst guests were not present at the hotel.

Similarly Transport for London are supportive of the level of cycle parking provision and shower and changing facilities. TfL suggest CCTV coverage should be provided as an added security measure for these facilities. It should be noted that should approval be granted the application would be required to meet relevant secured by design criteria and that this would be secured by way of condition.

No objections have been raised to the creation of a new access from the A4, subject to detailed design which would be secured via a S278 agreement should approval be granted.

In terms of the egress onto Bath Road, it is not considered that this would have a significant detrimental impact on the London Borough of Hillingdon road network. Notably to the west of this egress point there is a bus only access to the residential area of Longford Village and, as such, traffic from the hotel wishing to travel in an eastwards direction would need to travel past commercial properties along Bath Road to the east of the application site, before joining the A4. Given that no access could be gained to the hotel via the shared Abbey Business Centre access way, there would be no need for traffic to travel through Longford Village from the east to access the site. Accordingly, it is not considered that the proposal would lead to a significant increase in traffic through the sensitive residential area of Longford Village, to the detriment of residential amenity.

Residents have raised concerns over the potential increase in Heathrow Hotel Hoppa Buses passing through the village, and notably the applicant has committed to using this service through their Travel Plan. However, it should be noted that these buses already serve the Thistle Hotel opposite and, as such, it is not considered that the proposal would lead to a significant increase in these vehicles passing through the village.

Transport for London have suggested that additional information should be provided in the applicant's Travel Plan. However, should approval be granted a full Green Travel Plan would be secured via a S106 agreement.

In terms of the proposed residential properties it is proposed to provide a total of nine car parking spaces, including one disability standard space. The applicant suggests that one space would be allocated to each property, and the remaining three spaces would be used by visitors or disabled users. The existing access to no.452 Bath Road would be removed and these would be accessed via a new vehicular access further west along Bath Road.

The Council's Car Parking Standards require a maximum provision of 1.5 spaces per dwelling for flats and houses without individual curtilages. It is noted that TfL have objected to this level of provision and suggest that a ratio of one space per dwelling should be provided. However, it is noted that the London Plan provides a guideline of 1-1.5 spaces per dwelling for three-bedroom properties. Whilst, the proposed parking provision lies within the maximum London Plan standards it complies with current UDP standards and, given the site's low PTAL of 1b, is considered to be acceptable in this location.

Whilst these properties would be to the west of the bus only access discussed above and, as such, would need to travel through the village to gain access, it is not considered that

they would have a significant impact on traffic flows, highway or pedestrian safety, or create such additional noise or disturbance so as to impact significantly on the residential amenity of existing residents.

In terms of pedestrian access to the site, the applicant confirms that pedestrians would have priority over both vehicles and cycles. New pedestrian access points from the A4 are proposed adjacent to the main vehicle access slip road leading to the entrance forecourt. A second entrance from the A4 would be located adjacent to the river corridor, where it is proposed to provide a new pedestrian crossing as part of the S278 works in agreement with TfL. This would provide access through the site, alongside the river corridor, to Bath Road.

From Bath Road the primary pedestrian access point would utilise as existing gated entrance, shared with cyclists, into the grounds of the Grade II Listed Building. This would continue through the garden to connect with the entrance forecourt and the northerly access from the A4.

A new footpath would be created alongside the new exit road from the hotel, linking with the existing Abbey Business Centre access.

The application proposes the loss of part of the existing car park serving the Abbey Business Centre. It is unclear how many spaces would be lost, however, aerial photographs suggest this could be in the range of 60 spaces. The Transport Assessment fails to address the loss of the parking of the likely implications it could have on the surrounding area. It is likely the car parking provision at the Abbey Business Centre, which dates from the mid-nineties, exceeds current Council Parking standards. In addition, due to parking restrictions in a wide area surrounding the application site, it is not considered that this is likely to create a significant increase in on-street parking, unacceptably adding to congestion or detrimental to highway or pedestrian safety. As such, it is not considered a refusal reason could be justified on these grounds. However, it is recommended that an informative be added advising the applicant that this information should be provided as part of any resubmission.

