

## Report of the Head of Planning, Sport and Green Spaces

**Address** T5 BUSINESS AND N2 CAR PARKS NORTHERN PERIMETER ROAD  
HEATHROW AIRPORT

**Development:** Erection of a car park deck within the T5 Business Car Park to provide an additional 350 parking spaces and the conversion of the N2 Car Park from contractor parking to an additional T5 Long Stay Car Park with 790 spaces. (Consultation under Schedule 2, Part 18 of The Town and Country Planning (General Permitted Development) Order 1995)

**LBH Ref Nos:** 69671/APP/2013/3871

**Drawing Nos:** 19218-XX-GA-756-000010  
19219-XX-GA-756-000006  
SK-006  
SK-007  
SK-008  
19218-XX-GA-756-000007  
SK-010  
19218-XX-GA-756-000005  
SK-009  
BH/200625/REV1/RTU03  
N2 Car Park Lighting Layouts  
T5 Business Car Park Lighting Layouts and Obtrusive Light Study  
Heathrow Northern Perimeter Parking Photomontages  
5 Business Car Park Representative Cladding Materials  
Heathrow Northern Perimeter Vehicular Assessment  
Air Quality Assessment  
Noise Assessment

**Date Plans Received:** 27/12/2013                      **Date(s) of Amendment(s):**

**Date Application Valid:** 15/01/2014

### 1. SUMMARY

Heathrow Airport Ltd has submitted this proposal for consultation under Schedule 2, Part 18 of the Town and Country Planning (General Permitted Development) Order 1995. It proposes an additional 350 spaces in the T5 Business Car Park by constructing a parking deck and an additional 790 T5 Long Stay spaces by converting the N2 car park from a contractor's car park to a long stay car park, resulting in a net gain of 216 spaces overall. The applicants submit that this additional parking is required as the current car parking capacity for both business and long stay for T5 is not forecast to meet demand from 2014 onwards.

Despite this increase in spaces, the overall car parking provision at Heathrow would still fall well within the 42,000 space cap defined by condition A85 of the Terminal 5 planning permission (ref: 47853/APP/2002/1882). This cap sets a strategic limit on the totality of car parking within Heathrow Airport's main car parks.

The proposed development, including the proposed car park deck is considered to be visually acceptable and would not have an adverse effect on the openness of the adjoining Green Belt land, or the character of the Longford Village Conservation Area to

the north. In addition, the proposal would not have any detrimental impact on the amenities of the occupiers of neighbouring residential properties in Longford Village.

Subject to compliance with relevant considerations, it is considered that the scheme can satisfactorily address ecology, noise and air quality impacts, archaeology, drainage and flood related issues, the mitigation and adaptation to climate change and the minimising of carbon dioxide emissions.

The proposal complies with relevant London Plan and Local Plan policies and, accordingly, it is recommended that no objections be raised to this consultation.

## **2. RECOMMENDATION**

### **NO OBJECTION**

#### **1 COM27 Traffic Arrangements - submission of details**

Development shall not begin until details of all traffic arrangements (including where appropriate carriageways, footways, turning space, safety strips, sight lines at road junctions, kerb radii, car parking areas and marking out of spaces, loading facilities, closure of existing access and means of surfacing) have been submitted to and approved in writing by the Local Planning Authority. The approved development shall not be occupied until all such works have been constructed in accordance with the approved details. Thereafter, the parking areas, sight lines and loading areas must be permanently retained and used for no other purpose at any time. Disabled parking bays shall be a minimum of 4.8m long by 3.6m wide, or at least 3.0m wide where two adjacent bays may share an unloading area.

#### **REASON**

To ensure pedestrian and vehicular safety and convenience and to ensure adequate off-street parking, and loading facilities in compliance with Policy AM14 Hillingdon Local Plan: Part Two Saved UDP Policies (November 2012) and Chapter 6 of the London Plan (July 2011).

#### **2 COM29 No floodlighting**

No floodlighting or other form of external lighting shall be installed unless it is in accordance with details which have previously been submitted to and approved in writing by the Local Planning Authority. Such details shall include location, height, type and direction of light sources and intensity of illumination. Any lighting that is so installed shall not thereafter be altered.

#### **REASON**

(i) To safeguard the amenity of surrounding properties in accordance with policies BE13 and OE1 of the Hillingdon Local Plan: Part Two Saved UDP Policies (November 2012); and

(ii) To protect the ecological value of the area in accordance with Policy EC3 of the Hillingdon Local Plan: Part Two Saved UDP Policies (November 2012).

#### **3 COM7 Materials (Submission)**

No development shall take place until details of all materials and external surfaces, , including details of balconies have been submitted to and approved in writing by the Local Planning Authority. Thereafter the development shall be constructed in accordance with the approved details and be retained as such.

Details should include

i) information relating to make, product/type, colour and photographs/images

ii) The parapet enclosure to the new car park deck

#### REASON

To ensure that the development presents a satisfactory appearance in accordance with Policy BE13 Hillingdon Local Plan: Part Two Saved UDP Policies (November 2012)

#### **4 COM8 Tree Protection**

No site clearance or construction work shall take place until the details have been submitted to, and approved in writing by, the Local Planning Authority with respect to:

1. A method statement outlining the sequence of development on the site including demolition, building works and tree protection measures.

2. Detailed drawings showing the position and type of fencing to protect the entire root areas/crown spread of trees, hedges and other vegetation to be retained shall be submitted to the Local Planning Authority for approval. No site clearance works or development shall be commenced until these drawings have been approved and the fencing has been erected in accordance with the details approved. Unless otherwise agreed in writing by the Local Planning Authority such fencing should be a minimum height of 1.5 metres.

Thereafter, the development shall be implemented in accordance with the approved details. The fencing shall be retained in position until development is completed.

The area within the approved protective fencing shall remain undisturbed during the course of the works and in particular in these areas:

2.a There shall be no changes in ground levels;

2.b No materials or plant shall be stored;

2.c No buildings or temporary buildings shall be erected or stationed.

2.d No materials or waste shall be burnt; and.

2.e No drain runs or other trenches shall be dug or otherwise created, without the prior written consent of the Local Planning Authority.

#### REASON

To ensure that trees and other vegetation can and will be retained on site and not damaged during construction work and to ensure that the development conforms with policy BE38 Hillingdon Local Plan: Part Two Saved UDP Policies (November 2012)

#### **5 COM9 Landscaping (car parking & refuse/cycle storage)**

No development shall take place until a landscape scheme has been submitted to and approved in writing by the Local Planning Authority. The scheme shall include: -

1. Details of Soft Landscaping

1.a Planting plans (at not less than a scale of 1:100),

1.b Written specification of planting and cultivation works to be undertaken,

1.c Schedule of plants giving species, plant sizes, and proposed numbers/densities where appropriate

2. Details of Hard Landscaping

2.a Refuse Storage

2.b Cycle Storage

2.c Means of enclosure/boundary treatments

2.d Car Parking Layouts (including demonstration that 5% of all parking spaces are

served by electrical charging points)  
2.e Hard Surfacing Materials  
2.f External Lighting  
2.g Other structures

3. Details of Landscape Maintenance

3.a Landscape Maintenance Schedule for a minimum period of 5 years.

3.b Proposals for the replacement of any tree, shrub, or area of surfacing/seeding within the landscaping scheme which dies or in the opinion of the Local Planning Authority becomes seriously damaged or diseased.

4. Schedule for Implementation

5. Other

5.a Existing and proposed functional services above and below ground

5.b Proposed finishing levels or contours

Thereafter the development shall be carried out and maintained in full accordance with the approved details.

REASON

To ensure that the proposed development will preserve and enhance the visual amenities of the locality and provide adequate facilities in compliance with policies BE13, BE38 and AM14 of the Hillingdon Local Plan: Part Two Saved UDP Policies (November 2012) and Policies 5.11 (living walls and roofs) and 5.17 (refuse storage) of the London Plan (July 2011).

**6 NONSC Non Standard Condition**

Development shall not commence until a construction management strategy has been submitted to and approved in writing by the Local Planning Authority covering the application site and any adjoining land which will be used during the construction period. Such a strategy shall include the following matters:

- details of cranes and other tall construction equipment (including the details of obstacle lighting) - Such schemes shall comply with Advice Note 4 'Cranes and Other Construction Issues'(available at [www.aoa.org.uk/publications/safeguarding.asp](http://www.aoa.org.uk/publications/safeguarding.asp)). The approved strategy (or any variation approved in writing by the Local Planning Authority) shall be implemented for the duration of the construction period.

