

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

**Address** IAG CARCO CAMPUS SEALAND ROAD HEATHROW AIRPORT

**Development:** Erection of a new 11,520 sq.m (GIA) cargo handling facility (B8 use), ancillary buildings totalling 330 sq.m and associated works including changes to site access and reconfiguration of landside and airside parking.

**LBH Ref Nos:** 50045/APP/2016/2081

**Drawing Nos:** Gebler Tooth Travel plan  
1000-10-PL-223-000024 REV 2.0  
1000-10-PL-223-000026 REV 3.0  
1000-10-PL-223-000001 REV 3.0  
1000-20-PL-223-000003 REV 3.0  
1000-10-PL-223-000015 REV 3.0  
London Planning Energy Assessment reference 30000299-IRY-0001  
P1  
Air Quality Assessment  
1000-10-PL-736-000028 REV 2.0  
1000-10-PL-736-000029 REV 2.0  
1000-10-PL-223-000011 REV 3.0  
1000-30-PL-223-000027 REV 3.0  
RSK Flooding Note reference 132594-L01-HC-JC  
Design and Access Statement  
Noise Screening Report May 2016  
Transport Assessment May 2016  
Flood Risk Assessment parts 1-9  
Planning Statement

**Date Plans Received:** 31/05/2016                      **Date(s) of Amendment(s):** 14/09/2016  
**Date Application Valid:** 31/05/2016                      31/05/2016

### 1. SUMMARY

This application seeks consent for the erection of a new 11,520 sq.m (GIA) cargo handling facility at the IAG Cargo Campus, Heathrow. National, Regional and Local planning policy encourages airport-related development within the boundary of Heathrow Airport. The proposed development seeks to respond to projected demand for priority and temperature-controlled freight services whilst also re-configuring the site to ensure that the layout makes the most efficient use of operational land within the Heathrow airport boundary. The principle of the development is therefore considered acceptable

In relation to the proposed design and scale of the development, the size, scale, form and layout is considered appropriate to its location and to integrate well and complement the surrounding development which is characterised by large scale airport warehouses, hangars, cargo transit sheds and other large, specialist buildings.

A Transport Assessment has been received in support of the application confirms that there would be no unacceptable impacts on the highway network. The proposed development would not increase the number of car parking spaces required on the site. The existing 679 spaces would be replaced by re-provision on site and relocation as part

of the approved Arora MSCP (reference 65688/APP/2016/94) on the adjoining site.

In terms of the impact of the proposal on air quality, flood risk and sustainability, reports have been submitted and reviewed by the relevant Council Specialists. With the exception of the flooding impacts, which will be reported through the committee addendum, the Councils Specialists on Air Quality and Sustainability are satisfied that the proposed development will not have a detrimental impact on the surrounding environment, subject to appropriate conditions on any consent.

It is therefore recommended that the application is approved, subject to the receipt of positive comments from the Council's Flood and Water Management Officer.

## **2. RECOMMENDATION**

### **APPROVAL subject to the following:**

#### **1 COM3 Time Limit**

The development hereby permitted shall be begun before the expiration of three years from the date of this permission.

#### **REASON**

To comply with Section 91 of the Town and Country Planning Act 1990.

#### **2 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 [1000-10-PL-223-000026 REV 3.0; 1000-10-PL-223-000001 REV 3.0; 1000-20-PL-223-000003 REV 3.0; 1000-10-PL-223-000015 REV 3.0; 1000-30-PL-223-000027 REV 3.0; 1000-10-PL-223-000011 REV 3.0; 1000-10-PL-223-000015 REV 3.0; 1000-10-PL-736-000028 REV 2.0; 1000-10-PL-736-000029 REV 2.0] and shall thereafter be retained/maintained for as long as the development remains in existence.

#### **REASON**

To ensure the development complies with the provisions Hillingdon Local Plan: Part Two Saved UDP Policies (November 2012) and the London Plan (2016).

#### **3 COM5 General compliance with supporting documentation**

The development hereby permitted shall not be occupied until the following has been completed in accordance with the specified supporting plans and/or documents:  
Reduction in energy use and renewable technology installation [Report London Planning Energy Assessment reference 30000299-IRY-0001 P1]  
Air Quality Mitigation Measures [Report 'Air Quality Assessment September 2016']

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

#### **REASON**

To ensure that the development complies with the objectives of the Hillingdon Local Plan: Part One- Strategic Policies and Hillingdon Local Plan: Part Two Saved UDP Policies (November 2012)

#### **4 NONSC Link with application 65688/APP/2016/94**

Construction of the building hereby approved shall not commence until the 420 car parking spaces required by this development have been provided within the Multi Storey Car Park

approved as part of application 65688/APP/2016/94.

**REASON**

To ensure that an appropriate level of parking provision is provided for the cargo handling facility in accordance with Policies AM2, AM7 and AM14 of the Hillingdon Local Plan: Part Two - Saved Policies and 6.13 of the London Plan (2016).

**5 COM11 Restrictions on Changes of Uses (Part 3, Sch. 2 GPDO 1995)**

Notwithstanding the provisions of Part 3, Schedule 2 of the General Permitted Development (England) Order 2015 (or any order revoking and re-enacting that Order with or without modification), the building shall be used only for purposes within Use Class B8 of the Schedule to the Town and Country Planning (Use Classes) Order 1987 (as amended).