7.11 Urban design, access and security

The proposed hotel would be aligned in a north-south direction, characterised by four linear elements or 'fingers' which would be connected by subordinate blocks. The development would progressively increase in height from two/three storeys fronting Bath Road to six-storeys towards the middle of the site, and then back down to 5-storeys fronting the A4 Colnbrook By-Pass. This design approach has been adopted in order to attempt to address the differing character and scale of development to the south and north of the site.

The southern building line of the hotel follows that of the existing terraced dwellings which would be demolished as part of the scheme and at two-storeys in height, with a third-storey set back, seeks to reflect the height scale of surrounding development, including the three-storey Margaret Cassidy House opposite. The central portion would be set back from the ends to create a pavilion style effect which seeks to better articulate the building and reduce its perceived mass and scale. The third-storey would be set back and would be clad in timber panels in order to soften its visual impact on the streetscene, whereas the first and second storeys would be predominantly clad in red brick to create a contemporary design whilst reflecting on the use of brick on surrounding buildings. Large windows would be provided on all levels, and the pavilion ends would be characterised by the provision of green walls.

At five-storeys in height, the northern facade of the building would be significantly larger in height and scale to the Bath Road frontage, in order to reflect the more commercial nature of the A4. Similarly to the south elevation, the upper level would be set back and clad in timber in order to soften its visual impact and add articulation to the facade. Again the facade would be predominantly clad in red brick. Glazing would be provided to the main cores, and the fenestration would be interspersed with coloured metal panels in order to add visual interest.

The east and west facades would be broken up and articulated through a combination of the protruding linear 'fingers' and subservient connecting blocks, fenestration and materials. The linear blocks or 'fingers' would be faced with red brick, whereas the recessed link blocks would comprise a white render.

The east elevation also comprises the main entrance into the hotel and communal frontages such as the bar and restaurant. The entrance would comprise a two-storey glazed facade, with the pedestrian entrance demarcated through a canopy. The northern extent of the eastern facade also comprises the vehicular access to the parking areas.

The Council's Urban Design officer has raised no objections to the hotel design. However, whilst it is acknowledged that the design may be acceptable in isolation, as discussed above, when considered in context with the surrounding area, significant concerns are raised over its visual impact of the character and appearance of the surrounding area.

In terms of the proposed residential aspect, the layout has been arranged so that one detached dwelling fronts Bath Road, with the remaining five houses forming a terrace to the rear. No objections are raised to the general layout of the proposed properties, which it is considered would appropriately reflect the character of other residential developments in the area. However, concerns are raised over the proposed design, particularly in terms of their unarticulated and somewhat bland appearance, which fails to reflect the traditional detailing, and strong gable features characteristic of properties in this area. Accordingly, it is not considered that the proposed properties would fully integrate into the local vernacular, detrimental to the visual amenities of the street scene and surrounding area.

7.12 Disabled access

The applicant has submitted a Design and Access Statement which confirms that all entrance thresholds to the hotel and residential buildings would be level or slightly ramped with opening widths and doors designed in compliance with current regulations and Disability Discrimination Act (DDA) requirements. It also confirms that the residential properties would be built to lifetime homes standards. However, very limited information has been provided at this stage.

The Council's Access Officer has advised that insufficient information has been provided to demonstrate that the proposed hotel would be fully accessible and meet relevant requirements in accordance with the Disability Discrimination Act 1995 and Part M of the Building Regulations. A refusal reason is recommended on these grounds.

7.13 Provision of affordable & special needs housing

The proposed residential units would off-set the loss of those which would be demolished as part of the hotel development. Accordingly, there is no requirement to provide affordable or special needs housing for this development.