REASON

To ensure the development does not endanger the safe movement of aircraft or the operation of Heathrow Airport through interference with communication, navigational aids and surveillance equipment, in accordance with Policy A6 of the Hillingdon Local Plan: Part Two Saved UDP Policies (November 2012).

**7 NONSC Non Standard Condition**

Before the development hereby permitted commences a scheme of directional signage and wayfinding, both within and outside the car park, to ensure that links to public transport are clearly identified, shall be submitted to and agreed in writing by the Local Planning Authority. The approved scheme shall be implemented before the car parks are brought back into use and retained as such thereafter.

REASON

To ensure that users of the airport car parks are fully aware of public transport options

and how to access them in accordance with policy 5.2 of the London Plan (2011).

**8 NONSC Non Standard Condition**

The Car Park shall be incorporated into the Heathrow Airport Wide Energy Strategy which has been adopted across the airport.

**REASON**

In order to reduce carbon emissions and improve air quality across the airport in compliance with policy 5.2 of the London Plan (2011).

**9 AR3 Sites of Archaeological Interest - scheme of investigation**

No development shall take place until the applicant, their agent or successor in title has secured the implementation of a programme of archaeological work in accordance with a written scheme of investigation which has been submitted to and approved in writing by the Local Planning Authority. Thereafter development shall only take place in accordance with the approved scheme. The archaeological works shall be carried out by a suitably qualified body acceptable to the Local Planning Authority.

**REASON**

The site is of archaeological interest and it is considered that all evidence of the remains should be recorded in accordance with Policy BE3 of the Hillingdon Local Plan: Part Two Saved UDP Policies (November 2012).

**10 COM4 Accordance with Approved Plans**

The development hereby permitted shall not be carried out except in complete accordance with the details shown on the submitted plans, numbers

19218-XX-GA-756-000010  
19219-XX-GA-756-000006  
SK-006  
SK-007  
SK-008  
19218-XX-GA-756-000007  
SK-010  
19218-XX-GA-756-000005  
SK-009  
BH/200625/REV1/RTU03  
N2 Car Park Lighting Layouts

and shall thereafter be retained/maintained for as long as the development remains in existence.

**REASON**

To ensure the development complies with the provisions Hillingdon Local Plan: Part Two Saved UDP Policies (November 2012) and the London Plan (July 2011).

**11 COM15 Sustainable Water Management**

Prior to commencement, a scheme for the provision of sustainable water management shall be submitted to, and approved in writing by the Local Planning Authority. The scheme shall clearly demonstrate how it incorporates sustainable urban drainage in accordance with the hierarchy set out in Policy 5.15 of the London Plan and will:

- i. provide information on all Suds features including the method employed to delay and control the surface water discharged from the site and:
  - a. calculations showing storm period and intensity and volume of storage required to

control surface water and size of features to control that volume.

b. any overland flooding should be shown, with flow paths depths and velocities identified as well as any hazards, ( safe access and egress must be demonstrated).

c. measures taken to prevent pollution of the receiving groundwater and/or surface waters;

d. how they or temporary measures will be implemented to ensure no increase in flood risk from commencement of construction.

ii. provide a management and maintenance plan for the lifetime of the development of arrangements to secure the operation of the scheme throughout its lifetime. Including appropriate details of Inspection regimes, appropriate performance specification, remediation and timescales for the resolving of issues.

iii. provide details of the body legally responsible for the implementation of the management and maintenance plan.

Thereafter the development shall be implemented and retained/maintained in accordance with these details for as long as the development remains in existence.

#### REASON

(i) To ensure that surface water run off is controlled to ensure the development does not increase the risk of flooding in accordance with Policy EM6 (Flood Risk Management) of the Hillingdon Local Plan: Part 1- Strategic Policies (Nov 2012), Policy 5.12 (Flood Risk Management) of the London Plan (July 2011) and the Planning Practice Guidance

(ii) To ensure that surface water is handled as close to its source as possible in compliance with Policy 5.13 (Sustainable Drainage) of the London Plan (July 2011), and conserve water supplies in accordance with Policy 5.15 (Water use and supplies) of the London Plan (July 2011).

#### INFORMATIVES

##### 1

The perimeter treatment to the upper deck T5 car park, particularly facing the Longford Village boundary, should take the form of a more solid edge, such as angled louvres, ideally finished in a neutral, mat colour, possibly a light grey or similar, in order to limit light spillage and additional noise from vehicles using the upper deck as much as possible.

##### 2

The nature and scope of the archeological assessment and evaluation sought by condition 9 should be agreed with GLAAS and carried out by a developer appointed archaeological practice. The ensuing archaeological report will need to establish the significance of the site and the impact of the proposed development.

If archaeological safeguards do prove necessary, these could involve design measures to preserve remains in situ, or where that is not feasible, archaeological investigation prior to development.

Further information on archaeology and planning in Greater London is available at:  
<http://www.english-heritage.org.uk/professional/advice/our-planning-role/greaterlondon-archaeology-advisory-service/about-glaas/>

##### 3

Given the nature of the proposed development, it is possible that a crane may be required during its construction. The applicant's attention is drawn to the requirement

within the British Standard Code of Practice for the safe use of Cranes, and for crane operators to consult the aerodrome before erecting a crane in close proximity to an aerodrome. This is explained further in Advice Note 4, 'Cranes and Other Construction Issues' (available at [http://www.aoa.org.uk/policy\\_safeguarding.htm](http://www.aoa.org.uk/policy_safeguarding.htm)).

#### **4 152 Compulsory Informative (1)**

The decision to raise no objection 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).

#### **5 153 Compulsory Informative (2)**

The decision to raise no objection has been taken having regard to the policies and proposals in the Hillingdon Unitary Development Plan Saved Policies (September 2007) as incorporated into the Hillingdon Local Plan (2012) set out below, including Supplementary Planning Guidance, and to all relevant material considerations, including the London Plan (July 2011) and national guidance.

A4	New development directly related to Heathrow Airport
A5	New development at airports - incorporation of ancillary retail and leisure facilities and other services
A7	Developments likely to increase helicopter activity
AM15	Provision of reserved parking spaces for disabled persons
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
BE1	Development within archaeological priority areas
BE3	Investigation of sites of archaeological interest and protection of archaeological remains
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
OE3	Buildings or uses likely to cause noise annoyance - mitigation measures
OE8	Development likely to result in increased flood risk due to additional surface water run-off - requirement for attenuation measures
OL5	Development proposals adjacent to the Green Belt
LPP 5.1	(2011) Climate Change Mitigation
LPP 5.12	(2011) Flood risk management
LPP 5.13	(2011) Sustainable drainage
LPP 6.13	(2011) Parking
LPP 6.6	(2011) Aviation
LPP 7.15	(2011) Reducing noise and enhancing soundscapes
LPP 7.16	(2011) Green Belt
NPPF	

### **3. CONSIDERATIONS**

#### **3.1 Site and Locality**

Both of the car parks are situated to the north-west of Heathrow Airport, and are accessed from the Northern Perimeter Road. The development of the car parks relates to the operation of the airport and both sites are situated within the airport boundary on operational land.

The N2 is a long-stay surface level car park to the south of the Northern Perimeter Road and to the north of the northern runway. The northern boundary is defined by security fencing and a narrow grass verge along the Northern Perimeter Road. There is no planting or other soft landscape within the car park or along its airside boundaries. Some other airport car parks to the east of N2 are screened from the road by soft landscape.

The T5 Business car park is a surface level car park, located to the south of the Duke of Northumberland's River and the village of Longford and west of the N2 car park. It is accessed from the northern side of the Northern Perimeter Road. The roadside boundary is defined by security fencing and a wider road-side verge with spring bulb planting and a line of trees where space permits. The southern edge of the T5 car park also features the raised track and infrastructure associated with the Rapid Transport System.

The northern boundary between the site and the Duke of Northumberland's River and Longford is defined by a 3 metre high timber close board fence, beyond which is some light woodland planting.

The western edge of this site lies within the metropolitan Green Belt which also wraps around the western half of the north boundary.

