

Report of the Head of Planning, Transportation and Regeneration

Address	1 & 1A BATH ROAD HEATHROW
Development:	Outline planning application for demolition of two existing buildings, including a banqueting/ conference hall (Use Class D2) and office/warehouse (Use Class B1/B8), and erection of a five storey 192-bedroom hotel (Use Class C1), with associated works (landscaping reserved for subsequent approval).
LBH Ref Nos:	35805/APP/2019/137
Drawing Nos:	0392.1 Rev. 3 Outline Noise impact assessment Sequential Test and Impact Assessment (Submitted 26th September 2019) Outline Delivery and Servicing Management Plan (Dated March 2019) Outline Construction Logistics Plan (Dated March 2019) Transport Assessment (Dated March 2019) Draft Travel Plan (Dated March 2019) 1 Bath Road Existing First Floor Plan (Dated 02/05/2019) 1 Bath Road Existing Ground Floor Plan (Dated 02/05/2019) 1a Bath Road Existing First Floor Plan (Dated 02/05/2019) 1a Bath Road Existing Ground Floor Plan (Dated 02/05/2019) Letter Dated 10th May 180139.RP.ESDG.v1.0 Energy Assessment Addendum (June 2019) WSP Response to GLA (Dated 21 May 2019) 180139.rp.esdg v1.0 Sustainable Water Use Statement (May 2019) GLA Carbon Emission Reporting Spreadsheet v1.1 180139.RP.ESDG.v1.0 Energy Assessment (May 2019) SK 001 Building Height Indication Proposed North & East Elevations 4243.EcoAs.vf1 Ecological Assessment (December 2018) 70048973-FRA-01 Flood Risk Assessment (December 2018) 18-218.01 Rev. B Phase I Geo-Environmental Risk Assessment 70048973-001 Air Quality Assessment (December 2018) 4243.UpdatedEcoAss.vf4 Ecological Assessment (October 2009) Planning Statement PL1-500 Proposed Detail Section Design and Access Statement (November 2018) PL1-001 Existing Site Plan PL1 050 Location Plan 1346-HED-SW-XX-DR-L-1001 Rev. P1 Tree Removal Plan 1346-HED-SW-XX-DR-L-1004 Rev. P1 Site Sections 1346-HED-SW-XX-DR-L-1005 Rev. P2 Planting Plan 1346-HED-SW-XX-DR-L-1002 Rev. P3 Landscape Master Plan Figure 5 1346-HED-SW-XX-DR-L-1006 Rev. P2 Site Context Plan Figure 1 1346-HED-SW-XX-DR-L-1012 Rev. P2 Site Appraisal Photomontages 1346-HED-SW-XX-DR-L-1009 Rev. P2 Visual Appraisal Photographs (1 of 3) 1346-HED-SW-XX-DR-L-1008 Rev. P2 Visual Appraisal Plan Figure 3 1346-HED-SW-XX-DR-L-1014 Rev. P2 Site Appraisal Photographs (2 of 2) 1346-HED-SW-XX-DR-L-1011 Rev. P2 Visual Appraisal Photographs (3 of 3) 1346-HED-SW-XX-DR-L-1020 Rev. P1 Terrace Planter - Typical Section 1346-HED-SW-XX-DR-L-1010 Rev. P2 Visual Appraisal Photographs (2 of 3)

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 1346-HED-SW-XX-DR-L-1013 Rev. P2 Site Appraisal Photographs (1 of 2)
 1346-HED-SW-XX-DR-L-1019 Rev. P1 Terrace Planting Details
 1346-HED-SW-XX-DR-L-1015 Rev. P3 Site Appraisal Plan Figure 2
 1346-HED-SW-XX-DR-L-1016 Rev. P2 Visual Envelope Plan Figure 4
 1346-HED-SW-XX-RP-L-1001 Rev. P01 Landscape and Visual Impact Appraisal
 PL1-100 Rev. G Proposed Site Plan
 PL1-101 Rev. D Proposed Basement Floor Plans
 PL1-102 Rev. G Proposed Ground Floor Plan
 PL1-103 Rev. D Proposed First & Second Floor Plans
 PL1-104 Rev. D Proposed Third & Fourth Floor Plans
 PL1-105 Rev. D Proposed Roof Floor Plans
 PL1-121 Rev. E Proposed South & West Elevations
 PL1-130 Rev. E Proposed Sections
 PL1-700 Rev. F Schedule
 PL1-120 Rev. D Proposed North & East Elevations

Date Plans Received:	14/01/2019	Date(s) of Amendment(s):	14/01/2019
Date Application Valid:	14/01/2019		22/05/2019
			10/05/2019
			28/06/2019
			04/10/2019

1. SUMMARY

This application seeks outline planning permission for the demolition of two existing buildings, including a banqueting/conference hall (Use Class D2) and office/warehouse (Use Class B1/B8), and erection of a five storey 192-bedroom hotel (Use Class C1), with associated works (landscaping reserved for subsequent approval). Subject to conditions and planning obligations, the application is considered acceptable in principle and with regard to design, access, security, highways, energy, ecology, flooding, landscaping, waste, contamination and air quality. As such, the application is recommended for approval.

2. RECOMMENDATION

1. That delegated powers be given to the Head of Planning, Transportation and Regeneration to grant planning permission subject to:

A. That the application be referred to the Mayor under Article 5 of the Town and Country Planning (Mayor of London) Order 2008.

B. That the Council enter into a legal agreement with the applicant under Section 106 of the Town and Country Planning Act 1990 (as amended) to secure the following:

i) Employment Strategy and Construction Training: either a contribution equal to the formula (£2,500.00 for every £1m build cost + Coordinator Costs £9,600.00 or an in kind scheme) or an in-kind training scheme equal to the financial contribution delivered during the construction period of the development with the preference being for an in-kind scheme to be delivered.

- ii) Full Framework Travel Plan to include the use of the Heathrow National Express - Hoppa bus service (inc £20,000 bond)
- iii) Agreement to the ongoing maintenance of the drainage infrastructure and ordinary watercourse over the lifetime of the development in line with a submitted maintenance plan (secured as part of the recommended condition).
- iv) Highways Contribution, estimated at a cost of £90,000 (index linked), to TfL toward safety enhancements to the junction with the Bath Road and Craneswater.
- v) Prior to the first occupation of the site, the applicant shall successfully enter into a s278 agreement with TfL under Highways Act 1980 toward junction improvement of A4 Bath Road and the site access road.
- vi) Contribution amounting to £50,000 to be paid for amenity improvements along the River Crane and Frog's Ditch to improve the quality of access to public open space at Cranford Park from the south. This is to be delivered alongside the proposed project at Cranford Park which currently does not include access improvements from the south.
- vii) Contribution amounting to £155,013 to be paid for Hillingdon to deliver its air quality local action plan and/or implement specific measures on/along the road network affected by the proposal that reduce vehicle emissions and/or reduce human exposure to pollution levels.
- viii) Project Management & Monitoring Fee: a contribution equal to 5% of the total cash contributions secured from the scheme to enable the management and monitoring of the resulting agreement, is sought.

C. That in respect of the application for planning permission, the applicant meets the Council's reasonable costs in preparation of the Section 106 and/or 278 Agreements and any abortive work as a result of the agreement not being completed.

D. That Officers be authorised to negotiate and agree the detailed terms of the proposed agreement and conditions of approval.

E. If the Legal Agreements have not been finalised by 16th April 2020 (or such other timeframe as may be agreed by the Head of Planning, Transportation and Regeneration), delegated authority be given to the Head of Planning, Transportation and Regeneration to refuse planning permission for the following reason:

'The applicant has failed to provide contributions towards the improvement of services and facilities as a consequence of demands created by the proposed development (in respect of highway safety, the drainage network, the Blue Ribbon network and air quality). The proposal therefore conflicts with Policies EM3, EM6 and EM8 of the Hillingdon Local Plan: Part 1 - Strategic Policies (November 2012), Policies R17, AM2, AM7, BE32, OE7 and OE8 of the Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012), Policies DMCI 7, DMT 1, DMT 2, DMEI 6, DMEI 14 of the emerging Hillingdon Local Plan: Part 2 - Development Management Policies with Modifications (March 2019) and Policies 5.13, 5.15, 6.12, 7.14 and 7.24 of the London Plan (March 2016).'

F. That if the application is approved, the following conditions be attached:

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

Application for approval of the following reserved matters shall be made to the Local Planning Authority before the expiry of three years from the date of this permission (hereinafter called the "reserved matters"). Approval of the details shall be obtained from the Local Planning Authority in writing before any development is commenced: -

(a) Landscaping

REASON

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

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 documents:

0392.1 Rev. 3 Outline Noise impact assessment
180139.RP.ESDG.v1.0 Energy Assessment (May 2019)
180139.RP.ESDG.v1.0 Energy Assessment Addendum (June 2019)
180139.rp.esdg v1.0 Sustainable Water Use Statement (May 2019)
4243.EcoAs.vf1 Ecological Assessment (December 2018)
4243.UpdatedEcoAss.vf4 Ecological Assessment (October 2009)
70048973-FRA-01 Flood Risk Assessment (December 2018)
18-218.01 Rev. B Phase I Geo-Environmental Risk Assessment
70048973-001 Air Quality Assessment (December 2018)
1346-HED-SW-XX-RP-L-1001 Rev. P01 Landscape and Visual Impact Appraisal
Design and Access Statement (November 2018)
Draft Travel Plan (Dated March 2019)
Transport Assessment (Dated March 2019)
Outline Construction Logistics Plan (Dated March 2019)
Outline Delivery and Servicing Management Plan (Dated March 2019)

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

REASON

To ensure the development complies with the provisions Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012), emerging Hillingdon Local Plan: Part 2 - Development Management Policies with Modifications (March 2019) and the London Plan (March 2016).

4 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. This should include details of the window, doors and weatherings to the building. 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 2 - Saved UDP Policies (November 2012) and Policy DMHB 11 of the emerging Hillingdon Local Plan: Part 2 - Development Management Policies with Modifications (March 2019).

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

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

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

2. Details of Hard Landscaping
 - 2.a Refuse Storage
 - 2.b Cycle Storage
 - 2.c Means of enclosure/boundary treatments
 - 2.d Car Parking Layouts demonstrating a provision of 60 car parking spaces (including 7 Blue Badge Holder car parking spaces, 8 car parking spaces served by active electrical charging points and 8 car parking spaces served by passive electrical charging points), 4 motorcycle parking spaces and 1 coach parking space.
 - 2.e Hard Surfacing Materials
 - 2.f External Lighting
 - 2.g Other structures (such as play equipment and furniture)

3. Living Walls and Roofs
 - 3.a Details of the inclusion of living walls and roofs
 - 3.b Justification as to why no part of the development can include living walls and roofs

4. Details of Landscape Maintenance
 - 4.a Landscape Maintenance Schedule for a minimum period of 5 years.
 - 4.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.

5. Schedule for Implementation

6. Other
 - 6.a Existing and proposed functional services above and below ground
 - 6.b Proposed finishing levels or contours

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

REASON

To ensure that the proposed development will preserve and enhance the visual amenities of the locality and provide adequate facilities in compliance with Policies BE13, BE38 and AM14 Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012), Policies DMHB 11, DMHB 14 and DMT 6 of the emerging Hillingdon Local Plan: Part 2 - Development Management Policies with Modifications (March 2019) and Policies 5.11 and 5.17 of the London Plan (March 2016). Also, to avoid endangering the safe movement of aircraft and the operation of Heathrow Airport through the attraction of birds and an increase in the bird hazard risk of the application site, in compliance with Policy A6 of the Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012) and Policy DMAV 2 of the emerging Hillingdon Local Plan: Part 2 - Development Management Policies with Modifications (March 2019).

6 COM8 Tree Protection

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

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

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

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

- 2.a There shall be no changes in ground levels;
- 2.b No materials or plant shall be stored;
- 2.c No buildings or temporary buildings shall be erected or stationed.
- 2.d No materials or waste shall be burnt; and.
- 2.e No drain runs or other trenches shall be dug or otherwise created, without the prior written consent of the Local Planning Authority.

REASON

To ensure that trees and other vegetation can and will be retained on site and not damaged during construction work and to ensure that the development conforms with Policy BE38 Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012) and Policy DMHB 14 of the emerging Hillingdon Local Plan: Part 2 - Development Management Policies with Modifications (March 2019).

7 COM10 Tree 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 2 - Saved UDP Policies (November 2012), Policy DMHB 14 of the emerging Hillingdon Local Plan: Part 2 - Development Management Policies with Modifications (March 2019) and to comply with Section 197 of the Town and Country Planning Act 1990.

8 NONSC Servicing and Delivery Plan

Prior to the occupation of development, details of a Servicing and Delivery Plan, including swept path analysis drawings, shall be submitted to and approved in writing by the Local Planning Authority.

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

REASON

To encourage out of hours/off peak servicing to help mitigate the site's contribution to local congestion levels in compliance with Policies AM2 and AM7 of the Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012) and Policies DMT 1 and DMT 2 of the emerging Hillingdon Local Plan: Part 2 - Development Management Policies with Modifications (March 2019).

9 NONSC Construction Logistics Plan

Prior to the commencement of works on site, a Construction Logistics Plan (CLP) shall be submitted to and approved in writing by the Local Planning Authority.

This should detail the management of construction traffic, including vehicle types, frequency of visits, expected daily time frames, use of an onsite banksman, on-site loading/unloading arrangements and parking of site operative vehicles.

The construction works shall be carried out in strict accordance with the approved plan.

REASON

To ensure that the construction works include appropriate efficiency and sustainability

measures so as not to compromise the safe and efficient operation of the local highway network and minimizes emissions, in accordance with Policies AM2 and AM7 of the Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012), Policies DMT 1 and DMT 2 of the emerging Hillingdon Local Plan: Part 2 - Development Management Policies with Modifications (March 2019) and Policy 7.14 of the London Plan (March 2016).

10 NONSC Construction Environmental Management Plan

Prior to the commencement of development, a Construction Environmental Management Plan (CEMP) shall be submitted to, and approved in writing by, the Local Planning Authority. The CEMP shall comprise such combination of measures for controlling the effects of demolition, construction and enabling works associated with the development as may be approved by the Local Planning Authority. The CEMP shall address issues including the phasing of the works, hours of work, noise and vibration, air quality, waste management, site remediation, plant and equipment, site transportation and traffic management including routing, signage, permitted hours for construction traffic and construction materials deliveries. It will ensure appropriate communication with, the distribution of information to, the local community and the Local Planning Authority relating to relevant aspects of construction. Appropriate arrangement should be made for monitoring and responding to complaints relating to demolition and construction. The Plan must be drawn up in accordance with the GLA Control of Dust and Emissions from Construction and Demolition SPG. All demolition, construction and enabling work at the development shall be carried out in accordance with the approved CEMP unless otherwise agreed in writing by the LPA.

REASON

To safeguard the amenity of surrounding areas in accordance with Policy OE5 of the Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012) and Policy 7.14 of the London Plan Policy (March 2016).

11 NONSC Height Limitation on Trees & Shrubs

No existing individual trees, shrubs or stands of trees and shrubs on the application site and land edged blue on the approved plan as part of the approved landscaping scheme, shall be permitted to grow above a height of 43.3m metres AMSL.

REASON

To avoid trees or shrubs penetrating the Obstacle Limitation Surface (OLS) surrounding Heathrow Airport and endangering the movements of aircraft and the safe operation of the aerodrome, in compliance with Policy A6 of the Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012) and Policy DMAV 2 of the emerging Hillingdon Local Plan: Part 2 - Development Management Policies with Modifications (March 2019).

12 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 roof in order to minimise its attractiveness to birds which could endanger the safe movement of aircraft and the operation of Heathrow Airport, in compliance with Policy A6 of the Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012) and Policy DMAV 2 of the emerging Hillingdon Local Plan: Part 2 - Development Management Policies with Modifications (March 2019).

13 NONSC Control of Lighting

The development is close to the aerodrome and/or aircraft taking off from or landing at the aerodrome. Lighting schemes required during construction and for the completed development shall be of a flat glass, full cut off design, mounted horizontally, and shall ensure that there is no light spill above the horizontal.

REASON

To avoid endangering the safe operation of aircraft through confusion with aeronautical ground lights or glare, in compliance with Policy A6 of the Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012) and Policy DMAV 2 of the emerging Hillingdon Local Plan: Part 2 - Development Management Policies with Modifications (March 2019).

14 NONSC Light Spill

There shall be no light spill into the watercourse or adjacent buffer zone. To achieve this, and to comply with sustainability, artificial lighting should be directional and focused with cowlings to light sources in close proximity to the river corridor.

REASON

To ensure that artificial lighting does not disrupts the natural diurnal rhythms of a range of wildlife using/inhabiting the watercourse and its corridor habitat, in compliance with Policy EC1 of the Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012), Policies DMEI 7 and DMEI 8 of the emerging Hillingdon Local Plan: Part 2 - Development Management Policies with Modifications (March 2019) and Policy 7.19 of the London Plan (March 2016).

15 COM31 Secured by Design

The building(s) 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). No building shall be occupied 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 Policies 7.1 and 7.3 of the London Plan (March 2016).

16 NONSC Flood Resistance and Resilience Measures

Prior to the commencement of any development, a scheme for the provision and implementation of Flood Resistance and Resilience Measures shall be submitted to and agreed in writing with the Local Authority, in consultation with the Environment Agency. The works/scheme shall be constructed and completed in accordance with the approved plans/specification at such time(s) as may be specified in the approved scheme.

REASON

To protect the development from flooding in extreme circumstances and to reduce material damage to the properties in extreme flooding circumstances in compliance with Policies OE7 and OE8 of the Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012) and Policy DMEI 9 of the emerging Hillingdon Local Plan: Part 2 - Development Management Policies with Modifications (March 2019).

17 NONSC Walls and Fencing

Any walls or fencing constructed within landscaped areas around the site shall be designed to be open boarded or permeable to flood water.

REASON

To prevent obstruction to the flow and storage of flood water, with a consequent increased risk of flooding in compliance with Policies OE7 and OE8 of the Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012) and Policy DMEI 9 of the emerging Hillingdon Local Plan: Part 2 - Development Management Policies with Modifications (March 2019).

18 NONSC Surface Water

Prior to commencement, (excluding demolition and site clearance) a scheme for the provision of sustainable water management shall be submitted to, and approved in writing by the Local Planning Authority, in consultation with the Environment Agency.

The scheme shall clearly demonstrate how it, manages water and demonstrate ways of controlling the surface water on site by providing information on:

a) Sustainable Drainage features:

i. Infiltration drainage - a ground investigation must be provided to establish the level of groundwater on the site; to demonstrate the suitability of infiltration techniques proposed on the site by providing the results of infiltration testing in line with BRE Digest 365; and to confirm the suitability of infiltration drainage based on any encountered ground contamination

ii. Surface water discharge - the submitted drainage strategy must identify the proposed method and location of discharging collected surface water from the site in accordance with the hierarchy set out in Policy 5.13 of the London Plan. Where the proposal does not utilise the most sustainable solution, justification must be provided.

iii. SuDS - the submitted drainage strategy should incorporate Sustainable Drainage System (SuDS) elements that are embedded, where practicable, within the landscaping plan for the development. Preference should be given to above-ground SuDS elements that provide wider biodiversity, water quality and amenity benefits.

iv. Runoff rates - surface water discharge from the site must be no greater than 4.4l/s at a variety of return periods including 1 in 1 year, 1 in 30, 1 in 100, and 1 in 100 plus 40% climate change. Any increases above greenfield rates must be adequately justified and may be subject to developer contributions.

v. Drainage calculations - include calculations to demonstrate the volume of storage and size of drainage features provided is adequate to control surface water for a range of storm duration and rainfall intensities for events up to and including the critical 1 in 100

plus 40% climate change rainfall event.

vi. Exceedance routes - provide a plan showing the route surface water will take through the development for rainfall events exceeding the 1 in 100 year event. Where it is intended to store water on the ground surface, the maximum extent of overland flooding should be mapped and include details on flow paths, depths and velocities. Safe access and egress for the site must be demonstrated.

b) Long-term management and maintenance of the drainage system.

i. Provide a Management and Maintenance Plan for the drainage system that includes clear plans showing all of the drainage network above and below ground, and identifies the responsibility of different parties for each component of the drainage network. This will include details on the proposed maintenance requirements for the ordinary watercourse to the south of the site.

ii. Include details of the necessary inspection regimes and maintenance frequencies for each element of the drainage system.

iii. Where managed flooding of the ground surface is proposed, the plan should include the appropriate actions for those areas and document the actions required to ensure the safety of the users of the site during a rainfall event.

