

Report of the Head of Planning, Transportation and Regeneration

Address WORLD BUSINESS CENTRE 5 NEWALL ROAD HEATHROW AIRPORT

Development: Erection of office building (Outline application with all matters reserved)

LBH Ref Nos: 74351/APP/2018/4098

Drawing Nos: WBC5-EL-E-00001 Version 1.0 (Illustrative East Elevation)
WBC5-SP-00001 Version 1.0 (Illustrative Site Plan)
Planning Design and Access Statement - WBC5
Geoenvironmental and Geotechnical Desktop Study, September 2015
Archaeology Desk-Based Assessment, February 2016
Letter in response to Highways England comments by Cunningham Consultancy Ltd, dated 12/7/19
WBC5-EL-E-00001 Version 2.0 (Illustrative East Elevation)
Air Quality Assessment, November 2018
Energy Statement, September 2018
Surface Water Drainage Strategy, November 2018 (Issue 2)
Transport Assessment, September 2018
Cole Easdon Consultants Letter dated 27/2/19 - Addendum to the Surface Water Drainage Report
WBC5-GA-B1-00001 Version 2.0 (Illustrative Basement Plan)
WBC5-GA-00-00001 Version 2.0 (Illustrative Floor Plan)
Letter in response to LBH Highways, TfL and HAL comments by Cunningham Consultancy Ltd, dated 19/7/19
Agent's email dated 10/9/19
The Cunningham Consultancy Limited Letter dated 9/9/19
The Cunningham Consultancy Limited Letter dated 12/7/19
The Cunningham Consultancy Limited Letter dated 19/7/19

Date Plans Received:	21/11/2018	Date(s) of Amendment(s):	27/02/2019
Date Application Valid:	21/11/2018		10/09/2019
			21/11/2018
			16/08/2019
			21/12/2018

1. SUMMARY

This is an outline application for the fifth in a series of World Business Centre (WBC) office buildings (Use Class B1) on the southern side of the A4 Bath Road, within the boundary of Heathrow Airport. All matters have been reserved for subsequent approval. The proposed office building is a speculative development.

It is considered that the scheme is acceptable in principle, subject to a condition to ensure that the building would be occupied by an airport related company, in accordance with existing and emerging planning policy.

Indicative plans show a building with a similar footprint, siting and design to the adjoining WBC4 building and at 5 storeys, would have an additional floor than that of the adjoining WBC4 building, although be of similar overall height due to reducing floor to ceiling heights. The indicative plans show the proposal sharing WBC4's access ramp to the basement car parking area which would be extended under the proposed building.

Both NATS and HAL do raise safeguarding 'objections/ concerns', but both advise that these could be overcome with suitable conditions and informatives. These have been included in the officer's recommendation.

Highways England initially raised an objection to the scheme, on the grounds that insufficient information had been provided to assess the impact of the scheme on Junction 4 of the M4. Additional information has been submitted and Highways England have confirmed that this overcomes their objection.

This scheme is also GLA referable and the Mayor has raised a number of concerns with the scheme in his Stage 1 Report, including issues relating to policy compliance and need for a sequential test, highway and design matters. Further information has been submitted by the agent. Officers are satisfied that the scheme is policy compliant and no sequential test is required, subject to the airport occupancy condition. The scheme will be referred back to the Mayor.

There are no residential properties in the vicinity of the site.

The scheme has been assessed in terms of highway impacts and the Council's Highway Engineer raises no objections.

The scheme is considered to be acceptable in terms of impact upon trees and landscaping and flooding issues.

The scheme does make commensurate contributions as part of the S106 Agreement.

The application is recommended for approval.

2. **RECOMMENDATION**

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

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 enters into an agreement with the applicant under Section 106 of the Town and Country Planning Act 1990 (as amended) and/or Section 38/278 of the Highways Act 1980 (as amended) and/ or other appropriate legislation, subject to changes negotiated by the Local Planning Authority, to secure:

(i) The applicant is required to enter into a Section 278/38 agreement for all highway works required by the Local Planning Authority/TFL to include, but not limited to associated costs and works identified in junction improvement works, resurfacing, etc.

