



The principle of a car park use on the site is considered consistent with Policy A4 (New Development Directly Related to Heathrow Airport) of the Hillingdon Local Plan: Part Two Saved UDP Policies (November 2012).

Subject to conditions, it is considered that that the application has satisfactorily addressed traffic generation, on-site parking and access issues.

It is not considered that the proposal would have a significant impact on air quality so as to raise an objection to the scheme. The proposal does not raise specific amenity or environmental issues and is compatible with airport safeguarding.

The scale and specific design of the proposed building are considered, on balance, acceptable for this location within the Cargo area at Heathrow, which is dominated by large commercial buildings, including the larger British Airways Cargo Centre warehouse and the more recent Heathrow biomass plant.

The proposed development is considered to comply with relevant planning policies and approval is recommended subject to conditions.

## **2. RECOMMENDATION**

**APPROVAL subject to the following:**

### **1 COM1 Outline Time Limit**

The development hereby permitted shall begin either before the expiration of three years from the date of this permission, or before the expiration of two years from the date of approval of the last of the reserved matters to be approved, whichever is the later.

#### **REASON**

To comply with Section 92 of the Town and Country Planning Act 1990 (As Amended)

### **2 COM2 Outline Reserved Matters**

Details of the landscaping (hereinafter called "the reserved matters" shall be submitted to the local planning authority before the expiry of three years from the date of this permission and approved in writing before any development begins. The submitted details 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 (the species and coverage being acceptable in not attracting birds)

#### **2. Details of Hard Landscaping**

2.a Means of enclosure/boundary treatments

2.b Car Parking Layouts including demonstration that:

For the employee parking at ground level and part first floor level, 64 of all parking spaces are served by electrical charging points (43 active and 21 passive); 21 disabled parking bays; and 10 motorcycle bays.

For British Airways staff on the upper floors, xx of all parking spaces are served by electrical charging points (xx active and xx passive spaces).

2.c Hard Surfacing Materials

2.d External Lighting

### 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

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

#### REASON

(i) To comply with Sections 91 and 92 of the Town and Country Planning Act 1990 (As Amended).

(ii) To ensure that the proposed development will preserve and enhance the visual amenities of the locality, to avoid endangering the safe operation of aircraft through the attraction of

birds and provide adequate facilities, in compliance with policies A4, 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 (2015).

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

Notwithstanding the submitted plans, development for each phase of the development hereby approved 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, disability standard spaces, and electric charging bays, loading facilities, closure of existing access and means of surfacing) of that phase have been submitted to and approved in writing by the Local Planning Authority. Each phase of the approved development shall not be occupied until all such works relevant to that phase 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 (2015)

### **4 OM2 Levels**

The total height of the development hereby approved, shall not exceed 37.48 metres AOD

#### REASON

To avoid endangering the safe operation of aircraft, in accordance with Policy A4 of the Hillingdon Local Plan: Part Two Saved UDP Policies (November 2012).

### **5 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 avoid endangering the safe operation of aircraft, in accordance with Policy A4 of the Hillingdon Local Plan: Part Two Saved UDP Policies (November 2012).

## **6 COM7 Materials (Submission)**

No development shall take place until details of all materials and external surfaces 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 of 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).

## **7 NONSC Sustainable parking strategy**

No development shall commence until a low emission strategy (LES) has been submitted to and approved in writing by the Local Planning Authority. The LES shall address the following components in detail and with a plan of implementation associated with each of them:

- 1) A strategy to promote, support, and sustain staff's acquisition of low or zero emission vehicles over the course of the lifetime of the car park with the aim of the fleet composition using the car park to be Euro 5/VI or above, or have implemented retrofitting devices that will enable compliance with such Euro standards;

The strategy shall detail the steps that will be followed in addressing the lower emissions requirements stated above and what measures will be taken to take into account future changing standards and available technologies and be updated accordingly in agreement with the Local Planning Authority.

- 2) Provision of electric vehicle charging bays in line with the London Plan standards.

- 3) A clear and effective strategy to encourage staff using the car park to:

- a) use public transport;
- b) enter car share schemes;
- c) purchase and drive to work zero emission vehicles.

The measures in the agreed scheme shall be maintained throughout the life of the development.

## REASON

The application site is within an Air Quality Management Area and to comply with paragraph 124 of the NPPF, policies 5.2 and 7.14 of the London Plan (2015), policy DME1 14 of the London Borough of Hillingdon Local Plan (part 2), and London Borough of Hillingdon Air Quality Action Plan 2004.

## **8 NONSC Design & Construction Method Statement (Cross Rail)**

None of the development hereby permitted shall be commenced until detailed design and construction method statements for all of the ground floor structures, foundations and basements and for any other structures below ground level, including piling (temporary and permanent), have been submitted to and approved in writing by the Local Planning Authority which:-

- (i) Accommodate the proposed location of the Crossrail structures including tunnels, shafts and temporary works,
- (iii) Accommodate ground movement arising from the construction thereof,
- (iv) Mitigate the effects on Crossrail, of ground movement arising from development

The development shall be carried out in all respects in accordance with the approved design and method statements. All structures and works comprised within the development hereby permitted which are required by paragraphs C1(i), (iii) and (iv) of this condition shall be completed, in their entirety, before any part of the building hereby permitted is occupied.

### **REASON**

To ensure that strategic transport infrastructure proposals are not prejudiced, in accordance with Policies 2.8 and 6.4 of the London Plan (2015).

## **9 NONSC Design & Construction Method Statement (London Underground)**

The development hereby permitted shall not be commenced until detailed design and method statements (in consultation with London Underground) for all of the foundations, basement and ground floor structures, or for any other structures below ground level, including piling (temporary and permanent), have been submitted to and approved in writing by the local planning authority which:

- provide details on all structures
- accommodate the location of the existing London Underground structures and tunnels
- accommodate ground movement arising from the construction thereof
- mitigate the effects of noise and vibration arising from the adjoining operations within the structures and tunnels.

The development shall thereafter be carried out in all respects in accordance with the approved design and method statements, and all structures and works comprised within the development hereby permitted which are required by the approved design statements in order to procure the matters mentioned in paragraphs of this condition shall be completed, in their entirety, before any part of the building hereby permitted is occupied.

### **REASON**

To ensure that the development does not impact on existing London Underground transport infrastructure, in accordance with London Plan 2015 Table 6.1 and 'Land for Industry and Transport' Supplementary Planning Guidance 2012.

## **10 NONSC Parking for Gate Gourmet and British Airways Staff Only**

No more than 1,022 parking spaces in total shall be provided on the multi storey car park (MSCP) hereby approved. These car parking spaces shall only be used by employees at Gate Gourmet and British Airways.

A maximum of 280 of these car parking spaces (all ground floor and part first floor) shall be used by employees at Gate Gourmet working at the Gate Gourmet Airline Catering Facility, Southampton Road East, Heathrow Airport. A maximum of 742 car parking

spaces shall be used for British Airways staff working at the British Airways cargo site, Southampton Road East, Heathrow Airport.

#### REASON

1. To control the level of parking of cars by employees at Heathrow Airport, to prevent the parking spaces being used by airline passengers and to ensure that all parking is directly related to the operation of Heathrow Airport, in accordance with Policies A4, AM2 and AM7 of the Hillingdon Local Plan: Part Two Saved UDP Policies (November 2012).

2. Permission is only granted due to the specific parking requirements of British Airways in accordance with Policies A4, AM2 and AM7 of the Hillingdon Local Plan: Part Two Saved UDP Policies (November 2012).

3. Permission is only granted due to the specific parking requirements of Gate Gourmet and High Court judgement ref: Neutral Citation Number: [2015] EWHC 3753 (Ch) dated 21/12/2015 in accordance with Policies A4, AM2 and AM7 of the Hillingdon Local Plan: Part Two Saved UDP Policies (November 2012).

#### **11 NONSC Agreement to occupy MSCP**

No development shall commence on any part of the car park above first floor level (1st deck of parking) until a development agreement between the applicant (the Arora Group) and British Airways (BA) committing the latter to occupy the development has been submitted to and agreed in writing by the Local Planning Authority.

#### REASON

1. To ensure the proposed car park above first floor level is not built until there is certainty that it will be used by British Airways cargo workers.

2. To control the level of parking by employees at Heathrow Airport and ensure that all parking is directly related to the operation of Heathrow Airport in accordance with Policies A4, AM2 and AM7 of the Hillingdon Local Plan: Part Two Saved UDP Policies (November 2012).

#### **12 NONSC Green Travel Plan British Airways**

The implementation or review of any Green Travel Plan authorised and approved by the Local Planning Authority in respect of the British Airways cargo site Southampton Road East, Heathrow Airport, shall also apply to the British Airways cargo workers car parking hereby approved.

#### REASON

To ensure that any approved Green Travel Plan applicable to the British Airways cargo site can be fully implemented in accordance with Policies AM2 and AM7 of the Hillingdon Local Plan: Part Two Saved UDP Policies (November 2012).

#### **13 SUS6 Green Travel Plan Gate Gourmet**

Prior to the use of the multi storey car park for the Gate Gourmet parking, a Travel Plan for the Gate Gourmet staff shall be submitted to and approved in writing by the Local Planning Authority. The Travel Plan, as submitted shall follow the current Travel Plan Development Control Guidance issued by Transport for London and will include:

- (1) targets for sustainable travel arrangements ;
- (2) effective measures for the ongoing monitoring of the Travel Plan;
- (3) a commitment to delivering the Travel Plan objectives; and

(4) effective mechanisms to achieve the objectives of the Travel Plan by both present and future occupiers of the development.

The development shall be implemented only in accordance with the approved Travel Plan.

#### REASON

To promote sustainable transport and reduce the impact of the development on the surrounding road network in accordance with London Plan (2015) Policies 6.1 and 6.3.

#### **14 NONSC Car Parking Redistribution Strategy**

Notwithstanding the approved plans, prior to the proposed multi storey car park (MSCP) hereby approved being brought into use for British Airways staff who currently use the cargo site Southampton Road East, Heathrow Airport, details of a car parking redistribution strategy, showing the redistribution of the car parking spaces from the British Airways Cargo Centre to the MSCP shall be submitted and approved in writing by the Local Planning Authority. The strategy shall include:

- i) The total number and location of parking spaces to be relocated,
- ii) the number, location and specification of any visitor spaces
- iii) A phasing programme of the implemented change,
- iv) the number, location and specification of spaces for disabled users (including access routes for disabled users from each car parking space proposed),
- v) Electric Vehicle Charging Points (20% active and 10% passive), together with a strategy for the monitoring and conversion of the passive points to active, in accordance with the demand.
- vi) physical measures within the MSCP site to ensure that the approved phasing can be controlled and to prevent cars accessing areas of the 5th level of the car park which are not allocated for vehicle parking.
- vii) Measures to ensure that access to the redundant car parking at the adjacent British Airways Cargo site, from which car parking would be transferred is closed and the use of those transferred parking spaces be discontinued, once they have been transferred to the new MSCP.
- viii) Any disabled parking spaces required to be retained on the British Airways site shall be discounted from the maximum total allowed on the MSCP.