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

REASON

To ensure that surface water run off is controlled and to ensure the development does not increase the risk, in compliance with Policy EM6 of the Hillingdon Local Plan: Part 1 - Strategic Policies (November 2012), Policy OE8 of the Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012), Policy DMEI 9 and DMEI 10 of the emerging Hillingdon Local Plan Part 2 - Development Management Policies with Modifications (March 2019), Policy 5.12 and 5.13 of the London Plan (March 2016), the National Planning Policy Framework (June 2019); and Planning Practice Guidance (Flood Risk and Coastal Change March 2014).

19 NONSC Groundwater

Prior to commencement, (excluding demolition and site clearance) a Basement Impact Assessment shall be submitted to, and approved in writing by the Local Planning Authority, in consultation with the Environment Agency. The assessment shall include the results of a site investigation and, where groundwater is encountered, suitable mitigation provided to mitigate any impacts to local groundwater levels.

REASON

The ensure that the proposal does not increase groundwater flood risk, in compliance with Policy EM6 in Hillingdon Local Plan: Part 1 - Strategic Policies (November 2012), Policy DMEI 9 and DMHD 3 of the emerging Hillingdon Local Plan: Part 2 - Development Management Policies with Modifications (March 2019), Policy 5.12 of the London Plan (March 2016), the National Planning Policy Framework (June 2019); and Planning Practice Guidance (Flood Risk and Coastal Change March 2014).

20 NONSC Water Reuse

Prior to commencement, (excluding demolition and site clearance) a scheme for water reuse shall be submitted to, and approved in writing by the Local Planning Authority, in consultation with the Environment Agency. The scheme shall incorporate water saving measures and equipment and provide details of how rain and/or grey water will be

recycled and reused in the development.

REASON

To ensure that water is managed sustainably on the site in accordance with Policy DME1 10 of the emerging Hillingdon Local Plan: Part 2 - Development Management Policies with Modifications (March 2019), Policy 5.15 of the London Plan (March 2016) and the - National Planning Policy Framework (June 2019).

21 NONSC Contaminated Land

(i) The development shall not commence until a scheme to deal with contamination has been submitted to the Local Planning Authority (LPA) in accordance with the Supplementary Planning Guidance Document on Land Contamination, and approved by the LPA. All works which form part of the remediation scheme shall be completed before any part of the development is occupied or brought into use unless the Local Planning Authority dispenses with any such requirement specifically and in writing. The scheme shall include all of the following measures unless the LPA dispenses with any such requirement specifically and in writing:

a) 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

(b) A written method statement providing details of the remediation scheme and how the completion of the remedial works for each phase will be verified shall be agreed in writing with the LPA prior to commencement of each phase, along with the details of a watching brief to address undiscovered contamination. No deviation shall be made from this scheme without the express agreement of the LPA prior to its implementation.

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

(iii) Upon completion of the approved remedial works, this condition will not be discharged until a comprehensive verification report has been submitted to and approved by the LPA. The report shall include the details of the final remediation works and their verification to show that the works for each phase have been carried out in full and in accordance with the approved methodology.

(iv) No contaminated soils or other materials shall be imported to the site. All imported soils for landscaping purposes shall be clean and free of contamination. Before any part of the development is occupied, all imported soils shall be independently tested for chemical contamination, and the results of this testing shall be submitted and approved in writing by the Local Planning Authority. All soils used for gardens and/or landscaping purposes shall be clean and free of contamination.

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 2 - Saved UDP Policies (November 2012) and Policy DMEI 12 of the emerging Hillingdon Local Plan: Part 2 - Development Management Policies with Modifications (March 2019).

22 NONSC Accessible Facilities

Prior to the construction of the superstructure, details to demonstrate that 2 accessible rooms are fitted with a tracked hoist system and have an adjoining door to a standard bedroom, shall be submitted to and approved in writing by the Local Planning Authority.

The approved facilities should be provided prior to the occupation of the development and shall be permanently retained thereafter.

REASON

To ensure that people with disabilities have adequate access to the development in accordance with Policies AM13 and R16 of the Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012), Policy DME 6 of the emerging Hillingdon Local Plan: Part 2 - Development Management Policies with Modifications (March 2019) and Policies 4.5 and 7.2 of the London Plan (March 2016).

23 NONSC Signposting for People with Disabilities

Signplates, incorporating a representation of the Universal Wheelchair Symbol, should be displayed to indicate the location of convenient facilities to meet the needs of people with disabilities. Such signplates should identify or advertise accessible entrances to buildings, reserved parking spaces, accessible lifts and lavatory accommodation, manageable routes through buildings and availability of additional services. Signs for direction and location should have large characters or numerals and clearly contrast with the background colour.

REASON

To ensure that people with disabilities are aware of the location of convenient facilities in accordance with Policies AM13 and R16 of the Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012), Policy DME 6 of the emerging Hillingdon Local Plan: Part 2 - Development Management Policies with Modifications (March 2019) and Policies 4.5 and 7.2 of the London Plan (March 2016).

24 NONSC Car Park Management Plan

Prior to first occupation of the premises a Car Park Management Plan shall be submitted to and approved in writing by the Local Planning Authority.

The submitted plan shall set out how parking for staff and customer parking will be safely and effectively managed and how stay, park and fly services shall be precluded.

The approved plan shall remain in place for perpetuity.

REASON

To ensure the appropriate operation of the car park and prevention of inappropriate/informal parking from taking place by users of the site, AM2, AM7, AM14 and AM15 of the Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012) and Policies DMT 1, DMT 2 and DMT 6 of the emerging Hillingdon Local Plan: Part 2 - Development Management Policies with Modifications (March 2019).

25 NONSC Low Emission 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:

1) the fleet composition serving the Hotel to be Euro 6/VI or cleaner (e.g. electric) or have implemented retrofitting devices that will enable compliance with such Euro standards.

2) the supply of energy to the Hotel. Any CHP or gas boiler will have to conform with the London Ultra Low NOx requirements;

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.

3) an electric vehicle fast charging bay. This is to be implemented as part of the proposal with a minimum of three charging points.

4) a clear and effective strategy to encourage staff to

- a) use public transport;
- b) cycle / walk to work where practicable;
- c) enter car share schemes;
- d) purchase and drive to work zero emission vehicles.

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

REASON

Due to the application sites designation as part of an Air Quality Management Area and in order to comply with emerging Policy DMEI 14 of the Hillingdon Local Plan: Part 2 - Development Management Policies with Modifications (March 2019), Policy EM8 of the Hillingdon Local Plan: Part 1 - Strategic Policies (November 2012), Policy 7.14 of the London Plan (March 2016) and the National Planning Policy Framework (June 2019).

26 NONSC Automatic Lights

The lighting of the hotel shall employ devices that automatically turn the lights off when the rooms are not in use.

REASON

In the interests of energy conservation, in accordance with Policy DMEI 2 of the emerging Policy DMEI 14 of the Hillingdon Local Plan: Part 2 - Development Management Policies with Modifications (March 2019) and Policy 5.2 of the London Plan (March 2016).

27 NONSC Chimney or Extraction Ventilation System

No development shall take place until details of the height, position, design and materials of any chimney or extraction ventilation system, to extract kitchen fumes and odours, to be provided in connection with the development have been submitted to and approved in writing by the Local Planning Authority.

Thereafter the vent/chimney shall be permanently retained and maintained in good working order for so long as the use continues.

REASON

In order to safeguard the amenities of adjoining properties in accordance with Policy OE1 of the Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012), Policy DMHB 11 of the emerging Policy DMEI 14 of the Hillingdon Local Plan: Part 2 - Development Management Policies with Modifications (March 2019) and Policy 3.5 of the London Plan (March 2016).

28 NONSC Energy

Prior to any works above damp proof course level, full details of the low and zero carbon technology required to meet the CO2 reductions identified in the Energy Assessment (reference 180139.RP.ESDG.v1.0 (Dated May 2019)) shall be submitted and approved in writing by the Local Planning Authority. The details shall include full specifications, locations of equipment and associated emissions (noise/odour/gas).

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

REASON

To ensure the development contributes to a reduction in CO2 in accordance with Policy DMEI 2 of the emerging Policy DMEI 14 of the Hillingdon Local Plan: Part 2 - Development Management Policies with Modifications (March 2019) and Policy 5.2 of the London Plan (March 2016).

29 NONSC GLA Energy Condition

Prior to commencement of development, the following details should be submitted to and approved in writing by the Local Planning Authority:

- Drawings demonstrating how the site is to be future-proofed for a connection to a district heating network, including space provision for heat exchangers in the plant room, isolation valves and safe-guarded pipe route to the site boundary.
- Drawings illustrating the floor area, internal layout and location of the single energy centre.
- Review the potential to provide additional Photovoltaics to areas allocated to external plant, and demonstrate that the potential for PV has been maximised.

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

REASON

To ensure the development contributes to a reduction in CO2 in accordance with Policy DMEI 2 of the emerging Policy DMEI 14 of the Hillingdon Local Plan: Part 2 - Development Management Policies with Modifications (March 2019) and Policy 5.2 of the London Plan (March 2016).

30 NONSC Ecological Enhancement

No development shall take place until a scheme to protect and enhance the nature conservation interest of the site has been submitted to and approved by the Local Planning Authority.

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

REASON

In order to encourage a wide diversity of wildlife on the existing semi-natural habitat of the site in accordance with Policy EC5 of the Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012), Policies DMEI 7 and DMEI 8 of the emerging Hillingdon Local Plan: Part 2 - Development Management Policies with Modifications (March 2019) and Policy 7.19 of the London Plan (March 2016).

31 COM31 Secured by Design

The building and 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). No building shall be occupied 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 (2016) Policies 7.1 and 7.3.

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.

AM2	Development proposals - assessment of traffic generation, impact on congestion and public transport availability and capacity
AM7	Consideration of traffic generated by proposed developments.
AM14	New development and car parking standards.
BE4	New development within or on the fringes of conservation areas
BE13	New development must harmonise with the existing street scene.
BE19	New development must improve or complement the character of the area.
BE20	Daylight and sunlight considerations.
BE21	Siting, bulk and proximity of new buildings/extensions.
BE24	Requires new development to ensure adequate levels of privacy to neighbours.
BE32	Development proposals adjacent to or affecting the Grand Union

	Canal
BE35	Major development proposals adjacent to or visible from major road and rail connections to Heathrow and central London
LE4	Loss of existing industrial floorspace or land outside designated Industrial and Business Areas
OE1	Protection of the character and amenities of surrounding properties and the local area
OE11	Development involving hazardous substances and contaminated land - requirement for ameliorative measures
OE3	Buildings or uses likely to cause noise annoyance - mitigation measures
OE7	Development in areas likely to flooding - requirement for flood protection measures
OE8	Development likely to result in increased flood risk due to additional surface water run-off - requirement for attenuation measures
OL1	Green Belt - acceptable open land uses and restrictions on new development
OL2	Green Belt -landscaping improvements
OL4	Green Belt - replacement or extension of buildings
OL5	Development proposals adjacent to the Green Belt
R11	Proposals that involve the loss of land or buildings used for education, social, community and health services
R17	Use of planning obligations to supplement the provision of recreation leisure and community facilities
DMEI 10	Water Management, Efficiency and Quality
DMEI 12	Development of Land Affected by Contamination
DMEI 14	Air Quality
DMEI 4	Development on the Green Belt or Metropolitan Open Land
DMEI 6	Development in Green Edge Locations
DMEI 7	Biodiversity Protection and Enhancement
DMEI 8	Waterside Development
DME 5	Hotels and Visitor Accommodation
DME 2	Employment Uses Outside of Designated Sites
T2	Location of tourist accommodation and conference facilities
T4	Hotels, guest houses and other tourist accommodation - location, amenity and parking requirements
DMHB 10	High Buildings and Structures
DMHB 11	Design of New Development
DMHB 4	Conservation Areas
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DMT 1	Managing Transport Impacts
DMT 2	Highways Impacts
DMT 5	Pedestrians and Cyclists
DMT 6	Vehicle Parking
SPD-NO	Noise Supplementary Planning Document, adopted April 2006
SPD-PO	Planning Obligations Supplementary Planning Document, adopted July 2008
SPG-AQ	Air Quality Supplementary Planning Guidance, adopted May 2002
HDAS-LAY	Residential Layouts, Hillingdon Design & Access Statement, Supplementary Planning Document, adopted July 2006
LPP 4.2	(2016) Offices

LPP 4.5	(2016) London's Visitor Infrastructure
LPP 4.12	(2016) Improving opportunities for all
LPP 5.2	(2016) Minimising Carbon Dioxide Emissions
LPP 5.7	(2016) Renewable energy
LPP 5.12	(2016) Flood risk management
LPP 5.13	(2016) Sustainable drainage
LPP 5.15	(2016) Water use and supplies
LPP 5.21	(2016) Contaminated land
LPP 6.11	(2016) Smoothing Traffic Flow and Tackling Congestion
LPP 6.12	(2016) Road Network Capacity
LPP 6.13	(2016) Parking
LPP 7.2	(2016) An inclusive environment
LPP 7.3	(2016) Designing out crime
LPP 7.4	(2016) Local character
LPP 7.6	(2016) Architecture
LPP 7.7	(2016) Location and design of tall and large buildings
LPP 7.14	(2016) Improving air quality
LPP 7.15	(2016) Reducing and managing noise, improving and enhancing the acoustic environment and promoting appropriate soundscapes.
LPP 7.16	(2016) Green Belt
LPP 7.17	(2016) Metropolitan Open Land
LPP 7.19	(2016) Biodiversity and access to nature
LPP 7.24	(2016) Blue Ribbon Network
LPP 7.30	(2016) London's canals and other rivers and waterspaces
LPP 8.2	(2016) Planning obligations
LPP 8.3	(2016) Community infrastructure levy
NPPF- 2	NPPF-2 2018 - Achieving sustainable development
NPPF- 12	NPPF-12 2018 - Achieving well-designed places
NPPF- 13	NPPF-13 2018 - Protecting Green Belt land
NPPF- 15	NPPF-15 2018 - Conserving and enhancing the natural environment

3 170 LBH worked applicant in a positive & proactive (Granting)

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.

4 173 Community Infrastructure Levy (CIL) (Granting Consent)

Under the terms of the Planning Act 2008 (as amended) and Community Infrastructure Levy Regulations 2010 (as amended), this development is liable to pay the London Borough of Hillingdon Community Infrastructure Levy (CIL) and the Mayor of London's Community Infrastructure Levy (CIL). This will be calculated in accordance with the London Borough of Hillingdon CIL Charging Schedule 2014 and the Mayor of London's CIL Charging Schedule 2012. Before commencement of works the development parties must notify the London Borough of Hillingdon of the commencement date for the construction works (by submitting a Commencement Notice) and assume liability to pay CIL (by submitting an Assumption of Liability Notice) to the Council at planning@hillingdon.gov.uk. The Council will then issue a Demand Notice setting out the date and the amount of CIL

that is payable. Failure to submit a valid Assumption of Liability Notice and Commencement Notice prior to commencement of the development may result in surcharges being imposed.

The above forms can be found on the planning portal at: www.planningportal.gov.uk/planning/applications/howtoapply/whattosubmit/cil

Pre-Commencement Conditions: These conditions are important from a CIL liability perspective as a scheme will not become CIL liable until all of the pre-commencement conditions have been discharged/complied with.

5

The Greater London Authority have requested that the applicant notified of the requirement to submit a fire statement, produced by a third party suitable qualified assessor and agreed with the London Fire Brigade.

6

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/policy-campaigns/operations-safety/>

7

Wind Turbines can impact on the safe operation of aircraft through interference with aviation radar and/or due to their height. Any proposal that incorporates wind turbines must be assessed in more detail to determine the potential impacts on aviation interests. This is explained further in Advice Note 7, 'Wind Turbines and Aviation' available at <http://www.aoa.org.uk/policy-campaigns/operations-safety/>

8

Cadent have identified operational gas apparatus within the application site boundary. This may include a legal interest (easements or wayleaves) in the land which restricts activity in proximity to Cadent assets in private land. The Applicant must ensure that proposed works do not infringe on Cadent's legal rights and any details of such restrictions should be obtained from the landowner in the first instance.

If buildings or structures are proposed directly above the gas apparatus then development should only take place following a diversion of this apparatus. The Applicant should contact Cadent's Plant Protection Team at the earliest opportunity to discuss proposed diversions of apparatus to avoid any unnecessary delays.

If any construction traffic is likely to cross a Cadent pipeline then the Applicant must contact Cadent's Plant Protection Team to see if any protection measures are required.

All developers are required to contact Cadent's Plant Protection Team for approval before carrying out any works on site and ensuring requirements are adhered to.

Email: plantprotection@cadentgas.com Tel: 0800 688 588

3. **CONSIDERATIONS**

3.1 Site and Locality

The site comprises an irregular shaped plot of approximately 0.97 hectares located on the southern side of the A4 Bath Road in Harlington, adjoining the Heathrow Airport Boundary. It currently accommodates two x 2 storey units. Unit 1 is a warehouse/office and Unit 1A is a banqueting/conference hall.

The application site is located approximately 60 metres to the south of the Cranford Park Conservation Area and is designated as part of a Nature Conservation Site of Metropolitan or Borough Grade I Importance, with the southern section of the site being designated as part of the Green Belt. The northern section of the site has a Public Transport Accessibility Level (PTAL) of 3 and the southern section of the site has a PTAL of 2. The site is located next to the River Crane and is designated as part of Flood Zone 2. The central part of the site is also subject to potentially contaminated land.

3.2 Proposed Scheme

This application seeks Outline planning permission for the demolition of two existing buildings, including a banqueting/conference hall (Use Class D2) and office/warehouse (Use Class B1/B8), and erection of a five storey 192-bedroom hotel (Use Class C1), with associated works (landscaping reserved for subsequent approval).

Each floor of the hotel comprises of the following:

Basement Level 2 - 22 car parking spaces, entrance/lift lobby, stairwell, plant room, lifts and a gym.

Basement Level 1 - Back of house area (including break room, showers, lockers & changing room), plant room, meeting and conferences rooms and WC facilities.

Ground floor - 38 car parking spaces, 4 motorcycle parking spaces, reception area and lobby; luggage room, business centre, restaurant, bar/lounge, kitchen, WC facilities, back of house areas, refuse store and servicing area.

First floor - 49 hotel rooms including 5 accessible rooms and a first floor terrace.

Second floor - 49 hotel rooms including 5 accessible rooms.

Third floor - 47 hotel rooms including 5 accessible rooms and a third floor terrace.

Fourth floor - 47 hotel rooms including 5 accessible rooms.

A total of 60 car parking spaces, 4 motorcycle parking spaces and 1 coach space are proposed. 25 of these parking spaces, including 7 disability spaces and 2 electric vehicle spaces, would be provided at surface level to the rear of the building. A total of 22 car parking spaces, including 14 electric vehicle spaces, would be provided at basement level. 24 cycle parking spaces, for use by both staff and guests, would also be provided in the rear surface level car park. Vehicular access and egress to both the underground and surface level parking would be gained behind the hotel building via the adjacent shared access off Bath Road.

3.3 Relevant Planning History

35805/85/0208 1a Bath Road Harlington
Industrial dev. - 1703sq.m. (Full)(P)

Decision: 15-05-1985 Approved

35805/APP/2006/870 1a Bath Road Harlington

CHANGE OF USE FROM CLASS B1 (OFFICE) TO CLASS C1 (HOTEL) CONFERENCE AND BANQUETING SUITE.

Decision: 04-08-2006 Approved

35805/APP/2008/1976 1 & 1a Bath Road Harlington

Erection of a 7 storey, 288-bedroom hotel with associated landscaping, parking and conference facilities (involving demolition of existing office and storage buildings).

Decision: 25-09-2008 Refused

35805/APP/2009/2433 1 & 1a Bath Road Harlington

Demolition of existing buildings and erection of a five storey, 192-bedroom hotel, basement and surface level car parking, bar/restaurant, meeting rooms and other associated works.

Decision: 09-01-2012 Approved

35805/APP/2014/4087 1 Bath Road Heathrow

Change of Use of part of ground floor from Use Class B1 (Business) to Use Class A1 (Retail)

Decision: 15-01-2015 Refused

Comment on Relevant Planning History

Application reference 35805/APP/2008/1976 was refused for the erection of a 7 storey, 288-bedroom hotel with associated landscaping, parking and conference facilities (involving demolition of existing office and storage buildings).

Application reference 35805/APP/2009/2433 was approved for the demolition of existing buildings and erection of a five storey, 192-bedroom hotel, basement and surface level car parking, bar/restaurant, meeting rooms and other associated works. This planning permission was not implemented and expired in February 2015.

4. Planning Policies and Standards

Development Plan

Planning law requires that applications for planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise.