#### **3.2 Proposed Scheme**

The proposal seeks to deliver an additional 350 spaces in the T5 Business Car Park by constructing a parking deck and an additional 790 T5 Long Stay spaces by converting the N2 car park from a contractor's car park to a long stay car park.

T5 Business Car Park:

The parking deck will be positioned over the existing car park with a total east/west length of 100 metres and a north/south width of 47.8 metres. A total of 379 parking spaces will be provided on the deck, but will result in the loss of 29 existing ground level spaces as room is needed for the supporting structure and vehicle ramps. Therefore, the deck provides an uplift of 350 car parking spaces from the existing ground level car park. Additionally, seven blue badge car park bays will be provided at ground level.

The height of the vehicle deck will be 3.32 metres above ground level. A 1.1 metre high safety railing will be positioned around the perimeter of the deck and six metre high lighting columns will provide lighting to the deck below, but will have full cut off protection to minimise any light spillage.

The deck itself will be clad in grey profiled steel to match the existing customer service kiosk.

A passenger lift will also be provided and will be suitable for mobility impaired persons.



The new total number of parking spaces within the T5 Business Car Park will be 1,598.

#### N2 Car Park:

As specific contractor parking is no longer required, the N2 Car Park will change to T5 Long Stay parking. This will be an addition to the existing T5 Long Stay parking provision which is located slightly further east, along the Northern Perimeter Road and which currently has capacity for 2,756 vehicles. At present, N2 car park has 926 car parking spaces. This will be reduced to 790 spaces when converted to long stay parking.

The N2 car park will undergo improvements including line marking improvements, defined pedestrian routes, two bus stops for the shuttle bus service and a customer service kiosk. The proposal also requires the removal of the existing security screening facility located at the western end of the car park. A total of 25 blue badge bays will be provided and located adjacent to each bus stop.

Access to the new long stay car park is via two 4.5m wide entry gates accessed from the Northern Perimeter Road. The car park exit will be via two 3.5m wide gates to the southern arm of a roundabout on the Northern Perimeter Road. A four metre bus only exit gate in the western corner of the car park is provided for T5 bound shuttle buses.

Dedicated pedestrian walkways are designed to provide north-south links to bus stops and are each 2.4m wide. Other walkways along the each of the east-west aisles are 1.2m in width. A new customer service kiosk is proposed to be located in the eastern side of the car park adjacent to the main exit. The building is to be flat roofed with grey panel walls and of a type used in other long stay car park around the airport.

All car parking spaces will comply with the relevant standards.

### 3.3 Relevant Planning History

#### Comment on Relevant Planning History

##### T5 Business Car Park

The T5 Business Car Park is located to the south east of Longford Village where an existing 430 space car park has existed since the 1990's. The diversion of the Duke of Northumberland River to the west of T5 meant that an extension of this car park became possible and in July 2005 a planning application for a 1000 space car park extension was submitted (LBH ref 47853/APP/2005/1984). A package of enhancements for Longford Village was provided including an area of parkland, highway enhancements, a payment towards the air quality strategy and the restoration of a compound on the eastern side of the airport back to grassland.

The application was approved in December 2005 subject to the signing of a Section 106 agreement to secure the above enhancements. The car park was completed in September 2006 and since then has been operated as the T5 Business Car Park. The car park currently provides 1285 car parking spaces.

##### N2 Car Park

The N2 Car Park is currently used as a car park for contractors working on the T2 site. Contractors park at the N2 Car Park and go through a security screening process at a building on the car park site. They then enter security screened buses which takes them to the air side construction site. However, as the construction of T2 is nearing completion, demand for contractor car parking has reduced so that a dedicated car park is no longer necessary.

## 4. Planning Policies and Standards

### UDP / LDF Designation and London Plan

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

#### Part 1 Policies:

PT1.BE1	(2012) Built Environment
PT1.EM1	(2012) Climate Change Adaptation and Mitigation
PT1.EM2	(2012) Green Belt, Metropolitan Open Land and Green Chains
PT1.EM6	(2012) Flood Risk Management
PT1.EM8	(2012) Land, Water, Air and Noise
PT1.T4	(2012) Heathrow Airport

#### Part 2 Policies:

A4	New development directly related to Heathrow Airport
A5	New development at airports - incorporation of ancillary retail and leisure facilities and other services
A7	Developments likely to increase helicopter activity
AM15	Provision of reserved parking spaces for disabled persons
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
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LPP 7.15	(2011) Reducing noise and enhancing soundscapes

LPP 7.16 (2011) Green Belt  
NPPF

## **5. Advertisement and Site Notice**

**5.1** Advertisement Expiry Date:- **7th February 2014**

**5.2** Site Notice Expiry Date:- Not applicable

## **6. Consultations**

### **External Consultees**

This application was advertised by way of site and press notices. One response has been received, the contents of which are summarised below:

- i) The proposal is out of keeping with this section of the airfield where the scene is of largely single level car parking and countryside.
- ii) The layout, size, scale, appearance, and lack of additional landscaping is inappropriate.
- iii) Concerned about how the extra vehicle movements this proposal will generate will affect access and congestion on local roads.
- iv) Disruption caused during the construction and operational phases
- v) Negative impact on already poor air and noise quality.

### **GREATER LONDON AUTHORITY**

We have taken the view in the past that free-standing car park applications are not referable under category 3F, as there has to be a development associated with the car parking, not just a car park application on its own. The GLA does not consider this to be referable and so will not be responding.

### **ENGLISH HERITAGE ARCHAEOLOGY (GLASS)**

The National Planning Policy Framework (Section 12) and the London Plan (2011 Policy 7.8) emphasise that the conservation of archaeological interest is a material consideration in the planning process. Paragraph 128 of the NPPF says that applicants should be required to submit appropriate desk-based assessments, and where appropriate undertake field evaluation, to describe the significance of heritage assets and how they would be affected by the proposed development. This information should be supplied to inform the planning decision. Appraisal of this planning application using the Greater London Historic Environment Record and information submitted with the application indicates a need for further information to reach an informed judgment of its impact on heritage assets of archaeological interest.

This application lies within the proposed Heathrow Archaeological Priority Zone and partly within the proposed Stanwell Cursus Archaeological Priority Area. The Heathrow area is known to contain extensive and important remains of prehistoric, Roman and medieval landscape and settlement. The Stanwell Cursus is an early prehistoric ritual monument of national significance. Despite this known interest the application is not supported by any archaeological information and therefore fails to address the requirement of NPPF paragraphs 128 and 129 to assess the significance of heritage assets which may be affected and the impact of the proposed development upon that significance.

It is noted that this application is described as a consultation on permitted development under the

GPDO 1995. Advice is nevertheless provided in relation to best practice in assessing and mitigating archaeological impact which it is hoped that the applicants will respect.

Environment Record and information submitted with the application indicates a need for further information to reach an informed judgment of its impact on heritage assets of archaeological interest. It is therefore recommended that the following further studies should be undertaken to inform the preparation of proposals and accompany a planning application:

#### Desk Based Assessment

Desk-based assessment produces a report to inform planning decisions. It uses existing information to identify the likely effects of the development on the significance of heritage assets, including considering the potential for new discoveries and effects on the setting of nearby assets. An assessment may lead on to further evaluation and/or mitigation measures.

#### Evaluation

An archaeological field evaluation involves exploratory fieldwork to determine if significant remains are present on a site and if so to define their character, extent, quality and preservation. Field evaluation may involve one or more techniques depending on the nature of the site and its archaeological potential. It will normally include excavation of trial trenches. A field evaluation report will usually be used to inform a planning decision (pre-determination evaluation) but can also be required by condition to refine a mitigation strategy after permission has been granted.

The nature and scope of assessment and evaluation should be agreed with GLAAS and carried out by a developer appointed archaeological practice before any decision on the planning application is taken. The ensuing archaeological report will need to establish the significance of the site and the impact of the proposed development. Once the archaeological impact of the proposal has been defined a recommendation will be made by GLAAS.

The NPPF accords great weight to the conservation of designated heritage assets and also non-designated heritage assets of equivalent interest. Heritage assets of local or regional significance may also be considered worthy of conservation. If archaeological safeguards do prove necessary, these could involve design measures to preserve remains in situ or where that is not feasible archaeological investigation prior to development. If a planning decision is to be taken without the provision of sufficient archaeological information then we recommend that the failure of the applicant to provide adequate archaeological information be cited as a reason for refusal.