The parking distribution strategy shall then be strictly implemented as soon as the facility hereby permitted is brought into use. The strategy shall remain in place thereafter, unless otherwise agreed in writing by the Local Planning Authority.

#### REASON

1. In order to comply with the terms of the application.
2. Car parking spaces at different locations within Heathrow Airport will be affected as a result of parking re-distribution, but full details have not been submitted.
3. Parking spaces that have to be relocated as a result of the proposals must comply with the latest London Plan Policy.
4. To control the phasing of the parking transfer arrangements from the British Airways Cargo centre, in accordance with the London Plan (2015) Policies 6.1 and 6.3.
5. To promote sustainable transport and reduce the impact of the development on the surrounding road network and air quality in accordance with London Plan (2015) Policies 6.1 and 6.3.
6. To ensure that there is no net increase in airport staff parking as a result of this development and to ensure that no excess parking is provided in addition to any operational parking that may subsequently be permitted on the British Airways Cargo site Southampton Road East, Heathrow Airport, in accordance with Policies AM2 and AM7 of

the Hillingdon Local Plan: Part Two Saved UDP Policies (November 2012).

**15 NONSC Contamination**

(i) The development hereby permitted shall not commence until a scheme to deal with contamination has been submitted in accordance with the Supplementary Planning Guidance Document on Land Contamination and approved by the Local Planning Authority (LPA). The scheme shall include all of the following measures unless the LPA dispenses with any such requirement specifically and in writing:

(a) A desk-top study carried out by a competent person to characterise the site and provide information on the history of the site/surrounding area and to identify and evaluate all potential sources of contamination and impacts on land and water and all other identified receptors relevant to the site;

(b) A site investigation, including where relevant soil, soil gas, surface and groundwater sampling, together with the results of analysis and risk assessment shall be carried out by a suitably qualified and accredited consultant/contractor. The report should also clearly identify all risks, limitations and recommendations for remedial measures to make the site suitable for the proposed use; and

(c) A written method statement providing details of the remediation scheme and how the completion of the remedial works will be verified shall be agreed in writing with the LPA prior to commencement, along with details of a watching brief to address undiscovered contamination.

(ii) If during development works contamination not addressed in the submitted remediation scheme is identified, the updated watching brief shall be submitted and an addendum to the remediation scheme shall be agreed with the LPA prior to implementation; and

(iii) All works which form part of the remediation scheme shall be completed and a comprehensive verification report shall be submitted to the Council's Environmental Protection Unit before any part of the development is occupied or brought into use unless the LPA dispenses with any such requirement specifically and in writing.

**REASON**

To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems and the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors in accordance with policy OE11 of the Hillingdon Local Plan: Part Two Saved UDP Policies (November 2012).

**16 NONSC Low energy lighting scheme**

No development shall commence until details of a low energy lighting scheme have been submitted to and approved in writing by the Local Planning Authority. The development shall proceed in accordance with the approved details.

**REASON** To ensure the development contributes to a reduction in carbon emissions in accordance with Policy 5.2 of the London Plan (2015).

**17 NONSC Construction training scheme**

Development shall not commence until a construction training scheme to secure employment strategies to maximise employment opportunities for local residents has been submitted to and approved in writing by the Local Planning Authority. The approved scheme and timescale of providing the proposed strategy shall then be implemented in accordance with the agreed scheme.



REASON

To ensure the development contributes to community and social infrastructure to cater for the needs of the existing community and future populations in compliance with Policy CI1 of the Hillingdon Local Plan Part 1.

**18 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

048-GA-300-C

048-GA-301-C - First floor

048-GA-302-A

048-GA-303-A

048-GA-304-C - Ground level

048-EL-500-A

048-EL-501-A

048-EX-200

048-GA-100

048-GA-30R

048-GA-400-A.

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

REASON

To ensure the development complies with the provisions of the Hillingdon Local Plan: Part Two Saved UDP Policies (November 2012) and the London Plan (2015).

**19 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. provide 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 arrangements to secure the operation of the scheme throughout the lifetime of the development, 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 (March 2015) 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 (March 2015), and conserve water supplies in accordance with Policy 5.15 (Water use and supplies) of the London Plan (March 2015).

**20 COM31 Secured by Design**

The multi storey car park shall achieve 'Secured by Design' accreditation awarded by the Hillingdon Metropolitan Police Crime Prevention Design Adviser (CPDA) on behalf of the Association of Chief Police Officers (ACPO). The car park shall not be brought into use until accreditation has been achieved.

**REASON**

In pursuance of the Council's duty under section 17 of the Crime and Disorder Act 1998 to consider crime and disorder implications in exercising its planning functions; to promote the well being of the area in pursuance of the Council's powers under section 2 of the Local Government Act 2000, to reflect the guidance contained in the Council's SPG on Community Safety By Design and to ensure the development provides a safe and secure environment in accordance with London Plan (2015) Policies 7.1 and 7.3.

**21 OM19 Construction Management Plan**

Prior to development commencing, the applicant shall submit a demolition and construction management plan to the Local Planning Authority for its approval. The plan shall detail:

- (i) The phasing of development works
- (ii) The hours during which development works will occur
- (iii) Measures to prevent mud and dirt tracking onto footways and adjoining roads (including wheel washing facilities).
- (iv) Traffic management and access arrangements (vehicular and pedestrian) and parking provisions for contractors during the development process (including measures to reduce the numbers of construction vehicles accessing the site during peak hours).
- (vi) Measures to reduce the impact of the development on local air quality and dust through minimising emissions throughout the demolition and construction process.
- (vii) The storage of demolition/construction materials on site.

The approved details shall be implemented and maintained throughout the duration of the demolition and construction process.

**REASON**

To safeguard the amenity of surrounding areas in accordance with Policy OE1 of the Hillingdon Local Plan: Part Two Saved UDP Policies (November 2012).

**22 NONSC Bird Hazard Management Plan**

Development shall not commence until a Bird Hazard Management Plan has been submitted to and approved in writing by the Local Planning Authority. The submitted plan shall include details of management of any flat/shallow pitched/green roofs on buildings within the site which may be attractive to nesting, roosting and "loafing" birds. The management plan shall comply with Advice Note 8 'Potential Bird Hazards from Building Design'.

The Bird Hazard Management Plan shall be implemented as approved, on completion of the development and shall remain in force for the life of the building. No subsequent alterations to the plan are to take place unless first submitted to and approved in writing by the Local Planning Authority.

#### REASON

It is necessary to manage the flat roofs in order to minimise its attractiveness to birds which could endanger the safe movement of aircraft and the operation of Heathrow Airport, in accordance with Policy A4 of the Hillingdon Local Plan: Part Two Saved UDP Policies (November 2012).

#### INFORMATIVES

1

Please note that the proposed development sits directly above London Underground (LUL) operational railway infrastructure, namely the Piccadilly Line. The Developer should consult LUL on their development proposals and of the potential impacts upon the operational railway.

You may inspect and/or purchase copies of Plans, Sections, Environmental Statements, Explanatory Notes and Non-Technical Summaries pertaining to the Crossrail proposals at specified Libraries, Local Authority Offices or directly from Crossrail Limited at 28th Floor, 25 Canada Square, Canary Wharf, London E14 5LQ.

#### 2 I52 Compulsory Informative (1)

The decision to GRANT 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).

#### 3 I53 Compulsory Informative (2)

The decision to GRANT planning permission 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
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
AM2	Development proposals - assessment of traffic generation, impact on congestion and public transport availability and capacity
AM7	Consideration of traffic generated by proposed developments.

BE13	New development must harmonise with the existing street scene.
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
LPP 4.5	(2015) London's Visitor Infrastructure
LPP 5.1	(2015) Climate Change Mitigation
LPP 5.10	(2015) Urban Greening
LPP 5.12	(2015) Flood risk management
LPP 5.13	(2015) Sustainable drainage
LPP 5.17	(2015) Waste capacity
LPP 5.21	(2015) Contaminated land
LPP 6.10	(2015) Walking
LPP 6.13	(2015) Parking
LPP 6.6	(2015) Aviation
LPP 7.13	(2015) Safety, security and resilience to emergency
LPP 7.14	(2015) Improving air quality
LPP 7.15	(2015) Reducing noise and managing noise, improving and enhancing the acoustic environment and promoting appropriate soundscapes.
LPP 7.5	(2015) Public realm
LPP 7.6	(2015) Architecture
LPP 8.2	(2015) Planning obligations
LPP 8.3	(2015) Community infrastructure levy
NPPF	National Planning Policy Framework

#### **4 115 Control of Environmental Nuisance from Construction Work**

Nuisance from demolition and construction works is subject to control under The Control of Pollution Act 1974, the Clean Air Acts and other related legislation. In particular, you should ensure that the following are complied with:-

A. Demolition and construction works which are audible at the site boundary shall only be carried out between the hours of 08.00 and 18.00 hours Monday to Friday and between the hours of 08.00 hours and 13.00 hours on Saturday. No works shall be carried out on Sundays, Bank or Public Holidays.

B. All noise generated during such works shall be controlled in compliance with British Standard Code of Practice BS 5228:2009.

C. Dust emissions shall be controlled in compliance with the Mayor of London's Best Practice Guidance 'The Control of dust and emissions from construction and demolition.

D. No bonfires that create dark smoke or nuisance to local residents.

You are advised to consult the Council's Environmental Protection Unit ([www.hillingdon.gov.uk/noise](http://www.hillingdon.gov.uk/noise) Tel. 01895 250155) or to seek prior approval under Section 61 of the Control of Pollution Act if you anticipate any difficulty in carrying out construction other than within the normal working hours set out in (A) above, and by means that would minimise disturbance to adjoining premises.