The Development Plan for the London Borough of Hillingdon currently consists of the following documents:

The Local Plan: Part 1 - Strategic Policies (2012)

The Local Plan: Part 2 - Saved UDP Policies (2012)

The London Plan - Consolidated With Alterations (2016)

The National Planning Policy Framework (NPPF) (2019) is also a material consideration in planning decisions, as well as relevant supplementary planning documents and guidance.

Emerging Planning Policies

Paragraph 48 of the National Planning Policy Framework (NPPF) 2019 states that 'Local Planning Authorities may give weight to relevant policies in emerging plans according to:

- (a) the stage of preparation of the emerging plan (the more advanced its preparation, the greater the weight that may be given);
- (b) the extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given); and
- (c) the degree of consistency of the relevant policies in the emerging plan to this Framework (the closer the policies in the emerging plan to the policies in the Framework, the greater the weight that may be given).

Draft London Plan (Consolidated with Changes July 2019)

The GLA consulted upon a draft new London Plan between December 2017 and March 2018 with the intention of replacing the previous versions of the existing London Plan. The Plan was subject to examination hearings from February to May 2019, and a Consolidated Draft Plan with amendments was published in July 2019. This Consolidated version remains under examination with a report by the appointed panel of Inspectors due in Autumn 2019.

The Council's general approach at this stage is to give limited weight to the draft London Plan as a material consideration when deciding planning applications given at this stage of preparation it remains subject to a large number of objections, and could still be subject to significant further change prior to publication.

Proposed Submission Local Plan Part 2 with Main Modifications (March 2019)

The Revised Proposed Submission Local Plan Part 2 (LPP2) documents (Development Management Policies, Site Allocations and Designations and Policies Map Atlas of Changes) were submitted to the Secretary of State for examination in May 2018.

The public examination hearing sessions took place over one week in August 2018. Following the public hearing sessions, the examining Inspector advised the Council in a Post Hearing Advice Note sent in November 2018 that he considers the LPP2 to be a plan that could be found sound subject to a number of main modifications.

The main modifications proposed by the Inspector were agreed by the Leader of the Council and the Cabinet Member for Planning, Transport and Recycling in March 2019 and were published for public consultation from 27 March to 8 May 2019.

Taking para 48 of the NPPF into account, the Council's general approach to the weight which should be afforded to the draft LPP2 will be as follows:

The preparation of the LPP2 is now at a very advanced stage. The public hearing element of the examination process has been concluded and the examining Inspector has indicated that there are no fundamental issues with the LPP2 that would make it incapable of being found sound subject to the main modifications referred to above.

Those policies which are not subject to any proposed main modifications are considered to have had any objections resolved and can be afforded considerable weight. Policies that are subject to main modifications proposed by the Inspector will be given less than considerable weight. The weight to be attributed to those individual policies shall be considered on a case by case basis considering the particular main modification required by the Inspector and the material considerations of the particular planning application, which shall be reflected in the report, as required.

Finally, it is noted that the Inspector has indicated that subject to main modifications the LPP2 is fundamentally sound and therefore consistent with the relevant policies in the NPPF.

Notwithstanding the above, the starting point for determining planning applications remains the adopted policies in the Local Plan: Part 1 Strategic Policies and the Local Plan: Part 2 Saved UDP Policies 2012.

UDP / LDF Designation and London Plan

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

Part 1 Policies:

- PT1.T2 (2012) Public Transport Interchanges
- PT1.BE1 (2012) Built Environment
- PT1.CI1 (2012) Community Infrastructure Provision
- PT1.E1 (2012) Managing the Supply of Employment Land
- PT1.E3 (2012) Strategy for Heathrow Opportunity Area
- PT1.EM11 (2012) Sustainable Waste Management
- PT1.EM2 (2012) Green Belt, Metropolitan Open Land and Green Chains
- PT1.EM3 (2012) Blue Ribbon Network
- PT1.EM6 (2012) Flood Risk Management
- PT1.EM7 (2012) Biodiversity and Geological Conservation
- PT1.EM8 (2012) Land, Water, Air and Noise
- PT1.T4 (2012) Heathrow Airport

Part 2 Policies:

- AM2 Development proposals - assessment of traffic generation, impact on congestion and public transport availability and capacity
- AM7 Consideration of traffic generated by proposed developments.
- AM14 New development and car parking standards.
- BE4 New development within or on the fringes of conservation areas
- BE13 New development must harmonise with the existing street scene.
- BE19 New development must improve or complement the character of the area.
- BE20 Daylight and sunlight considerations.
- BE21 Siting, bulk and proximity of new buildings/extensions.
- BE24 Requires new development to ensure adequate levels of privacy to neighbours.
- BE32 Development proposals adjacent to or affecting the Grand Union Canal
- BE35 Major development proposals adjacent to or visible from major road and rail connections to Heathrow and central London
- LE4 Loss of existing industrial floorspace or land outside designated Industrial and

Business Areas

OE1	Protection of the character and amenities of surrounding properties and the local area
OE11	Development involving hazardous substances and contaminated land - requirement for ameliorative measures
OE3	Buildings or uses likely to cause noise annoyance - mitigation measures
OE7	Development in areas likely to flooding - requirement for flood protection measures
OE8	Development likely to result in increased flood risk due to additional surface water run-off - requirement for attenuation measures
OL1	Green Belt - acceptable open land uses and restrictions on new development
OL2	Green Belt -landscaping improvements
OL4	Green Belt - replacement or extension of buildings
OL5	Development proposals adjacent to the Green Belt
R11	Proposals that involve the loss of land or buildings used for education, social, community and health services
R17	Use of planning obligations to supplement the provision of recreation, leisure and community facilities
DMEI 10	Water Management, Efficiency and Quality
DMEI 12	Development of Land Affected by Contamination
DMEI 14	Air Quality
DMEI 4	Development on the Green Belt or Metropolitan Open Land
DMEI 6	Development in Green Edge Locations
DMEI 7	Biodiversity Protection and Enhancement
DMEI 8	Waterside Development
DME 5	Hotels and Visitor Accommodation
DME 2	Employment Uses Outside of Designated Sites
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DMT 1	Managing Transport Impacts
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SPD-NO	Noise Supplementary Planning Document, adopted April 2006
SPD-PO	Planning Obligations Supplementary Planning Document, adopted July 2008
SPG-AQ	Air Quality Supplementary Planning Guidance, adopted May 2002

HDAS-LAY	Residential Layouts, Hillingdon Design & Access Statement, Supplementary Planning Document, adopted July 2006
LPP 4.2	(2016) Offices
LPP 4.5	(2016) London's Visitor Infrastructure
LPP 4.12	(2016) Improving opportunities for all
LPP 5.2	(2016) Minimising Carbon Dioxide Emissions
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LPP 5.13	(2016) Sustainable drainage
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LPP 6.12	(2016) Road Network Capacity
LPP 6.13	(2016) Parking
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LPP 7.3	(2016) Designing out crime
LPP 7.4	(2016) Local character
LPP 7.6	(2016) Architecture
LPP 7.7	(2016) Location and design of tall and large buildings
LPP 7.14	(2016) Improving air quality
LPP 7.15	(2016) Reducing and managing noise, improving and enhancing the acoustic environment and promoting appropriate soundscapes.
LPP 7.16	(2016) Green Belt
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LPP 7.19	(2016) Biodiversity and access to nature
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NPPF- 12	NPPF-12 2018 - Achieving well-designed places
NPPF- 13	NPPF-13 2018 - Protecting Green Belt land
NPPF- 15	NPPF-15 2018 - Conserving and enhancing the natural environment

5. Advertisement and Site Notice

- 5.1** Advertisement Expiry Date:- **27th February 2019**
- 5.2** Site Notice Expiry Date:- Not applicable

19th February 2019

6. Consultations

External Consultees

Letters were sent to neighbouring properties, a site notice was erected and an advert was posted in the local paper. All consultations expired on the 27/02/2019. Two comments have been received from neighbouring properties and a petition with 31 signatories have been received. The concerns raised are summarised as follows:

- There are currently petitions against the Riverside venue, KFC and Starbucks for issues relating to noise, litter and anti-social behaviour. The proposal would add to these issues.
- The proposed building is too close to the residential homes opposite.
- Nighttime noise pollution caused by customers parking on Craneswater, a residential road, to avoid parking charges.
- Increased pressure on parking on Craneswater and increased traffic.
- Concerns regarding late night music associated with the banqueting hall.
- Littering associated with the food and restaurant use of the hotel.
- Concerns over the provision of parking for hotel employees and the potential for increased parking on Craneswater.
- Concerns over the behaviour of hotel customers, their consumption of alcohol and use of Berkeley meadow and the associated playground equipment.
- Cars travel down the A4 too fast and a speed camera should be a serious consideration.

CASE OFFICER COMMENT:

The consideration of parking or highways impacts is addressed as part of the Council's Highways Officer comments and noise impacts are considered by the Council's Environmental Protection Unit Officer.

NATURAL ENGLAND:

No comment.

NATIONAL AIR TRAFFIC SERVICES (NATS):

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

THAMES WATER:

Waste Comments

The application indicates that surface waters will NOT be discharged to the public network and as such Thames Water has no objection, however approval should be sought from the Lead Local Flood Authority. Should the applicant subsequently seek a connection to discharge surface water into the public network in the future then we would consider this to be a material change to the proposal, which would require an amendment to the application at which point we would need to review our position.

Thames Water would advise that with regard to Foul Water sewage network infrastructure capacity, we would not have any objection to the above planning application, based on the information provided

HEATHROW LTD:

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 conditions 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 next page for 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 Heathrow Airside Operations staff. In some instances it may be necessary to contact Heathrow 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 and Rural Affairs Department (SGERAD) before the removal of nests and eggs.

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 roof to minimise its attractiveness to birds which could endanger the safe movement of aircraft and the operation of Heathrow Airport.

Control of Lighting on the Proposed Development

The development is close to the aerodrome and/or aircraft taking off from or landing at the aerodrome. Lighting schemes required during construction and for the completed development shall be of a flat glass, full cut off design, mounted horizontally, and shall ensure that there is no light spill above the horizontal.

Reason: To avoid endangering the safe operation of aircraft through confusion with aeronautical ground lights or glare.

For further information please refer to Advice Note 2 'Lighting Near Aerodromes' (available at www.aoa.org.uk/policy-campaigns/operations-safety).

Your attention is drawn to the Air Navigation Order 2005, Article 135, which states that, "A person shall not exhibit in the United Kingdom any light which: (a) by reason of its glare is liable to endanger aircraft taking off or landing at an aerodrome; or (b) by reason of its liability to be mistaken for an aeronautical ground light is liable to endanger aircraft." The Order also grants the Civil Aviation Authority power to serve notice to extinguish or screen any such light which may endanger aircraft. Further information can be found Advice Note 2 'Lighting Near Aerodromes' (available at www.aoa.org.uk/policy-campaigns/operations-safety)

Submission of Landscaping Scheme

No development shall take place until full details of soft and water landscaping works have been submitted to and approved in writing by the Local Planning Authority, details must comply with Advice Note 3, 'Potential Bird Hazards from Amenity Landscaping & Building Design' available at www.aoa.org.uk/policy-campaigns/operations-safety). These details shall include:

- the species, number and spacing of trees and shrubs

No subsequent alterations to the approved landscaping scheme are to take place unless submitted to and approved in writing by the Local Planning Authority. The scheme shall be implemented as approved.

Reason: To avoid endangering the safe movement of aircraft and the operation of Heathrow Airport through the attraction of birds and an increase in the bird hazard risk of the application site.

Height Limitation on Trees & Shrubs

No existing individual trees, shrubs or stands of trees and shrubs on the application site and land edged blue on the approved plan as part of the approved landscaping scheme, shall be permitted to grow above a height of 43.3m metres AMSL.

Reason: If trees or shrubs exceed this height they will penetrate the Obstacle Limitation Surface (OLS) surrounding Heathrow Airport and endanger the movements of aircraft and the safe operation of the aerodrome. See Advice Note 1 'Safeguarding - an Overview' (also available at www.aoa.org.uk/policy-campaigns/operations-safety).

We will need to object to these proposals unless the above-mentioned conditions are applied to any planning permission.

We would also make the following observations:

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/policy-campaigns/operations-safety/>

Wind Turbines

Wind Turbines can impact on the safe operation of aircraft through interference with aviation radar and/or due to their height. Any proposal that incorporates wind turbines must be assessed in more detail to determine the potential impacts on aviation interests. This is explained further in Advice Note 7, 'Wind Turbines and Aviation' available at <http://www.aoa.org.uk/policy-campaigns/operations-safety/>

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.

ENVIRONMENT AGENCY:

Advice to LPA

Government guidance contained within the National Planning Practice Guidance (Water supply, wastewater and water quality - considerations for planning applications, paragraph 020) sets out a hierarchy of drainage options that must be considered and discounted in the following order:

1. Connection to the public sewer
2. Package sewage treatment plant (adopted in due course by the sewerage company or owned and operated under a new appointment or variation)
3. Septic Tank

Lack of capacity or plans to improve capacity in the sewer is not a valid reason for a development to install a private sewerage system. In such cases the developer should explore how a lack of capacity may be overcome so that their development can be connected to a public foul sewer. In these cases, if an applicant decides to apply for a water discharge permit for private treatment facilities, we are likely to refuse to grant the permit. Although no information has been provided at this stage, we expect the development to discharge foul wastewater via connection to public sewer.

Advice to LPA and applicant

We strongly recommend the use of flood proofing and resilience measures. Physical barriers, raised electrical fittings and special construction materials are just some of the ways you can help reduce flood damage.

To find out which measures will be effective for this development, please contact your building control department. In the meantime, if you'd like to find out more about reducing flood damage, visit the flood risk and coastal change pages of the planning practice guidance.

The following documents may also be useful:

Department for Communities and Local Government: Preparing for floods.

Department for Communities and Local Government: Improving the flood performance of new buildings.

We do not normally comment on or approve the adequacy of flood emergency response procedures accompanying development proposals, as we do not carry out these roles during a flood. Our involvement with this development during an emergency will be limited to delivering flood warnings to occupants/users covered by our flood warning network.

The planning practice guidance to the National Planning Policy Framework states that, in determining whether a development is safe, the ability of residents and users to safely access and exit a building during a design flood and to evacuate before an extreme flood needs to be considered. One of the key considerations to ensure that any new development is safe is whether adequate flood warnings would be available to people using the development.

In all circumstances where warning and emergency response is fundamental to managing flood risk, we advise local planning authorities to formally consider the emergency planning and rescue implications of new development in making their decisions. As such, we recommend you consult with your emergency planners and the emergency services to determine whether the proposals are safe in accordance with the guiding principles of the Planning Practice Guidance (PPG).

We have considered the findings of the flood risk assessment in relation to the likely duration, depths, velocities and flood hazard rating against the design flood for the proposal. We agree that this indicates that there will be no danger to people. This does not mean we consider that the access is safe, or the proposals acceptable in this regard. We remind you to consult with your emergency planners and the emergency services to confirm the adequacy of the evacuation

proposals.

Thank you again for consulting us. We request to be consulted on the reserved matters aspects of this proposal not covered in this application. If you have any queries regarding our response please get in touch at HNL SustainablePlaces@environmentagency.gov.uk.

CANAL AND RIVER TRUST:

No comment.

LONDON BOROUGH OF HOUNSLOW:

Thank you for your consultation and I can confirm that the London Borough of Hounslow do not wish to raise any objections to the proposed development.

TRANSPORT FOR LONDON (TfL):

The site is situated on A4 Bath Road, which forms part of the Transport for London Road Network (TLRN), and TfL offers the following comments:

1. The submitted Transport Assessment appears fail to be produced in line with the current TfL's Transport Assessment guidance, the document made no reference to the latest and Draft London Plan policies which is now a material consideration. The document also makes reference to previous application/ submission which dates back to 2012, which is too old and is therefore not acceptable, this should be removed. A fresh assessment should be made for existing scenario, therefore the 2018 survey result may be included. As such, the TA should be revised accordingly.
2. A full trip generation and mode share assessment must be carried out allow a full understanding of all trips to/ from the proposed development expected to generate. A minimum of two comparable sites must be consulted if TRICS is to be used for the basis on trip generation assessment. The mode share assessment must take into account the site's proximity Heathrow Airport and various way to access Heathrow by public transport, including TfL bus services, hotel shuttle etc. A vehicular trip distribution assessment is also required to form part of the assessment.
3. The offering of stay/ park and fly services would not be accepted as this would encourage further increase in car trips in the area.
4. It is noted that the junction into the site is very wide and is not friendly to pedestrians and cyclists, therefore this should be narrowed where possible to improve pedestrian/ cyclists environment. It is also requested that a PERS/ CLOS audit be undertaken to assess the existing walking/ cycling routes to and from the site, this would help to identify improvement needs. The proposed landscaping should be assessed using the 'Heathy Street Check for designer' ensuring they are sufficiently adequate.
5. A hotel travel plan for both guest and staff is required to set assortative targets and measures to promote sustainable travel behaviour and minimise use of private car to and from the site, this should be secured by s106 agreement. An agreement should be made existing hotel shuttle bus operator to serve the site to reduce level of taxi and private hire vehicle trips to and from Heathrow Airport.
6. The proposal to provide 24 cycle parking spaces is supported, they should be secured, covered and be design in line with the current London Cycle Design Standards (LCDS), shower and changing facilities for staff should also be provided accordingly. All of these should be secured planning conditions.

7. The proposal comprises 65 car parking spaces, the acceptability of such level of provision would be assessed through a parking accumulation assessment along with trip generation, the applicant shall therefore include this details in the revised TA submission.

8. Detailed submission of delivery & Servicing plan (DSP) and Construction logistics plan (CLP) would need to be secured by planning conditions and an outline DSP and CLP should be included in the revised TA submission.

In conclusion, TfL is unable to express support the proposal in its current form, and the applicant is therefore required to submit a revised Transport Assessment, Travel plan and associated details as mentioned above to allow TfL assess the acceptability of the proposal in details.

STAGE 1 GREATER LONDON AUTHORITY (GLA) RESPONSE:

London Plan and draft London Plan policies on principle of development, hotel use, Green Belt, inclusive design, sustainable development and transport are relevant to this application. The application does not fully comply with the London Plan and draft London Plan; the following matters should be addressed:

- Principle of development: Part of the redevelopment of the site is on previously developed land within Green Belt. The proposal is for hotel use which is broadly similar to a 2012 consented scheme (now expired), which was supported by the previous Mayor. The proposal meets the NPPF exception test and is not inappropriate development. As such, the proposal accords with Policy 7.16 of the London Plan, Policy G2 of the draft London Plan and the NPPF.
- Urban and inclusive design: The Council must secure details of materials to be used to ensure the best possible build quality is delivered in the context of the Green Belt. The approach to inclusive design is supported and must be secured by condition.
- Inclusive design: The design and access statement demonstrates that 10% of the bedrooms will be provided as wheelchair accessible rooms and that 8% of these will interconnect with a conventional room should a helper need to stay in the next room. This is welcomed. The location of disabled parking for Blue Badge holders at the rear of the hotel should be reconfigured to bring the location as close as possible to the south entrance and also safety and convenience issues for the disabled people in relation to the shared space with the coach parking spaces should be considered.
- Sustainable development: Carbon savings meet the target set within the London Plan. However, there are concerns, regarding the use of SAP 10 carbon emissions factors and flood risk management. All concerns must be addressed.
- Transport: The applicant is required to reduce car parking, deliver the necessary safety improvements identified and secured by s106/s278 agreement; and must address issues in relation to trip generation/mode share assessment as well as travel planning, car parking management plan, DSP and CLP.
- Flood risk management: The flood risk assessment provided for the proposed development does not comply with London Plan Policy 5.12 (and draft London Plan Policy SI.12), as it does not give appropriate regard to the need for resilience and emergency planning measures. As the site is at risk of flooding from a 35% Climate Change event, flood resilience construction and emergency planning measures should be included to manage these risks. The surface water drainage strategy for the proposed development complies with London Plan Policy 5.13 (and draft London Plan Policy SI.13). The development does not meet the requirements of London Plan Policy 5.15 (and draft London Plan Policy SI.5) as it does not meet the water consumption targets of these policies. Detailed comments have been sent to the applicant and the Council, and all concerns must be addressed.

Recommendation

That Hillingdon Council be advised that the application does not fully comply with the London Plan and draft London Plan, for the reasons set out in paragraph 42 of this report; but that the possible

remedies set out in that paragraph could address these deficiencies. The application does not need to be referred back to the Mayor if the Council resolves to refuse permission, but it must be referred back if the Council resolves to grant permission.

CASE OFFICER COMMENT REGARDING INCLUSIVE DESIGN:

It is agreed with the applicant that the current layout for the coach is the most suitable and any re-arrangement of the disabled parking would not provide any significant benefit in regards to access to the main building.