(ii) A full travel plan with an associated £20,000 bond,

(iii) £152,909 contribution towards air quality mitigation,

(iv) Employment Strategy and Construction Training - either a contribution equal to the formula within the Council Planning Obligations Supplementary Planning Document (SPD) 2014, or an in-kind training scheme equal to the financial contribution delivered during the construction period of the development. Details shall be in accordance with the Council Planning Obligations SPD with the

preference being for an in-kind scheme to be delivered.

(v) **Project Management & Monitoring Fee:** A financial contribution equal to 5% of the total cash contributions.

B) That the applicant meets the Council's reasonable costs in the preparation of the S106 Agreement and any abortive work as a result of the agreement not being completed.

C) That officers be authorised to negotiate and agree the detailed terms of the proposed agreement and conditions of approval.

D) That if any of the heads of terms set out above have not been agreed and the S106 legal agreement has not been finalised before the 28th February 2020, or any other period deemed appropriate that delegated authority be given to the Head of Planning, Transportation and Regeneration to refuse the application for the following reason:

'The applicant has failed to ensure that the necessary highway works and Travel Plan, would be undertaken/prepared in a timely manner and to an appropriate standard and that contributions towards mitigation of air quality, construction training and project management would be provided. The scheme therefore conflicts with Policy 7.14 of the London Plan (March 2016), Policies R17, AM2 and AM7 of the Hillingdon Local Plan: Part Two - Saved UDP Policies (November 2012) and emerging Policies DMEI 14, DMCI 7, DMT 1 and DMT 2 of the Hillingdon Local Plan: Part Two - Development Management Policies With Modifications (March 2019).'

E) That subject to the above, the application be deferred for determination by the Head of Planning, Transportation and Regeneration under delegated powers, subject to the completion of the legal agreement under Section 106 of the Town and Country Planning Act 1990 and other appropriate powers with the applicant.

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

Details of the access, appearance, landscaping, layout, and scale, (hereinafter called "the reserved matters") shall be submitted to the local planning authority before the expiry of three years from the date of this permission and approved in writing before any development begins.

The development shall be carried out in accordance with the approved details.

REASON

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

3 COM4 Accordance with Approved Plans

The development hereby permitted shall not be carried out except in complete accordance with the details shown on the submitted plans, numbers WBC5-SP-00001 Version 1.0 and shall thereafter be retained/maintained for as long as the development remains in existence.

REASON

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

4 NONSC Building Size/ Height Restriction

The proposed building shall not exceed a total floor area of 17,217m² GEA, with the overall office floor space not exceeding 12,892m² GEA and 5 storeys in height.

Reason:

In order to accord with the terms of the application and in order to safeguard the character of the area in accordance with Policy BE13 of the Hillingdon Local Plan: Part Two Saved UDP Policies (November 2012) and emerging policies DMHB 11 and DMHB 12 of the Hillingdon Local Plan: Part Two - Development Management Policies with Modifications (March 2019).

5 COM5 General Compliance with Supporting Documentation

The development hereby permitted shall not be occupied until the following has been completed in accordance with the specified supporting plans and/or documents:

- Reduction in energy use and renewable technology installation [Energy Statement]
- SUDS [Surface Water Drainage Strategy and Addendum to the Surface Water Drainage Strategy Report]
- Accessibility Measures [Planning, Design and Access Statement]
- Air Quality Mitigation [Air Quality Assessment]
- Archaeology Watching Brief [Archaeological Desk-Based Assessment]
- Ground investigation [Geoenvironmental and Geotechnical Desktop Study]

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

REASON

To ensure that the development complies with the objectives of Policies 5.2, 5.3, 5.7, 5.12, 5.13, 5.21, 7.2 and 7.14 of the London Plan (March 2016), Policies HE1, BE1, EM1, EM6 and EM8 of the Hillingdon Local Plan: Part One - Strategic Policies (November 2012) and Policies BE3, OE8 and OE11 of the Hillingdon Local Plan: Part Two Saved UDP Policies (November 2012) and emerging Policies DMEI 2, DMEI 9, DMEI 10, DMEI 12, DMEI 14, DMHB 7 and DMHB 12 of the Hillingdon Local Plan: Part Two - Development Management Policies with Modifications (March 2019).