#### **5 125 Consent for the Display of Adverts and Illuminated Signs**

This permission does not authorise the display of advertisements or signs, separate consent for which may be required under the Town and Country Planning (Control of Advertisements) Regulations 1992. [To display an advertisement without the necessary consent is an offence that can lead to prosecution]. For further information and advice, contact - Residents Services, 3N/04, Civic Centre, High Street, Uxbridge, UB8 1UW (Tel. 01895 250574).

## **6            13                    Building Regulations - Demolition and Building Works**

Your attention is drawn to the need to comply with the relevant provisions of the Building Regulations, the Building Acts and other related legislation. These cover such works as - the demolition of existing buildings, the erection of a new building or structure, the extension or alteration to a building, change of use of buildings, installation of services, underpinning works, and fire safety/means of escape works. Notice of intention to demolish existing buildings must be given to the Council's Building Control Service at least 6 weeks before work starts. A completed application form together with detailed plans must be submitted for approval before any building work is commenced. For further information and advice, contact - Residents Services, Building Control, 3N/01 Civic Centre, Uxbridge (Telephone 01895 250804 / 805 / 808).

## **7**

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>).

## **8            161                    Lighting Near Aerodromes.**

The development is close to the aerodrome and the approach to the runway. The applicant is advised that there is a need to carefully design any lighting proposals. This is further explained in Advice Note 2, 'Lighting near Aerodromes' (available at [www.aoa.org.uk/publications/safeguarding.asp](http://www.aoa.org.uk/publications/safeguarding.asp)). Please note that the Air Navigation Order 2005, Article 135 grants the Civil Aviation Authority power to serve notice to extinguish or screen lighting which may endanger aircraft.

## **9            162                    Potential Bird Hazards from Buildings**

The applicant is advised that any flat/shallow pitched or green roof on buildings have the potential to attract gulls for nesting, roosting and loafing and loafing purposes. The owners/occupiers of the building must ensure that all flat/shallow pitched roofs be constructed to allow access to all areas by foot using permanent fixed access stairs ladders or similar.

The owner/occupier must not allow gulls, to nest, roost or loaf on the building. Checks must be made weekly or sooner if bird activity dictates, during the breeding season. Outside of the breeding season gull activity must be monitored and the roof checked regularly to ensure that gulls do not utilise the roof. Any gulls found nesting, roosting or loafing must be dispersed by the owner/occupier when detected or when requested by BAA Airside Operations staff. In some instances it may be necessary to contact BAA Airside Operations staff before bird dispersal takes place. The contact would be Gary Hudson, The Development Assurance Deliverer for Heathrow Airport on 020 8745 6459.

The owner/occupier must remove any nests or eggs found on the roof. The breeding

season for gulls typically runs from March to June. The owner/occupier must obtain the appropriate licences where applicable from Natural England before the removal of nests and eggs. For further information please refer to Advice Note 3 'Potential Bird Hazards from Amenity Landscaping and Building Design'.

## **10            16                    Property Rights/Rights of Light**

Your attention is drawn to the fact that the planning permission does not override property rights and any ancient rights of light that may exist. This permission does not empower you to enter onto land not in your ownership without the specific consent of the owner. If you require further information or advice, you should consult a solicitor.

## **11**

The applicant is advised to contact London Underground Infrastructure Protection in advance of preparation of final design and associated method statements, in particular with regard to: demolition; excavation and construction methods.

## **12**

In dealing with the application the Council has implemented the requirement in the National Planning Policy Framework to work with the applicant in a positive and proactive way. We have made available detailed advice in the form of our statutory policies from the 'Saved' UDP 2007, Local Plan Part 1, Supplementary Planning Documents, Planning Briefs and other informal written guidance, as well as offering a full pre-application advice service, in order to ensure that the applicant has been given every opportunity to submit an application which is likely to be considered favourably.

## **13**

You are advised that the development hereby approved represents chargeable development under the Mayor's Community Infrastructure Levy. At this time the Community Infrastructure Levy is estimated to be £964,425, which is due on commencement of this development. The actual Community Infrastructure Levy will be calculated at the time your development is first permitted and a separate liability notice will be issued by the Local Planning Authority.

In addition the development hereby approved represents chargeable development under the Hillingdon Community Infrastructure Levy. At this time the Community Infrastructure Levy is estimated to be £101,970. Should you require further information please refer to the Council's Website [www.hillingdon.gov.uk/index.jsp?articleid=24738](http://www.hillingdon.gov.uk/index.jsp?articleid=24738).

### **3.            CONSIDERATIONS**

#### **3.1        Site and Locality**

The application site comprises a 0.67 hectare roughly rectangular shaped plot, located on the west side of Sealand Road, towards the southern side of Heathrow Airport. The site is currently undeveloped and appears to be informally used for car parking for airline passengers.

The site is bounded to the north by an electricity substation, beyond which is Southampton Road East and British Airways' World Cargo Centre; to the west by the Gate Gourmet Catering Centre; to the east by Sealand Road, beyond which is car parking; and to the

south by the Southern Perimeter Road.

The site falls within the Heathrow Airport boundary as shown on the Hillingdon Unitary Development Plan Proposals Map. The Duke of Northumberland and Longford Rivers are located to the south of the Southern Perimeter Road, beyond which is Green Belt land falling within the jurisdiction of Spelthorne Borough Council. The site also falls within an Air Quality Management Area.

### **3.2 Proposed Scheme**

The application, which is made in outline with all matters included apart from landscaping, proposes the erection of a ground plus 4 level multi storey car park (MSCP), comprising a total of 1,022 spaces. The ground floor and part of the first floor of the car park would be for the exclusive use of Gate Gourmet workers, who currently park in the P5 airport car park on the east side of Sealand Road, under an agreement with the airport operator (Heathrow Airport Limited). A controlled pedestrian access gate giving direct access between the proposed car park and adjoining Gate Gourmet site is also proposed.

The remainder of the first floor and upper floors would provide up to 742 spaces for British Airways workers at the adjoining British Airways (BA) World Cargo Centre, on the opposite side (north side) of Southampton Road East. BA is at an advanced stage in preparing proposals for a major redevelopment of the BA cargo site to provide a new Premia Building to support ongoing and expanded operations, to which a letter of intent from BA dated 13 November 2015 refers.

Currently, BA wish to relocate 671 existing parking spaces plus 71 extant spaces relating to the part implementation of a permitted car park at the BA cargo site, together with 30 additional spaces expected to be generated by their proposed re-development. Given that the proposed BA redevelopment does not yet benefit from a planning permission, it is considered that these 30 anticipated spaces should not be included as part of the current application. Therefore 742 BA spaces (671 existing plus 71 extant) are proposed, making a total of 1,022, including the 280 Gate Gourmet spaces.

The car park would be constructed of reinforced concrete with steel frame and a circulatory system incorporating a central ramp between each floor level. The elevations of the car park would comprise vertical metal louvres to the ground and first floors with each of the upper floors comprising 4 horizontal banded metal cladding panels with widths of 600mm and 300mm with colour graded from darker at the bottom to lighter at the top. A steel mesh would infill between the lower banded cladding on each floor to act as a vehicle crash barrier with open spaces above. A roof is also proposed to provide weather protection.

Existing landscaping around the road frontages would be largely retained with the existing hedge to Sealand Road retained and reinforced or replaced as necessary together with retention of the better trees / shrubs along the southern boundary fronting the Southern Perimeter Road with additional tree planting as required. Access into the site would be from Sealand Road a few metres further north from the existing access.

Energy efficient LED lighting would be provided within the car park and vehicular access and egress would be via electronic vehicle security barriers requiring swipe card and / or ANPR access.

The applicant requested a screening opinion from the Council, which confirms that the

proposal does not constitute EIA development.

### 3.3 Relevant Planning History

65688/APP/2009/1274 Land Adjacent To Building 1071 Sealand Road Heathrow Airport  
Erection of 240 bedroom 6 storey hotel and two drive through restaurants. Outline application with details of access, appearance, layout and scale. (Restaurant details comprise access and layout).

**Decision:** 08-09-2009 Approved

65688/APP/2009/86 Land Adjacent To Building 1071 Sealand Road Heathrow Airport  
Erection of 300-bedroom seven storey hotel with 67 ancillary car parking spaces (Outline application).

**Decision:** 09-04-2009 Withdrawn

65688/APP/2011/2990 Land Adjacent To Building 1071 Sealand Road Heathrow Airport  
Full Planning Permission for a 8,751m<sup>2</sup> (Gross External Area (GEA)) 240 bedroom 6 storey hotel including access, car parking and ancillary works to the northern section of the site. Full Planning Application Site Area: 3,122 m<sup>2</sup>/0.3122 Hectare.  
Outline planning permission for 2 approx 325m<sup>2</sup> (Gross internal area (GIA) Fast Food retail outlets to the southern section of the site. Outline application site area: 3,642m<sup>2</sup>/0.3642 hectare  
Restaurant/Fast Food retail outlets details comprise access and layout (Hybrid Application.)

**Decision:** 30-10-2013 Withdrawn

65688/APP/2015/142 Temporary Car Park Site Sealand Road Heathrow Airport  
Installation of a multi-deck car park to provide 9 levels of parking to provide 215 staff car parking spaces for the neighbouring Gate Gourmet Building and the remainder of spaces to be a commercial car park (Outline Application seeking approval of access, appearance, layout and scale).

**Decision:**

#### Comment on Relevant Planning History

The site was previously vacant land used for various temporary purposes, but has been used for several years for temporary car parking by an airport car park operator. Having examined the aerial photographs of the application site, it appears that it was cleared between 1999 to 2011. The site appears to have been used as a temporary car park since 2011.

65688/APP/2009/86  
Erection of a 300 bedroom seven storey hotel with 67 ancillary car parking spaces (outline application). - Withdrawn 9 April 2009.

65688/APP/2009/1274  
Erection of 240 bedroom 6 storey hotel and two drive through restaurants. Outline application with details of access, appearance, layout and scale. (Restaurant details comprise access and layout). - Approved 9 September 2009.



65688/APP/2011/2990

8,751m<sup>2</sup> Gross External Area (GEA)) 240 bedroom 6 storey hotel including access, car parking and ancillary works to the northern section of the site. Full Planning Application Site Area: 3,122 m<sup>2</sup>/0.3122 Hectare. Outline planning permission for 2 approx 325m<sup>2</sup> (Gross internal area (GIA)) Fast Food retail outlets to the southern section of the site. Outline application site area: 3,642m<sup>2</sup>/0.3642 hectare. Restaurant/Fast Food retail outlets details comprise access and layout (Hybrid Application.) - Withdrawn 30 October 2013.