CASE OFFICER COMMENT REGARDING SUSTAINABLE DEVELOPMENT:

The applicant has submitted '180139.RP.ESDG.v1.0 Energy Assessment (May 2019)' and '180139.RP.ESDG.v1.0 Energy Assessment Addendum (June 2019)' in response to the GLA.

Based on an email received on 5th September, the GLA confirmed that it is technically feasible to retrofit Variable Refrigerant Flow (VRF) units to source heat from a communal network. The following condition has been added to address the GLA's concerns relating to energy:

Prior to commencement of development, the following details should be submitted to and approved in writing by the Local Planning Authority:

- Drawings demonstrating how the site is to be future-proofed for a connection to a district heating network, including space provision for heat exchangers in the plant room, isolation valves and safe-guarded pipe route to the site boundary.
- Drawings illustrating the floor area, internal layout and location of the single energy centre.
- Review the potential to provide additional Photovoltaics to areas allocated to external plant, and demonstrate that the potential for PV has been maximised.

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

REASON

To ensure the development contributes to a reduction in CO2 in accordance with Policy DMEI 2 of the emerging Policy DMEI 14 of the Hillingdon Local Plan: Part 2 - Development Management Policies with Modifications (March 2019) and Policy 5.2 of the London Plan (March 2016).

CASE OFFICER COMMENT REGARDING TRANSPORT:

The applicant submitted revised documentation including a Transport Assessment (March 2019), Outline Delivery and Servicing Management Plan (March 2019), Outline Construction Logistics Plan (March 2019) and Draft Travel Plan (March 2019).

Revised plans were also submitted on 24th May 2019 by the applicant, reducing the number of car parking spaces to 60 spaces, updating the cycle store to be closed and secure covered with 'double stacker' cycle stand and relocating the motorcycle parking.

Transport for London (TfL) indicated that trip generation in general is acceptable, based on the revised Transport Assessment. Regarding parking, TfL stated that the parking accumulation indicated a maximum of 45 vehicles overnight and indicated that 55 spaces was acceptable in order to provide a 20% buffer. A financial contribution of £90,000 towards the improvement works was reiterated.

It is noted that Council's Highways Officer removed Greenwich, an inner London Borough, from the

Trics search parameters as this location does not reflect an outer London Borough site, producing a slightly higher trip generation. The Highways Officer noted that the forecasts on parking accumulation were based on an 80% occupancy rate but should have been based on 100% occupancy rate, this being a worst case scenario. Based on these revised parameters, a maximum accumulation of 60 spaces is generated. As such, the Council's Highways Officer has confirmed that a reduction to 60 spaces is acceptable.

Based on correspondence (dated 11th September 2019), TfL do not consider the proposal of 60 spaces as a reason for refusal.

CASE OFFICER COMMENT REGARDING FLOOD RISK AND SUDS:

The applicant submitted additional information in response to the GLA's stage 1 comments regarding flood risk and SuDs. This included the 'WSP Response to GLA (Dated 21 May 2019)' and the '180139.rp.esdg v1.0 Sustainable Water Use Statement (May 2019)'. The Council's Flood Risk and Water Management Officer stated agreement with these documents and the GLA confirmed that this satisfied outstanding concerns.

Internal Consultees

WASTE STRATEGY OFFICER:

Satisfactory for waste and recycling requirements.

TREES AND LANDSCAPING OFFICER:

This site is occupied by two office blocks, with car parking to the front and rear, and an area of open green space to the east.

Situated on the south side of Bath Road, the open space is bounded by the River Crane corridor to the east. There is a mix of tree and shrub planting along the frontage of the offices which become more dense on the edge of the open space - effectively providing year-round screening from the road.

Most of the open green space comprises mown grass with occasional mature / multi-stemmed willow trees. The southern boundary of the site is shared with Dudset Farm, a National Nature Reserve, which forms a linear plot extending southwards towards Heathrow airport.

There are no TPO's or Conservation Area designations affecting the site, although it is a SINC.

The land to the south and east of the two offices is designated Metropolitan Green Belt, a designation which seeks to retain openness and restrict urban sprawl.

Comment:

This is an outline application with landscaping reserved for subsequent approval, however, the submission is supported by some detailed landscape information by HED.

The D&AS describes the landscape proposals in some detail in chapter 5 and a visual impact appraisal in chapter 6 which identifies and analyses the effect of the development from six potential viewpoints.

While the existing trees have been identified on plan and would appear to have been surveyed, no tree report has been submitted at this stage.

A tree removal plan ref. 1346-HED-SW-XX-DR-L-1001 Rev P1 proposes to remove five individual trees - two in the southern car park, two close to the River Crane and one off-site tree to the north of the open space.

Drawing No. 1002 (Rev P3) provides a landscape masterplan showing the front and rear car parks to be re-arranged and enhanced with planting. The open space will be enhanced with native planting including a palette of trees, shrubs, wildflower meadows and swathes of bulbs. The installation of bat boxes is also proposed.

Drawing 1005 (Rev P2), provides a detailed planting plan based on the new / proposed site layout. The plan proposes approximately 30No. new trees, formal hedging, native planting and wildflower grassland supplemented with native bulbs.

Drawing No. 1019 Rev P1 provides a detailed planting plan for the terraces associated with the building.

Due to the proximity of the site to the airport, it is likely that any planting / ecological enhancement will be influenced by Heathrow's Bird Strike Avoidance guidance.

Recommendation:

If you are minded to approve the application, the landscape plans indicate an intention to provide landscape enhancement and future management in accordance with planning policies, including BE38.

Conditions should secure a comprehensive package of hard and soft landscape, together with management / maintenance proposals which are informed by a full tree report to BS5837:2012 and ecology survey and recommendations: COM2, COM7, COM8, COM9 (parts 1,2,3,4,5 and 6) and COM10.

FLOODING AND WATER MANAGEMENT OFFICER:

Flood Risk

A Flood Risk Assessment (FRA) has been submitted to accompany the application (WSP report dated December 2018, Draft revision). The site lies adjacent to the River Crane, which forms the eastern boundary of the development. The FRA confirms that the proposed development is located within Flood Zone 2 of the River Crane and has provided information obtained from the Environment Agency. Model information for the River Crane shows that there will be no flooding in the location of the proposed development for the 1 in 100 year flood event including a 35% allowance for climate change.

The FRA has confirmed that the finished floor levels of the proposed development, including the access level to the basement parking area, will be set at least 300mm above the modelled 1 in 100 year flood event including a 35% allowance for climate change. This is in line with the requirements of the NPPF, regional and local planning policy.

Permission has been given for an equivalent development on the site and therefore the principle of development has been established.

It is noted that landscaping has been reserved to be addressed at a later stage. Any landscaping proposals that include changes to site levels should take into consideration the flood water level within the River Crane and prevent any increase in the extent of flooding on the site.

It is recommended that the conditions placed on the previous permission in relation to flood risk management are carried through to this application.

Blue Ribbon Network

The proposed development is adjacent to the River Crane, a strategic waterway in the London Borough of Hillingdon. Policy EM3 of the Hillingdon Local Plan: Part 1 - Strategic Policies (November 2012) requires development to contribute to the positive enhancement of the river corridor. In addition, Policy DMEI 6 of the emerging Hillingdon Local Plan: Part 2 - Development Management Policies with Modifications (March 2019) requires development adjacent to watercourses in the Borough to provide environmental enhancements and, where feasible, deculverting of any culverted watercourses. Where this is not feasible, developer contributions may be required for off site works.

The preliminary landscaping strategy has taken into consideration the setting of the site adjacent to the River Crane and has proposed landscaping that enhances the riparian corridor. There are, however, no improvements to the wider amenity of the River Crane (public access to the river through the site) as part of the proposals.

The Council is leading on a project upstream of the site on the River Crane at the confluence with the Frog's Ditch for which there will be a substantial increase in the accessibility and amenity value of the strategic watercourse network close to this development site. The Council would therefore accept a developer contribution for off-site watercourse amenity improvements to ensure that the proposals will contribute to the positive enhancement of the river corridor.

Surface Water

The FRA includes an outline surface water drainage strategy for the development. No information is provided stating the existing surface water drainage arrangements from the site. The drainage strategy acknowledges that while infiltration drainage may be unlikely, infiltration testing in line with BRE365 will be undertaken as part of the ground investigation to inform the detailed design of the drainage strategy. This should be secured as part of a condition.

The proposed outfall for the surface water drainage system is into the ordinary watercourse that has been identified along the southern site boundary. Historic mapping submitted as part of the FRA suggests that the ordinary watercourse is an historic course of the River Crane. The FRA has not included any details about the condition, capacity or outfall arrangements from this ordinary watercourse to the River Crane, nor has it indicated whether there is any regular flow within the watercourse itself. This information will be important for determining whether this presents a suitable location for outfalls from the surface water drainage network and should be requested as part of a condition. Should this watercourse not prove to be a viable location for a drainage connection, alternatives will need to be proposed during detailed design (including an outfall to the River Crane).

It is proposed to use permeable paving with 400mm sub-base storage over the entire external parking area to manage collected surface water from the hardstanding and roof drainage. This will be connected with a restricted overflow to the ordinary watercourse in the south of the site via a linear reed bed. For events above a 1 in 30 year rainfall event, there will be an overflow weir from the parking area to a dry basin constructed as part of the landscaping proposals, which will have a restricted outfall to the ordinary watercourse.

The proposed drainage strategy will restrict surface water runoff from the site to greenfield rates and it has been demonstrated that there is a viable method of draining the site in accordance with local and regional planning policy. There are aspects of the drainage design that require further investigation which should be secured as part of a planning condition.

Groundwater

A two-storey basement is proposed on the site as part of the development. The Phase 1 Geo-Environmental Desk Study that has been submitted as part of the application (Aviron Associates Limited report revision B dated December 2018) states that the expected geology beneath the site includes superficial deposits of Alluvium and Taplow Gravel overlying London Clay. There is consequently the likelihood of groundwater to be encountered beneath the site. The FRA includes and assessment of the potential for the proposed basement to increase the risk of groundwater flooding and concludes that while there is the potential for the development to affect local groundwater levels, the proximity of the proposed basement to receptors and the mitigation that will be included in the design of the basement means that the risk is low.

The basement does not extend across the full width of the site and it is therefore considered that there is the potential for mitigation measures to be put in place once a site investigation has been undertaken and the impacts assessed. A pre-commencement condition is therefore recommended to be placed on the permission.

Water Use

The applicant has submitted a sustainable water use statement (Silcock Dawson & Partners report version 1.0 dated December 2018) to set out the proposed methods to conserve water supplies and reuse collected rainwater. The proposals include the provision of a rainwater harvesting tank that will be used to provide non-potable water to the toilets within the hotel. There are aspects of the proposals that require additional information to be provided after permission is granted and therefore a pre-commencement condition is recommended.

RECOMMENDATIONS: CONDITIONS and S106 AGREEMENTS

Flood Risk

Prior to the commencement of any development, a scheme for the provision and implementation of Flood Resistance and Resilience Measures shall be submitted and agreed in writing with the Local Authority. The works/scheme shall be constructed and completed in accordance with the approved plans/specification at such time(s) as may be specified in the approved scheme.

REASON: To protect the development from flooding in extreme circumstances and to reduce material damage to the properties in extreme flooding circumstances in compliance with Policies OE7 and OE8 of the Hillingdon Unitary Development plan Saved Policies (September 2007).

Any walls or fencing constructed within landscaped areas around the site shall be designed to be open boarded or permeable to flood water.

REASON: To prevent obstruction to the flow and storage of flood water, with a consequent increased risk of flooding in compliance with Policies OE7 and OE8 of the Hillingdon Unitary Development plan Saved Policies (September 2007).

Surface Water

Prior to commencement, (excluding demolition and site clearance) 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, manages water and demonstrate ways of controlling the surface water on site by providing information on:

a) Sustainable Drainage features:

- i. Infiltration drainage - a ground investigation must be provided to establish the level of groundwater on the site; to demonstrate the suitability of infiltration techniques proposed on the site by providing the results of infiltration testing in line with BRE Digest 365; and to confirm the suitability of infiltration drainage based on any encountered ground contamination
- ii. Surface water discharge - the submitted drainage strategy must identify the proposed method and location of discharging collected surface water from the site in accordance with the hierarchy set out in Policy 5.13 of the London Plan. Where the proposal does not utilise the most sustainable solution, justification must be provided.
- iii. SuDS - the submitted drainage strategy should incorporate Sustainable Drainage System (SuDS) elements that are embedded, where practicable, within the landscaping plan for the development. Preference should be given to above-ground SuDS elements that provide wider biodiversity, water quality and amenity benefits.
- iv. Runoff rates - surface water discharge from the site must be no greater than 4.4l/s at a variety of return periods including 1 in 1 year, 1 in 30, 1 in 100, and 1 in 100 plus 40% climate change. Any increases above greenfield rates must be adequately justified and may be subject to developer contributions.
- v. Drainage calculations - include calculations to demonstrate the volume of storage and size of drainage features provided is adequate to control surface water for a range of storm duration and rainfall intensities for events up to and including the critical 1 in 100 plus 40% climate change rainfall event.
- vi. Exceedance routes - provide a plan showing the route surface water will take through the development for rainfall events exceeding the 1 in 100 year event. Where it is intended to store water on the ground surface, the maximum extent of overland flooding should be mapped and include details on flow paths, depths and velocities. Safe access and egress for the site must be demonstrated.

b) Long-term management and maintenance of the drainage system.

- i. Provide a Management and Maintenance Plan for the drainage system that includes clear plans showing all of the drainage network above and below ground, and identifies the responsibility of different parties for each component of the drainage network. This will include details on the proposed maintenance requirements for the ordinary watercourse to the south of the site.
- ii. Include details of the necessary inspection regimes and maintenance frequencies for each element of the drainage system.
- iii. Where managed flooding of the ground surface is proposed, the plan should include the appropriate actions for those areas and document the actions required to ensure the safety of the users of the site during a rainfall event.

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

REASON: To ensure that surface water run off is controlled and to ensure the development does not increase the risk of flooding contrary to:

- Policy EM6 Flood Risk Management in Hillingdon Local Plan: Part 1 - Strategic Policies (November 2012);
- Policy OE8 of the Hillingdon Local Plan Part 2 - Saved UDP Policies (November 2012);
- Policy DME1 10 Water Management, Efficiency and Quality in emerging Hillingdon Local Plan Part 2 - Development Management Policies with Modifications (March 2019);
- Policy 5.12 Flood Risk Management of the London Plan (March 2016);
- To be handled as close to its source as possible in compliance with Policy 5.13 Sustainable Drainage of the London Plan (March 2016);
- National Planning Policy Framework (July 2018); and the,
- Planning Practice Guidance (Flood Risk and Coastal Change March 2014).

Groundwater

Prior to commencement, (excluding demolition and site clearance) a Basement Impact Assessment shall be submitted to, and approved in writing by the Local Planning Authority. The assessment shall include the results of a site investigation and, where groundwater is encountered, suitable mitigation provided to mitigate any impacts to local groundwater levels.

REASON: The proposal could increase groundwater flood risk contrary to:

- Policy EM6 Flood Risk Management in Hillingdon Local Plan: Part 1 - Strategic Policies (November 2012);
- Policy DMHD 3: Basement Development in emerging Hillingdon Local Plan: Part 2 - Development Management Policies with Modifications (March 2019);
- Policy 5.12 Flood Risk Management of the London Plan (March 2016);
- National Planning Policy Framework (July 2018); and the,
- Planning Practice Guidance (Flood Risk and Coastal Change March 2014).

Water reuse

Prior to commencement, (excluding demolition and site clearance) a scheme for water reuse shall be submitted to, and approved in writing by the Local Planning Authority. The scheme shall incorporate water saving measures and equipment and provide details of how rain and/or grey water will be recycled and reused in the development.

REASON: To ensure that water is managed sustainably on the site in accordance with:

- Policy DMEI 10 Water Management, Efficiency and Quality in emerging Hillingdon Local Plan: Part 2 - Development Management Policies with Modifications (March 2019);
- Conserve water supplies in accordance with Policy 5.15 Water use and supplies of the London Plan (March 2016); and the,
- National Planning Policy Framework (2019).

S106 Obligations

Developer contributions should be secured as part of the permission for amenity enhancements to the River Crane corridor to meet local planning policies related to the Blue Ribbon Network, as well as securing agreements to provide the ongoing maintenance of the proposed drainage network and ordinary watercourse within the site boundary.

FLOOD RISK AND WATER MANAGEMENT OFFICER FOLLOW-UP:

As discussed I have agreed to provide additional commentary following the receipt of a response from the GLA regarding flood risk and surface water management.

The GLA response states that the FRA "does not give appropriate regard to the need for resilience and emergency planning measures" however measures over and above those listed in the FRA and required by condition are not considered to be necessary.

The GLA response also states that the site is at risk of flooding in the 1 in 100 year event including a 35% allowance for climate change. Information from the Environment Agency provided in Appendix B.3 of the Flood Risk Assessment submitted to support the application shows that only an area of existing landscaping that is proposed to be retained as landscaping in the east of the site alongside the River Crane is expected to flood during a 1 in 100 year event when a 70% allowance for climate change is included. Below this event, no fluvial flooding of the site is expected beyond the immediate river corridor.

While there is an area on the current site that is shown to be at risk of surface water flooding, this is in the existing parking area at the front of the property. While the FRA may not have correctly classified this area as being at Medium risk of surface water flooding, it is isolated, not part of a

wider surface water flow path and associated only with local drainage and levels on the existing site. The inclusion of a sustainable drainage system will manage this risk and the assessment is considered to be proportionate to this flood risk source.

The recommended conditions will ensure that the detailed design of the development continues to align with local, regional and national planning policy.

CONTAMINATION OFFICER:

From available information it is recommended that the following conditions are applied: -

(i) The development shall not commence until a scheme to deal with contamination has been submitted to the Local Planning Authority (LPA) in accordance with the Supplementary Planning Guidance Document on Land Contamination, and approved by the LPA. All works which form part of the remediation scheme shall be completed before any part of the development is occupied or brought into use unless the Local Planning Authority dispenses with any such requirement specifically and in writing. The scheme shall include all of the following measures unless the LPA dispenses with any such requirement specifically and in writing:

a) 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

(b) A written method statement providing details of the remediation scheme and how the completion of the remedial works for each phase will be verified shall be agreed in writing with the LPA prior to commencement of each phase, along with the details of a watching brief to address undiscovered contamination. No deviation shall be made from this scheme without the express agreement of the LPA prior to its implementation.

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

(iii) Upon completion of the approved remedial works, this condition will not be discharged until a comprehensive verification report has been submitted to and approved by the LPA. The report shall include the details of the final remediation works and their verification to show that the works for each phase have been carried out in full and in accordance with the approved methodology.

(iv) No contaminated soils or other materials shall be imported to the site. All imported soils for landscaping purposes shall be clean and free of contamination. Before any part of the development is occupied, all imported soils shall be independently tested for chemical contamination, and the results of this testing shall be submitted and approved in writing by the Local Planning Authority. All soils used for gardens and/or landscaping purposes shall be clean and free of contamination.

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 Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012).

2 Reason for Refusal (if objecting):

N/A

3 Observations:

I have reviewed the following report: -

Title: Phase I Geo-Environmental Risk Assessment | Hotel Development; Ref 18-218.01 : Revision B; dated December 2018; Produced by Aviron Associates Limited.

The report includes an initial Conceptual Site Model and Preliminary Risk Assessment which are based on findings from a desk top study in conjunction with other relevant information from site.

Valid conclusions and recommendations identified within the report indicate requirements for a site investigation to further evaluate and quantify risk.

Therefore, the recommended conditions will supplement the relevant Geo-Environmental recommendations included within the Phase 1 report.

ACCESS OFFICER:

Any approval at this outline stage should convey to the applicant/agent that a full planning submission should comply with the 2016 London Plan policy 4.5, and its requirement to ensure that 10% of all new hotel bedrooms are accessible to wheelchair users.

1. To meet the requirements of London Plan 4.5, 9% of the proposed bedrooms should be fully accessible to wheelchair user guests. A further 1%, or 2 rooms, should be fitted with a tracked hoist system and have an adjoining door to a standard bedroom.
2. The ensuite bathrooms within the Universal Access guestrooms to ensure that wheelchair users are able to perform a side, frontal and oblique transfer onto the toilet pan and shower seat. The bedroom and ensuite bathroom design should accord with the design and layout set out in BS 8300-1:2018, Figure 30.
3. As the majority of wheelchair users prefer showers, 75% of the ensuite bathrooms within the required accessible bedrooms should have level access showering facilities.
4. Inherent in the design must be facilities that permit disabled people to leave the building in a safe and dignified way during an 'all-out' evacuation.