6 COM7 Materials (Submission)

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

been submitted to and approved in writing by the Local Planning Authority. Thereafter the development shall be constructed in accordance with the approved details and be retained as such.

Details should include 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 of the Hillingdon Local Plan: Part Two Saved UDP Policies (November 2012) and emerging Policies DMHB 11 and DMHB 12 of the Hillingdon Local Plan: Part Two - Development Management Policies with Modifications (March 2019).

7 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 to include native and efficient pollution absorbing species
 - 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 for no more than 146 parking spaces (notwithstanding the figures mentioned at paragraphs 5.6 to 5.9 in the Transport Assessment, the car parking layout shall include demonstration that 20% of all parking spaces are served by electrical charging points (active provision) and a further 20% of spaces are capable of being easily converted (passive provision), 10% of the spaces are accessibility spaces and provision for motorcycle parking equates to 5% of the parking provision).
 - 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

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

REASON

To ensure that the proposed development will preserve and enhance the visual amenities of the locality and provide adequate facilities in compliance with Policies BE13, BE38 and AM14 of the Hillingdon Local Plan: Part Two Saved UDP Policies (November 2012) and Policies 5.11 (living walls and roofs) and 5.17 (refuse storage) of the London Plan (March 2016) and emerging Policies DMHB 14, DMT 1, DMT 2, DMT 5 and DMT 6 of the Hillingdon Local Plan: Part Two - Development Management Policies with Modifications (March 2019).

8 NONSC Airport Occupancy Restriction

The development shall only be occupied by users who are directly involved in activities that are related to the operation of Heathrow Airport.

The applicant shall ensure that records that detail the activities of the occupiers of the building are maintained and made available for inspection at the request of the Local Planning Authority.

REASON

To ensure that airport related activity is confined to within the boundaries of Heathrow Airport, in accordance with Policy A4 of the Hillingdon Local Plan: Part Two - Saved UDP Policies (November 2012) and emerging Policy DMAV 2 of the Local Plan: Part Two - Development Management Policies with Modifications (March 2019).

9 NONSC Thames Water Condition

No properties shall be occupied until confirmation has been provided that all waste water network upgrades required to accommodate the additional flows from the development have been completed.

REASON

The development may lead to sewage flooding and network reinforcement works are anticipated to be necessary to ensure that sufficient capacity is made available to accommodate additional flows anticipated from the new development. Any necessary reinforcement works will be necessary in order to avoid sewer flooding and/or potential pollution incidents in accordance with Policy of the Hillingdon Local Plan: Part Two Saved UDP Policies (November 2012).

10 NONSC Overheating Assessment

An overheating assessment shall be undertaken and submitted as part of the detailed design.

Thereafter the development shall be implemented and maintained in full accordance with the approved overheating assessment.

REASON:

In order to comply with Condition 5.9 of the London Plan (March 2016).

11 NONSC Height Limitation Condition

Prior to any works above ground level, details of the proposed development to demonstrate that no building or structure shall exceed 41m Above Mean Sea Level (AMSL) on the southern boundary and 51m AMSL on the northern boundary (the heights vary due to a 1:7 slope known as the Transitional Surface, which passes over the site from south to north) shall be submitted to and approved by the LPA, in consultation with NATS and Heathrow Airport Limited.

REASON:

In order to safeguard the Obstacle Limitation Surface (OLS) surrounding Heathrow Airport, the breach of which could endanger aircraft movements and the safe operation of the aerodrome in accordance with Policy A4 of the Hillingdon Local Plan: Part Two Saved UDP Policies (November 2012) and emerging Policy DMAV 2 of the Local Plan: Part Two - Development Management Policies with Modifications (March 2019).