65688/APP/2015/142

Installation of a multi-deck car park to provide 9 levels of parking to provide 280 staff car parking spaces for the neighbouring Gate Gourmet Building and the remainder of spaces to be a commercial car park (Outline Application seeking approval of access, appearance, layout and scale). - Deferred for additional legal advice on 6 October 2015.

The issue of car parking for Gate Gourmet workers at this site relates to an original agreement for lease dated 29th May 1990 between the airport operator BAA (now named HAL) and British Airways plc (the predecessor Catering Base operator to Gate Gourmet), which is binding on the application site. This site was originally the approved car park for the Gate Gourmet facility. However, the car park was not provided at the outset, as BAA instead used the site for temporary construction related purposes, including the construction of the Heathrow Express underground railway. The agreement was then restated on 26th July 2000 when HAL sold the adjoining catering base to a Scottish Widows Fund and the restated agreement confirmed that the site would be used to provide a car park of up to 280 spaces for Gate Gourmet workers (who currently park within HAL's P5 employee car park on the east side of Sealand Road).

The applicant purchased the application site in 2008 on the basis of a 999 year lease and has been seeking alternatives to the provision of the Gate Gourmet parking which the applicant submits, represents a very inefficient use of scarce airport land. However, after protracted negotiations, the case was finally heard in the High Court in October 2015 (High Court judgement ref: Neutral Citation Number: [2015] EWHC 3753 (Ch) dated 21/12/2015). The judgement requires the applicant to construct a 280 space car park on the application site for use by Gate Gourmet workers in perpetuity. However, the judgement also allows additional time - until October 2018 to provide this parking in tandem with other development at the site.

#### **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.E3 (2012) Strategy for Heathrow Opportunity Area
- PT1.HE1 (2012) Heritage
- PT1.T1 (2012) Accessible Local Destinations
- PT1.T4 (2012) Heathrow Airport

## Part 2 Policies:

A4	New development directly related to Heathrow Airport
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
AM2	Development proposals - assessment of traffic generation, impact on congestion and public transport availability and capacity
AM7	Consideration of traffic generated by proposed developments.
BE13	New development must harmonise with the existing street scene.
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
LPP 4.5	(2015) London's Visitor Infrastructure
LPP 5.1	(2015) Climate Change Mitigation
LPP 5.10	(2015) Urban Greening
LPP 5.12	(2015) Flood risk management
LPP 5.13	(2015) Sustainable drainage
LPP 5.17	(2015) Waste capacity
LPP 5.21	(2015) Contaminated land
LPP 6.10	(2015) Walking
LPP 6.13	(2015) Parking
LPP 6.6	(2015) Aviation
LPP 7.13	(2015) Safety, security and resilience to emergency
LPP 7.14	(2015) Improving air quality
LPP 7.15	(2015) Reducing noise and managing noise, improving and enhancing the acoustic environment and promoting appropriate soundscapes.
LPP 7.5	(2015) Public realm
LPP 7.6	(2015) Architecture
LPP 8.2	(2015) Planning obligations
LPP 8.3	(2015) Community infrastructure levy
NPPF	National Planning Policy Framework

## 5. Advertisement and Site Notice

- 5.1 Advertisement Expiry Date:- **5th February 2016**
- 5.2 Site Notice Expiry Date:- Not applicable

## 6. Consultations

## **External Consultees**

### HEATHROW SAFEGUARDING

The proposed development has been examined from an aerodrome safeguarding perspective and could conflict with safeguarding criteria unless any planning permission granted is subject to the condition detailed below:

#### Submission of a Bird Hazard Management Plan

Development shall not commence until a Bird Hazard Management Plan has been submitted to and approved in writing by the Local Planning Authority. The submitted plan shall include details of:

- management of any flat/shallow pitched/green roofs on buildings within the site which may be attractive to nesting, roosting and "loafing" birds. The management plan shall comply with Advice Note 8 'Potential Bird Hazards from Building Design' attached \* See para below for information \*

The Bird Hazard Management Plan shall be implemented as approved, on completion of the development and shall remain in force for the life of the building. No subsequent alterations to the plan are to take place unless first submitted to and approved in writing by the Local Planning Authority.

Reason: It is necessary to manage the flat roofs in order to minimise its attractiveness to birds which could endanger the safe movement of aircraft and the operation of Heathrow Airport.

#### Information

The Bird Hazard Management Plan must ensure that flat/shallow pitched roofs be constructed to allow access to all areas by foot using permanent fixed access stairs ladders or similar. The owner/occupier must not allow gulls, to nest, roost or loaf on the building. Checks must be made weekly or sooner if bird activity dictates, during the breeding season. Outside of the breeding season gull activity must be monitored and the roof checked regularly to ensure that gulls do not utilise the roof. Any gulls found nesting; roosting or loafing must be dispersed by the owner/occupier when detected or when requested by BAA Airside Operations staff. In some instances it may be necessary to contact BAA Airside Operations staff before bird dispersal takes place. The owner/occupier must remove any nests or eggs found on the roof.

The breeding season for gulls typically runs from March to June. The owner/occupier must obtain the appropriate licences where applicable from Natural England before the removal of nests and eggs.

We would also make the following observations:

#### Lighting

The development is close to the aerodrome and the approach to the runway. We draw attention to the need to carefully design lighting proposals. This is further explained in Advice Note 2, 'Lighting near Aerodromes' (available at [http://www.aoa.org.uk/operation & safety/safeguarding.htm](http://www.aoa.org.uk/operation%20&%20safety/safeguarding.htm)). Please note that the Air Navigation Order 2005, Article 135 grants the Civil Aviation Authority power to serve notice to extinguish or screen lighting which may endanger aircraft.

#### Landscaping

The development is close to the airport and the landscaping which is included may attract birds which in turn may create an unacceptable increase in bird strike hazard. Any such landscaping should, therefore, be carefully design to minimise its attraction to hazard species of birds. Your attention is drawn to Advice Note 3, 'Potential Bird Hazards: Amenity Landscaping and Building Design' (available at <http://www.aoa.org.uk/operation&safety/safeguarding.htm>)

## 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, 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/operation & safety/safeguarding.htm](http://www.aoa.org.uk/operation& safety/safeguarding.htm))

We, therefore, have no aerodrome safeguarding objection to this proposal, provided that the above condition is applied to any planning permission.

It is important that any conditions requested in this response are applied to a planning approval. Where a Planning Authority proposes to grant permission against the advice of Heathrow Airport Ltd, or not to attach conditions which Heathrow Airport Ltd has advised, it shall notify Heathrow Airport Ltd, and the Civil Aviation Authority as specified in the Town & Country Planning (Safeguarded Aerodromes, Technical Sites and Military Explosive Storage Areas) Direction 2002.

## HEATHROW AIRPORT LTD

We refer to the above application recently submitted by Arora Management Services and have reviewed the application details. We are writing to confirm our support for the proposal subject to the comments in this letter.

The application site is one of the many leased areas within the airport boundary. The application proposes its redevelopment for car parking to facilitate further airport related development within the adjacent British Airways Cargo site and to accommodate existing employee parking for the adjoining Gate Gourmet flight catering facility. The majority of parking within the new facility will be used to accommodate displaced parking from the British Airways site. We feel this is an appropriate use for the site.

As the proposed car park would be wholly used by staff working at both the adjoining Gate Gourmet and British Airways sites, it would be classified as "tenanted" parking for the purposes of defining car parking within the airport boundary. As such Heathrow's car park cap does not apply.

We would therefore support the applicant's proposal for a planning condition to ensure that the parking remains for tenanted purposes only in connection with the adjoining uses. We would be grateful for the opportunity to see and comment on the proposed wording of the condition in due course.

We note that landscaping details have been reserved for subsequent approval. We would like to ensure that any landscaping scheme for this site reflects the broader Heathrow perimeter landscape strategy and would be happy to advise the applicant further in this respect at the appropriate time. We also wish the opportunity to engage with the applicant direct to ensure that the design details aligns with Heathrow design standards.

## METROPOLITAN POLICE

In principle I have no objections to this as long as it achieves Park Mark, whilst also adhering to the principles of Secured by Design for lighting and general security requirements.

## LONDON UNDERGROUND INFRASTRUCTURE

Though we have no objection in principle to the above planning application there are a number of potential constraints on the redevelopment of a site situated close to underground

tunnels and infrastructure. This site is above our Piccadilly line tunnel. Therefore, it will need to be demonstrated to the satisfaction of LUL engineers that:

- the development will not have any detrimental effect on our tunnels and structures either in the short or long term
- the design must be such that the loading imposed on our tunnels or structures is not increased or removed
- we offer no right of support to the development or land

Therefore we request that the grant of planning permission be subject to conditions to secure the following:

The development hereby permitted shall not be commenced until detailed design and method statements (in consultation with London Underground) for all of the foundations, basement and ground floor structures, or for any other structures below ground level, including piling (temporary and permanent), have been submitted to and approved in writing by the local planning authority which:

- provide details on all structures
- accommodate the location of the existing London Underground structures and tunnels
- accommodate ground movement arising from the construction thereof
- and mitigate the effects of noise and vibration arising from the adjoining operations within the structures and tunnels.

The development shall thereafter be carried out in all respects in accordance with the approved design and method statements, and all structures and works comprised within the development hereby permitted which are required by the approved design statements in order to procure the matters mentioned in paragraphs of this condition shall be completed, in their entirety, before any part of the building hereby permitted is occupied.

Reason: To ensure that the development does not impact on existing London Underground transport infrastructure, in accordance with London Plan 2015 Table 6.1 and 'Land for Industry and Transport' Supplementary Planning Guidance 2012

We also ask that the following informative is added:

The applicant is advised to contact London Underground Infrastructure Protection in advance of preparation of final design and associated method statements, in particular with regard to: demolition; excavation and construction methods;

## CROSS RAIL

Crossrail is a proposed new railway that will link Heathrow and Maidenhead in the west to Shenfield and Abbey Wood in the east using existing Network Rail tracks and new tunnels under Central London. The Crossrail Bill which was introduced into Parliament by the Secretary of State for Transport in February 2005 was enacted as the Crossrail Act on the 22nd July 2008. The first stage of Crossrail preparatory construction works began in early 2009. Main construction works have started with works to the central tunnel section to finish in 2018, to be followed by a phased opening of services. Crossrail Limited administers a Direction issued by the Department for Transport on 24th January 2008 for the safeguarding of the proposed alignment of Crossrail. The site of this planning application is identified within the limits of land subject to consultation under the Safeguarding Direction.