7.14 Trees, landscaping and Ecology

TREES/LANDSCAPING

The site is predominantly flat, open and not built upon, although there are several houses

along the Bath Road frontage. There are views of the site, in particular the open Green Belt land, and the large clumps of trees, from the A4 Colnbrook Bypass to the north, and from the Bath Road to the south. Trees, which are mostly evergreen provide a wooded backdrop and contribute to the setting of the low-rise buildings on the Bath Road frontage, and the character of the locality.

There are many trees on the site. In the main these form linear groups and clumps and provide large-scale landscape features. These include several mature conifers, mostly Yew. Most of the broadleaved trees are Sycamore, but there are also some mature Walnuts, which are probably relics of the orchard that once covered most of the site, and a couple of mature Beeches.

The trees have been the subject of a tree survey in accordance with BS 5837:2005. The report includes a tree survey plan based on a topographical survey.

A total of 144 individual trees and groups were assessed and categorised according to the guidance. There is a good age-range of trees on the site (25% young, 40% middle-aged and 35% mature), with no over-mature trees. Two trees are categorised as A grade (good quality and landscape value, where protection and retention is most desirable as part of any redevelopment), and 21 trees are categorised as B grade (fair quality and value, worthy of protection and retention as part of any redevelopment). However, the majority (94 no.) of the trees are C rated (poor), which could be retained but are not a constraint on the development of the site. The remaining 27 trees are found to have serious defects and/or to be in poor condition, and are R rated and identified for removal, in the interests of safety and/or sound arboricultural management.

The trees, mostly Yews and other evergreens are conspicuous in views from the Bath Road and have high amenity values, and should therefore be retained as part of the development of this site. The trees along the riverbank, including a mature Ash, are also conspicuous and should be retained. The trees that form a large clump in the middle of the site are mostly Sycamore, and collectively have a high amenity value. The development of the site should selectively retain these trees.

There is reference to an Arboricultural Impact Assessment in the Planning Statement, the results of which are seemingly submitted as part of the application. Such an assessment would normally be in the form of a report and drawings. There is reference to an Arboricultural Implications Plan, which shows the root protection areas of the trees, in the Landscape Design section of the Design and Access Statement, which could be the unnumbered small scale drawing on the same page, however, this is not clear. That drawing shows trees to be retained and removed, and the root protection areas of the trees, but at that scale it is hard to interpret. Furthermore, the application does not include details of tree protection measures. In the same section, it is stated that the trees which are lost as part of the scheme will be replaced.

The trees on the site are not protected by Tree Preservation Order or Conservation Area designation. Nevertheless, many of the trees are large and conspicuous features in the local landscape, and contribute to the visual amenity and character of the area. The trees of higher values should be protected and retained as part of any redevelopment of the site.

The landscape setting, strategy and masterplan are outlined in the Landscape Design section of the Design and Access Statement which states that the layout is informed by the tree-related and landscape information. However, the block plan does not show the

trees.

The hotel and a linear park would be located on the main part of the site, part of which is in the Green Belt, and it appears most of the valuable trees/features alongside the river and on the eastern part of the site would be retained, although several trees in the middle of the site will be removed to provide space for the hotel. However, it is considered that there is insufficient tree-related information to make a full assessment of the impact of the scheme on the retained trees, due to the proximity and construction of the building and associated structures.

Six houses would be provided on the south-eastern part of the site and all of the trees/features around them would be retained. However, there is insufficient tree-related information to enable a full assessment of the impact of the scheme on the retained trees, due to the proximity and construction of the building and associated structures, and hard-surfaces.

The Council's Trees/Landscape Officer has advised that the scheme is unacceptable in terms of Saved Policy BE38 of the UDP, because it makes inadequate provision for the long-term retention of trees in proximity to the buildings and associated structures and hard-surfaces, the loss of which would, in addition to the direct loss of trees, be detrimental to the visual amenity and arboreal/wooded character of the locality and the Green Belt.