**REASON**

To ensure that the support is maintained for operational uses within the airport boundary in accordance with Policy T4 of the Hillingdon Local Plan: Part One - Strategic Policies (November 2012)

**6 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) An air quality and dust management plan in accordance with the 'Control of Dust Emissions during Construction and Demolition SPG' (GLA) outlining the measures to reduce the impact of the development on local air quality and dust through minimising emissions throughout the demolition and construction process.

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 Policies Policy EM8 of the Hillingdon Local Plan: Part 1, Policy 7.14 of the London Plan (2016) and paragraph 124 of the National Planning Policy Framework.

**7 NONSC Radar Mitigation Scheme**

No construction work shall commence on site until a Radar Mitigation Scheme (RMS), (including a timetable for its implementation during construction), has been agreed with the Operator and approved in writing by the London Borough of Hillingdon.

The Radar Mitigation Scheme (RMS) shall thereafter be implemented and operated in accordance with the approved details.

**REASON:**

In the interests of the safe movement of aircraft or the operation of Heathrow Airport and of NATS En-route PLC through interference with communication, navigational aids and surveillance equipment in accordance with policies T4 and Strategic Objective 25 of the

Hillingdon Local Plan: Part One - Strategic policies.

**8 NONSC Crane operation plan**

No construction work shall commence on site until the Developer has agreed a "Crane Operation Plan". Such a strategy shall include details of cranes and other tall construction equipment (including crane locations, operating height and details of obstacle lighting). Such schemes shall comply with Advice Note 4 'Cranes and other Construction issues' (available at [www.aoa.org.uk/operations & safety/safeguarding.asp](http://www.aoa.org.uk/operations%20&%20safety/safeguarding.asp)).

Details of this plan shall be submitted to and approved in writing by the Local Planning Authority in consultation with the "Radar Operator".

Construction at the site shall only thereafter be operated in accordance with the approved details and report.

**REASON:**

To ensure that the construction work and equipment on and adjoining the site does not breach the Obstacle Limitation Surface (OLS) at the airport, nor endanger the safe movement of aircraft through interference with communication, navigational aids and surveillance equipment in accordance with policies T4 and Strategic Objective 25 of the Hillingdon Local Plan: Part One - Strategic policies.

**9 COM7 Materials (Submission)**

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

Details should include information relating to make, product/type, colour and photographs/images.

**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)

**10 COM9 Landscaping**

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

1. Details of Soft Landscaping
  - 1.a Planting plans (at not less than a scale of 1:100),
  - 1.b Written specification of planting and cultivation works to be undertaken,
  - 1.c Schedule of plants giving species, plant sizes, and proposed numbers/densities where appropriate
  
2. Details of Hard Landscaping
  - 2.a Cycle Storage
  - 2.b Means of enclosure/boundary treatments
  - 2.c 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 surfing/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

To ensure that the proposed development will preserve and enhance the visual amenities of the locality and provide adequate facilities in compliance with policies BE13 and BE38 Hillingdon Local Plan: Part Two Saved UDP Policies (November 2012).

#### **11 COM10 Tree/hedges/shrubs to be retained**

Trees, hedges and shrubs shown to be retained on the approved plan shall not be damaged, uprooted, felled, lopped or topped without the prior written consent of the Local Planning Authority. If any retained tree, hedge or shrub is removed or severely damaged during construction, or is found to be seriously diseased or dying another tree, hedge or shrub shall be planted at the same place or, if planting in the same place would leave the new tree, hedge or shrub susceptible to disease, then the planting should be in a position to be first agreed in writing with the Local Planning Authority and shall be of a size and species to be agreed in writing by the Local Planning Authority and shall be planted in the first planting season following the completion of the development or the occupation of the buildings, whichever is the earlier. Where damage is less severe, a schedule of remedial works necessary to ameliorate the effect of damage by tree surgery, feeding or groundwork shall be agreed in writing with the Local Planning Authority. New planting should comply with BS 3936 (1992) 'Nursery Stock, Part 1, Specification for Trees and Shrubs' Remedial work should be carried out to BS BS 3998:2010 'Tree work - Recommendations' and BS 4428 (1989) 'Code of Practice for General Landscape Operations (Excluding Hard Surfaces)'. The agreed work shall be completed in the first planting season following the completion of the development or the occupation of the buildings, whichever is the earlier.

#### REASON

To ensure that the trees and other vegetation continue to make a valuable contribution to the amenity of the area in accordance with policy BE38 Hillingdon Local Plan: Part Two Saved UDP Policies (November 2012) and to comply with Section 197 of the Town and Country Planning Act 1990.

#### **12 NONSC Non road mobile machinery**

All Non Road Mobile Machinery (NRMM) must meet meet Stage IIIA criteria of EU Directive 97/68/EC and registered online on the NRMM website at <http://nrmm.london/>.

#### REASON

To ensure the development complies with Policy EM8 of the Hillingdon Local Plan: Part 1, Policy 7.14 of the London Plan (2016) and paragraph 124 of the National Planning Policy Framework.