The implications of the Crossrail proposals for the application have been considered and the detailed design of the proposed development needs to take account of the construction of Crossrail. Therefore if, as the Local Planning Authority, you are minded to grant planning permission for the development, Crossrail Limited are of the view that the following condition should be applied:

Crossrail condition for foundation design, noise, vibration and settlement is recommended alongside an informative.

#### HISTORIC ENGLAND (GLAAS)

A predetermination archaeological evaluation has been carried out as requested by this office as part of the application. The investigation has been a very useful exercise and provided sufficient information on the nature and significance of the archaeological remains which would be impacted by the proposed works. The Evaluation Report produced by Allen Archaeology Limited and dated August 2015 indicates that parts of the site have been subjected to significant truncation. Towards the southern end of the site, the truncation appears to be less however the only feature identified in this area comprised an undated pit/ditch terminus.

Having considered the proposals with reference to the results of the evaluation, I conclude that the proposal is unlikely to have a significant effect on heritage assets of archaeological interest.

No further assessment or conditions are therefore necessary.

Please do not hesitate to contact me should you require any further information. This response relates solely to archaeological considerations. If necessary, Historic England's Development Management or Historic Places teams should be consulted separately regarding statutory matters.

#### GREATER LONDON AUTHORITY (GLA)

The GLA has confirmed that free-standing car park applications are not referable under category 3F of the Mayor of London Order 2008, as there has to be a development associated with the car parking, not just a car park application on its own.

#### SPELTHORNE COUNCIL

No comment received.

#### **Internal Consultees**

##### ENVIRONMENTAL PROTECTION UNIT (EPU)

Contamination (summary)

Submitted Reports - No contaminated land reports

Contamination is not considered by the developer as an issue in this application. There is an archaeological investigation and the pictures of the ground seem to show soils of a gravelly, sandy silty nature below the concrete and tarmac. There doesn't appear to be an historic contaminative use, apart from the airport (fuel spills in some areas).

In the case of other sites at the airport a site investigation has been submitted. There should be a geotechnical investigation anyway for the building work. There is unlikely to be a major concern but standard contamination condition is recommended, so that some information can be obtained, confirming the ground on which the large car park is to be built is clean.

Lighting:

Standard LT1 Floodlighting condition recommended which prohibits Floodlighting without prior approval.

Air Quality:

- 1) The site lies within an Air Quality Management Area (AQMA), and in the vicinity of the most polluted area within this AQMA (Heathrow). Existing conditions within the study area show poor air quality, with concentrations of nitrogen dioxide exceeding the annual mean objective along a number of roads, including the Great South-West Road (to the east of) the development site.
- 2) The traffic associated with the proposed development will affect air quality at existing properties along the road network affected by the proposed car park vehicular movements, which amount to circa 1022 vehicles on the road.
- 3) Staff members will inevitably travel from other locations across the AQMA. The Heathrow area presents pollution concentrations mostly above the objectives.
- 4) There would also be a significant impact on local concentrations at relevant locations elsewhere along the network.
- 5) The Airport Air Quality Strategy has as one of their actions to reduce NOx emissions under the airport's control. Heathrow's Air Quality Action Plan includes the objective of reducing NOx emissions the airport controls, and guide and influence to help achieve compliance with the EU air quality limit values. Action 2.15 specifically seeks to encourage the use of low and zero emission vehicles on the airport and is underpinned by the development of new guidance to lease or buy low emission vehicles.
- 6) The Airport Travel Plan states that one the main objectives of the Airports is to reduce the need for private transport and support the increase of more sustainable forms of travel to the airport. It also recognises that emissions from private cars and taxis are the biggest source of Heathrow's pollution with its focus during Q6 being on those modes that have the greatest impact which includes staff commuting.
- 7) Action 5 from Heathrow Blueprint for Reducing Emissions (Action 5 - Incentivise low emission vehicles) includes the review of colleague incentive schemes to encourage low & zero emission cars for commuting. A salary sacrifice scheme has been developed for Heathrow Airport Limited colleagues that incentivizes ultra low emission vehicles which is to be promoted and rolled out in 2016.

Therefore a low emission strategy is required in line with the objectives above, to link up Hillingdon's Air Quality Local Action Plan with the Heathrow Airport Air Quality Strategy, Heathrow Airport Air Quality Action Plan and Heathrow's Air Quality Blue print and implement the actions considered above.

A condition is therefore recommended requiring the submission of a Low Emission Strategy for Car Park Users (airport staff), addressing the following issues:

- 1) a strategy to promote, support, and sustain staff's acquisition of low or zero emission vehicles
- 2) Electric vehicle charging bay in line with the London Plan standards.
- 3) A strategy to encourage staff to use public transport; enter car share schemes; purchase and drive to work zero emission vehicles.

Informative: (Standard Construction work informative recommended).

URBAN DESIGN AND CONSERVATION OFFICER

The development of this site will not impact on any acknowledged historic assets or their setting. The site does fall within the proposed Heathrow Archaeological Zone, however, GLAAS have advised that they do not require any further submission re this matter.

#### TREE AND LANDSCAPE OFFICER (Summary)

Landscape Planning designations:

There are no Tree Preservation Orders and no Conservation Area designations affecting the site.

Landscape opportunities and constraints:

Adopted Local Plan, Policy BE1 seeks high quality design of the built and external environment.

- 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.
- Any soft landscape proposals will need to be designed and managed in accordance with guidance provided by BAA's Birdstrike Avoidance Team.

#### LANDSCAPE CONSIDERATIONS:

- The covering letter and plans propose a 5 level multi-storey car park with 1,080 spaces.
- As noted in the covering letter, the planning (and visual) impacts of the current proposal will be significantly reduced compared with the 9 level scheme.
- The brief Design & Access Statement confirms (5.7) that the 'existing landscaping around the road frontages will be largely retained and re-enforced as necessary together with retention of the better trees / shrubs along the southern boundary fronting the Southern perimeter Road.'
- No vegetation survey / analysis has been submitted, but it is evident that the hedge along the Sealand Road frontage will have to be sacrificed to facilitate the construction of the car park.
- The Ground Floor / Site Plan, ref. 300 Rev C, by Unum shows an indicative planted landscape buffer along the Sealand Road frontage and the retention /supplementing of planting along the Southern Perimeter Road boundary.
- In terms of the building footprint and illustrative landscape proposals, the current layout is similar to the previous application.
- If the application is recommended for approval, landscape conditions should be imposed to ensure that the proposals enhance the character and local distinctiveness of the surrounding natural and built environment.

#### RECOMMENDATIONS:

No objection, subject to the above observations and COM9 (standard landscape condition) parts 1,2,3,4,5, and 6.

#### HIGHWAY ENGINEER (Summary)

- The application seeks to transfer, a total of 1022 allocated car parking spaces from adjacent existing and committed developments / sites, to the proposed new MSCP. The adjacent sites may then be subject of potential redevelopment. This raises a number of matters that requires further consideration / clarification, as follows:
- The site has very poor public transport accessibility (PTAL=1b). Sealand Road is a Private Road, maintained by Heathrow Airport.
- A generic transport assessment report should ideally be submitted. The previous application proposed a 'meet and greet' operational model whereas the current application is for an operational staff car parking for adjacent sites.

The assessment should set out details of existing use of the site, quantify the existing use of car parking at individual adjacent sites from which parking is to be transferred, provide full detail of the



future proposals for adjacent sites (from where existing parking is to be transferred), demonstrate compliance with current car parking standards etc. The transport assessment should consider the individual and cumulative impacts of existing, committed and proposed land uses at each site.

(Officer Note: Following an internal review it was not deemed necessary to provide a bespoke transport assessment for the MSCP alone, as there is a net reduction in parking provision and the proposal will not affect Council controlled roads. In addition, a parking relocation strategy is secured by condition).

- Existing and proposed allocation of car parking to individual adjacent sites / developments should be detailed and assessed against LBH parking standards and justified using data from comparable generic sites within the use class. Use and access to car parking at all adjacent sites, from which car parking would be transferred, should be closed at the same time when use of the new MSCP commences.

(Officer Note: Proposed parking allocation for the adjacent P5 and British Airways sites will be assessed when planning applications are submitted for redevelopment of these sites, taking into account any parking relocated to the MSCP)

- Car parking should include 10% provision for disabled users.

(Officer Note: This is covered by condition. See commentary at section 7.10 of this report).

- Car parking (for employment use) should include 20% active and 10% passive provision for electric vehicles. Motorcycle parking should be provided at 1/20 car park space. Cycle parking should be provided to LBH minimum standards for existing and proposed redevelopment at adjacent sites.

(Officer Note: This is covered by condition. See commentary at section 7.10 of this report).

- The capacity of the proposed access arrangement should be assessed to demonstrate operational adequacy. The concentration of traffic movements at the new MSCP access, should demonstrate that the displaced employee related demands from the current accesses serving adjacent sites can be accommodated in context of any additional trips generated from any redevelopment at those sites. Detailed assessment of traffic demands related to shift working and traffic growth also requires consideration as part of a comprehensive generic transport assessment report.

(Officer Note: The adequacy of access to the adjacent P5 and British Airways sites will be assessed when planning applications are submitted for redevelopment of these sites, taking into account the proposed MSCP).

- Subject to information regarding proposed use of other adjacent sites (from where car parking is to be transferred), it may be necessary to undertake traffic assessment of the local highway network. All corresponding traffic modelling will be required to demonstrate acceptable calibration and validation of base year conditions. Depending on the programme for the redevelopment / construction etc, phased future year assessments may also be required. Full details of forecasting multi-modal traffic generation will be required. The scope of such an assessment should be discussed and agreed with the Planning Authority.

(Officer Note: Traffic assessments associated with the redevelopment of the adjacent P5 and British Airways sites will be carried out where necessary in support of any planning applications submitted for redevelopment of these sites, taking into account the proposed MSCP).

- TfL and adjoining borough should be consulted.

(Officer Note: The GLA and Spelthorne Borough Council have been consulted. No comments have been received).

- Construction and logistics Plan will be required.

(Officer Note: This is covered by condition).

- Travel Plans will be required for existing adjacent sites and for proposed redevelopment.

(Officer Note: This is covered by condition).

The above issues should be addressed in order for the current proposals to be considered in accordance with Policy AM2, AM7 and AM14.

## SUSTAINABILITY OFFICER

No objections.

## FLOOD AND DRAINAGE OFFICER (Summary)

A condition is recommended to ensure the appropriate management of surface water run off within the development.