12 NONSC Control of Lighting on the Proposed Development

Prior to any works above ground level, details of any proposed lighting scheme required during construction and for the completed development shall be submitted to and approved by the LPA, in consultation with NATS and Heathrow Airport Limited. The scheme should ensure that lighting schemes 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 Condition A4 of the Hillingdon Local Plan: Part Two Saved UDP Policies (November 2012) and emerging Policy DMAV 2 of the Local Plan: Part Two - Development Management Policies with Modifications (March 2019).

13 NONSC 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 below for further information*

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

REASON:

It is necessary to manage the flat roofs in order to minimise their attractiveness to birds which could endanger the safe movement of aircraft and the operation of Heathrow Airport, in accordance with Policy A4 of the Hillingdon Local Plan: Part Two Saved UDP Policies (November 2012) and emerging Policy DMAV 2 of the Local Plan: Part Two - Development Management Policies with Modifications (March 2019).

14 NONSC 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
- details of any water features

No subsequent alterations to the approved landscaping scheme are to take place unless submitted to and approved in writing by the Local Planning Authority, in consultation with NATS and Heathrow Airport Limited. 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 in accordance with Policy A4 of the Hillingdon Local Plan: Part Two - Saved UDP Policies (November 2012) and emerging Policies DMHB 14 and DMAV 2 of the Local Plan: Part Two - Development Management Policies with Modifications (March 2019).

15 NONSC Radar Mitigation Scheme

No construction shall commence on site until a Radar Mitigation Scheme (RMS), (including a timetable for its implementation during construction), has been agreed with the Operator and approved in writing by the Local Planning Authority, in consultation with NATS and Heathrow Airport Limited.

REASON:

In the interests of the safe movement of aircraft and the operation of Heathrow Airport in accordance with Policy A4 of the Hillingdon Local Plan: Part Two Saved UDP Policies (November 2012) and emerging Policy DMAV 2 of the Local Plan: Part Two - Development Management Policies with Modifications (March 2019).

16 NONSC Radar Mitigation Scheme - Implementation

No construction work shall be carried out on site above 5m AGL unless and until the approved Radar Mitigation Scheme has been implemented and the development shall thereafter be operated fully in accordance with such approved Scheme.

REASON:

In the interests of the safe operation of Heathrow Airport in accordance with Policy A4 of the Hillingdon Local Plan: Part Two Saved UDP Policies (November 2012) and emerging Policy DMAV 2 of the Local Plan: Part Two - Development Management Policies with Modifications (March 2019).

17 NONSC Crane Operation Plan

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

Construction at the site shall only thereafter be operated in accordance with the approved "Crane Operation Plan".

REASON:

In the interests of the safe operation of Heathrow Airport in accordance with Policy A4 of the Hillingdon Local Plan: Part Two Saved UDP Policies (November 2012) and emerging Policy DMAV 2 of the Local Plan: Part Two - Development Management Policies with Modifications (March 2019).

18 COM15 Sustainable Water Management

No development approved by this permission shall be commenced until a scheme for the provision of sustainable water management has been submitted to and approved in writing by the Local Planning Authority. The scheme shall clearly demonstrate that

sustainable drainage systems (SUDS) have been incorporated into the designs of the development in accordance with the hierarchy set out in accordance with Policy 5.13 of the London Plan and will:

- i. provide information about the design storm period and intensity, the method employed to delay and control the surface water discharged from the site and the measures taken to prevent pollution of the receiving groundwater and/or surface waters;
- ii. include a timetable for its implementation; and
- iii. provide a management and maintenance plan for the lifetime of the development which shall include the arrangements for adoption by any public authority or statutory undertaker and any other arrangements to secure the operation of the scheme throughout its lifetime. The scheme shall also demonstrate the use of methods to minimise the use of potable water through water collection, reuse and recycling and will:
- iv. provide details of water collection facilities to capture excess rainwater;
- v. provide details of how rain and grey water will be recycled and reused in the development.

Thereafter the development shall proceed in accordance with the approved scheme.

REASON

To ensure the development does not increase the risk of flooding in accordance with Policy OE8 of the Hillingdon Local Plan: Part Two Saved UDP Policies (November 2012) and Policy 5.3 of the London Plan (March 2016) and emerging Policy DMEI 10 of the Local Plan: Part Two - Development Management Policies with Modifications (March 2019).