ECOLOGY

The application was submitted with an environmental statement (ES) as part of the environmental impact assessment (EIA) regulations. Ecology was included within this assessment. This identifies the presence of bat roosts at the site at 468 Bath Road, and in a tree within the grounds of 456 Bath Road. The trees and tree-lines, river corridor, and the back garden of 456 and 470 Bath Road have been identified as foraging areas for the bats. Bats are considered European Protected Species and therefore afford a high level of protection. The applicant recognises the importance of the bat populations in the area but defers further action and surveys to the Licensing stage.

A European Protected Species licence application will need to be submitted to and approved by Natural England prior to the demolition of 468 Bath Road and works to the tree roost in 456 Bath Road.

PPS9 requires development to promote and enhance biodiversity on sites. The development is situated next to the Duke of Northumberland River. This provides an ideal opportunity to promote and enhance the environmental setting of the development site. The information provided with the application does not sufficiently demonstrate that the development is protecting and importantly enhancing the natural environment. The Hotel guests present a possible strain on the existing habitats and accordingly appropriate mitigation is required. The Council's Sustainability Officer has objected on these grounds.

7.15 Sustainable waste management

In terms of the proposed hotel, because this is a commercial development, the hotel operator ultimately has discretion over which waste management methods are used. An integrated refuse facility for the hotel is shown at ground floor level, although limited details have been provided at this stage. Full details of waste and recycling facilities would be required by way of condition should approval be granted.

In terms of the residential properties, limited details of refuse provision have been provided at this stage. The Council's Waste Services Team have advised that facilities should be provided for the storage of up to two bags of recycling and two bags of refuse per week plus three garden waste bags every two weeks. It is considered that there is sufficient space to provide these facilities of site and, accordingly this could be required by way of condition should approval be granted.

7.16 Renewable energy / Sustainability

Policy 4A.7 of the London Plan (renewable energy) requires major development to show how the development would generate a proportion of the site's electricity or heat needs from renewables wherever feasible. In line with advice from the Greater London Authority the Council requires major developments to meet the 20% renewable target.

The applicant has submitted an Energy Strategy, which demonstrates that a number of measures have been incorporated into the scheme to reduce its energy demand. These include limiting solar gain into bedrooms, ensuring air tightness, and using efficient electrical equipment.

The use of a number of renewable energy sources, wind power, photovoltaics, ground source heating and cooling, solar thermal hot water generation and biomass have been investigated. It is proposed to use a gas fired combined cooling heat and power (CCHP) system, and roof mounted photovoltaics, which combined would result in a carbon saving of 50%. This exceeds London Plan standards and is considered to be acceptable. Further details would be required by way of condition should approval be granted.

The Council's Sustainability Officer has advised that CCHP is not a form of renewable energy and, as such, has objected on the basis that the proposal would not meet the London Plan requirement of 20%. Nevertheless, the use of CCHP, in combination with other renewable energy sources, is an approach which has been frequently used by hotel developers along the Bath Road. It is recognised that CCHP is a relatively clean source of energy and the use of this technology to meet the London Plan standards has been considered acceptable by both the Council and the Greater London Authority, when assessing other applications for hotel schemes in the Heathrow area. As such, a refusal reason could not be justified on this basis.

7.17 Flooding or Drainage Issues

The western part of the site falls within Flood Zone 2 and, accordingly, the applicant has submitted a Flood Risk Assessment. The Environment Agency have advised that the submitted Flood Risk Assessment does not provide a suitable basis for assessment to be made of the flood risks arising from the proposed development and, in fact, suggests that the proposed development will cause an unacceptable risk of surface water flooding to people and property elsewhere. Accordingly the Environment Agency have objected to the proposal. This is reflected in the proposed reasons for refusal.

In addition to the above the Council's Sustainability Officer has advised that PPS25 sets out a sequential approach to managing new development and flood risk. This advises that development should ideally be located within Flood Zone 1. Where development is proposed outside this zone, an applicant must demonstrate that there is no other reasonably available land to locate the development. If development is proposed in flood zones 2 or 3 then the applicant must demonstrate application of the sequential test.