The condition should require a scheme for the provision of sustainable water management which shall clearly demonstrate how it controls the surface water on site by providing information on Suds features, incorporating sustainable urban drainage; calculations showing storm period and intensity and volume of storage required to control surface water and size of features to control that volume to Greenfield run off rates; receptors capacity; a site investigation where infiltration techniques are proposed; identify vulnerable receptors; long term management and maintenance of the drainage system; and during construction, how temporary measures will be implemented to ensure no increase in flood risk from commencement of construction.

## **7. MAIN PLANNING ISSUES**

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

The application site falls within the Heathrow Airport boundary. Policy A4 of the Hillingdon Local Plan: Part Two Saved UDP Policies (November 2012) requires development directly related to Heathrow Airport to be located within the airport boundary, and development not directly related to Heathrow Airport to be located outside the airport boundary. Airport car parking is directly related to the operation of Heathrow Airport and the proposal is therefore considered to be in accordance with Policy A4.

The proposed use of the car park for Gate Gourmet and British Airways workers is also considered to be in accordance with Policy A4, as Gate Gourmet provides in-flight meals for airlines, whilst British Airways provides cargo services. Both Gate Gourmet and BA are located in existing large commercial premises adjoining the application site's western and northern boundary and are both themselves within the airport boundary.

The application site is located within the airport's cargo area where it is surrounded by commercial airport activities largely comprising airport warehousing; commercial units; the airport's major new biomass plant; and car parking. However, the applicant points out that the size of the site and its vehicular access off Sealand Road limit its ability to physically accommodate an airport sized warehouse or air cargo transit sheds. Previously, the site

has been used for airport car parking, but the planning permission granted for a hotel in September 2009 (ref: 65688/APP/2009/1274), which included 2 drive through restaurants has not been implemented, due to commercial issues. Accordingly, the applicant submits that the size of the site and its location within the cargo area prevents its use for traditional airport cargo purposes.

The applicant further submits that the requirement for use of the site to provide parking for Gate Gourmet workers sterilises use of the site for alternative development such as the previously permitted hotel and drive through restaurants. This follows a High Court decision from 2015, that the applicant is required to provide a minimum 280 space car park for Gate Gourmet employees. The legal requirement also effectively precludes a mixed use development at the site and consequently, the applicant submits that a multi-deck car park is considered the only practical development option that makes efficient use of the site, whilst accommodating the necessary Gate Gourmet car park. Consequently, a multi storey car park is considered to be an appropriate development option that makes efficient use of this brown field site whilst accommodating the necessary car parking.

### Heathrow Airport Car Parking

The issue of Heathrow Airport car parking was considered in great detail at the Terminal 5 planning Inquiry. In his decision to permit Terminal 5 in November 2001 the Secretary of State placed a condition upon the permission limiting the number of on-airport car parking spaces within BAA's controlled main car parks to 42,000 (including a maximum of 17,500 staff spaces). The condition relates to specifically allocated sites owned or controlled by the airport operator but excludes car parks leased to airport tenants such as hotels or warehouses. The car park cap imposed by the T5 decision does not relate to the proposed Gate Gourmet parking as it will be car parking leased to an airport tenant. The same applies to the British Airways parking, which will not be (and is not currently) subject to the car park cap.

As the proposed car park would be wholly used by staff working at both the adjoining Gate Gourmet and British Airways sites, it would be classified as "tenanted" parking for the purposes of defining car parking within the airport boundary. As such, Heathrow's car parking cap does not apply. Accordingly, there is no conflict with the Heathrow Airport T5 car park cap condition.

In light of the above mentioned considerations, no objections are raised to the principle of staff parking at this location within the Heathrow airport boundary.

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

The London Plan density matrix, and HDAS density guidelines relate specifically to residential developments. As such, the density of commercial and industrial schemes needs to be assessed on a case by case basis taking into account issues such as urban design, landscaping, parking, traffic impact, etc. These issues are all discussed later in the report.

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

The site does not fall within close proximity to any listed buildings, conservation areas, or areas of special local character.

The site is within the Heathrow Archaeological Priority Zone, a designated area of archaeological interest particularly, but not exclusively, for pre-roman remains. In this case GLAAS required the submission of a desk based assessment and consequent on site investigations which were carried out in June 2015. The site investigations confirmed that

no evidence of significant archaeological remains remain at the site and the archaeological potential of the site is low.

Historic England (GLAAS), having considered the proposals with reference to the results of the evaluation, conclude that the proposal is unlikely to have a significant effect on heritage assets of archaeological interest and no further assessment or conditions are therefore necessary.

#### **7.04 Airport safeguarding**

Heathrow Airport Safeguarding and National Air Traffic Services (NATS) have both confirmed that they have no objections to the proposal, subject to appropriate conditions and informatives.

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

Policy OL5 of the Hillingdon Local Plan: Part Two Saved UDP Policies (November 2012) seeks to protect the Green Belt from nearby developments which may prejudice its visual amenity. Whilst the proposed multi deck car park would be visible from Green Belt land, the nearest of which is located approximately 140m to the south in Spelthorne, the Southern Perimeter Road, Duke of Northumberland and Longford Rivers, and Bedfont Road to the south, provide a buffer between this land and the proposed building. Hoardings along Bedfont Road also limit these views to an extent and extensive tree planting within and on the boundary of the Green Belt land would also restrict any long distance views from here.

In addition, the proposed car park would be seen in context with other large scale airport related developments. As such, it is not considered that the proposal would have such a detrimental impact on the visual amenity of the Green Belt sufficient to justify refusal.

It should be noted that no comments have been received from Spelthorne Borough Council.

#### **7.06 Environmental Impact**

London Underground (LU) has identified that there are a number of potential constraints on the redevelopment of this site, which is situated close to underground tunnels and infrastructure. Therefore, it will need to be demonstrated that the development will not have any detrimental effect on LU tunnels and structures either in the short or long term. In addition, the site is identified within the limits of land subject to consultation under the Cross Rail Safeguarding Direction. Both London Underground and Cross Rail have therefore requested conditions requiring the detailed design and method statements for all of the foundations, basement and ground floor structures, or for any other structures below ground level, including piling (temporary and permanent).

Subject to compliance with these conditions, it is not considered that the proposal will impact on underground structures associated with the existing London Underground and proposed Cross Rail infrastructure.

With regard to ground contamination, the Council's Environmental Protection Unit notes that there does not appear to be a historic contaminative use apart from the airport, but that in the case of other application sites at the airport a site investigation has been submitted. Although it is not anticipated that ground contamination would be a major concern given that a car park is not a sensitive end use, the Environmental Protection Unit has recommended a condition requiring a scheme to deal with contamination in order to confirm that the ground on which the large car park is to be built is clean. Because of the risk that during development works unforeseen contamination may be found, the condition should require a written method statement providing details of a remediation scheme and

how the completion of the remedial works will be verified, along with details of a watching brief to address undiscovered contamination. In addition, the site may require imported top soil for landscaping purposes and a condition is recommended to ensure the imported soils are independently tested, to ensure they are suitable for use.

Subject to this condition, it is considered that the proposed development accords with the ground condition and contamination policies set out in the NPPF, London Plan and the Hillingdon Local Plan Parts 1 and 2.

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

The northern side of the Southern Perimeter Road is dominated by Heathrow's main cargo area and, as such, is characterised by large scale functionally designed warehouses, hangars and industrial buildings. Sealand Road provides access to the large British Airways World Cargo buildings and associated office buildings and car parks, and the adjacent Gate Gourmet catering facility. The southern side of the Southern Perimeter Road is bounded by the Duke of Northumberland and Longford River corridors and associated landscaping and footpaths, which run parallel with the road. Beyond the rivers is Green Belt land falling within the jurisdiction of Spelthorne Borough Council.

Policy BE13 of the Hillingdon Local Plan: Part Two Saved UDP Policies (November 2012) seeks to ensure that new development complements and improves the character and amenity of the area. London Plan Policy 7.6 further requires new development to be of the highest architectural quality, enhance, activate and appropriately define the public realm, meet the principles of inclusive design and incorporate best practice in resource management and climate change mitigation.

The proposed multi-deck car park would be 5 storeys high but the height of each storey is only 2.72m (apart from the 3.6m high ground floor) such that its height is only 14.88m. This is well below the height of the hotel previously permitted on the site (6 floors plus roof plant). The elevational treatment has been carefully considered to limit the perceived mass of the building by using a mix of different width cladding panels interspersed with 300mm gaps to create a geometric rhythm to the facades. Additionally, the shading of the panels with lighter grading dependent on height "lightens" the facade and its visual impact. Blue shades are proposed.

The whole building at ground and first floors is proposed to be clad with vertical louvres. The very few windows are limited to stair cores which gives the building a distinctive commercial character in keeping with its unique airport cargo area surroundings.

Neither NATS or Heathrow Safeguarding have raised objections to the height of the proposed car park. However, given the location of the development close to the approach to the runway, a condition is recommended, to ensure that the height of the building does not exceed that shown on the submitted plans.

The surrounding area is characterised by large scale industrial buildings and associated car parking associated with Heathrow Airport. This includes the very large scale, approximately 300m by 90m by 35m high BA World Cargo building, which is located approximately 180m to the north west of the site, and its ancillary approximately 110m by 57m by 10m high Premium Products Cargo building and 2-storey car park located beyond Southampton Road immediately to the north of the site. There is also the recently completed biomass power station on part of the P5 car park on the opposite side (east side) of Sealand Road, which has a main building height of around 20m with the main flue stacks at 34.8m.

The airport's cargo area is strongly commercial in character and the existing Cargo multideck car park located approximately 350m to the west of the site also fronts onto the Southern Perimeter Road and provides a precedent for multi-decked parking along the airport's southern perimeter road. Accordingly, it is considered the proposed height and design is satisfactory.

The proposed provision of enhanced boundary screening to the site's 2 road frontages will reflect the existing landscape screening and includes the planting of trees which would provide improved visual greening compared to the existing.

On balance, it is not considered that the proposed development would be out of keeping with the character or appearance of the surrounding area sufficient to justify refusal. In view of these considerations, and subject to appropriate conditions, the proposed multideck car park is considered to comply with Policy BE13 of the Hillingdon Local Plan: Part Two Saved UDP Policies (November 2012) and Policy 7.6 of the London Plan.

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

The site is bordered by commercial development within Heathrow Airport and, as such, it is not considered that that the proposal would have any significant detrimental impact on the neighbouring uses in terms of overlooking, overshadowing or noise.

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

Not relevant to this type of application. Guidelines referring to living conditions relate to residential developments.