NB: The applicant is reminded of the duties set out in the Equality Act 2010 with regard to employment and service provision. Whilst an employer's duty to make reasonable adjustment is owed to an individual employee or job applicant, the responsibility of service providers is to disabled people at large, and the duty is anticipatory. The failure to take reasonable steps at this stage to facilitate access will therefore count against the service provider, if/when challenged by a disabled person. It is therefore recommended that the applicant takes full advantage of the opportunity that this development offers, to improve the accessibility of the premises to people with mobility and sensory impairments.

Conclusion: no objection from the accessibility viewpoint is raised at this outline planning stage.

ACCESS OFFICER FOLLOW-UP:

The revised plans dated 24 May 2019 in respect of this outline application have been reviewed, and are considered to be acceptable at this outline stage from an accessibility and inclusive design perspective. Conclusion: acceptable.

ENVIRONMENTAL PROTECTION UNIT OFFICER:

The acoustic report has provided noise mitigation details in relation to the building envelope structure and glazing, it has demonstrated how the internal noise levels will be achieved and comply with

BS8233: 2014.

Secondly the the report covers external noise levels on the proposed site and states that although mechanical plant/equipment and services to be used on the site has not been selected the appropriate cumulative plant noise criteria/targets have already been determined and will be applied. This approach is satisfactory.

The applicant has provided good practice measures for external plant so as to prevent noise nuisance.

POLICY OFFICER COMMENTS (Dated 4th April 2019):

Development Plan

Planning law requires that applications for planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise.

The Development Plan for the London Borough of Hillingdon currently consists of the following documents:

The Local Plan: Part 1 - Strategic Policies (2012)

The Local Plan: Part 2 - Saved UDP Policies (2012)

The London Plan - Consolidated With Alterations (2016)

The National Planning Policy Framework (NPPF) (2019) is also a material consideration in planning decisions, as well as relevant supplementary planning documents and guidance.

Draft Local Plan Part 2

The Revised Proposed Submission Local Plan Part 2 (LPP2) documents (Development Management Policies, Site Allocations and Designations and Policies Map Atlas of Changes) were submitted to the Secretary of State for examination in May 2018.

The public examination hearing sessions took place over one week in August 2018. Following the public hearing sessions, the examining Inspector advised the Council in a Post Hearing Advice Note sent in November 2018 that he considers the LPP2 to be a plan that could be found sound subject to a number of main modifications.

The main modifications proposed by the Inspector were agreed by the Leader of the Council and the Cabinet Member for Planning, Transport and Recycling in March 2019 and are published for public consultation from 27 March to 8 May 2019.

Regarding the weight which should be attributed to the emerging LPP2, paragraph 48 of the National Planning Policy Framework (NPPF) 2019 states that 'Local Planning Authorities may give weight to relevant policies in emerging plans according to:

- (a) the stage of preparation of the emerging plan (the more advanced its preparation, the greater the weight that may be given);
- (b) the extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given); and
- (c) the degree of consistency of the relevant policies in the emerging plan to this Framework (the closer the policies in the emerging plan to the policies in the Framework, the greater the weight that may be given).

With regard to (a) above, the preparation of the LPP2 is now at a very advanced stage. The public hearing element of the examination process has been concluded and the examining Inspector has

indicated that there are no fundamental issues with the LPP2 that would make it incapable of being found sound subject to the main modifications referred to above.

With regard to (b) above, those policies which are not subject to any proposed main modifications are considered to have had any objections resolved and can be afforded considerable weight. Policies that are subject to main modifications proposed by the Inspector will be given less than considerable weight. The weight to be attributed to those individual policies shall be considered on a case by case basis considering the particular main modification required by the Inspector and the material considerations of the particular planning application, which shall be reflected in the report, as required.

With regard to (c) it is noted that the Inspector has indicated that subject to main modifications the LPP2 is fundamentally sound and therefore consistent with the relevant policies in the NPPF.

Notwithstanding the above, the starting point for determining planning applications remains the adopted policies in the Local Plan: Part 1 Strategic Policies and the Local Plan: Part 2 Saved UDP Policies 2012.

Planning Designations

- Nature Conservation Site of Metropolitan or Borough Grade 1 Importance
- Green Belt (eastern and southern part of the site)

Principle of Development

The principle of a hotel use on this site has been previously established through the lapsed planning permission and previous pre-app response in 2018. However, there has been a change in the planning policy context since the Council's previous pre-application response which is reflected in the comments below.

Loss of Warehousing

The loss of B8 employment floorspace on this site should be assessed against policy DME 2: Employment Sites Outside Designated Employment Areas which can be afforded significant weight as there is only proposed modification to the policy which is relatively minor in nature. At present no evidence is provided to address the policy criteria other than comments that the number of jobs to be provided on the site will approximately double from 30 to 67. This is not sufficient to justify the proposed loss of B8 employment floorspace in the context of the emerging policies.

Proposed Hotel

The draft Local Plan Part 2 is now at an advanced stage of preparation, and as a result of the examination process there are some proposed modifications to policy DME5 which remove references to supporting hotel growth on the Heathrow Perimeter. These changes follow the publication of the Airports National Policy Statement (ANPS) which identified a potential area for Heathrow expansion which included a number of the hotel growth opportunities allocated in the draft Local Plan Part 2. Although the proposed development site was not located on any of these allocated sites, and is also outside the area identified for Heathrow expansion in the ANPS, this proposed modification to policy DME5 to make it consistent with national policy does represent a material change since the permission of the lapsed approval. However, the Local Plan Part 1 policy E2 does identify the Heathrow Perimeter in general as a location for hotel growth and given this site is not within the expansion area identified in the ANPS, this continues to carry weight in supporting a new hotel proposal in this location. However, the applicant should provide additional to demonstrate this

is a sustainable location in terms of the type of offer and its relationship to the airport.

Finally, it will be important to consult the relevant authorities regarding any potential changes in relation to issues such as public safety and noise arising from airport expansion which could affect the future operation of a hotel on this site.

Green Belt

The impact of the proposed scheme on the open character and appearance of the Green Belt should be assessed against policy DME1 6: Development in Green Edge Locations which can be afforded significant weight. The policy states that new development should incorporate proposals to assimilate development into the surrounding area by the use of extensive peripheral landscaping to site boundaries.

CASE OFFICER:

The applicant submitted a letter dated 10th May 2019 in response to these comments, providing further justification for principle of development.

POLICY OFFICER FOLLOW-UP COMMENTS (Dated 24th May 2019):

Please see the following as Planning Policy Comments in relation to the loss of non-designated industrial floorspace.

The policy framework for determining this application has altered slightly since the approval of 35805/APP/2009/2433, due to the emergence of the Local Plan: Part 2 - Development Management Policy DME 2 and the weight that may be attached to it in line with Paragraph 48 of the NPPF (2018).

The applicant's letter has sought to address the criteria within emerging Policy DME 2. There is merit in the applicant's argument that the scheme would conform with criterion (iv) in that it would not adversely affect any adjoining employment land. As such the loss is deemed acceptable.

Due to the outstanding objections that currently existing on the Draft London Plan and its policies relating to the retention of industrial capacity, limited weight can be attached to these policies in determining applications at present. However, if these policies gather more weight, they will likely have implications for how the loss of industrial capacity is determined in the London Borough of Hillingdon.

CASE OFFICER COMMENT:

During the process of the application, the preferred hotel growth location along the Bath Road was removed from the emerging local plan to avoid conflict between the Local Plan and the Airports National Policy Statement (ANPS). As such, a Sequential Test and Impact Assessment was requested in accordance with paragraphs 86, 87, 89 and 90 of the National Planning Policy Framework (June 2019).

UPDATED POLICY OFFICER COMMENTS (Dated 27th September 2019):

Development Plan

1.1 Planning law requires that applications for planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise.

1.2 The Development Plan for the London Borough of Hillingdon currently consists of the following

documents:

- The Local Plan: Part 1 - Strategic Policies (2012)
- The Local Plan: Part 2 - Saved UDP Policies (2012)
- The London Plan - Consolidated With Alterations (2016)

1.3 The National Planning Policy Framework (NPPF) (2019) is also a material consideration in planning decisions, as well as relevant supplementary planning documents and guidance.

Emerging Planning Policies

2.1 Paragraph 48 of the NPPF (2019) states that Local Planning Authorities may give weight to relevant policies in emerging plans according to:

(a) the stage of preparation of the emerging plan (the more advanced its preparation, the greater the weight that may be given);

(b) the extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given); and

(c) the degree of consistency of the relevant policies in the emerging plan to this Framework (the closer the policies in the emerging plan to the policies in the Framework, the greater the weight that may be given).

Draft London Plan (Consolidated with Changes July 2019)

3.1 The GLA consulted upon a draft new London Plan between December 2017 and March 2018 with the intention of replacing the previous version of the existing London Plan (2016). The Plan was subject to examination hearings from February to May 2019, and a Consolidated Draft Plan with amendments was published in July 2019. This Consolidated version remains under examination with a report by the appointed panel of Inspectors due in autumn 2019.

3.2 The Council's general approach at this stage is to give limited weight to the draft London Plan as a material consideration when deciding planning applications given at this stage of preparation it remains subject to a large number of objections, and could still be subject to significant further change prior to publication.

Proposed Submission Local Plan Part 2 with Main Modifications (March 2019)

4.1 The Revised Proposed Submission Local Plan Part 2 (LPP2) documents (Development Management Policies, Site Allocations and Designations and Policies Map Atlas of Changes) were submitted to the Secretary of State for examination in May 2018.

4.2 The public examination hearing sessions took place over one week in August 2018. Following the public hearing sessions, the examining Inspector advised the Council in a Post Hearing Advice Note sent in November 2018 that he considers the LPP2 to be a plan that could be found sound subject to a number of main modifications.

4.3 The main modifications proposed by the Inspector were agreed by the Leader of the Council and the Cabinet Member for Planning, Transport and Recycling in March 2019 and were published for public consultation from 27 March to 8 May 2019.

4.4 Taking Paragraph 48 of the NPPF into account, the Council's general approach to the weight which should be afforded to the draft LPP2 will be as follows:

- The preparation of the LPP2 is now at a very advanced stage. The public hearing element of the examination process has been concluded and the examining Inspector has indicated that there are no fundamental issues with the LPP2 that would make it incapable of being found sound subject to the main modifications referred to above.

- Those policies which are not subject to any proposed main modifications are considered to have had any objections resolved and can be afforded considerable weight. Policies that are subject to main modifications proposed by the Inspector will be given less than considerable weight. The weight to be attributed to those individual policies shall be considered on a case by case basis considering the particular main modification required by the Inspector and the material considerations of the particular planning application, which shall be reflected in the report, as required.

4.5 Finally, it is noted that the Inspector has indicated that subject to main modifications the LPP2 is fundamentally sound and therefore consistent with the relevant policies in the NPPF.

4.6 Notwithstanding the above, the starting point for determining planning applications remains the adopted policies in the Local Plan: Part 1 Strategic Policies and the Local Plan: Part 2 Saved UDP Policies 2012.

Green Belt

5.1 The submitted drawings indicate that the footprint of the proposed building would not extend beyond the developed area of the site into the Green Belt, as indicated on the Proposals Map of the existing and emerging development plan. Whilst the proposed parking area at the rear of the site would be located on land falling within the Green Belt, this area already comprises hardstanding and is used as car parking for the existing commercial units. Therefore no objection is raised to the appropriateness of the development within this part of the Green Belt.

Loss of D2

6.1 The scheme would result in the loss of a banqueting hall, which is identified as a D2 use class (Assembly & Leisure) by the applicant. Officers agree with this land use class designation. A banqueting hall is not specifically identified as one of the protected community uses referred to in either the existing or emerging development plan, nor would it meet any of the broader definitions within Paragraph 92 of the NPPF (2019).

6.2 LPP1 (2012) Policy CI 2 outlines that developments proposals should not result in the loss of existing leisure and recreational facilities unless satisfactory alternative provision is made or it can be demonstrated that the asset is no longer needed. There is evidence that a number of existing banqueting halls would remain within a reasonable catchment area of the existing facility. There have been no public comments to suggest that this would lead to a shortfall of this specific use. Furthermore, an element of the current facilities being offered would also be retained through the ancillary C1 uses proposed on the ground floor of the hotel, which includes a private bar, restaurant and conference facilities for hire.

6.3 The harm related to the loss of this D2 floorspace is therefore considered to be minimal.

Loss of B8

7.1 The scheme would also involve the loss of 1,908 sqm (GIA) of non-designated B8 floorspace with ancillary offices. The loss of this floorspace is not contrary to policies within the adopted Development Plan.

7.2 However, in line with Paragraph 48 of the NPPF (2019), weight should be afforded to the emerging LPP2 (2019) Policy DME 2. The applicant has provided evidence that the scheme would conform with criterion (iv) in that it would not adversely affect any adjoining employment land.

7.3 In regards to the Draft London Plan (2019) and its policies relating to the retention of non-designated industrial capacity, due to the outstanding objections that currently exist it is considered that limited weight can be attached to these policies in determining applications at present. It is also noted that no objection has been raised by the GLA in regards to the loss of non-designated B8 floorspace. However, if these policies are adopted, they will likely have implications for how the loss of non-designated industrial capacity is determined in the London Borough of Hillingdon in the future

Gain of C1

8.1 The scheme is proposing a 192 bedroom hotel with ancillary uses (C1). The scheme is located along the Bath Road, which is an area of the borough with a high proportion of hotels due to its close proximity and access to Heathrow Airport.

8.2 Hotels and associated conference facilities are defined as main town centre uses within Appendix 2 of the NPPF (2019). Paragraph 85 of the NPPF (2019) outlines in part d) that planning policies should allocate a range of suitable sites in town centres to meet the scale and type of development likely to be needed, looking at least ten years ahead.

8.3 The LPP1 (2012) Policy E2 identifies that projected Hotel Growth in the borough will be required at a minimum of 3,800 additional bedrooms between 2007 - 2026, based on the GLA's Hotel Demand Study (2006). However, the LPP1 (2012) also outlines a far higher benchmark of 5,600 additional bedrooms between 2012 - 2026, based on a subsequent Hillingdon Tourism Study (2007). The LPP1 notes the need to monitor these figures closely in order to determine the most realistic projection. Between 2012/13 and 2018/19, 4,203 C1 bedrooms have been approved within the London Borough of Hillingdon, of which 3,453 bedrooms (82.2%) have been built, started or have not expired. Noting this significant growth to date and the amount of time left within the LPP1 (2012) period, it is considered that the 5,600 benchmark is the more appropriate figure.

8.4 It should be noted that, as part of the evidence base for the draft London Plan (2019), GLA Economics produced Working Paper 88: Projections of demand and supply for visitor accommodation in London to 2050. However this evidence uses a Heathrow Airport Northwest Runway expansion scenario as its central case. Due to the significant uncertainty around the delivery of this scenario, it is not considered that these figures are the most appropriate to be used for determining planning applications at present.

8.5 Suitable sites to meet the scale of the development outlined within the LPP1 (2012) were initially identified within the emerging LPP2 (2019) site allocations and designations document. However, as outlined within the Post Hearing Advice Note (PHAN) provided by the Inspector in November 2018, the Inspector has requested the deletion of the Hotel & Office Growth Allocations in proximity to Heathrow Airport due to uncertainty regarding their delivery.

8.6 Following this deletion, it is likely that a shortfall in capacity may exist in and on the edge of town centres or on sites allocated with an up-to-date plan. This has been confirmed by the applicant's sequential test that demonstrates that there are no sequentially preferable sites which are suitable and available for the proposal. In line with Paragraph 85 Part E of the NPPF (2019), in order to meet the identified need it is appropriate to consider schemes in other accessible locations that comply with Development Plan policies.

8.7 LPP1 Policy E2 outlines that new hotels and visitor facilities will be encouraged 'in other sustainable locations'. London Plan (2016) Policy 4.5 also outlines that it may be appropriate to locate visitor accommodation outside of town centres where they relate to a major visitor attraction

of sub-regional or greater significance, which in this case would be Heathrow Airport itself.

8.8 In terms of the definition of 'other sustainable locations', the adopted LPP2 (2012) Policy T2 outlines that accommodation and conference facilities on sites easily accessible from Heathrow Airport, underground and railway stations and from the main road network are acceptable. The applicant has demonstrated how this site is easily accessible to Heathrow Airport and main road network.

8.9 Emerging LPP2 (2019) Policy DMTC 1 outlines that an impact assessment is required for any scheme proposing 1,000 sqm of combined main town centres uses outside of the town centre, in order to consider the effect of the proposal on the vitality and viability of existing town centres. Paragraph 89 of the NPPF (2019) is more specific in outlining that this is only required for assessing new retail and leisure development. Regardless, the applicant has provided an impact assessment to conclude that the proposed scheme would not materially affect the vitality and viability of existing town centres.

8.10 To conclude, the Planning Policy Team do not raise any objection to the principle of the development.

HIGHWAYS OFFICER:

The development site fronts the A4 (Bath Road) which makes up part of Transport for London's Road Network and is classified as a priority red route. The site itself is bound by the A4 to the north which runs east-west across the Hillingdon Borough and links to the A312 via the Parkway roundabout which in turn links to the M4 corridor. Heathrow Airport is located towards the south of the A4 (Bath Road).

Within the vicinity of the site, Bath Road is a dual carriageway with a central guard rail and is subject to a 40mph speed limit. Bath Road makes use of pedestrian footways, street lighting, centerline road markings and parking restrictions along both sides of the carriageway. Public transport facilities in the form of bus stops are also located within walking distance of the site.

The site is currently accessed via a left turn in taper lane which immediately connects to a shared internal access road. This taper lane helps to ensure that vehicles pulling off the A40 into the site are able to do so without obstructing the free-flow of traffic. You will be aware that this application seeks outline planning consent for the demolition of two existing buildings comprising a banqueting/conference hall and office/warehouse in order to construct a 192-bed hotel with 415sqm of conference/banqueting and 390sqm of dining/bar facilities.

Given the very location of the site, it is expected that the hotel would mostly serve airport patronage. Upon reviewing the Public Transport Accessibility Level (PTAL) rating for the development using the Transport for London WebCAT service, it is indicated that the site contains a PTAL rating of 2. It is therefore likely that patrons would require dependency on the private car for journeys to and from the site.

Parking Provision

Policy AM14 of the Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012) seeks to ensure that all development is in accordance with the Councils adopted Car Parking Standards.

The emerging DMT6 policy and parking standard for hotels (Use Class C1) indicates that assessment should be carried out on an individual basis whilst considering provision for taxi pick-up and drop-off, coach parking, car rental operations and additional activities in addition to the hotel itself. However, the Councils currently adopted saved Unitary Development Plan (UDP) does provide

a more prescriptive standard for Hotels with a ratio of 1 parking space per 5 hotel bedrooms plus 1 space per 25sqm of conference facilities. This would generate a parking requirement of 70 spaces.

The submissions propose 65 parking spaces in the form of a two floor ground floor and basement car park which whilst not in complete accordance with the currently adopted saved Unitary Development Plan standard, is similar to that approved under the previous consent (ref, 5805/APP/2009/2433). An objection on this basis is not expected to be sustained during an appeal scenario. The proposed level of parking is therefore deemed acceptable.

Disabled Parking

To accord with both the currently adopted UDP standard and the emerging Local Plan: Part 2 DMT 6 policy, it is required that 10% of parking provision be allocated to blue badge holders.

Under the proposed level of parking for the hotel, it is required that 7 spaces be allocated to disabled users. The submissions demonstrate the required level of provision which is deemed suitable.

Electrical Vehicle Charging Points (EVCP)

Provisions for electrical charging points have been provided in excess of the Local Plan Part 2 standards which require 5% active and 5% passive provision. The submissions propose a total of 16 spaces however no mention of how many spaces dedicated as 'active' or 'passive' provision has been provided. I would therefore request that a condition be imposed requiring 8 spaces to be provided as 'active' EVCP and a further 8 as 'passive' EVCP. An 'active' EVCP is one which has all the necessary hardware already provided in situ. A 'passive' EVCP is one which has all the necessary connections provided underground thereby making it easy to install an EVPO in response to future demand

Motorcycle/Scooter Parking

Provision for motorcycle/scooter parking should accord with the emerging Local Plan: Part 2 DMT 6 policy which requires 5% of the total car parking provision. In this instance, it is required that 3 spaces be accommodated for. Whilst the submissions indicate 4 spaces in the surface level car park, the additional provision is welcomed. To help tackle motorcycle theft, all motorcycle parking spaces should be provided with 'anchor points'.