#### **13 NONSC Low Emission Strategy**

Prior to the commencement of development, a Low Emission Strategy, with accompanying air quality action plan, demonstrating the the management, control and reduction of NO<sub>2</sub>, PM<sub>10</sub> and PM<sub>2.5</sub> ('the emissions') shall be submitted to and approved

in writing by the Local Planning Authority. The action plan shall identify all sources for the emissions and the measures and technology to reduce and manage them. The measures shall include but not be limited to:

**Vehicular Traffic:**

- Setting targets for and incentivising the use of Euro V and Euro VI HGVs
- Setting targets for and incentivising the use of Euro 5 and Euro 6 non HGVs
- Installation of electric charging points
- Active promotion of cleaner vehicle technologies for all users of the development
- Active promotion of no idling

**Technology:**

Use of low emission boilers that comply with the GLA Sustainable Design and Construction SPD

**Emissions:**

The action plan must include forecasts for the emissions associated with the development and set annual reduction targets.

**Monitoring:**

The action plan must include details for monitoring the vehicular types and recording the percentage of Euro V/5 and Euro VI/6 vehicles as well as progress against the emission reduction targets.

**Reporting:**

The action plan must include details for reporting the results of the monitoring to the Local Authority.

**REASON**

To ensure the development reduces and manages its air quality impacts in an area that currently exceeds minimum EU limit values for health and in line with Policy EM8 of the Local Plan and 7.14 of the London Plan.

**14 NONSC Energy Measures**

Prior to the commencement of development full specification of lighting, energy efficiency measures and low or zero carbon technology shall be submitted in writing to the Local Planning Authority. The specifications shall be accompanied by an updated assessment which demonstrates the development will achieve a 35% reduction in CO<sub>2</sub> from a 2013 Building Regulation baseline. The assessment shall clearly show:

- 1 - The baseline consumption (KwHr) and emissions (KgCO<sub>2</sub>) to 2013 Building Regulations - this should be separated into the relevant sections of heating, lighting, cooling demands etc...
- 2 - The energy efficiency measures, their specifications and impact on the baseline (KgCO<sub>2</sub> and KwHr)
- 3 - The details and specifications of the low and zero carbon technology including the inputs and outputs.
- 4 - The impact of the low and zero carbon technology on the baseline (KgCo<sub>2</sub> and KwHr)
- 5 - The methods for monitoring and reporting the reduction targets to the Local Planning Authority

The development shall proceed in accordance with the approved details.

Reason

To ensure the development delivers the CO2 savings as set out in the energy strategy and in accordance with the London Plan Policy 5.2.

**15 NONSC Construction Training**

Prior to the commencement of development, a construction training scheme to secure employment strategies to maximise employment opportunities for local residents shall be 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 C11 of the Hillingdon Local Plan Part 1 - Strategic Policies.

**16 NONSC Travel Plan**

Within 3 months of occupation of the building hereby approved, a Travel Plan 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 (2016) Policies 6.1 and 6.3.

**17 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 other than for routine maintenance which does not change its details.

**REASON**

To safeguard the amenity of surrounding properties in accordance with policies BE13 and OE1 Hillingdon Local Plan: Part Two Saved UDP Policies (November 2012); and to protect the ecological value of the area in accordance with Policy EC3.

**INFORMATIVES**

**1 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).

## **2 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 - The Spatial Development Strategy for London consolidated with alterations since 2011 (2016) and national guidance.

A4	New development directly related to Heathrow Airport
AM14	New development and car parking standards.
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 8.3	(2015) Community infrastructure levy
NPPF	National Planning Policy Framework

## **3 I59 Councils Local Plan : Part 1 - Strategic Policies**

On this decision notice policies from the Councils Local Plan: Part 1 - Strategic Policies appear first, then relevant saved policies (referred to as policies from the Hillingdon Unitary Development Plan - Saved Policies September 2007), then London Plan Policies (2016). On the 8th November 2012 Hillingdon's Full Council agreed the adoption of the Councils Local Plan: Part 1 - Strategic Policies. Appendix 5 of this explains which saved policies from the old Unitary Development (which was subject to a direction from Secretary of State in September 2007 agreeing that the policies were 'saved') still apply for development control decisions.



### **3. CONSIDERATIONS**

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

The IAGC campus is a 14.4ha site located within the Heathrow Airport Boundary. To the east of the application site is Terminal 4 and to the north, the Central terminal Area and Terminals 2 and 3. To the west of the application site is the Ascentis building, used for bulk non-premium cargo, which will remain unaffected by the proposed development.

The existing campus provides a range of cargo services accommodation in several large buildings. Ascentis is the largest on the campus, and is a six storey building used for general freight. Premia is a single storey warehouse building to the east of Ascentis and used for products that require special handling. Carrus is a three storey building to the south of Ascentis which provides administrative offices for the IAG Cargo Hub.

Surrounding the buildings are various land and airside traffic circulation routes, staff car parking and airside parking. The site is located on the existing car park for the IAG site

#### **3.2 Proposed Scheme**

This application seeks consent for the erection of an 11,520 sq.m building on the eastern side of the campus, that will be approximately 3 storeys in height. The building includes a mezzanine of 1020 sq.m which accommodates the welfare and administrative accommodation.

The building footprint is approximately 90m by 100m and is proposed to project 23 metres further to the south and 20 metres further to the north than the existing Premia building. The building is proposed to be a single volume warehouse with a roof apex of 11.7m, 1.5m higher than the existing Premia building.