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

##### TRAFFIC IMPACT

Policy AM7 of the Hillingdon Local Plan: Part Two - Saved UDP Policies (November 2012) advises that proposals for development will be assessed against their contribution to traffic generation and impact on congestion, having regard to the present and potential capacity of public transport and that the traffic generated by proposed developments would need to be accommodated on principal roads without increasing access demand along roads or at junctions already used to capacity, not prejudice the free flow of traffic, nor diminish environmental benefits brought about by other road improvement schemes or infiltrate local roads.

All roads within the airport are owned and operated by HAL and, as such, the implications of any development on the airport road system are for HAL to assess. HAL has raised no objections to the scheme on traffic generation or traffic management grounds.

The Highway Engineer has requested a generic Transport Assessment, which would include details of the future proposals for adjacent sites (from where existing parking is to be transferred). However, on balance, it was not deemed necessary to provide a generic transport assessment for the MSCP alone, as there is a net reduction in parking provision and the proposal will not affect Council controlled roads. Any cumulative traffic impacts relating to the future development of the P5 and British Airways sites will be assessed when planning applications are submitted for any redevelopment of these sites, taking into account the proposed MSCP. In addition, a parking relocation strategy is secured by condition, to ensure the proposal does not result in a net increase in parking provision.

Notably, there should be no adverse impacts on any local authority controlled roads, as the number of vehicle trips will not increase. Gate Gourmet parking already takes place in the Airport's P5 employee car park on the opposite side of Sealand Road, although it should be

noted that the proposed ground and part first floor provision of 280 spaces for Gate Gourmet would be less than the 350 car park spaces issued to each shift of Gate Gourmet workers to park in the airport's P5 car park. As such, there would be a reduction in parking provision available to Gate Gourmet.

All of the cars that would use the proposed MSCP are existing workers vehicles already accessing car parks off Sealand Road, or relate to the 71 extant parking spaces that can lawfully be provided at the British Airways cargo site. It should also be noted that the existing airline passengers' vehicles that currently use the application site on a temporary basis (a maximum of around 300 cars) will also be removed, resulting in a reduction of vehicle movements. Accordingly, there will be no net increase in the number of cars accessing Sealand Road and therefore no off-site highway implications.

It is also considered that there should be no measurable adverse impacts on any local authority controlled roads, as the dual carriageway Southern Perimeter Road does not pass any residential properties and is designed to cater for airport cargo and T4 traffic. In addition, predicted traffic generation levels are significantly below the level of trips predicted for the previously approved hotel and drive through restaurants. As such, no further Transport Assessment is considered necessary and the proposal is considered to comply with policies AM2 and AM7 of the Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012).

## ACCESS

The current application is for operational staff car parking for adjacent sites. Within the proposals, all of the vehicles using the car park can only access the site via the dual carriageway Southern Perimeter Road, as is the existing situation.

In terms of vehicle flows to the proposed car park, the current shift changeover pattern of Gate Gourmet staff is 6am, 2pm, and 10pm. The applicant has explained that the pattern for British Airways (BA) using the car park will vary from this, as BA do not want there to be any conflicts between drivers from the two companies accessing the site. The details of access times is one of the various technical matters that is currently subject to detailed work related to the proposed legal agreement between the applicant and BA. Accordingly, the access times will be fully detailed and controlled, so that there is no delay accessing the car park and proposals are likely to involve staggered BA staff entry times as required.

Significantly, BA has extensive experience of operating large staff MSCPs at Heathrow and elsewhere (as does the applicant) and such matters as timed entry, automatic number plate recognition system (ANPR), electronic cards, high speed entry barriers, manned entry etc will be utilised as necessary, to ensure rapid access to the car park in order to prevent queues.

It is acknowledged that the car park entry arrangements are an important matter for the car park users who are considered to be best placed to control the process. It should also be noted that HAL, as highway authority for the Airport, has confirmed its support for the application and will be further involved in its detailed implementation. The roads surrounding the site are under the control of HAL and are therefore unenforceable by the Council. Accordingly, no planning conditions are considered necessary to control these access arrangements.

The Highway Engineer observes that the adequacy of access to the adjacent P5 and

British Airways sites, including any cumulative impacts, would need to be assessed in context of any additional trips generated from any redevelopment at those sites. Any future development proposals will be assessed when planning applications are submitted for redevelopment of these sites, taking into account the proposed MSCP.

## PARKING

### Heathrow Airport Car Parking

The issue of Heathrow Airport car parking was considered in great detail at the Terminal 5 planning Inquiry. In his decision to permit Terminal 5 in November 2001, the Secretary of State placed a condition upon the permission limiting the number of on-airport car parking spaces within BAA's (British Airports Authority, now HAL) controlled main car parks to 42,000 (including a maximum of 17,500 staff spaces). The condition relates to specifically allocated sites owned or controlled by the airport operator but excludes car parks leased to airport tenants such as hotels or warehouses. The car park cap does not relate to the proposed Gate Gourmet parking as it will be car parking leased to an airport tenant. The same applies to the BA parking which will not be (and is not currently) subject to the car park cap.

This position is confirmed by HAL, in a letter dated 20 January 2016 stating that as the proposed car park would be wholly used by staff working at both the adjoining Gate Gourmet and British Airways sites, it would be classified as "tenanted" parking for the purposes of defining car parking within the airport boundary. As such, Heathrow's car parking cap does not apply. Accordingly, there is no conflict with the Heathrow Airport T5 car park cap condition.

### Parking Relocation Strategy

10% disability standard parking spaces are included for the Gate Gourmet parking in accordance with Council standards. The proposed BA parking does not include details of disability standard spaces or visitors spaces, because the proposals for redevelopment of the BA cargo site are still unconfirmed. In addition, the parking relocation of parking spaces from the BA Cargo Centre to the MSCP is likely to be on a phased basis. Accordingly, it is appropriate that the precise number of BA parking spaces, including the number and location of disabled spaces and the phasing programme should be controlled by planning conditions. This will ensure that the number and type of operational parking spaces that are ultimately permitted on the main BA cargo site are not additional to those in the proposed MSCP.

It is also necessary to control the construction of the car park to ensure that commencement of the BA parking (storeys 1-4) is not commenced until an agreement to occupy the MSCP by BA is completed.

In light of the above mentioned considerations, a condition is recommended, in order to manage the redistribution of the parking spaces appropriately. This condition requires the following:

- i) Details of each parking space to be relocated,
- ii) Locations of the parking redistributions,
- iii) A phasing programme of the implemented change, including how redundant areas of parking on the British Airways site are to be managed
- iv) Affected spaces for disabled users (including access routes for disabled users from



each car parking space proposed),

- v) Electric Vehicle Charging Points (active and passive), together with a strategy for the monitoring and conversion of the passive points to active, in accordance with the demand.
- vi) physical measures within the MSCP site to ensure that the approved phasing can be controlled and to prevent cars accessing areas of the 5th level of the car park which are not allocated for vehicle parking.

There are no definitive proposals for the P5 car park once the Gate Gourmet parking is relocated. However, the P5 site is identified as a site available for airport related development on the Terminal 5 'A85' car parking cap condition. HAL has aspirations to construct a Pharmaceutical / Perishables Centre, as set out in HAL's Heathrow's Cargo Strategy Blueprint dated November 2015. It is therefore likely that the existing P5 car park will be developed at a future date for air cargo purposes.

#### Travel Plans

It should be noted that the proposed provision of 280 spaces for Gate Gourmet workers would be less than the 350 car park passes issued to each shift of Gate Gourmet workers to park in the airport's P5 car park. There would therefore be a reduction in parking provision available to Gate Gourmet. Nevertheless, there does not appear to be an existing travel plan in place for Gate Gourmet workers, and given the planned reduction in parking provision, officers consider the proposed parking relocation to a permanent site to be an opportunity to introduce a travel plan for Gate Gourmet, in line with Heathrow's blueprint for reducing emissions document, published in 2015. The Travel Plan can be secured by condition, in the event of an approval.

In addition, it is recommended that a condition is imposed requiring the implementation or review of any Green Travel Plan authorised and approved by the Local Planning Authority in respect of the British Airways cargo site to also apply to the British Airways cargo workers car parking in the proposed MSCP. This is to ensure that any approved Green Travel Plan applicable to the British Airways cargo site can be fully implemented in accordance with Policies AM2 and AM7 of the Hillingdon Local Plan: Part Two Saved UDP Policies (November 2012).

#### Conclusion

Overall, it is considered that the highway considerations can be addressed by suitably worded conditions. Subject to these conditions, it is considered that the application has satisfactorily addressed traffic generation, on-site 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**

The surrounding area is characterised by large scale industrial buildings and associated car parking associated with Heathrow Airport. This includes the very large scale, approximately 300m by 90m by 35m high BA World Cargo building, which is located approximately 180m to the north west of the site, and its ancillary approximately 110m by 57m by 10m high Premium Products Cargo building and 2-storey car park located beyond Southampton Road immediately to the north of the site. There is also the recently completed biomass power station on part of the P5 car park on the opposite side (eastside) of Sealand Road, which has a main building height of around 20m with the main flue stacks at 34.8m.

The elevational treatment has been carefully considered to limit the perceived mass of the building by using a mix of different width hit and miss cladding panels interspersed with 300mm gaps to create a geometric rhythm to the facades. Additionally, the shading of the panels with lighter grading dependent on height "lightens" the facade and its visual impact. The design approach to the proposed car park is considered reasonable in seeking to break down the perceived scale of the building by using horizontal banding with lightening blue colour in relation to height. Accordingly, it is considered the proposed design is satisfactory.

**ACCESS:**

Addressed in Section 7.10.

**SECURITY:**

It is proposed that the car park will be provided with external and internal CCTV coverage as part of the process to obtain Park Mark accreditation. This can be secured by condition.

**7.12 Disabled access**

The car park would have level lift access to every floor along with 10% disabled parking bays for the Gate Gourmet parking.

With regard to the British Airways parking these do not include details of disability standard spaces or visitors spaces as the precise nature of the redevelopment proposals for the British Airways cargo site are not known at this time. Accordingly, it is appropriate that the precise number British Airways disabled spaces and their location should be controlled by planning conditions. This will ensure that the disabled spaces are appropriately located and to control the number of parking spaces that are transferred from the main BA cargo site to the proposed MSCP.

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

Not relevant to this application. There is no requirement for this type of development to contribute towards the borough's affordable or special housing needs.