19 NONSC Energy

Prior to above ground works, full details of at least 600m² of PV panels to be installed on the roof of the building shall be submitted to and approved in writing by the Local Planning Authority. The PVs shall demonstrate the carbon savings from the 'be green' section of the broad energy strategy (Pavey Engineering, September 2018). The details shall include elevations and final roof plans (not indicative), specifications of the PVs and a sunpath analysis to ensure the panels are free from shading and are located for optimal performance.

The development must proceed in accordance with the approved details unless otherwise agreed in writing by the Local Planning Authority.

REASON

To ensure the development contributes to carbon savings in accordance with Policy 5.2 of the London Plan (March 2016) and DMEI 2 of the Local Plan: Part Two - Development Management Policies with Modifications (March 2019).

20 NONSC Borehole Monitoring

Groundwater monitoring should be undertaken from the existing borehole on site and from a new borehole to be provided along the northern boundary of the site, the results of which should be submitted to the local flood authority every 6 months up to 24 months after the completion of development by sending an email to flooding@hillingsdon.gov.uk or alternatively provide access to an online data logger.

Any differential groundwater levels between the north and south of the development greater than 100mm must be reported to the Council within 2 weeks of measuring and a mitigation statement submitted to the Council for approval to identify remedial actions.

REASON

To ensure the development does not increase the risk of flooding in accordance with

Policy OE8 of the Hillingdon Local Plan: Part Two Saved UDP Policies (November 2012), Policy 5.12 of the London Plan (March 2016) and emerging Policy DMEI 10 of the Local Plan: Part Two - Development Management Policies with Modifications (March 2019).

21 NONSC Contamination Condition

(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

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

22 NONSC 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 measures in the agreed scheme shall be implemented and maintained throughout the life of the development.

Reason

As the application site is within an Air Quality Management Area and to comply with paragraph 124 of the NPPF, Policy 7.14 of the London Plan, and emerging Policy DMEI 14 of the Local Plan: Part Two - Development Management Policies with Modifications (March 2019).

23 NONSC Air Quality - Construction and demolition phase

In order to control the dust and emissions from the demolition and construction phases, the Construction Management Plan must be developed in accordance with the Air Quality Management (IAQM) 'Guidance on the assessment of dust from demolition and construction' and the GLA, Control of Dust and Emissions from Construction and Demolition Supplementary Planning Guidance. All Non-Road Mobile Machinery (NRMM) used during construction must meet Stage IIIA criteria of EU Directive 97/68/EC and must be registered online on the NRMM website at <http://nrmm.london/>. Confirmation of the registration must be submitted to the LPA.

Reason:

To ensure the development reduces and manages its air quality impacts in an air quality management area in accordance with Policy EM8 of the Hillingdon Local Plan: Part Two - Saved UDP Policies (November 2012) and emerging Policy DMEI 14 of the Local Plan: Part Two - Development Management Policies with Modifications (March 2019).

24 COM31 Secured by Design

The proposed 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). The development shall not 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 (March 2016) Policies 7.1 and 7.3 and emerging Policy DMHB 15 of the Local Plan: Part Two - Development Management Policies with Modifications (March 2019).

25 NONSC Non Standard Condition

The car parking space shall not be used or sub-let for airport parking and shall only be used by employees and visitors of the office building.

REASON

To ensure that the proposed car parking serves the office development and is not used to increase airport parking capacity, in accordance with Policy A4 of the Hillingdon Local Plan: Part Two - Saved UDP Policies (November 2012) and emerging Policy DMAV 2 of the Local Plan: Part Two - Development Management Policies with Modifications (March

2019).

26 NONSC CEMP

Before the development hereby approved commences, a Construction Environmental Management Plan (CEMP) shall be submitted to, and approved in writing by, the Local Planning Authority, in consultation with Network Rail. 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. 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 Two - Saved UDP Policies (November 2012).