The works form part of a phased development for the site. Phase 1 forms this application and is for a new development to meet demand for priority and temperature controlled freight services. The building is of the size proposed to enable decant of the current premium cargo operation from the existing Premia building and accommodate growth to 2020.

In respect of the existing 7300sq.m building, this will be come partly redundant as a result of the works. It is proposed in the future to demolish most of Premia and extend

#### **3.3 Relevant Planning History**

##### **Comment on Relevant Planning History**

The most relevant planning history is listed.

Of note is the recent planning approval 65688/APP/2016/94 which granted consent for the erection of a multi-deck car park for use by Gate Gourmet and British Airways staff on land to the south of this application site on Sealand Road. This application is relevant to the consideration of this submission as the application proposes to utilise the some of the car parking spaces approved as part of this application

### **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.T1 (2012) Accessible Local Destinations
- PT1.T4 (2012) Heathrow Airport

### Part 2 Policies:

- A4 New development directly related to Heathrow Airport
- AM14 New development and car parking standards.
- 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 8.3 (2015) Community infrastructure levy
- NPPF National Planning Policy Framework

## 5. Advertisement and Site Notice

- 5.1 Advertisement Expiry Date:- **26th July 2016**

5.2 Site Notice Expiry Date:- Not applicable

## 6. Consultations

### External Consultees

Historic England:

Do not consider it necessary for the application to be notified to Historic England.

NATS

NATS received a consultation from Hillingdon on the application referenced above. Having assessed the proposal, NATS anticipates that the new hangar will have a detrimental impact upon its infrastructure, namely the H10 radar located just over 1km to the East of the proposed site.

The impact on the radar is anticipated to manifest itself in the form of the generation of false radar targets. This is due to a significant amount of radar energy being reflected by the structure and interrogating aircraft outside the area targeted by the radar. Having analysed the performance of the radar and the effect of surrounding buildings, while the current application is considered to be unacceptable on cumulative grounds, NATS is satisfied that the potential for mitigation exists.

To avoid the new construction reflecting significant energy, NATS believes it could be possible to remove the effect by altering the east-facing side. This should be rendered less smooth and uniform and/or to be constructed using less conductive/reflective materials. NATS would be happy to engage with the applicant and discuss options in this respect.

Further to alterations to the design, should these not be practical or desirable, NATS is also satisfied that impact on its radar can be mitigated through a modification to the radar system. This mitigation solution, referred to as a 'radar mitigation scheme' or 'RMS' removes the impact of the development through a modification to the radar system to address the generation of false targets. To ensure the mitigation is implemented, NATS would the applicant to enter into an agreement in respect of the required works and its funding.

Should the London Borough of Hillingdon be minded to grant the application NATS's position is that it respectfully requests that the standard aviation conditions are imposed on any consent, as detailed overleaf. This will ensure that its infrastructure is not impaired in any way through either design changes to the hangar or a modification to the radar system.

### CONDITIONS

1. No construction work shall commence on site until a Radar Mitigation Scheme (RMS), (including a timetable for its implementation during construction), has been agreed with the Operator and approved in writing by the London Borough of Hillingdon. The Radar Mitigation Scheme (RMS) shall thereafter be implemented and operated in accordance with the approved details.

REASON:

In the interests of the safe operation of Heathrow Airport and of NATS En-route PLC.

2. No construction work shall commence on site until the Developer has agreed a "Crane Operation Plan" which has been submitted to and has been approved in writing by the Local Planning Authority in consultation with the "Radar Operator". Construction at the site shall only thereafter be operated in accordance with the approved "Crane Operation Plan".

REASON:

In the interests of the safe operation of Heathrow Airport and of NATS En-route PLC.

## Internal Consultees

### Air Quality Officer:

The development site is within the declared Hillingdon Air Quality Management Area within an area where the air quality is already poor with concentrations of nitrogen dioxide exceeding the annual mean objective along a number of the roads around the development. This includes the Great Southwestern Road. The additional traffic generated by the proposed development (approx 262 additional freight movements) has been assessed as impacting detrimentally on the already poor levels of air quality at existing receptors along the nearby road network situated on the Great Southwestern Road. The transport report has assessed the impacts on the road network close to the development site, however, as the Transport Report states, the perimeter road allows direct access to the surrounding road networks including the A4 Bath Road and the M4. These roads are also currently exceeding the annual mean nitrogen dioxide objective.

The air quality assessment concludes that the concentrations associated with the increases in road traffic attributable to the proposed development are negligible, however it goes on to identify that as the development increases the intensity of exposure to existing residents already in exceedance that an appropriate selection of best practice mitigation measures are implemented. It should be noted that the Council consider any increases in pollution at sensitive receptors already above the air quality standards as significant and therefore requires mitigation. Should this development be recommended for approval the following conditions to secure a low emission strategy, air quality and dust management plan and ensure that all road machinery meets the EU directive.

### Sustainability officer:

An Energy Assessment was submitted by the applicants and reviewed by the Council's Sustainability Officer.

There are no objections in general to the report, however the officer is concerned that the use of the heat pumps has delivered such savings and the supporting information is not entirely clear. In particular it is not clear what the input and outputs of the heat pumps are, how they have been sized and how 'cooling' has been accounted for within the baseline assessment.

Notwithstanding such, the officer is confident that these issues can be ironed out by a more detailed assessment which will require specifications of the final pump designs and therefore raises no objections subject to a condition to ensure that details of the low or zero carbon technologies are submitted to the Council and are accompanied by updated assessments showing that a 35% reduction is achieved.