Further information on archaeology and planning in Greater London is available at:  
<http://www.english-heritage.org.uk/professional/advice/our-planning-role/greaterlondon-archaeology-advisory-service/about-glaas/>

Please note that this advice relates solely to archaeological considerations. If necessary, English Heritage's Development Management or Historic Places teams should be consulted separately regarding statutory matters.

#### HEATHROW AIRPORT SAFEGUARDING

We have now assessed the application against safeguarding criteria and can confirm that we have no safeguarding objections to the proposed development. However, we would like to make the following observation :

#### Cranes

Given the nature of the proposed development, it is possible that a crane may be required during its construction. We would therefore draw the applicant's attention to the requirement within the British Standard Code of Practice for the safe use of Cranes, or crane operators to consult the

aerodrome before erecting a crane in close proximity to an aerodrome. This is explained further in Advice Note 4, 'Cranes and Other Construction Issues' (available at <http://www.aoa.org.uk/policy/safeguarding.htm>).

#### NATS (En Route)

The proposed development has been examined from a technical safeguarding aspect and does not conflict with our safeguarding criteria. Accordingly, NATS (En Route) Public Limited Company ("NERL") has no safeguarding objection to the proposal.

However, please be aware that this response applies specifically to the above consultation and only reflects the position of NERL that is responsible for the management of en route air traffic, based on the information supplied at the time of this application. This letter does not provide any indication of the position of any other party, whether they be an airport, airspace user or otherwise. It remains your responsibility to ensure that all the appropriate consultees are properly consulted.

If any changes are proposed to the information supplied to NERL in regard to this application which become the basis of a revised, amended or further application for approval, then as a statutory consultee NERL requires that it be further consulted on any such changes prior to any planning permission or any consent being granted.

#### **Internal Consultees**

##### ENVIRONMENTAL PROTECTION UNIT

##### Noise

The noise reports suggest there could be a 2-3dBA increase in the noise levels from the car park resulting from this development and that it could be up to 2dBA above background. Although it looks like the actual impact is likely to be less, as they have assumed that the peak period for car park use instead of being a 9am as it is now it would be between 6 and 7 am when background noise levels are lower. The height of the car park barrier is actually 1m high, which would be acceptable from a noise point of view and therefore should not require further conditioning.

##### Air Quality

Comments below with regard to air quality. Further clarification is sought regarding approach to the air quality assessment on why 'baseline' air quality is worse than 'with development' air quality at receptor locations (see comments below). The application will result in a net increase of 216 car parking spaces, or 350 car parking spaces at the current T5 business car park.

The following information was submitted with regard to air quality:

- Heathrow Airport Ltd, Northern Perimeter Parking Studies Air Quality Assessment, by AMEC UK Ltd. and Ricardo-AEA Ltd for HAL dated September 2013.

The proposed development is within the declared AQMA and in an area that is probably exceeding the European Union limit value for annual mean nitrogen dioxide (NO<sub>2</sub>-40.0 mg/m<sup>3</sup>). The air quality assessment has used FEA NO<sub>2</sub> baseline data (FEA - assessment to allow full runway alteration during easterly operations) for 2015, which is also when the car parks are indicated to be operational. The FEA baseline planning application has been refused.

Comments with regard to air quality provided below primarily relates to the emission contribution from the proposed development only. Emissions considered include car park emissions calculated

using a speed of 16 km/hr over a distance equal to half the perimeter of the car park. The impact from the car park developments, which would result in 350 additional car parking spaces close to residents in Longford at the T5 business car park are described as imperceptible and negligible at relevant receptor locations. Increases in concentrations are indicated to be confined to locations of no relevant exposure, with an increase of 0.1 mg/m<sup>3</sup> indicated adjacent to the Duke of Northumberland.

The operational road traffic results in chapter 6 states the following: 'Everywhere except close to the Terminal 5 Business car park, the concentration of each pollutant is lower under the Development scenario than the Baseline. The Terminal 5 Business car park has a very small increase in activity which causes a small increase in concentration. However, there is a decrease in activity in N2 car park and on the Perimeter Road, that causes a net decrease in concentration at all of the receptors modelled outside the airport boundary.'

On the basis of the approach outlined above, the changes in concentration are small, and indicated to be less than 0.05 mg/m<sup>3</sup> of NO<sub>2</sub> outside the airport boundary. At properties in Longford, NO<sub>2</sub> concentrations are between 0.01 mg/m<sup>3</sup> and 0.04 mg/m<sup>3</sup> lower in the development case than the baseline, with the main increase in NO<sub>2</sub> confined to the vicinity of the car park.

#### HIGHWAY ENGINEER

The proposal involves the erection of a car park deck in the T5 Business Car Park to provide an additional 350 parking spaces and the conversion of the N2 Car Park from contractor parking with 924 spaces to an additional T5 Long Stay Car Park with 790 spaces, resulting in a net loss of 134 spaces.

The applicant has not provided information explaining the need for the above proposals, which will result in a significant increase in car parking. Also the car park survey data and the assumptions regarding the barriers' capacity referred to in the D&A statement have not been provided. In the absence of information, the proposals cannot be fully assessed from the highways/traffic point of view.

Notwithstanding the above, the proposals are considered to have a main traffic impact on the Northern Perimeter Road and other nearby airport roads, which are not part of the Council's adopted highway network.

Consequently, no objection is raised from the highways point of view.

#### TREE AND LANDSCAPE OFFICER

Saved policies OL1-OL5 seek to protect the visual amenity of the Green Belt, expect comprehensive landscape improvements and prevent conspicuous development which might injure the visual amenity of the Green Belt by reason of siting, materials or design. (The National Planning Policy Framework advises that the essential characteristics of the Green Belt is its openness.)

Saved policy BE38 seeks the retention and utilisation of topographical and landscape features of merit and the provision of new planting and landscaping wherever it is appropriate.

- The proposed deck for the T5 Business Car Park measures 100 metres x 47.8 metres above existing car park spaces and is situated within the north-east section of the main site.
- The western extremity of the proposed deck lies very close the edge of the Green Belt boundary.
- The proposed deck is 3.2 metres above ground level, above which there will be 6.0 metre high lighting columns (total 9.2 metres above ground level) at 16.0 metre intervals. There will also be a protective parapet around the edge of the deck at 4.2 metres above ground level.
- The Q6 Early Design document includes verified photomontages of the T5 Car Park, by Arup, including a methodology in accordance with the Landscape Institute's 'Guidelines for Landscape &

Visual Impact Assessment'. The five selected viewpoints from the southern edge of Longford Village are indicated on a Location Plan.

- The daytime photomontages indicate that the T5 deck and lighting columns will not have a great impact from the viewpoints. However, the photomontages are based on summer views when the visual impact will be modified by the intervening vegetation while in leaf. These views will be more open for six months (+/-) when the trees are not in leaf.
- The series of Nightview Parameters confirms that there will be a glow of light over the car park, which will effectively have an urbanising influence on the views towards the airport from Longford Village.
- The conversion of the 924 space N2 Car Park involves the re-arrangement of circulation and spaces within the existing ground level car park and the provision of a single-storey (2.9 metre high) Welfare Facility close to the eastern site exit. This should have no significant visual impact.
- The Design & Access Statement confirms that no new landscaping has been proposed as part of the development.
- Opportunities will be taken, wherever feasible, to plant climbing plants at the base of the fence and (where space permits) trees will be planted to reduce the visual impact of the structure and to reduce the risk of birds colliding with the glazed panels.

**OBSERVATIONS / RECOMMENDATIONS:** It is noted that a very small section of the raised decking and ancillary structures for the T5 Car Park, site lie just within the Green Belt - and inevitably has some impact on the openness of the space.

Views from Longford Village, to the north, will be part screened (particularly in the summer months) by the intervening vegetation around the Duke of Northumberland's River. Light pollution, at night, from the lamp columns and car headlights is likely to be visible (particularly in winter months). - There may be an opportunity to secure additional tree planting to the north of the T5 car park.

Views of the T5 car park from the Northern Perimeter Road will be relatively uninterrupted, although set well back from this boundary and part-mitigated by existing roadside planting.