The information provided by the applicant does not satisfy either the requirements of the sequential test or the principals of PPS25. Paragraph 6.3 of the applicant's flood risk assessment attempts to apply the sequential test to the development. However, it uses a

table that does not appear in any of the guidance and is geared towards a successful application without the submission of supporting data. The information is therefore inadequate to demonstrate application of the sequential test as set out in PPS25. The Council's Sustainability Officer has objected to the scheme on this basis.

7.18 Noise or Air Quality Issues

AIR QUALITY

The site falls within an Air Quality Management Area and, as such, an Air Quality Assessment has been submitted. Whilst officers in the Council's Environmental Protection Unit have raised no objections to the scheme they have advised that the development could lead to a very minor increase in pollutants and, as such, given the existing poor air quality in the area, a number of mitigation measures should be put in place, including the provision of a Green Travel Plan and a S106 contribution of £25,000 towards air quality monitoring in the area. It is considered that these measures would be sufficient to offset the impact of the development on local air quality.

NOISE

Officers' in the Council's Environmental Protection Unit have advised that in accordance with Hillingdon's Supplementary Planning Document on Noise, it is the responsibility of the developer to ensure satisfactory noise levels inside the proposed hotel. Nevertheless, should planning approval be granted an appropriate condition could be added to ensure appropriate mitigation measures against noise were carried out.

In terms of the proposed residential properties, it is noted that the application site falls within PPG4 Noise Exposure Category C, which advises that planning permission should not normally be granted. However, these would directly replace existing residential properties and are located on the edge of a primarily residential area. As such, it is not considered that refusal could be justified on noise grounds. The Environmental Statement submitted in support of the application claims that satisfactory internal noise levels can be provided inside the properties through suitable sound insulation and notably the Council's Noise Officer has raised no objections on these grounds, subject to the imposition of appropriate conditions should approval be granted, to ensure the amenity of future occupiers would be sufficiently safeguarded.

In terms of noise impact from the proposed hotel development, it is considered that this could be controlled through use of appropriate conditions should approval be granted and, accordingly, no objections are raised on these grounds.

7.19 Comments on Public Consultations

Points (i), (ii), (iii), (vi), (vii), (viii) and the concerns raised by the Thistle Hotel have been addressed in the Committee report.

Point (iv) suggests the Council misled new property owners by not informing them of the proposal. Pre-application discussions are confidential and the Council is not able to disclose information regarding these until a formal application has been submitted.

Point (v) raises concerns regarding the proposed third runway. Should the runway go ahead it would not have any physical impacts on the application site. It should be noted that the proposed third runway is not a Council proposal and is not supported by the London Borough of Hillingdon.

Point (ix) suggests that boundary disputes and property values should be taken into consideration when assessing applications. These issues are not material planning considerations.

7.20 Planning obligations

Policy R17 of the Unitary Development Plan Saved Policies September 2007 states that:

'The Local Planning Authority will, where appropriate, seek to supplement the provision of recreation open space, facilities to support arts, cultural and entertainment activities, and other community, social and educational facilities through planning obligations in conjunction with other development proposals'.

The Council's S106 officer has advised that contributions should be provided towards construction training, hospitality training, public realm improvements, air quality monitoring, provision of a comprehensive green travel plan, and project management and monitoring. In addition, the applicant should enter into a S278 agreement to secure relevant highway works to the A4. In this instance a S106 agreement has not been progressed with the application due to fundamental objections to the scheme, which are reflected in the reasons for refusal.

7.21 Expediency of enforcement action

Not applicable.

7.22 Other Issues

- Contamination

Officers in the Council's Environmental Protection Unit have advised that there could be some contamination present at the site. Should approval be granted this could be addressed by way of appropriate conditions.

8. Observations of the Borough Solicitor

When making their decision, Members must have regard to all relevant planning legislation, regulations, guidance, circulars and Council policies. This will enable them to make an informed decision in respect of an application.