### Flood and Water Management Officer:

The applicant has submitted an FRA which does not take account of the Heathrow produced SFRA which identifies areas at key risks from surface water. It also does not mention the agreement that as a private network, Heathrow have agreed to ensure that individual development will reduce the run off to greenfield run off to reduce the pressure on the 3 catchment reservoirs which receive the drainage from the site.

RESPONSE: An updated Flood Report has been received and updated comments of the Officer will be reported at the planning committee meeting.

### Trees and Landscape Officer:

The Design & Access Statement makes reference to landscape enhancement in the De section.

The D&AS confirms that the campus is dominated by buildings and hard landscape associated with the operational requirements of the site. However, the existing 'soft' landscaped areas will

retained/re-instated (where affected) and new tree planting will be introduced to 'improve the visual field and humanise the environment'. Within the Sustainability Statement the report notes that the design provides for outdoor amenity areas for the benefit of staff. These areas will include hard and soft landscaped amenity areas providing sheltered/screened spaces for staff use.

If the application is recommended for approval, landscape conditions should be imposed to ensure that the proposals preserve and enhance the character and local distinctiveness of the surrounding natural and built environment.

Environmental Protection Officer:

No objection.

Highways Officer:

The proposal involves the erection of a new large cargo handling facility off Sealand Road, Heathrow Airport which is the responsibility of HAL. The site is close to the junction of Sealand Road and South Perimeter Road.

The cargo site provides 5 areas of operation including the staff car park. The main staff car park has 621 spaces on site and there are 58 disabled parking spaces available adjacent to main buildings on the same overall cargo complex. The existing and proposed cargo handling facility are located immediately adjacent to the Southern Perimeter Road. There were pre-app discussions over the proposals earlier in 2016 and Highways/Transport issues were identified at that time and the need for a Transport Assessment was discussed.

The existing cargo facility has a total annual throughput of approximately 630,000 tonnes and the Premia facility deals with approximately 95,000 tonnes of that. There are staff and visitor car parking spaces on site for 679 cars. The existing cargo facility has the ability for 53 vehicles to wait to load/unload. A Transport Assessment by Gebler Tooth dated May 2016 provided the most relevant information on the proposal.

This application relates to the 1st phase of a development to create a new large cargo building for Premia that will result in an increased throughput of 136,000 tonnes (+46%) in Phase 1 by 2019 and later 2022 this figure will increase to 224,000 tonnes (+136%) with Phase 2 in place but only Phase 1 is dealt with in this application. The area of the proposed development will replace an area of existing car parking.

The displaced car parking will use the newly (May 2016) approved car parking in the adjacent site. Obviously this new parking facility is not constructed at present and there is no guarantee that this approved permission will be constructed to meet with the needs of the staff at the Cargo centre. One significant transport issue I have with this application is that the existing car park users will be asked to park at a facility which is away from the application site (outside the redline boundary) and what linkage there is with such an arrangement.

The demand for staff car parking was demonstrated in the TA as Figure 3.9 shows that there is a peak demand for 600 spaces during the middle of the day.

In terms of traffic the traffic surveys in the TS for cargo showed that there is a range of commercial vehicles arriving and departing throughout the day but 1000 to 1100 is the busiest hour with 42% of lorries being articulated.

The development itself will mean there will be a new cargo processing area and the existing building where these existing operations take place will house new airside storage facilities.

The 46% increase in cargo tonnage will increase traffic generation in the area and this will mean 20 additional trips in the peak hour (1000 to 1100). In the morning peak hour 12 trips per hour are

expected and 16 in the afternoon peak hour. These constitute a very small increase (approximately 0.35%) in peak hour movements which is not significant.

The proposed car parking arrangements at the site mean that 203 parking spaces will be retained at the site and the remainder (478) will be allocated at the Arora MSCP (yet to be built) so the overall provision remains the same.

In summary the cargo area under consideration will be increased to allow a 43% increase in throughput which will result in additional traffic but this is evenly spread through the day so peak hours are not significantly affected.

There will be a need to make minor modifications to the road access and an increase in the number of security barriers.

The TA suggests that there will be a new bespoke Travel Plan for the site which can be conditioned and is supported. On the basis of the TP changes in cycle and motorcycle parking will be made.

On the basis of the above comments the only serious concern associated with this proposal is the off-site car parking which does not seem to be within the control of the applicant. There is no information relating to the need for any additional staff to service the proposal which could have a significant effect on car parking demands.

OFFICER RESPONSE: Responses to the queries of the Highways Officer are dealt with in the relevant section of this report.

## **7. MAIN PLANNING ISSUES**

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

Policy T4 of the Hillingdon Local Plan: Part One - Strategic Policies recognises the importance of the airport to the borough. This policy supports the sustainable operation of Heathrow within its present boundaries.

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. For the purposes of this policy, directly related includes the storage and distribution facilities.

The proposed development seeks to respond to projected demand for priority and temperature controlled freight services, whilst also reconfiguring the site to ensure that the layout makes the most efficient use of the operational land within the airport boundary. IAG undertook a strategic review of its cargo operations in 2012 and this development will be the first phase in delivering a new masterplan for the IAG Cargo Campus. This phase comprises the provision of the building described within the earlier sections of the report and Phase 2, which does not form part of this development, will comprise the demolition of the existing Premia building and erection of an additional facility fully integrated with the cargo handling facility subject of this application.