The impact of the N2 Car Park will be no worse than at present. However, it would help to have a hedge planted in the verge against the security fence.

It is also noted that if there are no landscape enhancements proposed, this would be contrary to saved policy BE38.

#### URBAN DESIGN AND CONSERVATION OFFICER

If this is permitted development then there's nothing the Local Planning Authority can do other than pass on English Heritage comments. If it's not permitted development, we could insist on what English Heritage requires under the current Local Plan Part 2 archaeological policies, even though the Council has not actually designated the Heathrow APZ or the Stanwell Cursus APA as yet.

Given the proximity of the car park to the Longford Village Conservation Area we should seek appropriate tree planting to screen the boundary of the car park and filter views of the additional floor. We should also request the enclosure of the new floor, particularly adjacent to the village boundary, to limit light spillage and additional noise as far as is possible. This should take the form of a more solid edge at first floor level, such as angled louvres, ideally finished in a neutral, matt colour, possibly a light grey or similar.

#### FLOOD AND DRAINAGE OFFICER

The principles of maintaining the status quo as Heathrow has put forward previously in managing surface water is not acceptable. Developments should reduce flood risk in accordance with the NPPF and London Plan supplementary planning guidance (which requires as a minimum a 50%

reduction in run off) as well as Hillingdon Local Plan Part 1. As advised previously developments at Heathrow should be informed by a site wide strategy to manage water, as there is considerable flood risk caused by Heathrow which should be reduced by future development.

Therefore the following Suds condition will be requested and provision of details showing how it complies with the above standards should be provided.

Prior to commencement, a scheme for the provision of sustainable water management shall be submitted to, and approved in writing by the Local Planning Authority. The scheme shall clearly demonstrate how it incorporates sustainable urban drainage in accordance with the hierarchy set out in Policy 5.15 of the London Plan and will:

- i. provide information on all Suds features including the method employed to delay and control the surface water discharged from the site and:
  - a. calculations showing storm period and intensity and volume of storage required to control surface water and size of features to control that volume.
  - b. any overland flooding should be shown, with flow paths depths and velocities identified as well as any hazards, ( safe access and egress must be demonstrated).
  - c. measures taken to prevent pollution of the receiving groundwater and/or surface waters;
  - d. how they or temporary measures will be implemented to ensure no increase in flood risk from commencement of construction.
- ii. provide a management and maintenance plan for the lifetime of the development of arrangements to secure the operation of the scheme throughout its lifetime. Including appropriate details of Inspection regimes, appropriate performance specification, remediation and timescales for the resolving of issues.
- iii. provide details of the body legally responsible for the implementation of the management and maintenance plan.

Thereafter the development shall be implemented and retained/maintained in accordance with these details for as long as the development remains in existence.

#### REASON

To ensure that surface water run off is controlled to ensure the development does not increase the risk of flooding contrary to Policy EM6 Flood Risk Management in Hillingdon Local Plan: Part 1- Strategic Policies (Nov 2012) Policy 5.12 Flood Risk Management of the London Plan (July 2011) and Planning Policy Statement 25. To be handled as close to its source as possible in compliance with Policy 5.13 Sustainable Drainage of the London Plan (July 2011), and conserve water supplies in accordance with Policy 5.15 Water use and supplies of the London Plan (July 2011).

## **7. MAIN PLANNING ISSUES**

### **7.01 The principle of the development**

The proposed development is directly related to the provision of services and facilities at Heathrow Airport on operational land. It is therefore Permitted Development in accordance with Class A of Part 18 of Schedule 2 of the Town and Country Planning (General Permitted Development) Order 1995 and does not require planning permission. However, in accordance with the Order, the airport operator must consult with the Local Planning Authority before commencing any development.

The approval of T5 was subject to a range of conditions, one of which being a cap on the number of car parking spaces allowed on airport. Specifically, this was condition A85 and imposes a 42,000 space car parking cap on land on specifically allocated sites within the airport boundary that were identified at the Inquiry.

The last car park count pursuant to condition A85 was submitted in August 2013. This confirmed that there are currently 36,849 car parking spaces available for staff and the



public.

The proposals are located within existing car parks and do not involve any change of land use. In addition, the net gain of 216 spaces overall would result in the total number of car parking spaces airport wide increasing from 36,849 to 37,065, which would be 4,935 spaces less than the Heathrow wide car park cap of 42,000. No objections are therefore raised to the principle of the proposed development.

#### **7.02 Density of the proposed development**

Not applicable to this type of development.

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

##### ARCHAEOLOGY

Saved Part 2 Policy BE3 of the Local Plan states that the applicant will be expected to have properly assessed and planned for the archaeological implications of their proposal. Proposals which destroy important remains will not be permitted. The National Planning Policy Framework (Section 12) and the London Plan (2011 Policy 7.8) emphasise that the conservation of archaeological interest is a material consideration in the planning process.

Paragraph 141 of the NPPF says that applicants should be required to record and advance understanding of the significance of any heritage assets to be lost (wholly or in part) and to make this evidence publicly available.

The application site is within the proposed Heathrow and the Stanwell Cursus Archaeological Priority Areas. English Heritage have accordingly been consulted on the proposals. English Heritage has indicated a need for further information to reach an informed judgment of its impact on heritage assets of archaeological interest.

English Heritage notes that the application site lies within the proposed Heathrow Archaeological Priority Zone and partly within the proposed Stanwell Cursus Archaeological Priority Area. The Heathrow area is known to contain extensive and important remains of prehistoric, Roman and medieval landscape and settlement. The Stanwell Cursus is an early prehistoric ritual monument of national significance. However, the application is not supported by any archaeological information and therefore fails to address the requirement of NPPF paragraphs 128 and 129 to assess the significance of heritage assets which may be affected and the impact of the proposed development upon that significance.

Notwithstanding the above observations, both English Heritage and the Council's Urban Design and Conservation officer acknowledge that this is not a planning application, but a consultation on permitted development under the GPDO 1995. Furthermore the Council has not actually designated the Heathrow APZ or the Stanwell Cursus APA as yet.

In light of the above mentioned considerations, it is recommended that the request by English Heritage for further studies to be undertaken, in the form of a desk based assessment and/or an archaeological field evaluation, be passed on to the applicant.

##### OTHER HERITAGE CONSIDERATIONS

Saved Policy BE4 requires any new development within or on the fringes of a Conservation Area to preserve or enhance those features that contribute to its special architectural and visual qualities, and to make a positive contribution to the character or appearance of the conservation area. Saved Policy BE10 states that development

proposals should not be detrimental to the setting of a listed building.

The application site is not in a designated area. The nearest conservation area is the Longford village Conservation Area to the north, on the other side of the Duke of Northumberland River. This is located some distance from the application site and it is not considered that this area will be directly affected by the proposed development. The nearest listed buildings are in Longford Village and are also some distance from the site. It is considered that the new decked car park would have little direct impact on the setting of these listed structures. The Conservation Officer considers that there would be no adverse impact on their setting, subject to appropriate tree planting to screen the boundary of the car park and filter views of the additional deck. In addition, the parapet enclosure to the new deck, particularly adjacent to the village boundary, could take the form of a more solid edge at first floor level, to limit light spillage and additional noise as far as is possible.

Subject to the above mentioned considerations It is therefore considered that the scheme could be implemented without detriment to the character of the Longford village Conservation Area or the setting of nearby listed buildings, in accordance with Saved Policy BE10 of the Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012).

#### **7.04 Airport safeguarding**

Heathrow Airport Safeguarding and National Air Traffic Services (NATS) have been consulted on this consultation. No objections have been received subject to appropriate considerations and informatives.

#### **7.05 Impact on the green belt**

Saved policies OL1-OL5 seek to protect the visual amenity of the Green Belt, expect comprehensive landscape improvements and prevent conspicuous development which might injure the visual amenity of the Green Belt by reason of siting, materials or design. Saved Policy OL5 states that development adjacent or conspicuous from the Green Belt will only be permitted if it would not injure the visual amenities of the Green Belt, by reason of siting, materials, design, traffic or activities generated. This is reflected in the NPPF, which advises that the visual amenities of the Green Belt should not be injured by development conspicuous from it of a kind that might be visually detrimental by reason of siting, materials or design.