Cycle Parking

The emerging Local Plan: Part 2 requires a minimum of 1 space per 10 members of staff. Given that the submitted application form proposes 56 full-time equivalent employees, it is required that 6 spaces be accommodated for. On the other hand, the London plan minimum standards would require 1 space per 20 bedrooms for long stay and 1 space per 50 bedrooms for short stay which would require a total of 14 spaces.

It is proposed that a total of 24 spaces be provided towards the rear surfaced car park. Whilst the proposed level of cycle parking is an overprovision compared to that required under both the emerging Local Plan: Part 2 and London Plan minimum standards, the additional level of cycle parking is welcomed.

Coach Parking

To accord with the emerging Local Plan: Part 2, one coach space per 50 bedrooms is required. Whilst only one space is proposed, this level of provision would be similar to that previously granted consent. Furthermore, it is noted that the site could benefit from future use of the Heathrow National

Express - Hoppa bus service which would undoubtedly promote sustainable travel to Heathrow central bus station and Airport terminals. I trust you as the Local Planning Authority will secure this by way of condition.

Access Provision

Access to the site is currently gained through a priority junction via the A4 (Bath Road) through a left in taper lane. The access arrangement would predominantly remain unchanged and will follow that granted under the previous planning consent. It is noted however that conditions/obligations were previously imposed requiring the need for alterations to be made to the existing site access and nearby junctions.

As with the previous scheme, Transport for London have raised concerns over the access width being safe and suitable for both pedestrians and cyclists travelling along this section of the A4 (Bath Road). It has therefore been requested that improvements be made to the site junction/access. Although no detailed designs have been produced at this present point in time, this can in fact be secured via a planning obligation or suitable planning condition once known. I trust this would therefore be incorporated as part of the consent.

Swept path analysis drawings have been provided demonstrating coach tracking accessing and egressing the site. Although concerns are raised with coaches having to overrun into the second running lane of the dual carriageway in order to turn into the left lane, the site under the current use classes (B1, B8 and D2) would accommodate vehicles which would already be carrying out similar manoeuvres.

Trip Generation

Policy AM7 of the Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012) considers whether the traffic generated by proposed developments is acceptable in terms of the local highway and junction capacity, traffic flows and conditions of general highway or pedestrian safety.

To determine the existing level of trips associated with the site traffic surveys were undertaken at the site access junction. It is highlighted that the site currently generates 16 movements throughout the AM peak hour and 34 movements throughout the PM peak hour during the weekday. A weekend survey was also commissioned which established 13 movements during the AM peak hour and 52 movements during the PM peak hour.

To determine the proposed level of trips associated with the application site, the applicant has carried out an interrogation of the TRICS (Trip Rate Information Computer System) database involving the proposed use class with reference to three sites. Although an argument can be made as to whether or not one or more of the selected sites are comparable in terms of their location within Greater London, it has been highlighted that the derived (vehicle) trip rates are similar to those established from the previously consented application.

Weekday Trips

The results show that the proposed hotel could generate an increase of 16 movements during the AM 'network' peak hour and a reduction of 13 movements during the PM 'network' peak hour compared to that currently associated with the site. It is observed however that trips typically linked to hotels would take place outside the network peak hours with patrons checking in during the evening period (19:00-20:00) and checking out during the late morning period (11:00-12:00). As such, the submitted data shows that the proposed site during the weekday would generate an additional 22 movements during the Hotel AM peak hour (11:00-12:00) and a reduction of 5

movements during the Hotel PM peak hour (19:00-20:00) compared to that which currently takes place.

Weekend Trips

No comparable weekend trip data has been provided. The Transport Assessment therefore assumes that trip rates would be similar to but no greater than the weekday trips. When applying the proposed weekday trips to the existing weekend surveys, an increase of 20 movements is expected during the AM 'network' peak and a reduction of 27 movements during the PM 'network' peak hours.

During the Hotel AM Peak (11:00-12:00), an additional 10 movements will be generated, however during the Hotel PM peak, a reduction of 21 movements is likely to take place compared to that currently associated with the site.

Net Trips

Overall, trip rates during all AM peak hours would be expected to be sufficiently absorbed within the existing local road network without having a notable detriment to traffic congestion and road safety.

Servicing and Delivery Arrangements

Whilst it has been demonstrated that the access as existing is able to accommodate service/delivery vehicles and coaches in forward gear, given that potential improvements will be secured altering the access geometry at the junction (as mentioned above), revised swept path analysis drawings of associated service and delivery vehicles will be required.

A draft framework serving/delivery plan has been submitted to support the planning application. The draft plan outlines that operational service/loading trips are to take place outside of associated peak hours and that whilst the level of daily operational trips are at present unknown, this will be monitored and agreed as part of the final Service and Delivery Plan. I trust you as the Local Planning Authority will secure this by way of condition.

Car Parking Management Plan (CPMP)

In order to best mitigate and control parking demand within the car park serving the proposed hotel, a detailed CPMP will be required which should ensure the smooth operation of the car park and prevent inappropriate/informal parking from taking place by users of the site. This should detail the preclusion of stay, park and fly services. This should be imposed by way of condition.

Workplace Travel Plan

A draft Travel Plan has been included within the submissions, whilst broadly acceptable, additional and more robust measures are required which will encourage and enable a mode shift away from the driver only private car in favour of more sustainable modes of travel.

It is suggested that the Full Framework Travel Plan include the use of the Heathrow National Express - Hoppa bus service which will provide further relief of traffic impact along the network. This should be secured via a section 106 agreement.

Construction Logistics Plan

Prior to the implementation of the works, a full Construction Management Plan is required to be secured under a suitable planning condition due to the site constraints of the local highway network. This should detail the management of construction traffic, including vehicle types, frequency of

visits, expected daily time frames, use of an onsite banksman, on-site loading/unloading arrangements and parking of site operative vehicles.

Conclusion

Mindful of the above, should you be minded to approve the application, I would request that the above mentioned obligations and conditions be attached.

HIGHWAYS OFFICER FOLLOW-UP:

Following discussions with the Highways Manager, we've removed Greenwich from the Trics search parameters as this is an inner London Borough and is not entirely reflective of the site which sits in an outer London Borough. This generates a slightly higher trip generation.

The forecasts of the parking accumulation is done on an 80% occupancy rate, this should in fact be considered on a worst case scenario (100%). Therefore, when working out the accumulation based on the revised trip rates a maximum accumulation of 60 spaces is generated. In the spirit of compromise, I am willing to deviate from current parking standards which require 70 spaces and am therefore willing to accept a reduction to 60 spaces.

AIR QUALITY OFFICER:

1 Summary of Comments

DAMAGE COST

The proposed development is located with the A4 Corridor Focus Area, bringing traffic and energy production emissions which will add to current exceedances. As per the new London Plan, developments need to be neutral as minimum and positive in Focus Areas, contributing to the reduction of emissions in these sensitive areas.

Therefore, a section 106 agreement with the LAP of £155,013 is to be paid for Hillingdon to deliver its air quality local action plan and or implement specific measures on/along the road network affected by the proposal that reduce vehicle emissions and or reduce human exposure to pollution levels.

2 Reason for Refusal (if objecting)

N/A

3 Observations

In addition, an Air Quality condition is required to develop and implement a Low Emission Strategy. See text below.

Condition Air Quality - Low Emission 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:

1) the fleet composition serving the Hotel to be Euro 6/VI or cleaner (e.g. electric) or have implemented retrofitting devices that will enable compliance with such Euro standards.

2) the supply of energy to the Hotel. Any CHP or gas boiler will have to conform with the London Ultra Low NOx requirements;

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.

3) an electric vehicle fast charging bay. This is to be implemented as part of the proposal with a minimum of three charging points.

4) a clear and effective strategy to encourage staff to

- a) use public transport;
- b) cycle / walk to work where practicable;
- c) enter car share schemes;
- d) purchase and drive to work zero emission vehicles.

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

REASON

Due to the application sites designation as part of an Air Quality Management Area and in order to comply with emerging Policy DME1 14 of the Hillingdon Local Plan: Part 2 - Development Management Policies with Modifications (March 2019), Policy EM8 of the Hillingdon Local Plan: Part 1 - Strategic Policies (November 2012), Policy 7.14 of the London Plan (March 2016) and the National Planning Policy Framework (June 2019).

SUSTAINABILITY OFFICER - ECOLOGY:

Agreed to add ecological enhancement condition.

SUSTAINABILITY OFFICER - ENERGY:

GLA have provided comment on energy matters.

URBAN DESIGN OFFICER:

The application site comprises a partly commercial, partly Green Belt site, situated on the north east of the Northern perimeter of Heathrow Airport, fronting Bath Road (the A4). The site is bounded by the river Crane to the west, and car parks serving Heathrow airport to the north and east. The existing buildings are positioned to the western part of the site, and consist of two parallel, two-storey buildings for light industrial/warehousing and office use. Car parking areas are currently found to the front and rear of the site. Within the site the land to the south and east of the existing buildings is designated as Metropolitan Green Belt. The Green Belt setting along the river Crane also forms part of the protected Nature Conservation Area. The Green Belt extends to the north, on the Northern side of Bath Road, opposite the application site, into Cranford Park, the historic landscape setting of the former Cranford House, now demolished. Cranford Park includes the Grade II listed stables.

The application is an outline planning application for demolition of the existing buildings and the erection of a five storey, 192-bedroom hotel with basement and surface car parking, a bar/restaurant, meeting rooms and associated works. The scheme is almost identical to the 192 bedroom hotel scheme granted permission under planning reference 35805/APP/2009/2433 in 2012

The proposal is submitted in outline form, with matters of layout, scale, appearance and access to be determined as part of the application and landscaping to be left as a reserved matter.

As stated above the scheme is almost identical to that approved under application

35805/APP/2009/2433 which has now lapsed. A pre-application submission was submitted to the council in 2018 (app: 35805/PRC/2018/77). Officers concluded that since the design and appearance of the hotel was essentially the same as the lapsed consent, that there were no design concerns with the proposal and I would concur with this view.

The scheme proposes the re-development of the existing low-key two-storey commercial buildings with a 5 storey high hotel development, which retains the existing two access points to the west. The scheme proposes the transformation of the Green Belt land to the east into a hotel garden, which can be accessed from the conference centre on the ground floor. The scheme will improve accessibility into the eastern part of the application site and the riverbank, whilst the informal character of wilderness will be transformed into a designed landscape.

The scheme has been amended slightly from the previously consented scheme with the glazed atrium having now been replaced with a courtyard facing the landscaped garden; the reduction in the footprint of the building at ground floor level to make the proposed ground floor footprint the same as the existing buildings (1,890 sqm); the removal of the sunken garden and the provision of 4 motorcycle parking spaces adjacent to the cycle parking area to address changes in planning policy.

The alterations are not considered to alter the buildings appearance significantly that raises any design concerns over the previously approved scheme. No objection is, therefore, raised on design grounds.

Should the application be minded for approval then I would suggest conditions be attached requesting the external building materials be submitted to and be approved by the local authority along with details of the windows, doors and weatherings to the building.

7. MAIN PLANNING ISSUES

7.01 The principle of the development

HOTEL USE

Hotels and associated conference facilities are defined as main town centre uses within Appendix 2 of the NPPF (June 2019). Paragraph 85 of the NPPF (June 2019) outlines in part d) that planning policies should allocate a range of suitable sites in town centres to meet the scale and type of development likely to be needed, looking at least ten years ahead.

Policy E2 of the Local Plan: Part 1 - Strategic Policies (November 2012) identifies that projected Hotel Growth in the borough will be required at a minimum of 3,800 additional bedrooms between 2007 - 2026, based on the GLA's Hotel Demand Study (2006). However, this also outlines a far higher benchmark of 5,600 additional bedrooms between 2012 - 2026, based on a subsequent Hillingdon Tourism Study (2007). There is a need to monitor these figures closely in order to determine the most realistic projection. Between 2012/13 and 2018/19, 4,203 C1 bedrooms have been approved within the London Borough of Hillingdon, of which 3,453 bedrooms (82.2%) have been built, started or have not expired. Noting this significant growth to date and the amount of time left within the plan period, it is considered that the 5,600 benchmark is the more appropriate figure.

As noted by the Council's Policy Officer, as part of the evidence base for the draft London Plan (2019), GLA Economics produced Working Paper 88: Projections of demand and supply for visitor accommodation in London to 2050. This evidence uses a Heathrow Airport Northwest Runway expansion scenario as its central case and due to the significant uncertainty around the delivery of this scenario, it is not considered that these figures are the most appropriate to be used for determining planning applications at present.

Suitable sites to meet the scale of the development outlined within the Hillingdon Local Plan: Part 1 - Strategic Policies (November 2012) were initially identified within the emerging Hillingdon Local Plan: Part 2

site allocations and designations document. However, as outlined within the Post Hearing Advice Note (PHAN) provided by the Inspector in November 2018, the Inspector has requested the deletion of the Hotel & Office Growth Allocations in proximity to Heathrow Airport due to uncertainty regarding their delivery.

Following this deletion, it is likely that a shortfall in capacity may exist in and on the edge of town centres or on sites allocated with an up-to-date plan. This has been confirmed by the applicant's sequential test that demonstrates that there are no sequentially preferable sites which are suitable and available for the proposal. In line with Paragraph 85 Part E of the NPPF (June 2019), in order to meet the identified need it is appropriate to consider schemes in other accessible locations that comply with Development Plan policies.

Policy E2 of the Hillingdon Local Plan: Part 1 - Strategic Policies (November 2012) outlines that new hotels and visitor facilities will be encouraged 'in other sustainable locations'. Policy 4.5 of the London Plan (March 2016) states that it may be appropriate to locate visitor accommodation outside of town centres where they relate to a major visitor attraction of sub-regional or greater significance, which in this case would be Heathrow Airport.

In terms of the definition of 'other sustainable locations', Policy T2 of the Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012) outlines that accommodation and conference facilities on sites easily accessible from Heathrow Airport, underground and railway stations and from the main road network are acceptable. The applicant has demonstrated how this site is easily accessible to Heathrow Airport and main road network.

Policy DMTC 1 of the emerging Hillingdon Local Plan: Part 2 - Development Management Policies with Modifications (March 2019) states that an impact assessment is required for any scheme proposing 1,000 square metres of combined main town centres uses outside of the town centre, in order to consider the effect of the proposal on the vitality and viability of existing town centres. The applicant has provided an impact assessment to conclude that the proposed scheme would not materially impact the vitality and viability of existing town centres. As stated by the Council's Policy Officer, there is no objection to the principle of development.

LOSS OF OFFICE/WAREHOUSE USE

The proposed development would result in the loss of an approved office/warehouse (Use Class B1/B8).

Policy DME 2 of the emerging Hillingdon Local Plan: Part 2 - Development Management Policies with Modifications (March 2019) states that proposals which involve the loss of employment floorspace or land outside designated employment areas will normally be permitted if:

- i) the existing use negatively impacts on local amenity, through disturbance to neighbours, visual intrusion or has an adverse impact on the character of the area; or
- ii) the site is unsuitable for employment reuse or development because of its size, shape, location, or unsuitability of access; or
- iii) Sufficient evidence has been provided to demonstrate there is no realistic prospect of

land being reused for employment purposes; or
iv) The new use will not adversely affect the functioning of any adjoining employment land.

Policy LE4 of the Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012) states that proposals which involve the loss of existing industrial floorspace or land outside designated industrial and business areas will normally be permitted if:

- (i) The existing use seriously affects amenity, through disturbance to neighbours, visual intrusion or an adverse impact in the character of an area; or
- (ii) The site is unsuitable for industrial redevelopment because of the size, shape, location or lack of vehicular access; or
- (iii) There is no realistic prospect of the land being used for industrial and warehousing purposes in the future; or
- (iv) They are in accordance with the Council's regeneration policies for an area.

In justifying the proposed loss of the existing warehouse unit, the applicant notes that although the existing occupier is able to function relatively harmoniously with the neighbouring uses, any new occupiers are likely to generate higher levels of delivery traffic which would conflict with the existing banqueting hall use and barrier-controlled shared access arrangements. The applicant notes that the warehouse is relatively small, measuring approximately 402 square metres on floor space, and is constrained to the extent that it has limited marketing potential. This is evidenced by its vacancy between May 2011 and September 2014. The existing warehouse is also isolated and the surrounding area contains no other warehouses or industrial uses. As such, the applicant considers the existing use to be out of character for the area.

As stated by the Council's Policy Officer, the applicant's assertion that the proposed development would conform with criterion (iv) of emerging Policy DME 2 of the Hillingdon Local Plan: Part 2 - Development Management Policies with Modifications (March 2019) and would not adversely affect any adjoining employment land is deemed acceptable. It is considered that the existing warehouse use is generally out of character for the area, with residential uses and fast food uses characterising the immediate area. As such, the proposal meets the requirement of criterion (i) of Policy LE4 of the Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012). It is noted that Draft London Plan policies relating to the retention of industrial capacity are currently afforded limited weight due to outstanding objections.

BANQUETING/CONFERENCE HALL USE

The proposed development would result in the loss of a banqueting/conference hall (Use Class D2). A banqueting hall is not specifically identified as one of the protected community uses referred to in either the existing or emerging development plan, nor would it meet any of the broader definitions within Paragraph 92 of the NPPF (2019).

Policy CI 2 of the Hillingdon Local Plan: Part 1 - Strategic Policies (November 2012) states that developments proposals should not result in the loss of existing leisure and recreational facilities unless satisfactory alternative provision is made or it can be demonstrated that the asset is no longer needed.

There is evidence that a number of existing banqueting halls would remain within a reasonable catchment area of the existing facility. There have been no public comments to suggest that this would lead to a shortfall of this specific use. Furthermore, an element of the current facilities being offered would also be retained through the ancillary C1 uses

proposed on the ground floor of the hotel, which includes a private bar, restaurant and conference facilities for hire. As stated by the Council's Policy Officer, the resultant loss of D2 floorspace is considered to be minimal.

EMPLOYMENT

The application form submitted by the applicant indicates the proposal would provide 45 full time staff and 22 part time staff. In order to fulfil the requirements of Policy 4.12 of the London Plan (March 2016), the applicant is required to guarantee that local residents benefit through jobs and training. If recommended for approval, this would be secured by a Section 106 legal agreement.

7.02 Density of the proposed development

Not relevant to the consideration of this application.

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

Policy BE4 of the Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012) states that new developments should retain or enhance the character and appearance of Conservation Areas and those features which contribute to the special architectural qualities. This is supported by Policy DMHB 4 of the emerging Hillingdon Local Plan: Part 2 - Development Management Policies with Modifications (March 2019).

The proposed five-storey building would measure approximately 46.9 metres in width, 46.2 metres in depth and 16.5 metres in height. The design would incorporate two landscaped terraces on the east side of the building and would be clad in metal and glass. Specifically, the 'inner skin' is clad in reflective aluminium metal panels with an arboreal pattern applied and the 'outer skin' is a smooth glass surface with a larger leaf pattern irregularly applied for a screen print effect.

It is noted that the application site is located approximately 60 metres to the south of the Cranford Park Conservation Area. The use of the proposed terracing, glazing, planting and materials is considered to reduce the bulk of the proposed block and soften any impact on the Conservation Area. As such, the proposal is considered to accord with Policy BE4 of the Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012) and Policy DMHB 4 of the emerging Hillingdon Local Plan: Part 2 - Development Management Policies with Modifications (March 2019).

7.04 Airport safeguarding

Policy A6 of the Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012) states that the Local Planning Authority will not grant planning permission for development likely to interfere with the safe and efficient operation of Heathrow or Northolt Airports.

As stated by the National Air Traffic Services (NATS), the proposed development does not conflict with safeguarding criteria and there is no objection. However, the consultation response from Heathrow Ltd indicates that the proposal could conflict with safeguarding criteria and that any grant of planning permission should be subject to conditions. Such conditions would include the submission of a Bird Hazard Management Plan, details regarding the control of lighting, landscaping and height limitation on trees and shrubs. Informatives regarding the British Standard Code of Practice for cranes and wind turbines would also be attached if planning permission is granted.

7.05 Impact on the green belt

Paragraph 143 of the National Planning Policy Framework (NPPF) (2019) sets out that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in 'very special circumstances'. Paragraph 144 continues this, stating:

"When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations."

Policy 7.16 of the London Plan (March 2016) supports this, stating:

"The strongest protection should be given to London's Green Belt, in accordance with national guidance. Inappropriate development should be refused, except in very special circumstances. Development will be supported if it is appropriate and helps secure the objectives of improving the Green Belt as set out in national guidance".

In terms of local policy, the Hillingdon Local Plan: Part 1 - Strategic Policies (November 2012) gives strong protection to Green Belt land. Policy EM2 states that the Council will seek to maintain the current extent of the Green Belt and any proposals for development in the Green Belt and Metropolitan Open Land will be assessed against national and London Plan (March 2016) policies, including the very special circumstances test.