27 NONSC Delivery and Servicing Plan

Before the development hereby permitted is brought into use, a servicing and delivery plan shall be submitted to and approved by the Local Planning Authority.

The development shall be implemented and maintained in accordance with the approved plan.

REASON:

To safeguard the amenity of surrounding areas in accordance with policy AM7 of the Hillingdon Local Plan: Part Two - Saved UDP Policies (November 2012).

28 NONSC Accessibility Condition

Details of inclusive design, to include WC provision for disabled people and at least one accessible unisex toilet should be included as part of the reserved matters. Any accessible toilet shall be designed in accordance with the guidance given in Approved Document M to the Building Regulations 2010 (2015 edition). Furthermore, the details shall have regard to the Equality Act 2010 which seeks to protect people accessing goods, facilities and services from discrimination on the basis of a 'protected characteristic', which includes those with a disability. As part of the Act, service providers are obliged to improve access to and within the structure of their building, particularly in situations where reasonable adjustment can be incorporated with relative ease. The Act states that service providers should think ahead to take steps to address barriers that impede disabled people.

The development shall be implemented and maintained in accordance with the approved details.

REASON

To ensure compliance with Policy 7.2 of the London Plan (March 2016) .

INFORMATIVES

1 152 **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).

2 153 **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.

NPPF- 2	NPPF-2 2018 - Achieving sustainable development
NPPF- 6	NPPF-6 2018 - Building a strong, competitive economy
NPPF- 9	NPPF-9 2018 - Promoting sustainable transport
NPPF- 12	NPPF-12 2018 - Achieving well-designed places
NPPF- 14	NPPF-14 2018 - Meeting the challenge of climate change, flooding and coastal change
LPP 2.13	(2016) Opportunity Areas and Intensification Areas
LPP 4.1	(2016) Developing London's economy
LPP 4.2	(2016) Offices
LPP 4.11	(2016) Encouraging a connected economy
LPP 5.1	(2016) Climate Change Mitigation
LPP 5.2	(2016) Minimising Carbon Dioxide Emissions
LPP 5.3	(2016) Sustainable design and construction
LPP 5.9	(2016) Overheating and cooling
LPP 5.10	(2016) Urban Greening
LPP 5.11	(2016) Green roofs and development site environs
LPP 5.12	(2016) Flood risk management
LPP 5.13	(2016) Sustainable drainage
LPP 5.14	(2016) Water quality and wastewater infrastructure
LPP 5.15	(2016) Water use and supplies
LPP 5.21	(2016) Contaminated land
LPP 6.3	(2016) Assessing effects of development on transport capacity
LPP 6.5	(2016) Funding Crossrail and other strategically important transport infrastructure
LPP 6.6	(2016) Aviation
LPP 6.7	(2016) Better Streets and Surface Transport
LPP 6.9	(2016) Cycling
LPP 6.10	(2016) Walking
LPP 6.13	(2016) Parking
LPP 6.14	(2016) Freight
LPP 7.1	(2016) Lifetime Neighbourhoods
LPP 7.2	(2016) An inclusive environment
LPP 7.3	(2016) Designing out crime
LPP 7.4	(2016) Local character

LPP 7.5	(2016) Public realm
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OE5	Siting of noise-sensitive developments
OE8	Development likely to result in increased flood risk due to additional surface water run-off - requirement for attenuation measures
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AM2	Development proposals - assessment of traffic generation, impact on congestion and public transport availability and capacity
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AM9	Provision of cycle routes, consideration of cyclists' needs in design of highway improvement schemes, provision of cycle parking facilities
AM14	New development and car parking standards.
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DMHB 15	Planning for Safer Places
DMEI 1	Living Walls and Roofs and Onsite Vegetation
DMEI 3	Decentralised Energy
DMEI 9	Management of Flood Risk
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DMAV 1	Safe Operation of Airports

DMT 2	Highways Impacts
DMT 4	Public Transport
DMT 5	Pedestrians and Cyclists
SPD-NO	Noise Supplementary Planning Document, adopted April 2006
SPG-AQ	Air Quality Supplementary Planning Guidance, adopted May 2002

3

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

4

HAL draws the applicant's attention 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/).