The proposed deck for the T5 Business Car Park would be situated within the north-east section of the main site measuring 100 metres x 47.8 metres, at 3.2 metres above ground level, above which there will be 6.0 metre high lighting columns. The western extremity of the proposed deck lies very close the edge of the Green Belt boundary. There will also be a protective parapet around the edge of the deck at 4.2 metres above ground level, and inevitably the proposed deck would have somehas some impact on the openness of the space.

Photomontages of the T5 Car Park have been submitted showing views from five selected viewpoints from the southern edge of Longford Village. Views from Longford Village, to the north, will be part screened by the intervening vegetation around the Duke of Northumberland's River. The daytime photomontages indicate that the T5 deck and lighting columns will be not have a great impact from the viewpoints, although it is noted that these photomontages are based on summer views when the visual impact will be filtered by the intervening vegetation while in leaf. These views will be more open during the winter months. It is therefore recommended that additional tree planting be sought on land to the north of the T5 Business car park to further screen views from the adjoining Green Belt and Longford Village beyond.

The series of Nightview Parameters confirms that there will be a glow of light over the car park, which will inevitably have an urbanising influence on the views towards the airport from the adjoining Green Belt. Light pollution, at night, from the lamp columns and car headlights is likely to be visible, particularly in winter months. This could be partially addressed by the use of a solid parapet along the northern edge of the proposed deck and additional tree planting, as suggested above.

The conversion of the 924 space N2 Car Park involves the re-arrangement of circulation and spaces within the existing ground level car park and the provision of a single-storey (2.9 metre high) Welfare Facility, close to the eastern site exit. It is considered that this should have no significant visual impact.

In conclusion, the proposed parking deck in the T5 Business Car Park is unlikely to be seen beyond the existing vegetation and infrastructure and as such, would not be readily visible from the Green Belt to the north of the site. Additional tree planting on land to the north of the T5 Business car park would further screen views from the adjoining Green Belt. As such, the scheme is considered to be in compliance with Saved Policies OL5 and BE38 of the Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012) and London Plan 7.21.

#### **7.07 Impact on the character & appearance of the area**

Policies BE13 and BE19 of the Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012) seek to ensure that new development makes a positive contribution to the character and amenity of the area in which it is proposed. Policy BE13 states that, in terms of the built environment, the design of new buildings should complement or improve the character and appearance of the surrounding area and should incorporate design elements which stimulate and sustain visual interest.

The impact of the proposed development on the Green belt land to the north of the T5 business car park and Longford village Conservation Area have been deal with in relevant sections of this report.

Views of the T5 car park from the Northern Perimeter Road will be relatively uninterrupted by the proposed deck, which would be set well back from this boundary and part-mitigated by existing roadside planting. It is considered that impact of the N2 Car Park will be no worse than at present, although additional hedge planting in the verge against the security fence would be an advantage.

As stated elsewhere in this report, the T5 Business Car Park is at a location that could be be susceptible to negative impacts of light spill, particularly the Green Belt land to the north of the site and the hotel to the east. The series of Nightview Parameters confirms that there will be a glow of light over the car park, which will effectively have an urbanising influence on the views towards the airport from Longford Village.

The submission includes an Obtrusive Light Survey, which provides details of the light fittings and anticipated light spill for both car parks, but with particular emphasis on T5 Business Car Park. It has been found that the increase of luminance from the T5 Business Car Park to nearby hotel windows, Northern Perimeter Road and the nearest fence to the north of the site is less than 2 lux in all circumstances, and the additional shielding effect of the trees surrounding the east and north side of the T5 car park will limit the lighting spillage further into the ecological zone to the north of the site, to levels below 1 lux.

The conversion of the 924 space N2 Car Park involves the re-arrangement of circulation and spaces within the existing ground level car park and the provision of a single-storey (2.9 metre high) Welfare Facility, close to the eastern site exit. It is considered that this should have no significant visual impact. In addition, the N2 Car Park is not considered to be in a location that would be considered sensitive to light pollution.

#### **7.08 Impact on neighbours**

Policies BE20 and BE21 of the Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012) seek to prevent developments which would be detrimental to the amenity of nearby occupiers by way of their siting, bulk, proximity or loss of light.

There are no residential properties that directly abut the site. The development would be separated from residential properties by the Duke of Northumberland River and open land to the north and west.

The nearest residential properties are located over 100m way from the proposed decked car park, to the northwest. Accordingly, it is not considered that the proposed development would have any detrimental impact on the amenity of the nearest residential occupants. Accordingly, the proposal would comply with policies BE20, BE21 and BE24 of the Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012).

Issues relating to air quality and noise are dealt with elsewhere in this report.

#### **7.09 Living conditions for future occupiers**

Not applicable to this type of development.

#### **7.10 Traffic impact, Car/cycle parking, pedestrian safety**

The National Planning Policy Framework (NPPF) at Paragraph 32 states that plans and decisions should take account of whether safe and suitable access to the site can be achieved for all people; and development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe. Paragraph 35 of NPPF also refers to developments and states that developments should be located and designed where practical to give priority to pedestrian and cycle movements; create safe and secure layouts which minimise conflicts between traffic and cyclists or pedestrians.

Local requirements in relation to impacts on traffic demand, safety and congestion are set out in Local Plan Part 2 policy AM7 which states:

The LPA will not grant permission for developments whose traffic generation is likely to:

- (i) unacceptably increase demand along roads or through junctions which are already used to capacity, especially where such roads or junctions form part of the strategic London road network, or
- (ii) prejudice the free flow of traffic or conditions of general highway or pedestrian safety

TfL is the highway authority for A4 Bath Road, BAA is responsible for roads within the airport boundary, while Hillingdon Council is responsible for the rest of the road network in this area.

#### **CAR PARKING**

The proposal would result in the gain of 350 spaces at the T5 Business Car Park coupled with the loss of 134 spaces at the N2 Car Park, resulting in a net gain of 216 spaces overall. The applicants submit that this additional parking is required as the current car parking capacity for both business and long stay for T5 is not forecast to meet demand from 2014 onwards. If this demand is not provided, then the applicants point out that the

most likely alternative for these types of passengers is to use mini-cabs or to be dropped off and picked up by a private vehicle, such as by a friend or relative. Both alternate options would have negative highway capacity implications, as they both result in two, two-way movements, rather than one two-way movement, when a car is parked at the airport.

The total number of car parking spaces airport wide as a result of the proposal increases from 36,849 to 37,065. Despite this increase in spaces, the overall car parking provision at Heathrow would still fall well within the 42,000 space cap defined by condition A85 of the Terminal 5 planning permission (ref: 47853/APP/2002/1882). This cap sets a strategic limit on the totality of car parking within Heathrow Airport's main car parks and additionally limits staff parking spaces to 17,500 within the cap. The applicant submits that one of the reasons the cap has not been met is because BAA has implemented much less parking than originally proposed for Terminal 5. However, it is important to note that the cap is airport wide and not specific to Terminal 5.

In terms of total car parking provision at Heathrow Airport, it is considered that the 42,000 space car park cap condition is the appropriate control. This level was set by the Secretary of State, taking into account all relevant issues (such as the cap on air traffic movements and projected passenger numbers), when Terminal 5 was granted planning permission in November 2001. This approach has consistently been taken to other applications for car parking at the airport.

#### Traffic Generation:

A vehicular assessment has been undertaken to examine the potential impact of the proposal on the Northern Perimeter Road. In terms of the current traffic volumes, the assessments shows that there are currently three daily two way peaks between 0600-0900, 1200-1400 and 1600-1800.

#### T5 Business Car Park:

In terms of T5 Business Car Park, demand during the week far exceeds weekend demand. The weekday daily peaks show that the peak entry time is between 0600 and 0700 with on average 107 vehicle entries. The existing exit peaks are spread over a three hour period from 1900 to 2200 with around 65-70 vehicles exiting per hour. The total number of two way movements per weekday has been calculated at around 1000 (i.e. 500 daily entries and exits).

The introduction of 350 additional spaces to the T5 Business Car Park is not predicted to change the profile of the peak times for entry and exit. It will however increase the total journeys by a total of 630 daily entries and exits, equating to an additional 136 entries between 0600 and 0700 and 90 vehicles per hour (270 total) between 2100 and 2200. This equates to an additional 280 two way vehicle movements per weekday.