Policies OL1, OL2 and OL4 of the Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012) also give strong emphasis to not normally permitting new building in the Green Belt, reflecting overarching national and London wide policies.

Policy OL1 of the Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012) states that agriculture, horticulture, nature conservation, open air recreation and cemeteries are the only open land uses which are acceptable in the Green Belt. All other forms of development are, by definition, 'inappropriate'. In order for 'inappropriate' development to be acceptable in the Green Belt, very special circumstances must apply.

Policy OL2 of the Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012) states that within the Green Belt, where proposals are acceptable in principle, the Local Planning Authority will seek comprehensive landscaping improvements to achieve enhanced visual amenity and other open land objectives.

Policy OL5 of the Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012) states that the Local Planning Authority will normally only permit proposals for development adjacent to or conspicuous from the Green Belt, if it would not injure the visual amenities of the Green Belt by reason of siting, materials, design, traffic or activities generated.

This is supported by Policy DME1 4 of the emerging Hillingdon Local Plan: Part 2 - Development Management Policies with Modifications (March 2019) which only allows inappropriate development in very special circumstances. Extensions and redevelopment on sites will be permitted where the proposal would not have a greater impact on the openness of the Green Belt and Metropolitan Open Land.

Policy DME1 6 of the emerging Hillingdon Local Plan: Part 2 - Development Management Policies with Modifications (March 2019) also states that new development adjacent to the Green Belt, Metropolitan Open Land, Green Chains, Sites of Importance for Nature Conservation, Nature Reserves, countryside, green spaces or the Blue Ribbon Network should incorporate proposals to assimilate development into the surrounding area by the use of extensive peripheral landscaping to site boundaries.

The southern section of the application site is designated as part of the Green Belt and the

area encompassing the existing buildings is located immediately next to Green Belt designation. As such, the proposed building would be located next to the Green Belt and the proposed car park would be located within the Green Belt. It is noted that the area to facilitate the proposed car park already consists of hardstanding and is used as car parking for the existing units. As such, no objection is raised to the appropriateness of the development within this part of the Green Belt.

This proposed 192-bedroom hotel would consist of a five storey building with a u-shaped floor plan, measuring approximately 46.9 metres in width, 46.2 metres in depth and 16.5 metres in height. The use of terracing, glazing, planting on the eastern facade as well as the palette of materials is considered to reduce the bulk of the proposed block and soften the impact on the adjoining Green Belt.

In the immediate area surrounding the application site, the street scene consists of low-rise two storey residential buildings and one storey high retail buildings. Further to the east, it is noted that there are larger scale buildings including the 'Heathrow House' seven-storey building, the 'Moxy' six-storey building and a newly built four-storey building. The submitted visual appraisal demonstrates that the proposed building would be viewed in context with existing large scale buildings and would be partially screened by vegetation. As such, it is considered that the proposed five-storey hotel would be in keeping with the height, mass and scale of buildings typical to this side of Bath Road and the surrounding Heathrow area.

The existing Green Belt to the east of the proposed building, and forming the eastern part of the application site, currently has the appearance of poorly maintained scrubland. It is proposed to retain and enhance this land through the management of the existing landscape and introduction of new wildflower grassland areas, bulb planting, native tree planting and hedge planting. Along the southern boundary of the site, native shrub planting would provide a boundary between the site and the adjacent airport car parking and native trees would be introduced to enhance the setting. Deadwood piles are also proposed and would provide enhanced opportunities for invertebrate habitats, ensuring that the biodiversity of this part of the Green Belt and the Nature Conservation Area of Metropolitan or Borough Grade I Importance is enhanced. As such, the proposed landscaping measures would enhance the value of the site and improve its visual amenity.

Whilst it is acknowledged that the proposed building would be larger in terms of height and scale than the existing buildings on the site, given the high quality design and significant landscaping improvements proposed, it is considered that the proposal would enhance the visual amenities of the Green Belt and complies with Policies OL1, OL2 and OL4 of the Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012) and DMEI 4 and DMEI 6 of the emerging Hillingdon Local Plan: Part 2 - Development Management Policies with Modifications (March 2019) and the NPPF (2019).

7.06 Environmental Impact

Matters regarding environmental impact, including noise, air quality, sustainability, flooding, trees and landscaping and ecology are addressed further in the report.

7.07 Impact on the character & appearance of the area

Policy 7.7 of the London Plan (March 2016) and Policy DMHB 10 of the emerging Hillingdon Local Plan: Part 2 - Development Management Policies with Modifications (March 2019) requires that consideration is given to the impact of the proposed development on the character of the area, its relation to surrounding buildings and the public realm, legibility, the skyline, quality and sustainability of design, permeability and local regeneration. Tall buildings should not affect their surroundings adversely in terms of microclimate, wind turbulence, overshadowing, noise, reflected glare, aviation, navigation

and telecommunication interference and should not impact on local or strategic views or sensitive locations adversely.

Policy BE13 of the Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012) states that development will not be permitted if the layout and appearance fail to harmonise with the existing street scene or other features of the area which the Local Planning Authority considers it desirable to retain or enhance.

Policy BE35 of the Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012) states that when considering proposals for major development adjacent to and visible from major road and rail connections to Heathrow and Central London, namely the M4 and Heathrow spur, the A4, the A40, the Paddington to Bristol and the Marylebone to Birmingham railway lines and the Heathrow Express Link, the local planning authority will seek to ensure:

- (i) That development is of a high standard of design, layout and landscape;
- (ii) That where opportunities arose, attractive views and important local landmarks are opened up from these transport corridors.

This proposed 192-bedroom hotel would consist of a five storey building with a u-shaped floor plan, measuring approximately 46.9 metres in width, 46.2 metres in depth and 16.5 metres in height. The design would incorporate two landscaped terraces on the east side of the building and a courtyard entrance at ground floor leading to a central atrium space. The building would be clad in metal and glass. Specifically, the 'inner skin' is clad in reflective aluminium metal panels with an arboreal pattern applied and the 'outer skin' is a smooth glass surface with a larger leaf pattern irregularly applied for a screen print effect. This use of terracing, glazing, planting on the eastern facade as well as the palette of materials is considered to reduce the bulk of the proposed block and soften the impact on the adjoining Green Belt, Blue Ribbon network and Nature Conservation Area.

In the immediate area surrounding the application site, the street scene consists of low-rise two storey residential buildings and one storey high retail buildings. Further to the east, it is noted that there are larger scale buildings including the 'Heathrow House' seven-storey building, the 'Moxy' six-storey building and a newly built four-storey building. The submitted visual appraisal demonstrates that the proposed building would be viewed in context with existing large scale buildings and would be partially screened by vegetation. As such, it is considered that the proposed five-storey hotel would be in keeping with the height, mass and scale of buildings typical to this side of Bath Road and the surrounding Heathrow area.

Given the above, it is considered that the proposal accords with Policy 7.7 of the London Plan (March 2016), Policy DMHB 10 of the emerging Hillingdon Local Plan: Part 2 - Development Management Policies with Modifications (March 2019), Policy BE13 and BE35 of the Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012).

Policy DMEI 6 of the emerging Hillingdon Local Plan: Part 2 - Development Management Policies with Modifications (March 2019) states that new development adjacent to the Green Belt, Metropolitan Open Land, Green Chains, Sites of Importance for Nature Conservation, Nature Reserves, countryside, green spaces or the Blue Ribbon Network should incorporate proposals to assimilate development into the surrounding area by the use of extensive peripheral landscaping to site boundaries.

The proposed development would retain and enhance the adjoining green space to the east of the site through the management of the existing landscape and introduction of new

wildflower grassland areas, bulb planting, native tree planting and hedge planting. Native shrub planting along the southern boundary would screen the adjacent airport car parking and native trees would be introduced to enhance the setting. Deadwood piles are also proposed and would enhance the ecological value and visual amenities of the Green Belt and the Nature Conservation Area of Metropolitan or Borough Grade I Importance.

It is noted that there are no proposed improvements to the wider amenity of the River Crane. As noted by the Council's Flooding and Water Management Officer, the Council is leading on a project upstream of the site on the River Crane at the confluence with the Frog's Ditch for which there will be a substantial increase in the accessibility and amenity value of the strategic watercourse network close to this development site. The Council would therefore accept a developer contribution for off-site watercourse amenity improvements to ensure that the proposals will contribute to the positive enhancement of the river corridor. This is to be secured by Section 106 agreement.

7.08 Impact on neighbours

The following policies and guidelines are considered with regard to the impact on neighbours:

Policy BE19 of the Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012) states that the local planning authority will seek to ensure that new development within residential areas complements or improves the amenity and character of the area.

Policy BE21 of the Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012) states that planning permission will not be granted for new buildings or extensions which by reason of their siting, bulk and proximity, would result in a significant loss of residential amenity.

Policy BE20 of the Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012) states that buildings should be laid out so that adequate daylight and sunlight can penetrate into and between them and the amenities of existing houses are safeguarded.

The Hillingdon Design and Access Statement Guidelines (HDAS) SPD for Residential Layouts specifies that where a two or more storey building abuts a property or its boundary, adequate distance should be maintained to overcome possible domination, overbearing and overshadowing. Paragraph 4.9 of the HDAS SPD for Residential Layouts states that in order to both protect the existing outlook from and to properties and ensure that there is adequate daylight received to habitable rooms, kitchens and gardens of adjacent dwellings, a minimum distance of 15 metres is required.

Policy BE24 of the Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012) states that the design of new buildings should protect the privacy of the occupiers and their neighbours.

The Hillingdon Design and Accessibility Statement (HDAS) SPD for Residential Layouts (July 2006) states that, as a guide, the distance between facing habitable room windows in adjoining/adjacent residential properties should not be less than 21 metres.

This is also supported by Policy DMHB 11 of the emerging Hillingdon Local Plan: Part 2 - Development Management Policies with Modifications (March 2019) which states: B) Development proposals should not adversely impact on the amenity, daylight and sunlight of adjacent properties and open space.

The nearest residential properties to the proposed development are located on the opposite side of the A4 Bath Road dual carriageway, approximately 60 metres away from the proposed building frontage. Given this distance, it is not considered that the proposed building would have any significant impact on residential amenity in terms of overlooking, loss of privacy, loss of light or loss of outlook.

Given the above, the proposed development is considered to accord with Policies BE19, BE20, BE21 and BE24 of the Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012) and Policy DMHB 11 of the emerging Hillingdon Local Plan: Part 2 - Development Management Policies with Modifications (March 2019).

7.09 Living conditions for future occupiers

It should be noted that there are no adopted planning standards in respect of privacy/overlooking between hotel guest bedrooms.

However the building design affords adequate daylight and sunlight to each unit with openings in each hotel room providing outlook for future users.

7.10 Traffic impact, Car/cycle parking, pedestrian safety

CAR PARKING

Policy AM14 of the Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012) will be considered and requires that new development is only permitted where it is in accordance with the Council's adopted car parking standards.

Policy DMT 6 of the emerging Hillingdon Local Plan: Part 2 - Development Management Policies with Modifications (March 2019) indicates that the assessment of parking for hotels (Use Class C1) should be carried out on an individual basis whilst considering provision for taxi pick-up and drop-off, coach parking, car rental operations and additional activities. Comparatively, the Councils currently adopted parking standards are more prescriptive for Hotels with a ratio of 1 parking space per 5 hotel bedrooms plus 1 space per 25sqm of conference facilities. This would generate a parking requirement of 70 spaces.

A total of 60 car parking spaces and 1 coach space are proposed. 25 of these parking spaces, including 7 disability spaces and 2 electric vehicle spaces, would be provided at surface level to the rear of the building, and 22 spaces, including 14 electric vehicle spaces, would be provided at basement level. As stated by the Council's Highways Officer, this level of proposed parking is similar to that previously approved on the application site and an objection on this basis is not expected to be sustained at an appeal. The proposed level of parking is therefore deemed acceptable.

DISABLED PARKING

To accord with Policy AM14 of the Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012) and Policy DMT 6 of the emerging Hillingdon Local Plan: Part 2 - Development Management Policies with Modifications (March 2019), it is required that 10% of parking provision be allocated to blue badge holders.

Based on the proposed level of parking, it is required that 7 spaces are allocated to disabled users. The proposed development would provide the level of parking and accords with Policy AM14 of the Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012) and Policy DMT 6 of the emerging Hillingdon Local Plan: Part 2 - Development Management Policies with Modifications (March 2019).

ELECTRIC VEHICLE CHARGING POINT (EVCP)

Policy DMT 6 of the emerging Hillingdon Local Plan: Part 2 - Development Management Policies with Modifications (March 2019) required that parking for electric vehicles should be provided at a current minimum of 5% of car parking spaces with 5% passive provision.

The submissions proposes a total of 16 EVCP spaces. It is, however, noted that the submitted plans do not disclose the number of 'active' or 'passive' provision. The Council's Highways Officer, recommends a condition requiring 8 spaces to be provided as 'active' EVCP and a further 8 as 'passive' EVCP.

MOTORCYCLE/SCOOTER PARKING

Policy DMT 6 of the emerging Hillingdon Local Plan: Part 2 - Development Management Policies with Modifications (March 2019) requires that parking spaces for motorised two wheelers (motorcycles, moped and scooters) must be provided at the rate of 5% of car parking space.

In this instance, it is required that 3 spaces be accommodated for. The proposed development indicates the provision of 4 spaces in the surface level car park and is considered acceptable. As stated by the Council's Highways Officer, all motorcycle parking spaces should be provided with 'anchor points'.

CYCLE PARKING

Policy DMT 6 of the emerging Hillingdon Local Plan: Part 2 - Development Management Policies with Modifications (March 2019) requires a minimum of 1 space per 10 members of staff. Comparatively, London Plan (March 2016) minimum standards require 1 space per 20 bedrooms for long stay and 1 space per 50 bedrooms for short stay which would require a total of 14 spaces.

Given that the proposed development proposes 56 full-time equivalent employees, it is required that 6 spaces be accommodated for. It is proposed that a total of 24 spaces be provided towards the rear surfaced car park. Whilst the proposed level of cycle parking is an over-provision, the additional level of cycle parking is considered acceptable.

COACH PARKING

Policy DMT 6 of the emerging Hillingdon Local Plan: Part 2 - Development Management Policies with Modifications (March 2019) requires that one coach space is provided per 50 bedrooms.

As stated by the Council's Highways Officer, this level of provision would be similar to that previously granted consent and the site could benefit from future use of the Heathrow National Express - Hoppa bus service. If recommended for approval, this will be secured within a Full Framework Travel Plan as part of a Section 106 agreement.

ACCESS PROVISION

The access arrangement would predominantly remain unchanged and will follow that granted under the previous planning consent. It is noted that conditions/obligations were previously imposed requiring the need for alterations to be made to the existing site access

and nearby junctions.

As with the previous scheme, Transport for London have raised concerns over the access width being safe and suitable for both pedestrians and cyclists travelling along this section of the A4 (Bath Road). It is requested that improvements be made to the site junction/access via the planning obligations process. This is proposed to be secured as a Head of term in the event that planning permission is granted.

Swept path analysis drawings demonstrate coach tracking accessing and egressing the site. The site under the current use classes (B1, B8 and D2) would accommodate vehicles which would already be carrying out similar manoeuvres. As such, the proposed use would similarly be considered acceptable.

TRIP GENERATION

Policy AM7 of the Hillingdon Local Plan: Part 2 - Saved Unitary Development Plan Policies (November 2012) considers whether the traffic generated by proposed developments is acceptable in terms of the local highway and junction capacity, traffic flows and conditions of general highway or pedestrian safety.

The development site fronts the A4 (Bath Road) which forms part of Transport for London's Road Network and is classified as a priority red route. Given the sites location, it is expected that the hotel would mostly serve airport patronage. Based on a PTAL rating of 2, it is likely that patrons would be dependent of the use of a private car.

As noted by the Council's Highways Officer, derived (vehicle) trip rates are similar to those established from the previously consented application. Overall, trip rates during all AM peak hours would be expected to be sufficiently absorbed within the existing local road network without having a notable detriment to traffic congestion and road safety.

SERVICING AND DELIVERY ARRANGEMENTS

Although it has been demonstrated that the access as existing is able to accommodate service/delivery vehicles and coaches in forward gear, the potential improvements to be secured would alter access. If recommended for approval, a full Servicing and Delivery Plan will be secured by condition.

CAR PARKING MANAGEMENT PLAN (CPMP)

If recommended for approval, a detailed Car Parking Management Plan will be secured by condition. This condition will also seek to prohibit off airport parking or 'park and fly' services which are being promoted by other hotel operators. This measure seeks to ensure sustainable modes of transport are utilised when making trips to and from the hotel.

WORKPLACE TRAVEL PLAN

As stated by the Council's Highways Officer, the submitted draft Travel Plan is considered broadly acceptable. If recommended for approval, a Full Framework Travel Plan to include the use of the Heathrow National Express - Hoppa bus service will be secured by Section 106 agreement.

CONSTRUCTION LOGISTICS PLAN

If recommended for approval, a full Construction Management Plan will be secured by condition. This should detail the management of construction traffic, including vehicle types, frequency of visits, expected daily time frames, use of an onsite banksman, on-site loading/unloading arrangements and parking of site operative vehicles.

Given the above considerations, the proposed development is considered to accord with Policies AM7 and AM14 of the Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012) and Policy DMT 6 of the emerging Hillingdon Local Plan: Part 2 - Development Management Policies with Modifications (March 2019).

7.11 Urban design, access and security

DESIGN

This is addressed in the 'Impact on the character & appearance of the area' section of the report.

ACCESS

This is addressed in the 'Disabled access' section of the report.

SECURITY

A secured by design condition will be attached if the application is recommended for approval.

7.12 Disabled access

Policy 4.5 of the London Plan (March 2016) requires that at least 10 per cent of bedrooms are wheelchair accessible for hotel development.

Policy 7.2 of the London Plan (March 2016) requires that the all new development provides the highest standards of accessible and inclusive design.

Policy R16 of the Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012) states that the Local Planning Authority will only grant permission for facilities if they include adequate provision for accessibility, in particular those of elderly people, people with disabilities, women and children.

Policy DME 6 of the emerging Hillingdon Local Plan: Part 2 - Development Management Policies with Modifications (March 2019) states:

A) In order to ensure that inclusive access has been incorporated into the proposal from the onset, the Council will require:

- i) all proposals to meet the requirements of the Accessible Hillingdon SPD;
- ii) a Design and Access Statement to be submitted with the planning application; and
- iii) for proposals of ten rooms or more, an Accessibility Management Plan should be submitted with the planning application.

B) For proposals of 10 rooms or more, the Council will require 10% of hotel rooms to meet wheelchair accessibility standards. In particular, accessible rooms should:

- i) be located along accessible routes, close to lifts on upper floors and close to the reception on the ground floor;
- ii) be situated so that they have equal access to views enjoyed from standard bedrooms; and
- iii) provide appropriate facilities for a wide range of disabilities.

The design and access statement demonstrates that 10% of the bedrooms will be

provided as wheelchair accessible rooms and that 8% of these will interconnect with a conventional room should a helper need to stay in the next room. The submitted details also indicate a compliance with a number of the matters raised by the Council's Access Officer, including demonstration of Universal Access guestrooms, level access showering facilities and facilities that permit disabled people to leave the building in a safe and dignified way during an 'all-out' evacuation. Subject to a condition requiring that 2 accessible rooms are fitted with a tracked hoist system and have an adjoining door to a standard bedroom, the proposed development is considered to accord with Policy R16 of the Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012), Policy DME 6 of the emerging Hillingdon Local Plan: Part 2 - Development Management Policies with Modifications (March 2019) and Policies 4.5 and 7.2 of the London Plan (March 2016).

7.13 Provision of affordable & special needs housing

Not applicable to the consideration of this application.

7.14 Trees, landscaping and Ecology

TREES AND LANDSCAPING

Policy BE38 of the Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012) states that development proposals will be expected to retain and utilise topographical and landscape features of merit and provide new planting and landscaping wherever it is appropriate. Planning applicants for planning consent will be required to provide an accurate tree survey showing the location, height, spread and species of all trees where their proposals would affect any existing trees.

Policy DMHB 14 of the emerging Hillingdon Local Plan: Part 2 - Development Management Policies with Modifications (March 2019) states:

A) All developments will be expected to retain or enhance existing landscaping, trees, biodiversity or other natural features of merit.

B) Development proposals will be required to provide a landscape scheme that includes hard and soft landscaping appropriate to the character of the area, which supports and enhances biodiversity and amenity particularly in areas deficient in green infrastructure.