Given that the development is directly related to the operations at Heathrow, seeks to expand the airport activities within the boundary of the operational area of the airport and within the no objection is raised to the principle of the development.

### **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 were consulted prior to the submission of the application and stated that they did not require the submission of a desk based assessment and consequent on site investigations.

#### **7.04 Airport safeguarding**

The scheme has been reviewed by NATS and BAA. Concerns have been raised by NATS in respect of aerodrome safeguarding and conditions have been recommended on any consent to ensure that sufficient mitigation is put in place to ensure the development will have no impact on the H10 Radar at the Airport and also a construction management strategy submitted to ensure that the heights of cranes and other tall construction equipment do not breach the Obstacle Limitation Surface at Heathrow. Subject to the inclusion of such conditions, no objection is raised in this regard.

#### **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 building 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 building 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.

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

Policy BE1 of the Hillingdon Local Plan: Part One - Strategic Policies (November 2012) requires all new development to maintain the quality of the built environment including providing high quality urban design. Policy BE13 of the Hillingdon Local Plan: Part Two - Saved UDP Policies (November 2012) states that development will not be permitted if the layout and appearance fails to harmonise with the existing street scene.

The site is dominated by the 6 storey Ascentis building to the west of the site and the surrounding area generally is characterised by large scale airport warehouses, hangers, cargo transit sheds and other large specialist buildings.

The height of the proposed building is in part dictated by the 3 storey automated storage facility occupying the northern side and mezzanine level which needs to clear the loading door bays. Whilst this does result in a building that is much larger than the existing cargo building it is proposed to replace, given the presence of other large buildings within the vicinity of the area, and the height not too dissimilar to others within this part of the airport, no objection is raised to the overall size and scale of the building proposed.

In terms of the materials, the building is proposed to be a metal clad structure in the grey metal composite panels typical of other airport development. Overall, the proposed design and finish of the building is considered acceptable and to not appear out of character with the design and appearance of buildings within the surrounding area.

#### **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 applicable to the consideration of this application.

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

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. Notwithstanding such, there are potential implications resulting from such a development on the wider highway network that the applicants have assessed through their transport assessment. As a result of the proposed development, it is predicted that annual cargo tonnage capacity will increase from 95,000 to 136,000 as a result of this application. The increase in cargo tonnage will result in an increase in traffic movements in the area, which equates to an additional 20 trips in the peak hour (1000 to 1100). In the morning peak hour, 12 trips per hour are expected and 16 in the afternoon peak hour. These constitute a very small increase (approximately 0.35%) in peak hour movements which is not significant increase overall within the area. Therefore whilst there will be a 43% increase in throughput which will result in additional traffic, as this is evenly spread throughout the day, the peak hours are not affected so significantly that the scheme would have a detrimental impact on the adjacent local highway or transport networks.

#### **CAR PARKING**

The existing site accommodated 679 car parking spaces and the area of the proposed development will replace an area of existing car parking. The details accompanying the application state that 420 spaces will be relocated from the existing campus to a site south of Sealand Road owned by Arora Management Services Limited. The relocation of these spaces will allow the land currently used for surface level parking to be used for operational, airport related development.

The accompanying Transport Assessment demonstrates that there is a demand for 600 spaces during the middle of the day and in terms of traffic, the surveys show that there are a range of commercial vehicles arriving and departing throughout the day, however the busiest hour is between 1000 to 1100.

The site to the south of Sealand Road was granted outline planning permission (only matter reserved was landscaping) within application 65688/APP/2016/94 for a multi storey car park specifically for the use of British Airways (a subsidiary of IAG) and Gate Gourmet.



As a result, this application permitted 1022 car parking spaces, 742 to be used by BA and 280 by Gate Gourmet. The intentions behind application 65688/APP/2016/94, were to provide car parking for the cargo site, to facilitate its comprehensive and efficient redevelopment. As a result, application 65688/APP/2016/94 was granted subject to a number of planning conditions to secure the use of the spaces on this site. Of relevance are the following conditions:

- Condition 10 - This condition requires a maximum of 742 spaces shall be used for British Airways staff working at the cargo site
- Condition 11 - This condition requires the submission of a development agreement between Arora Group and BA which commits BA to occupy the development. This development has to be in place before the car park can be constructed above first floor level, which are the floors to be occupied by BA.
- Condition 12 - This condition requires the implementation or review of any Green Travel Plan in respect of the BA cargo site, shall also apply to the BA cargo workers car parking
- Condition 14 0 This condition requires the submission of a car parking redistribution strategy to include details of the number and location of parking spaces to be relocated and a phasing programme and physical measures to ensure the control of parking spaces.

The conditions within application 65688/APP/2016/94 ensure a linkage and commitment that the spaces required as part of this development will be provided. Conditions are recommended on this consent to ensure that such linkages remain and that this scheme cannot proceed without the relevant commitments and agreements in place. It is important to note that parking and access matters in relation to the car park site were considered and approved as part of application 65688/APP/2016/94 and its conditions.

In terms of car parking, 203 spaces will be retained on the site and the remainder (478) will be allocated at the Arora MSCP, therefore the parking provision remains the same. No objection is therefore raised on parking grounds.