#### N2 Car Park:

Unlike the T5 Business Car Park, the N2 Car Park will change in entry and exit profile, due to the change from contractor parking to long stay parking. The vehicular assessment shows there to be a current peak of 324 entry movements from 0600 to 0700 and 240 exit movements from 1700-1800. This corresponds to the times when contractors arrive and depart at either end of the working shift. This profile will change with the introduction of long stay parking. Based on figures taken from the existing T5 Long Stay Car Park on the Northern Perimeter Road, it is anticipated that the entry peak will shift earlier in the morning between 0500 and 0600 and will be 19 vehicles per hour while the exit peak will

be between 2100 and 2200 and will also be 19 vehicles per hour.

The assessment shows that not only will the peak profile for the N2 Car Park change to be outside of the peak traffic times on the Northern Perimeter Road, but will also result in a large decrease in traffic flow, namely 324 entry vehicles down to 19 in the morning peak hour and 240 exit vehicles down to 19 in the evening peak hour.

Impact upon the Northern Perimeter Road:

The result of 350 additional bays in the T5 Business Car Park is a slight increase in the amount of traffic on the Northern Perimeter Road. However, the vehicular assessment has also shown a large reduction in the traffic flow into and out of the N2 Car Park along with a redistribution of the peak vehicle movements. The combined effect of both car parks is an overall reduction in traffic on the Northern Perimeter Road.

It is not considered that the proposals would lead to a significant impact on roads outside the airport. Roads within the airport boundary are owned and operated by BAA and, as such, the implications of any developments on the airport road system are for BAA to assess. Notably the Council's Highway Engineer has raised no objections with regard to the impact of the development on the local road network. As such, it is considered that the application has satisfactorily addresses traffic generation, parking and access issues, in compliance with Policies AM2, AM7, AM14 and AM15 of the Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012).

#### **7.11 Urban design, access and security**

Issues of urban design and access have been dealt with in relevant sections of this report.

#### **7.12 Disabled access**

A passenger lift will be provided to access the decked T5 car park and will be suitable for mobility impaired persons. The lift capacity will be up to eight persons and will have a door clearance of 900mm. 350 spaces at T5 Business Car Park. seven blue badge car park bays will be provided at ground level. For the N2 car park, a total of 25 blue badge bays will be provided and located adjacent to each bus stop. Accordingly, the scheme is considered to comply with Policy AM15 of the Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012), London Plan policies 7.1 and 7.2 and the Council's Supplementary Planning Document 'Accessible Hillingdon'

#### **7.13 Provision of affordable & special needs housing**

Not applicable to this type of development.

#### **7.14 Trees, landscaping and Ecology**

##### TREES/LANDSCAPING

Saved Policy BE38 of the Unitary Development Plan Saved Policies states, amongst other things that development proposals will be expected to retain and utilise topographical and landscape features of merit. Saved policies OL1-OL5 seek to protect the visual amenity of the Green Belt, expect comprehensive landscape improvements and prevent conspicuous development which might injure the visual amenity of the Green Belt by reason of siting, materials or design.

The Design & Access Statement states that no new landscaping has been proposed as part of the development. However, officers consider that there are opportunities where feasible, to plant climbing plants at the base of the perimeter fence and in the case of the T5 business car park, to plant trees, particularly on the northern boundary in order to reduce the visual impact of the structure from the Green Belt and Longford Village.

A condition is therefore recommended requiring a detailed landscaping scheme incorporating the planning outlined above. Subject to this condition, it is considered that the scheme is on the whole acceptable and in compliance with Saved Policy BE38 of the Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012).

## ECOLOGY

Saved Policy EC1 states that the local planning authority will not permit development which would be unacceptably detrimental to designated local nature reserves and other nature reserves. If development is proposed on or in the near vicinity of such sites, applicants must submit an ecological assessment where considered appropriate by the local planning authority to demonstrate that the proposed development will not have unacceptable ecological effects. Saved Policy EC3 requires proposals for development in the vicinity of sites of nature conservation importance to have regard to the potential effects on such sites on changes in the water table and of air, water, soil and other effects, which may arise from the development. Regarding the creation of new habitats..

The T5 Business Car Park is located to the south of the Duke of Northumberland's River and an ecological corridor that separates the car park from residential properties in Longford. The impact of the parking deck on this ecological corridor has been considered, particularly in terms of light spill. The assessment indicates that the new parking deck will not lead to significant environmental effects.

It is noted that the current use and management regime of the site as car parks reduces the likely harm on protected species, as the existing environment is unlikely to provide suitable shelter or habitat for hibernating animals. However, the additional tree planting sought could contribute towards the promotion of nature conservation interests in the area, in compliance with relevant policies.

It is considered that the proposal could be completed without detriment to the recognised ecological value of this area, in accordance with Policy EC1 of the Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012), Policy EM7 of the Local Plan Part 1, Policy 7.18 of the London Plan and the NPPF.

### **7.15 Sustainable waste management**

As the consultation is for commercial development the airport operator ultimately has discretion over which waste management methods are used.

### **7.16 Renewable energy / Sustainability**

The proposal represents permitted development and, as such, there is no requirement for the development to comply with policies relating to renewable energy and sustainability.

### **7.17 Flooding or Drainage Issues**

Policy EM6 (Flood Risk Management) of the Local Plan Part 1 Strategic Policies (Adopted November 2012) states that applicants must demonstrate that Flood Risk can be suitably mitigated. Saved Policies OE7 and OE8 of the Local Plan Part 2 seek to ensure that new development incorporates appropriate measures to mitigate against any potential risk of flooding.

The site is within Flood Zone 1 and is less than 1 hectare. In addition, this application is a consultation on permitted development under the GPDO 1995. As such a flood risk assessment is not required.

The site is located in the airport's Western Catchment Area. Although the site is not located within a zone at risk of flooding, it would still be necessary for the proposal to

demonstrate that it would incorporate sustainable drainage techniques and reduce the risk of flooding, in accordance with the requirements of relevant local plan policies, Policies 5.11, 5.12 and 5.13 of the London Plan and the NPPF.

A Drainage Strategy has been submitted as part of the application. The existing T5 Business car park incorporates a storm water drainage system. The proposed car park deck will incorporate a storm water drainage system to prevent any water dripping between deck plates and affecting the car parking space directly below. In order to ensure that storm water effectively drains to discharge points from the car park deck, the deck is to be laid at a minimum gradient of 1:60 with a positive outward fall being provided on all perimeter areas. Drain paths will be intercepted to avoid water discharging onto entrance/egress ramps.

As the new parking deck is located directly above the existing surface car park, there will be no net increase in storm water captured and discharged from the site. It is therefore currently anticipated that there will be no additional petrol interceptor requirements or any requirements for incorporation of storm water attenuation.

Nevertheless, the Flood and Drainage Officer considers that the principles of maintaining the status quo at Heathrow, in managing surface water is not acceptable. Developments should reduce flood risk in accordance with Hillingdon's Local Plan Part 1, the NPPF and London Plan supplementary planning guidance. Developments at Heathrow should be informed by a site wide strategy to manage water, as there is considerable flood risk caused by Heathrow, which should be reduced by future development. The Flood and Drainage Officer has therefore recommended a Suds condition requiring the development to show how it complies with the above standards.

Subject to appropriate drainage strategy, the proposal would comply with Policy EM6 (Flood Risk Management) of the Hillingdon Local Plan: Part 1- Strategic Policies (Nov 2012), Policies OE7 and OE8 of the Local Plan Part 2 Saved UDP Policies (Nov 2012), Policies 5.12 and 5.13 of the London Plan (July 2011) and the NPPF.

## **7.18 Noise or Air Quality Issues**

Air Quality:

An Air Quality Assessment has been undertaken that assumes full runway alternation on easterly operations. The assessment assumes that aircraft departures will occur from the northern runway to the east and incorporates the pollutants associated with taxiing and start of roll conditions near the site of both car parks, which would be a worse case scenario.

The baseline year adopted is 2015, which is both the year for the potential start of easterly runway alternation and the start of the new car park arrangements. Although a range of pollutants have been assessed, the critical pollutant measured in the assessment is NO<sub>2</sub>. The assessment demonstrates that the proposal will result in NO<sub>2</sub> level increases at the T5 Business Car Park but these increases are confined to airport land and do not result in increases at nearby receptor points. NO<sub>2</sub> at the N2 car park are shown to decrease due to the change in traffic profile from contractors parking to long stay parking.