**7.14 Trees, landscaping and Ecology**

Policy BE38 of the Hillingdon Local Plan: Part Two Saved UDP Policies 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 site currently benefits from a tall evergreen hedge along its eastern boundary, and a mix of tall shrubs and trees along the southern boundary, although the quality of the existing vegetation is relatively poor.

The existing operational site area is fenced and comprises a compacted hardcore surface with areas of tarmac and concrete but no landscaping. The wider site ownership area benefits from a mature hedge and grassed verge along most of its eastern boundary frontage to Sealand Road, and a mix of tall shrubs and trees along the road frontage to the Southern Perimeter Road although the quality of the existing vegetation is relatively poor. The other northern and western boundaries do not front onto roads and contain no landscaping, only security fencing.

Whilst landscaping is reserved for future consideration, the indicative landscaping plan proposes an appropriate landscaped green edge to both reinforce / improve or replace the existing landscaping. The provision of hedge planting interspersed with appropriate tree planting along the site's road frontages would help to mitigate the impact of the car park building.

The Tree and Landscape Officer raises no objections. Subject to necessary conditions, including reserved matters landscaping requirements, the scheme is considered to comply with Policy BE38 of the Hillingdon Local Plan: Part Two Saved UDP Policies.

**7.15 Sustainable waste management**

Not applicable to this car park.

**7.16 Renewable energy / Sustainability**

The only energy consumed by the car park would be electricity, primarily for lighting. The building has no roof and it is recommended that a planning condition ensuring an energy efficient lighting scheme would be adequate to limit energy use. Accordingly the development is considered to comply with relevant London Plan energy / sustainability policies in this regard.

A condition is recommended to ensure that Electric Vehicle Charging Points (active and passive) are provided, together with a strategy for the monitoring and conversion of the passive points to active, in accordance with the demand, in accordance with London Plan standards.

In addition, a condition is recommended requiring a sustainable parking strategy. Amongst the measures that could be incorporated include measures for the future provision of electric charging points as demand increases staff's acquisition of low or zero emission vehicles, encourage staff to use public transport and enter car share schemes.

**7.17 Flooding or Drainage Issues**

The site is located within Flood Zone 1 and is less than 1ha in size such that no Flood Risk Assessment is required.

London Plan policies 5.12 and 5.13 require development proposals to use sustainable urban drainage systems (SUDS) unless there are good reasons for not doing so. Policy EM6 Flood Risk Management in Hillingdon Local Plan: Part 1- Strategic Policies (Nov 2012) requires that surface water run off is controlled to ensure the development does not increase the risk of flooding. Conditions are proposed requiring the provision of site drainage which should be SUDs appropriate.

Subject to conditions, it is considered that the proposal would comply with the intentions of the Hillingdon Local Plan: Part One and Part Two Saved UDP Policies (November 2012) in respect to water management and London Plan policies 5.12 and 5.13.

**7.18 Noise or Air Quality Issues**

NOISE:

The Council's Environmental Protection Unit has been consulted on the application and raises no objection.

AIR QUALITY:

The site falls within an Air Quality Management Area. The Borough considers that any exceedence of the air quality objective will be deemed as significant, given that it is a level set to protect human health.

The air quality impacts related to any new MSCP are directly linked to the increase in vehicle trip generation. In this case there is no increase in trip generation as no additional vehicles will be accessing Sealand Road and there will actually be a modest reduction in trips due to the removal of the existing temporary airport car parking at the site. It should also be noted that a number of electric vehicle charging bays and passive charging bays

will also be provided, in accordance with relevant standards, which will assist in reducing future vehicle emissions. Accordingly it is not considered that there are adverse implications for air quality and no requirement for an air quality assessment to be submitted.

Nevertheless, the Borough considers that any exceedence of the air quality objective will be deemed as significant, given that it is a level set to protect human health. The Environmental Protection Unit therefore recommends a scheme for a Low Emission Strategy for airport staff using the car park, in line with Heathrow's Air Quality Strategy, Heathrow Airport Air Quality Action Plan, Heathrow's Air Quality Blue print and Hillingdon's Air Quality Local Action Plan.

The strategy would promote, support, and sustain staff's acquisition of low or zero emission vehicles, provide electric vehicle charging bays, encourage staff to use public transport and enter car share schemes. This could be secured by way of a condition in the event of an approval.

Subject to the above mentioned condition, 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.

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

Heathrow Airport Ltd.(HAL) raises no objections to the development, subject to satisfactory design and landscaping being achieved, and a condition to ensure that the parking remains for tenanted purposes only, in connection with the adjoining airport related uses.

#### **7.20 Planning obligations**

CIL

The development will be liable for the Mayoral CIL but not Hillingdon's own CIL. The Gate Gourmet and British Airways worker's parking is ancillary to the existing B2 General Industrial uses of the adjoining facilities and therefore is not subject to the Hillingdon CIL.

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

Not relevant to this application.

#### **7.22 Other Issues**

None.

### **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**

No objections are raised to the principle of the proposed development for airport related staff car parking, which is considered to be in accordance with Local Plan Part 2 Policy A4, being directly related to the operation of Heathrow Airport.

As the proposed car park would be wholly used by staff working at both the adjoining Gate Gourmet and British Airways sites, Heathrow's car parking cap does not apply. Accordingly, there is no conflict with the Heathrow Airport T5 car park cap condition.

The scale and design of the proposed building are considered, on balance, acceptable for this location within the Cargo area at Heathrow Airport. In addition, it is not considered that the proposal would have such a detrimental impact on the visual amenity of the Green Belt

sufficient to justify refusal.

The anticipated traffic generation is not considered to have an adverse impact on the local road network. Subject to conditions, it is considered that that the application has satisfactorily addressed traffic generation, on-site parking and access issues.

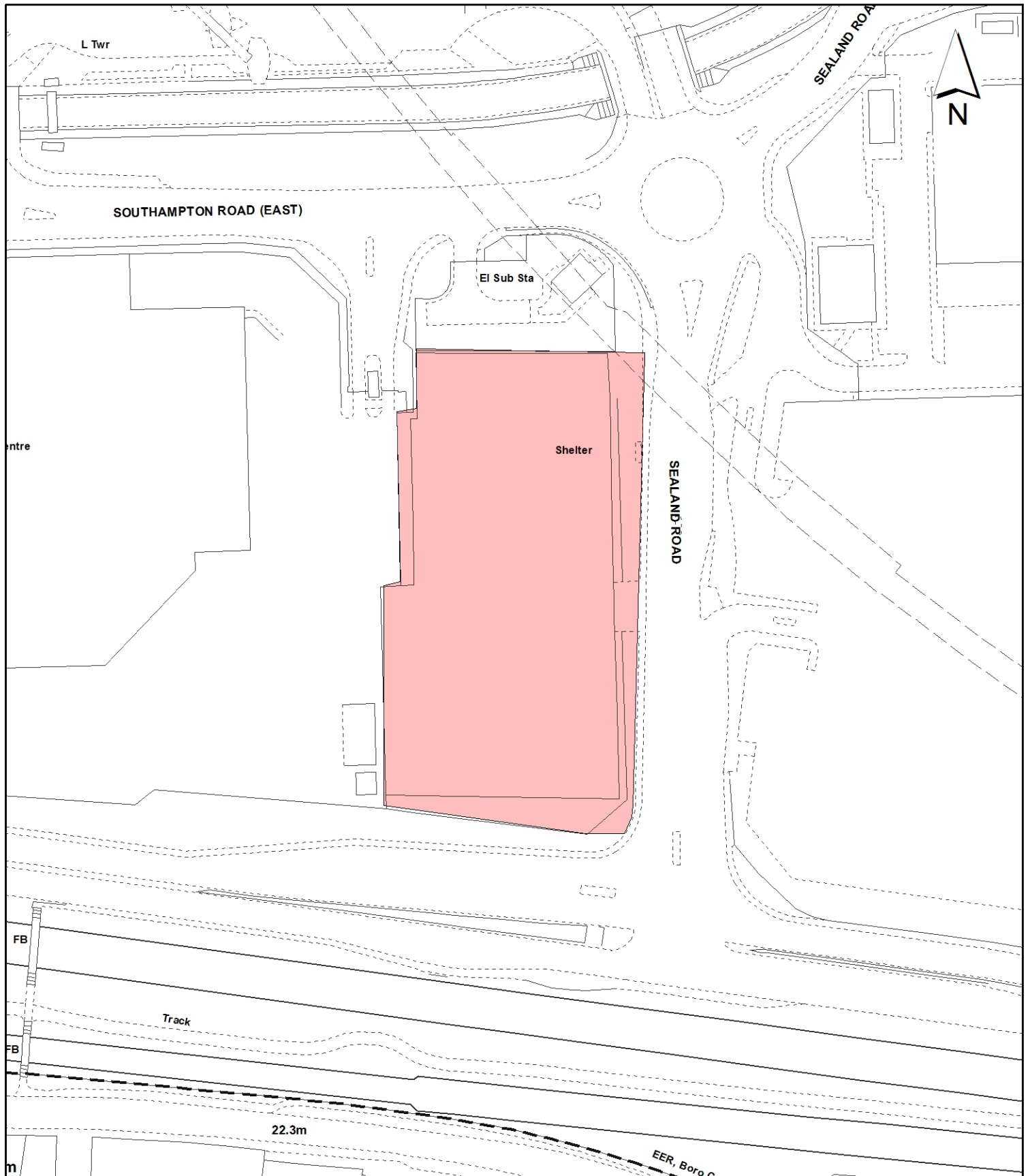
The proposal complies with relevant planning policy and accordingly, approval is recommended.

#### **11. Reference Documents**

Hillingdon Local Plan: Part 1 - Strategic Policies (November 2012)  
Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012)  
Hillingdon Supplementary Planning Document: Accessible Hillingdon (May 2013)  
London Plan (2015)  
National Planning Policy Framework (March 2012)  
London Borough of Hillingdon Air Quality Action Plan 2004

**Contact Officer:** Karl Dafe

**Telephone No:** 01895 250230



**Notes:**

 Site boundary

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Site Address:

**Temporary Car Park Site  
 Sealand Road  
 Heathrow Airport**

**LONDON BOROUGH  
 OF HILLINGDON**  
 Residents Services  
 Planning Section  
 Civic Centre, Uxbridge, Middx. UB8 1UW  
 Telephone No.: Uxbridge 250111

Planning Application Ref:

**65688/APP/2016/94**

Scale:

**1:1,250**

Planning Committee:

**Major**

Date:

**March 2016**



**HILLINGDON**  
 LONDON