In addition Members should note that the Human Rights Act 1998 (HRA 1998) makes it unlawful for the Council to act incompatibly with Convention rights. Decisions by the Committee must take account of the HRA 1998. Therefore, Members need to be aware of the fact that the HRA 1998 makes the European Convention on Human Rights (the Convention) directly applicable to the actions of public bodies in England and Wales. The specific parts of the Convention relevant to planning matters are Article 6 (right to a fair hearing); Article 8 (right to respect for private and family life); Article 1 of the First Protocol (protection of property) and Article 14 (prohibition of discrimination).

Article 6 deals with procedural fairness. If normal committee procedures are followed, it is unlikely that this article will be breached.

Article 1 of the First Protocol and Article 8 are not absolute rights and infringements of these rights protected under these are allowed in certain defined circumstances, for example where required by law. However any infringement must be proportionate, which means it must achieve a fair balance between the public interest and the private interest infringed and must not go beyond what is needed to achieve its objective.

Article 14 states that the rights under the Convention shall be secured without discrimination on grounds of 'sex, race, colour, language, religion, political or other opinion, national or social origin, association with a national minority, property, birth or other status'.

9. Observations of the Director of Finance

10. CONCLUSION

In conclusion, strong objections are raised to the location of the proposed hotel on land currently designated as Green Belt and it is not considered that the applicant has demonstrated special circumstances sufficient to justify the loss of this land. Furthermore, it is considered that the proposed building would be clearly visible from surrounding Green Belt, particularly to the west and north west, appearing as a prominent feature which would be of detriment to the character and visual amenities of the Green Belt.

In addition to being clearly visible from the Green Belt, the proposed hotel would also be clearly visible from both the Bath Road and A4 Colnbrook By-Pass. It is considered that it would be out of keeping with the character and appearance of this part of the A4, which tends to be relatively open in nature and characterised by smaller scale developments along its frontage, and this part of the Bath Road which is largely characterised by smaller scale historical properties in residential use.

Insufficient information has been submitted to demonstrate that the scheme would make adequate provision for the long-term retention of trees and landscaping, and similarly insufficient information has been submitted to demonstrate that the scheme would fully meet the needs of disabled persons working at or visiting the site.

In addition the scheme gives rise to a need for planning obligations and these have not currently been secured by way of a legal agreement.