The Transport Assessment refers to a bespoke Travel Plan for the site in support of the application which will set out the potential travel initiatives

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

##### URBAN DESIGN

See section 7.07 of the report.

##### ACCESS

Access to the proposed building will be via the junction of Sealand Road/Southampton Road East and the alignment of the existing security barriers is proposed to be revised to provide greater separation between the barriers. Egress would be provided from two exit barriers leading back to the Sealand Road/Southampton Road roundabout to the east. No objection is raised.

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

Not applicable to the consideration of this application.

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

The Design & Access Statement makes reference to landscape enhancement in Design section.

The D&AS confirms that the campus is dominated by buildings and hard landscape associated with the operational requirements of the site. However, the existing 'soft' landscaped areas will be retained/re-instated (where affected) and new tree planting will be

introduced to improve the visual field and humanise the environment. Within the Sustainability Statement the report notes that the design provides outdoor amenity areas for the benefit of staff. These areas will include hard landscaped amenity areas providing sheltered/screened spaces for staff use.

If the application is recommended for approval, landscape conditions will be imposed to ensure that the proposals preserve and enhance the character and local distinctiveness of the surrounding natural and built environment.

#### **7.15 Sustainable waste management**

Not applicable.

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

Policy 5.2 of the London Plan sets out the energy requirements for schemes. These are required to submit an energy assessment showing how the development will achieve a 35% reduction in CO2 from a 2013 Building Regulations baseline.

An Energy Assessment has been received with this application and sets out the Part L compliance modelling for the welfare areas (offices, staff rooms, WCs and associated plant rooms). Warehouse areas have been deemed exempt as energy consumption is process driven. Even though they are exempt, the warehouse has been designed using a low to zero carbon strategy, including the following measures: Part L2A minimum or improved U-values; Passive heating and cooling using free cooling/heating (90% recirculated air); Use of ambient door curtains - not heated door curtains; and use of high efficiency heat pumps. In terms of the welfare areas, the proposed building complies with the GLA requirements and provides a 35% improvement on the "baseline" building. The use of heat pump technology for hot water generation and conditioning of the space is a large contribution along with the passive design provisions and high efficiency services proposed.

The report has been reviewed by the Council's Sustainability Officer who is concerned that the use of the heat pumps has delivered such savings. In particular it is not clear from the supporting information what the input and outputs of the heat pumps are, how they have been sized and how 'cooling' has been accounted for within the baseline assessment.

Notwithstanding such, the Officer considers that these issues can be addressed by a more detailed assessment which will require specifications of the final pump designs and such is requested by condition.

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

The site is located within Flood Zone 1. A Flood Risk Assessment (FRA) has been submitted with the application and reviewed by the Council's Flood Water Management Officer. Further information has been requested by the Officer as the FRA which does not take account of the Heathrow produced Strategic Flood Risk Assessment, which identifies areas at key risks from surface water, nor the commitments made by Heathrow to reduce run off. A revised FRA has been received and is being reviewed by the Council. Final comments from the Officer will be provided at the meeting.

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

NOISE:

A noise screening report has been submitted with the application and reviewed by the Council's Environmental Protection Officer. No objection is raised to this document.

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 development site is within the declared Hillingdon Air Quality Management Area within an area where the air quality is already poor with concentrations of nitrogen dioxide exceeding the annual mean objective along a number of the roads around the development. This includes the Great Southwestern Road. The additional traffic generated by the proposed development (approx 262 additional freight movements) has been assessed as impacting detrimentally on the already poor levels of air quality at existing receptors along the nearby road network situated on the Great Southwestern Road. The transport report has assessed the impacts on the road network close to the development site, however, as the Transport Report states, the perimeter road allows direct access to the surrounding road networks including the A4 Bath Road and the M4. These roads are also currently exceeding the annual mean nitrogen dioxide objective.

The air quality assessment concludes that the concentrations associated with the increases in road traffic attributable to the proposed development are negligible, however it goes on to identify that as the development increases the intensity of exposure to existing residents already in exceedence that an appropriate selection of best practice mitigation measures are implemented. It should be noted that the Council consider any increases in pollution at sensitive receptors already above the air quality standards as significant and therefore requires mitigation.

Overall, no objection is raised to the report submitted and a number of conditions are recommended to secure a low emission strategy, air quality and dust management plan and ensure that all road machinery meets the EU directive.

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

No comments were received from the consultation.

In respect of the statutory and Councils consultation, these have been reported within the main body of the report.

#### **7.20 Planning obligations**

CIL

The development will be liable for the Mayoral and Hillingdon's own CIL.

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

Not applicable.

#### **7.22 Other Issues**

There are no other issues for consideration.

### **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**

None.

#### **10. CONCLUSION**

National, Regional and Local planning policy encourages airport-related development within the boundary of Heathrow Airport. The proposed development seeks to respond to projected demand for priority and temperature-controlled freight services whilst also re-configuring the site to ensure that the layout makes the most efficient use of operational land within the Heathrow airport boundary. The principle of the development is therefore

considered acceptable

In relation to the proposed design and scale of the development, the size, scale, form and layout is considered appropriate to its location and to integrate well and complement the surrounding development which is characterised by large scale airport warehouses, hangars, cargo transit sheds and other large, specialist buildings.