The Council's Environmental Protection Unit notes that the proposed development is within the declared AQMA and in an area that is probably exceeding the European Union limit value for annual mean nitrogen dioxide (NO<sub>2</sub>-40.0 mg/m<sup>3</sup>).



Whilst the proposed increase in parking spaces would be likely to have some impact on air quality, it is noted that the overall parking provision would fall well within the 42,000 space cap set by the Terminal 5 Planning Inspector. The goals of BAA's Heathrow Wide Energy Strategy, which aim to reduce carbon dioxide emissions across the airport are acknowledged. Accordingly, it is not considered that the proposal would have such a significant impact on air quality so as to raise an objection to the scheme.

Noise:

A noise assessment has been undertaken that examines the noise impact of the increase in car parking at the T5 Business Car Park. The N2 Car Park has not been assessed due to the distance from noise sensitive receptors. The assessment has shown that if a worst case scenario were to be applied where all traffic movements occurred on the new elevated parking deck, hourly ambient noise levels may increase by 2-3dB. However, when considering the extent of other noise sources surrounding the site such as the existing road network and airport operations, the proposal is unlikely to be discernable beyond what is currently experienced.

It is considered that the application sites are located a sufficient distance away from receptors sensitive to noise, such as residential properties. In addition, it the proposal largely replaces existing car parks. Accordingly, it is not considered that the proposal would have any significant noise impacts.

#### **7.19 Comments on Public Consultations**

One response has been received to the public consultation. the issues raised have been dealt with in the main body of the report.

#### **7.20 Planning obligations**

Planning obligations are not applicable to this type of application.

#### **7.21 Expediency of enforcement action**

Not applicable to this application.

#### **7.22 Other Issues**

Assessment of the need for Environmental Impact Assessment

The applicaant has provided an explanation of why the proposal is not EIA Development.

- The proposals are not considered to be of a significantly greater scale than the current car park and not of a markedly different nature, as the use of the land does not change.
- The proposals are to be provided on previously developed sites and do not meet any of the reevant criteria.
- The potential for impact from the proposed development is low.
- In the highly unlikely event of an impact occurring, the effects are likely to be localised within the site boundaries, would not be complex in nature and would easily be reversible.

For the reasons set out above, it is not considered that an EIA is required.

### **8. Observations of the Borough Solicitor**

General

Members must determine planning applications having due regard to the provisions of the development plan so far as material to the application, any local finance considerations so far as material to the application, and to any other material considerations (including regional and national policy and guidance). Members must also determine applications in

accordance with all relevant primary and secondary legislation.

Material considerations are those which are relevant to regulating the development and use of land in the public interest. The considerations must fairly and reasonably relate to the application concerned.

Members should also ensure that their involvement in the determination of planning applications adheres to the Members Code of Conduct as adopted by Full Council and also the guidance contained in "Probity in Planning, 2009".

#### Planning Conditions

Members may decide to grant planning consent subject to conditions. Planning consent should not be refused where planning conditions can overcome a reason for refusal. Planning conditions should only be imposed where Members are satisfied that imposing the conditions are necessary, relevant to planning, relevant to the development to be permitted, enforceable, precise and reasonable in all other respects. Where conditions are imposed, the Council is required to provide full reasons for imposing those conditions.

#### Planning Obligations

Members must be satisfied that any planning obligations to be secured by way of an agreement or undertaking pursuant to Section 106 of the Town and Country Planning Act 1990 are necessary to make the development acceptable in planning terms. The obligations must be directly related to the development and fairly and reasonably related to the scale and kind to the development (Regulation 122 of Community Infrastructure Levy 2010).

#### Equalities and Human Rights

Section 149 of the Equalities Act 2010, requires the Council, in considering planning applications to have "due regard" to the need to eliminate discrimination, advance equality of opportunities and foster good relations between people who have different "protected characteristics". The "protected characteristics" are age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation.

The requirement to have "due regard" to the above goals means that members should consider whether persons with particular "protected characteristics" would be affected by a proposal when compared to persons who do not share that protected characteristic. Where equalities issues arise, members should weigh up the equalities impact of the proposals against the other material considerations relating to the planning application. Equalities impacts are not necessarily decisive, but the objective of advancing equalities must be taken into account in weighing up the merits of an application. The weight to be given to any equalities issues is a matter for the decision maker to determine in all of the circumstances."

Members should also consider whether a planning decision would affect human rights, in particular the right to a fair hearing, the right to respect for private and family life, the protection of property and the prohibition of discrimination. Any decision must be proportionate and achieve a fair balance between private interests and the public interest.

### **9. Observations of the Director of Finance**

Not Applicable.

### **10. CONCLUSION**

The proposals for an additional deck of parking at the T5 Business Car Park along with a new T5 Long Stay Car Park at the N2 car park reflect the demand for car parking spaces

for passengers using T5. The level of car parking provision would fall well within the airport's 42,000 space cap and it is not considered that the proposal would have any adverse impacts on the surrounding road network.

The proposed parking deck is set within the boundaries of the existing T5 Business Car Park and set back from the boundary edges. The Views Assessment demonstrates that the new structure will not be clearly visible from any sensitive receptor points, such as the adjoining Green Belt and Longford Village Conservation Area.

The supporting information to this Part 18 GPDO submission indicates that any negative impacts of the proposal will be localised to airport land and that overall, conditions will improve as a result of the development.

The cumulative impact of the development with existing car park facilities has also been assessed through noise nuisance and air quality, light spill and traffic generation. The proposal is not considered to give rise to significant environmental effects.

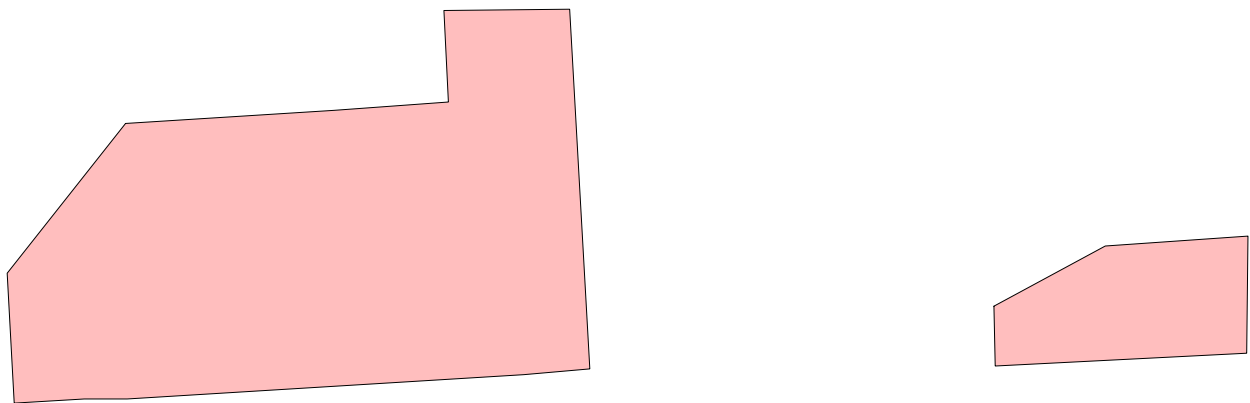
The proposal complies with relevant London Plan, Local Plan policies and the NPPF. Accordingly, it is recommended that no objections be raised subject to appropriate considerations.

## **11. Reference Documents**

- (b) The Hillingdon Local Plan: Part 1- Strategic Policies (8th November 21012)
- (c) London Plan (2011)
- (d) Hillingdon Local Plan Part 2 Saved UDP Saved Policies (November 2012)
- (e) Supplementary Planning Document Accessible Hillingdon
- (f) Supplementary Planning Guidance Community Safety by Design
- (g) NPPF
- (h) Planning Practice Guidance

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**Notes**

 Site boundary

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Site Address

**T5 Business and N2 Car Parks  
Northern Perimeter Road  
Heathrow Airport**

Planning Application Ref:

**69671/APP/2013/3871**

Planning Committee

**Major Application**

Scale

**1:3,500**

Date

**March 2014**

**LONDON BOROUGH  
OF HILLINGDON  
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