This is an outline planning application which is supported by some detailed landscape information despite reserving landscaping as a matter for subsequent approval. It is, however, noted that no tree report has been submitted at this stage. As stated by the Council's Trees and Landscaping Officer, the landscape plans indicate an intention to provide landscape enhancement and future management in accordance with Policy BE38. If recommended for approval, a comprehensive package of hard and soft landscape proposals, including management and maintenance proposals, which are informed by a full tree report to BS5837:2012 and ecology survey are to be secured by condition.

ECOLOGY

Paragraph 170 of the NPPF (June 2019) requires that planning decisions contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes and sites of biodiversity. Notably, development impacts should be minimised and should provide net gains for biodiversity by establishing coherent ecological networks that are more resilient to current and future pressures. Similarly, Policy 7.19 of the London Plan (March 2019) requires that development proposals make a positive contribution to the protection, enhancement, creation and management of biodiversity and give the highest protection to sites with existing or proposed international designations.

Policy EM3 of the Hillingdon Local Plan: Part 1 - Strategic Policies (November 2012) requires that the Council continues to promote and contribute to the positive enhancement of the strategic river and canal corridors and the associated wildlife and habitats through the Biodiversity Action Plan and the Thames River Basin Management Plan, and developer contributions where appropriate. The Council will work with the Environment Agency and other interested bodies to continue to enhance the local character, visual amenity, ecology, transportation, leisure opportunities and sustainable access to rivers and canals. The Council will collaborate with adjacent local authorities to ensure that Hillingdon's river and canal corridors complement and link with cross boundary corridors. Further, Policy EM7 of the Hillingdon Local Plan: Part 1 - Strategic Policies (November 2012) requires the protection and enhancement of all Sites of Importance for Nature Conservation.

Policy DMEI 7 of the emerging Hillingdon Local Plan: Part 2 - Development Management Policies with Modifications (March 2019) requires that development retains or enhances features of biodiversity value. If development is proposed on or near the vicinity of a site considered to have features of ecological value, applicants must submit appropriate surveys and assessments to demonstrate that the proposed development will not have unacceptable effects. All development alongside, or that benefits from a frontage on to a main river or the Grand Union Canal will be expected to contribute to additional biodiversity improvements. Proposals that result in significant harm to biodiversity which cannot be avoided, mitigated, or, as a last resort, compensated for, will normally be refused. It is noted this this policy is subject to main modifications by the Inspector.

Policy DMEI 8 of the emerging Hillingdon Local Plan: Part 2 - Development Management Policies with Modifications (March 2019) supports this and requires that development on sites that adjoin or include a watercourse have regard to the relevant provisions of the Thames River Basin Management Plan and any other relevant Catchment Management Plans and where feasible, secure the implementation of environmental enhancements to open sections of river or watercourse. Development located in or adjacent to watercourses should enhance the waterside environment and biodiversity by demonstrating a high design quality which respects the historic significance of the canal and character of the waterway and provides access and improved amenity to the waterfront. It is noted this this policy is also subject to main modifications by the Inspector.

Policies EC1, EC2 and EC3 of the Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012) state that permission will not be granted for development which would adversely affect the integrity of sites of special scientific interest, or be unacceptably detrimental to sites of metropolitan or borough (Grade I) importance for nature conservation, designated local nature reserves and other nature reserves.

As stated by the Council's Sustainability Officer, there is no objection to the proposed development, subject to a condition requiring the submission of an ecological enhancement plan to provide details on how the current areas of high ecological value will be retained and enhanced. Hence, subject to condition, the proposed development is not considered contrary to Policies EC1, EC2 and EC3 of the Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012), Policies DMEI 7 and DMEI 8 of the emerging Hillingdon Local Plan: Part 2 - Development Management Policies with Modifications (March 2019), Policy EM3 and EM7 of the Hillingdon Local Plan: Part 1 - Strategic Policies (November 2012), Policy 7.19 of the London Plan (March 2016), and the NPPF (June 2019).

7.15 Sustainable waste management

Policy 5.17 of the London Plan (March 2016) sets out the Mayor's spatial policy for waste

management, including the requirements for new developments to provide appropriate facilities for the storage of refuse and recycling.

As stated by the Council's Strategic Waste Officer, the proposed development would be satisfactory with regard to waste and recycling requirements. A proposed refuse store is positioned to the rear of the proposed building, where easy collection off-street can be achieved. The proposal would accord with Policy 5.17 of the London Plan (March 2016).

7.16 Renewable energy / Sustainability

Policy 5.2 of the London Plan (March 2016) requires that development proposals should make the fullest contribution to minimising carbon dioxide emissions in accordance with the energy hierarchy: Be lean: use less energy; Be clean: supply energy efficiently; and Be green: use renewable energy.

Policy EM1 of the Hillingdon Local Plan: Part 1 - Strategic Policies (November 2012) states that the Council will ensure that climate change mitigation is addressed at every stage of the development process. This includes the reduction of carbon emissions through low carbon strategies and encouraging the installation of renewable energy to meet the targets set by the London Plan (March 2016).

Policy DMEI 2 of the emerging Hillingdon Local Plan: Part 2 - Development Management Policies with Modifications (March 2019) requires that: A) All developments make the fullest contribution to minimising carbon dioxide emissions in accordance with London Plan targets; B) All major development proposals must be accompanied by an energy assessment showing how these reductions will be achieved; C) Proposals that fail to take reasonable steps to achieve the required savings will be resisted. However, if the Council is minded to approve the application despite not meeting the carbon reduction targets, then it will seek an off-site contribution to make up for the shortfall. The contribution will be sought at a flat rate at of £/tonne over the lifetime of the development, in accordance with the current 'allowable solutions cost'.

The Sustainability Officer has stated no objection to the proposed development with regard to energy, subject to a condition requiring the submission of low and zero carbon technology details. The GLA also request that a condition is added to secure details demonstrating how the site is to be future-proofed for a connection to a district heating network, details of the floor area, internal layout and location of the single energy centre and details demonstrating that the potential for PV has been maximised. Subject to such conditions, the proposal development is not considered contrary to Policy 5.2 of the London Plan (March 2016), Policy EM1 of the Hillingdon Local Plan: Part 1 - Strategic Policies (November 2012) and Policy DMEI 2 of the emerging Hillingdon Local Plan: Part 2 - Development Management Policies with Modifications (March 2019).

7.17 Flooding or Drainage Issues

Policy EM6 (Flood Risk Management) of the Hillingdon Local Plan: Part 1 - Strategic Policies (November 2012) states that applicants must demonstrate that Flood Risk can be suitably mitigated. Policies OE7 and OE8 of the Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012) seek to ensure that new development incorporates appropriate measures to mitigate against any potential risk of flooding. This is further supported by Policies 5.13 and 5.15 of the London Plan (March 2016).

The application site is located to the west of the River Crane and is designated as part of Flood Zone 2. The submitted flood risk assessment indicates the finished floor levels of the proposed development will be set at least 300mm above the modelled 1 in 100 year flood event including a 35% allowance for climate change. It is noted that any landscaping

proposals that include changes to site levels should take into consideration the flood water level within the River Crane and prevent any increase in the extent of flooding on the site.

As stated by the Council's Flooding and Water Management Officer, further investigation is required and should be secured by planning condition. As such, subject to flood risk, surface water and ground water conditions, it is considered that the proposal is not contrary Policy EM6 (Flood Risk Management) of the Hillingdon Local Plan: Part 1 - Strategic Policies (November 2012), Policies OE7 and OE8 of the Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012) and Policies 5.13 and 5.15 of the London Plan (March 2016).

7.18 Noise or Air Quality Issues

NOISE

Policy OE1 of the Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012) states that planning permission will not normally be granted for uses and associated structures which are, or are likely to become, detrimental to the character or amenities of surrounding properties or the area generally, because of:

"(i) The siting or appearance;

(ii) The storage or display of vehicles, goods, equipment or other merchandise;

(iii) Traffic generation and congestion;

(iv) Noise and vibration or the emission of dust, smell or other pollutants, unless sufficient measures are taken to mitigate the environmental impact of the development and ensure that it remains acceptable."

Policy OE3 of the Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012) states that buildings or uses which have the potential to cause noise annoyance will only be permitted if the impact is mitigated within the acceptable levels by engineering, lay-out or administrative measures.

Policy OE5 of the Hillingdon Local Plan: Part 2 - Saved Unitary Development Plan Policies (November 2012) states that proposals for the siting of noise sensitive developments such as family housing, schools or certain forms of commercial activity where the occupiers may suffer from noise or vibration will not be permitted in areas which are, or are expected to become, subject to unacceptable levels of noise or vibration. Where development is acceptable in principle, it will still be necessary to establish that the proposed building or use can be sited, designed, insulated or otherwise protected from external noise or vibration sources appropriate national and local standards. Account will be taken of any changes to occur in noise levels within 10-15 year period following the date of submission of any application for planning permission.

As addressed in other sections of the report, the proposed development is not considered to be detrimental to the character or amenities of surrounding properties or the area generally, because of siting, appearance, storage or display of vehicles, goods, equipment or other merchandise.

As stated by the Council's Highways Officer, the proposed development provides an acceptable number of parking spaces for the hotel use proposed. Further, it is considered that the trip rates generated by the proposed development would be sufficiently absorbed within the existing local road network without having a notable detriment to traffic congestion and road safety.

The Council's Environmental Protection Unit Officer has also confirmed that the proposed

development would provide noise mitigation measures and is in accordance with BS8233: 2014. The proposed development also employs good practice measures for external plant so as to prevent noise nuisance. As such, the proposal does not result in an unacceptable impact on neighbours amenity.

Given the above considerations, the proposed development is considered to accord with Policies OE1, OE3 and OE5 of the Hillingdon Local Plan: Part 2 - Saved Unitary Development Plan Policies (November 2012).

AIR QUALITY

Paragraph 181 of the NPPF (June 2019) states that planning decisions should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas.

Policy 7.14 of the London Plan (March 2016) states that development proposals should be at least 'air quality neutral' and not lead to further deterioration of existing poor air quality (such as areas designated as Air Quality Management Areas (AQMAs)).

Policy EM8 of the Hillingdon Local Plan: Part 1 - Strategic Policies (November 2012) states that all development should not cause deterioration in the local air quality levels and should ensure the protection of both existing and new sensitive receptors.

Policy DMEI 14 of the emerging Hillingdon Local Plan: Part 2 - Development Management Policies with Modifications (March 2019) states that: A) Development proposals should demonstrate appropriate reductions in emissions to sustain compliance with and contribute towards meeting EU limit values and national air quality objectives for pollutants. B) Development proposals should, as a minimum: i) be at least "air quality neutral"; ii) include sufficient mitigation to ensure there is no unacceptable risk from air pollution to sensitive receptors, both existing and new; and iii) actively contribute towards the improvement of air quality, especially within the Air Quality Management Area.

The application site forms part of an Air Quality Management Area and is located within the A4 Corridor Focus Area. As stated by the Air Quality Officer, the proposed development will generate traffic and energy production emissions to add to current exceedances. In order to accord with London Plan policy, a section 106 agreement with the LAP of £155,013 is to be paid for Hillingdon to deliver its air quality local action plan and/or implement specific measures on/along the road network affected by the proposal that reduce vehicle emissions and or reduce human exposure to pollution levels. If recommended for approval, a low emission strategy condition would also be attached. Hence, subject to a Section 106 agreement and discharge of condition, the proposed development is considered to accord with the NPPF (June 2019), Policy 7.14 of the London Plan (March 2016), Policy EM8 of the Hillingdon Local Plan: Part 1 - Strategic Policies (November 2012) and Policy DMEI 14 of the emerging Hillingdon Local Plan: Part 2 - Development Management Policies with Modifications (March 2019).

7.19 Comments on Public Consultations

Please see 'External Consultees' section of the report.

7.20 Planning obligations

The Community Infrastructure Levy Regulation 2010 (Regulations issued Pursuant to the 2008 Act) and the National Planning Policy Framework (June 2019) have put three tests on the use of planning obligations into law. Planning obligations should be:

- i. necessary to make the development acceptable in planning terms
- ii. directly related to the development, and
- iii. fairly and reasonable related in scale and kind to the development

Policy R17 of the adopted Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012) is concerned with securing planning benefits related to the scale and type of development. The policy is supported by more specific supplementary planning guidance.

The Council's Section 106 Officer has reviewed the proposal, as have other statutory consultees. The comments received indicate the need for the following contributions or planning obligations to mitigate the impact of the development.

Non-monetary contributions:

- i) Employment Strategy and Construction Training: either a contribution equal to the formula (£2,500.00 for every £1m build cost + Coordinator Costs £9,600.00 or an in kind scheme) or an in-kind training scheme equal to the financial contribution delivered during the construction period of the development with the preference being for an in-kind scheme to be delivered.
- ii) Full Framework Travel Plan to include the use of the Heathrow National Express - Hoppa bus service.
- iii) Agreement to the ongoing maintenance of the drainage infrastructure and ordinary watercourse over the lifetime of the development in line with a submitted maintenance plan (secured as part of the recommended condition).

Monetary contributions:

- iv) Highways Contribution, estimated at a cost of £90,000 (index linked), to TfL toward safety enhancements to the junction with the Bath Road and Craneswater.
- v) Prior to the first occupation of the site, the applicant shall successfully enter into a s278 agreement with TfL under Highways Act 1980 toward junction improvement of A4 Bath Road and the site access road.
- vi) Contribution amounting to £50,000 to be paid for amenity improvements along the River Crane and Frog's Ditch to improve the quality of access to public open space at Cranford Park from the south. This is to be delivered alongside the proposed project at Cranford Park which currently does not include access improvements from the south.
- vii) Contribution amounting to £155,013 to be paid for Hillingdon to deliver its air quality local action plan and/or implement specific measures on/along the road network affected by the proposal that reduce vehicle emissions and/or reduce human exposure to pollution levels.
- viii) Project Management & Monitoring Fee: a contribution equal to 5% of the total cash contributions secured from the scheme to enable the management and monitoring of the resulting agreement, is sought.

The proposal would also be liable for the London Borough of Hillingdon CIL and the Mayor of London's CIL, as the scheme provides more than 100 sqm of floorspace. This would be collected by the Council after implementation (if permission were to be granted) and could be subject to surcharges for failure to assume liability, submit a commencement notice and late payment, or and indexation in line with the construction costs index.

7.21 Expediency of enforcement action

Not applicable to the consideration of this application.

7.22 Other Issues

EXTERNAL LIGHTING

If recommended for approval, details regarding the proposed lighting scheme will be secured by condition as part of the landscaping scheme.

CONTAMINATION

Policy OE11 of the Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012) states that planning permission will not be granted for proposals which:

(i) Involve the use, storage, installation or processing of explosive, inflammable, corrosive, toxic or other harmful/hazardous substances which are a potential safety risk to existing or proposed development in the vicinity; or

(ii) Involve an increase in the use by the public of contaminated land which is to remain untreated,

unless the Local Planning Authority is satisfied that appropriate ameliorative measures proposed can overcome (i) and (ii) above.

This is supported by Policy EM8 of the Hillingdon Local Plan Part 1: Strategic Policies (November 2012) and Policy DME1 12 of the emerging Hillingdon Local Plan: Part 2 - Development Management Policies with Modifications (March 2019).

As stated by the Council's Contamination Officer, if recommended for approval, the application should be subject to a condition requiring details of a site investigation, remediation scheme to deal with contamination and a verification report to detail the works for each phase and ensure they have been carried out in full and in accordance with the approved methodology. This is required to ensure compliance with Policy OE11 of the Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012), Policy EM8 of the Hillingdon Local Plan Part 1: Strategic Policies (November 2012) and Policy DME1 12 of the emerging Hillingdon Local Plan: Part 2 - Development Management Policies with Modifications (March 2019).

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

In conclusion, this outline planning permission for the demolition of a banqueting/conference hall (Use Class D2) and office/warehouse (Use Class B1/B8), and erection of a five storey 192-bedroom hotel (Use Class C1) is considered acceptable in principle and with regard to design, access, security, highways, energy, ecology, flooding, landscaping, waste, contamination and air quality. Subject to conditions and planning obligations, the application is recommended for approval.

11. Reference Documents

National Planning Policy Framework (June 2019)

The London Plan (March 2016)

Hillingdon Local Plan: Part 1 - Strategic Policies (November 2012)

Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012)

Emerging Hillingdon Local Plan: Part 2 - Development Management Policies with Modifications (March 2019)

Hillingdon Design and Accessibility Statement: Residential Layouts (July 2006)

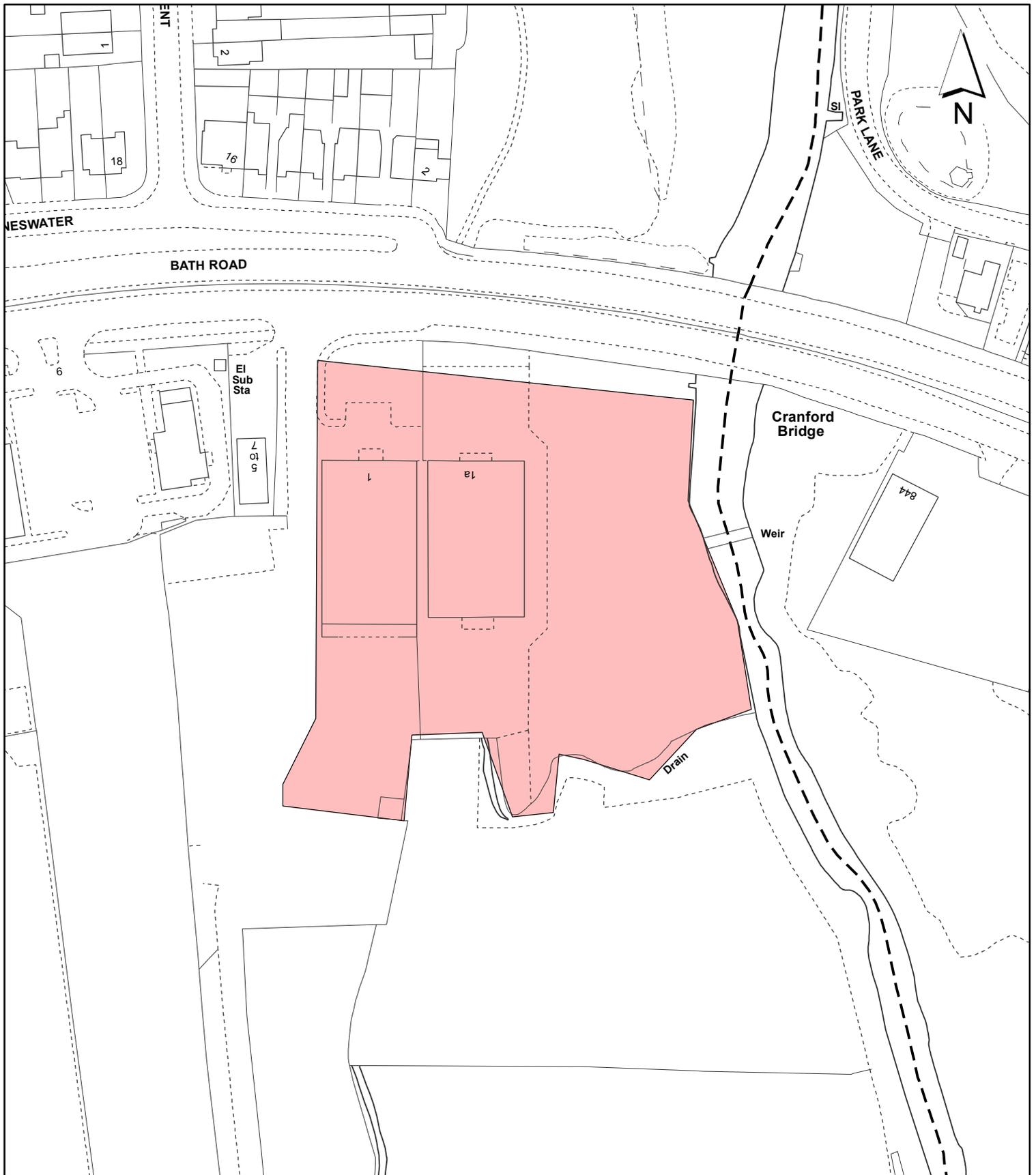
Hillingdon Design and Accessibility Statement: Accessible Hillingdon (December 2008)

Planning Obligations - Supplementary Planning Document (July 2014)

Noise - Supplementary Planning Document (April 2006)

Contact Officer: Michael Briginshaw

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Notes:

 Site boundary

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Site Address:

1 & 1a Bath Road

Planning Application Ref:
35805/APP/2019/137

Planning Committee:
Major

Scale:
1:1,250

Date:
October 2019

LONDON BOROUGH OF HILLINGDON
Residents Services Planning Section
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