A Transport Assessment has been received in support of the application confirms that there would be no unacceptable impacts on the highway network. The proposed development would not increase the number of car parking spaces required on the site. The existing 679 spaces would be replaced by re-provision on site and relocation as part of the approved Arora MSCP (reference 65688/APP/2016/94) on the adjoining site.

In terms of the impact of the proposal on air quality, flood risk and sustainability, reports have been submitted and reviewed by the relevant Council Specialists. With the exception of the flooding impacts, which will be reported through the committee addendum, the Councils Specialists on Air Quality and Sustainability are satisfied that the proposed development will not have a detrimental impact on the surrounding environment, subject to appropriate conditions on any consent.

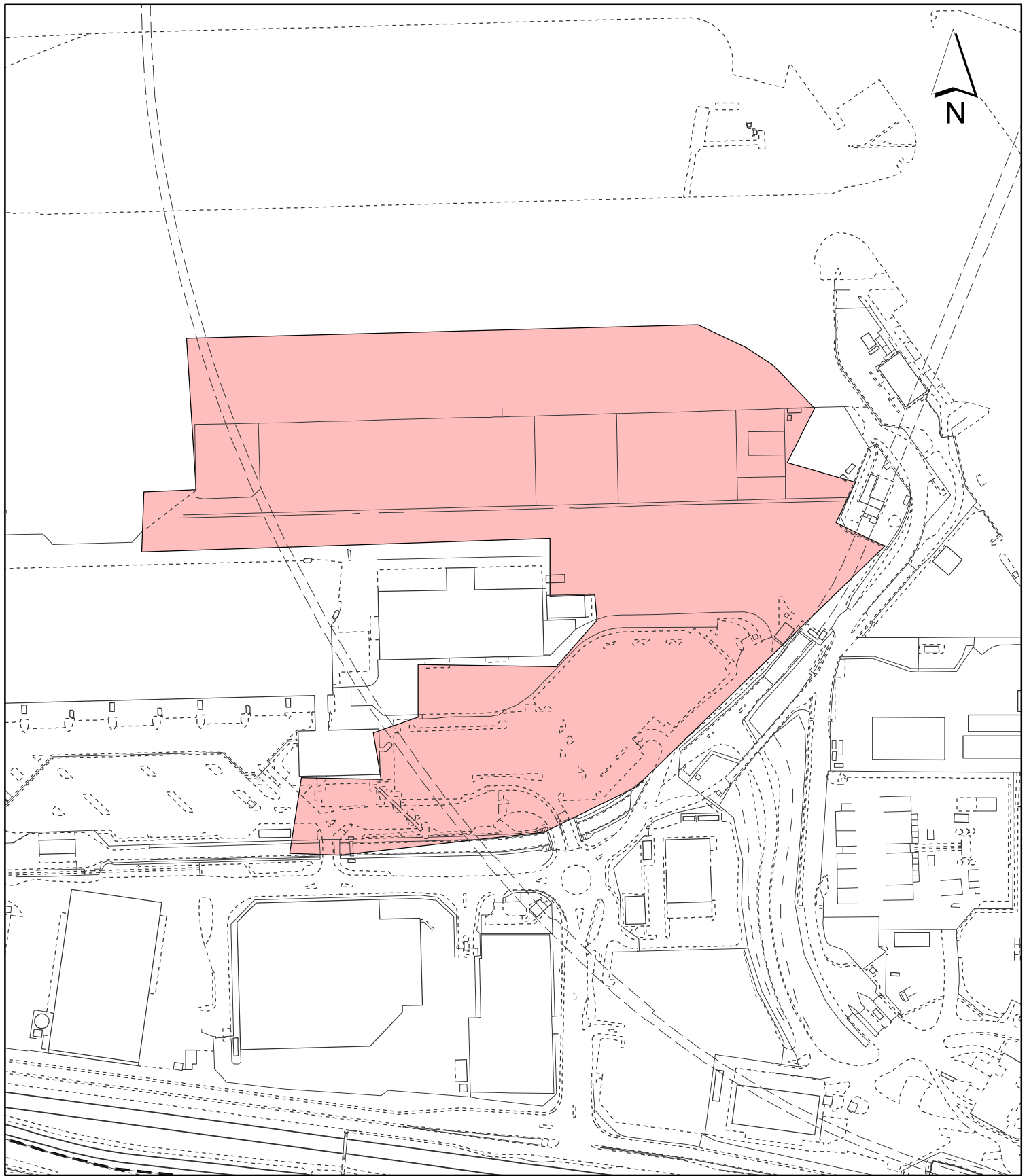
It is therefore recommended that the application is approved, subject to the receipt of positive comments from the Flood and Water Management Officer.

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

Hillingdon Local Plan: Part 1 - Strategic Policies (November 2012)  
Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012)  
London Plan (2016)  
National Planning Policy Framework (March 2012)  
London Borough of Hillingdon Air Quality Action Plan 2004

**Contact Officer:** Charlotte Goff

**Telephone No:** 01895 250230



**Notes:**

 Site boundary

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Site Address:

**IAG Cargo Campus**

**LONDON BOROUGH OF HILLINGDON**  
**Residents Services**  
**Planning Section**

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

Planning Application Ref:

**50045/APP/2016/2081**

Scale:

**1:3,500**

Planning Committee:

**Major**

Date:

**October 2016**



**HILLINGDON**  
 LONDON