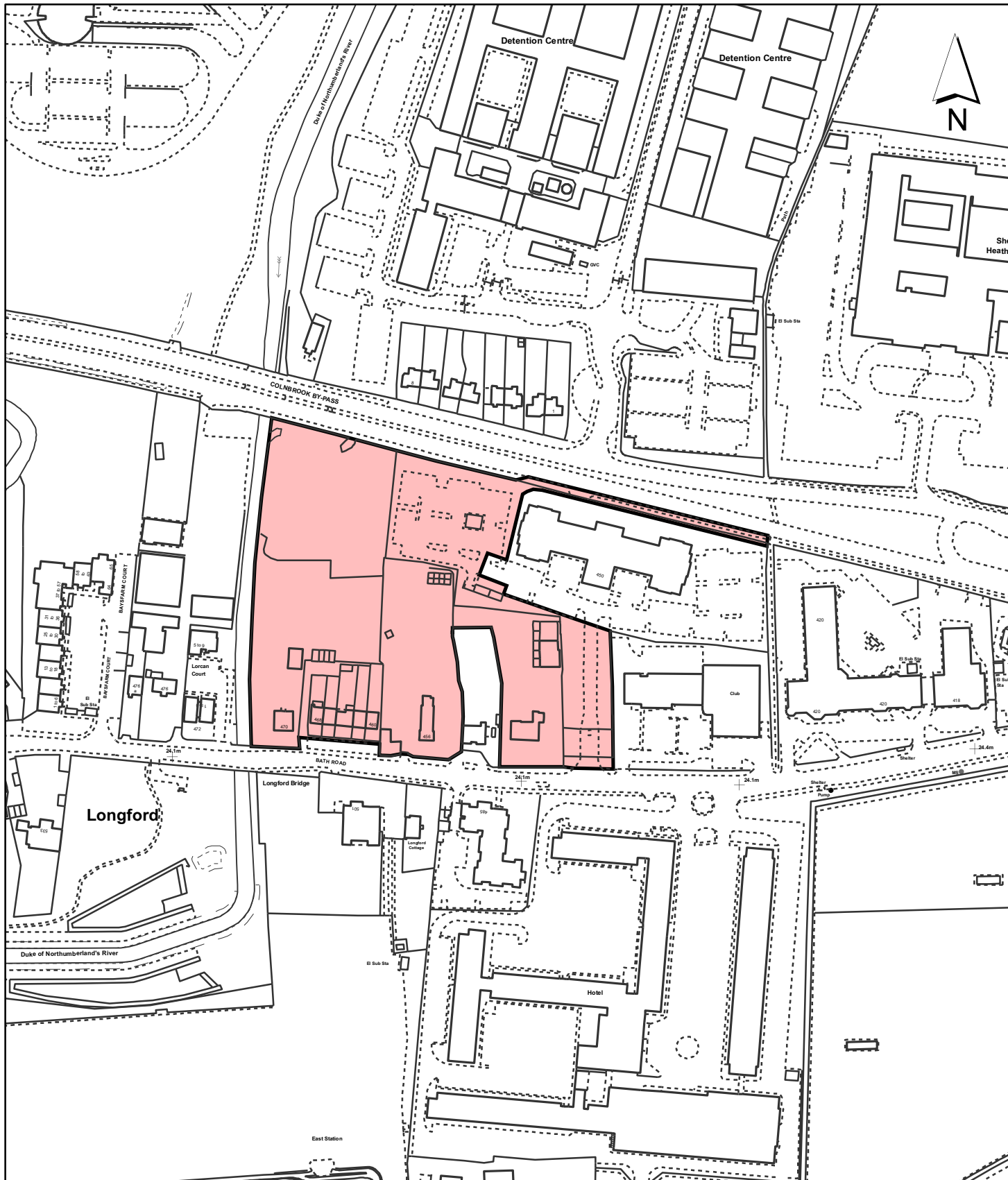
In view of the above, the application is recommended for refusal.

11. Reference Documents

Hillingdon Unitary Development Plan Saved Policies (September 2007)
London Plan (Consolidated with Alterations since 2004)
Planning Policy Statement 1 (Delivering Sustainable Development)
Planning Policy Guidance 2 (Green Belt)
Planning Policy Statement 3 (Housing)
Planning Policy Guidance 13 (Transport)
Planning Policy Guidance 15 (Planning & the Historic Environment)
Planning Policy Guidance Note 16 (Archaeology and Planning)
Planning Policy Statement 22 (Renewable Energy)
Planning Policy Guidance 24 (Planning & Noise)
Planning Policy Statement 25 (Development & Flood Risk)
Good Practice Guide on Planning for Tourism
Council's Supplementary Planning Guidance - Noise
Council's Supplementary Planning Guidance - Air Quality
Council's Supplementary Planning Guidance - Community Safety by Design
Council's Supplementary Planning Guidance - Planning Obligations
Supplementary Planning Document - Residential Layouts
Supplementary Planning Document - Accessible Hillingdon

Contact Officer: Johanna Hart

Telephone No: 01895 250230



Notes



Site boundary

For identification purposes only.

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Site Address

**452, 456, 460 - 470 (evens)
and land rear of Bath Road
Longford**

Planning Application Ref:

65419/APP/2009/2715

Planning Committee

Central and South

Scale

1:2,500

Date

February 2010

**LONDON BOROUGH
OF HILLINGDON**

**Planning &
Community Services**

Civic Centre, Uxbridge, Middx. UB8 1UW
Telephone No.: Uxbridge 250111



HILLINGDON
LONDON