5

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 or before the removal of nests and eggs.

6

The applicant is advised that for further general information about airport safety, see Advice Note 1 'Safeguarding an Overview' (available at www.aoa.org.uk/policy-campaigns/operations-safety) and regarding lighting, refer to Advice Note 2 'Lighting Near Aerodromes' (available at www.aoa.org.uk/policy-campaigns/operations-safety).

7 I47A **Damage to Verge - For Private Roads:**

Care should be taken during the building works hereby approved to ensure no damage occurs to the verge of footpaths on private roads during construction. Vehicles delivering materials to this development shall not override or cause damage to a private road and where possible alternative routes should be taken to avoid private roads. The applicant may be required to make good any damage caused.

8 I70 **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.

9 I73 **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.

3. CONSIDERATIONS

3.1 Site and Locality

The application site comprises approximately 0.54ha of open land within the Heathrow Airport boundary which adjoins the recently completed four storey WBC4 office building occupied by a company which provides technology to airlines and the travel industry. The site is roughly square shaped and lies between the A4 Bath Road and Newall Road, which form the northern and southern boundaries of the site respectively. Although the site has frontages onto both these roads, vehicular access is only gained from Newall Road via Neptune Road to the west, which links to the airport's Northern Perimeter Road to the south.

The majority of the site currently comprises hardstanding which together with several single storey prefabricated car repair / facilities buildings and related car parking, is used in connection with a maintenance depot for a car hire business. The site did previously provide the bulk of the former part four, part five storey office building known as Cardinal Point which was demolished in 2014.

To the north, the site fronts the A4 Bath Road dual carriageway immediately on the opposite side of which is the 6 storey Marriott Hotel. To the east of the site is the Heathrow Airport Taxi Feeder Park comprising stacking rows for queueing black cabs waiting to be called forward to the airport's terminal taxi ranks to pick up passengers. To the south the site fronts onto Newall Road - an airport road that is not a through road and serves the Heathrow Airport Taxi Feeder Park, a BT telephone exchange, various airport workshops and a diesel service station. To the west the site adjoins the 4 storey World Business Centre 4 office building which is wholly occupied by the airport operations company, beyond which are the WBC1, WBC2 and WBC3 office buildings which are near identical 4 and 5 storey multi-let office buildings.

The site forms part of Heathrow Airport and has a fair PTAL (Public Transport Accessibility Level) score of 3 as assessed by TfL (where 6 represents the highest and 1 the lowest level of accessibility). The site also forms part of an Air Quality Management Area and is included within the proposed Heathrow Archaeological Priority Zone.

3.2 Proposed Scheme

This is an outline application for the erection of an office building (Use Class B1) with basement car park comprising up to 17,217m² GEA (16,701m² GIA). The application is made in outline with all matters reserved.

The building would have a maximum height of 5 storeys, plus the basement level which would provide car parking and plant accommodation. The maximum office floor space would be 12,892m² GEA excluding the 4,325m² basement. This represents a 35% increase on WBC4's floorspace of 9,550m² GEA (excluding the 4,325m² basement), mainly as a result of an additional floor.

The submitted illustrative site plan shows the office building with an identical footprint, siting and access arrangements as the adjoining WBC4 building which has its main elevation, building entrance and vehicular access on Newall Road and is set back from the A4 Bath Road at the rear by some 5.2m. The basement ramp, previously approved as part of the adjoining WBC4 development would be shared by this proposal to access its basement. The illustrative east elevation shows a building with 5 storeys, as compared to the 4 storey WBC4, although the adjoining building does have a large plant room on the roof.

The Planning, Design and Access Statement advises that the proposed office building, at this outline planning stage, is intended to reflect the new adjacent office building (WBC4)

which itself is a further iteration of the 3 earlier WBC office buildings. It is proposed to have the same front and rear building lines as the adjacent building and similar external materials are likely to be used. At the rear of the building, the landscaping will reflect the existing landscape treatment along the rear of the existing WBC frontage to the A4 (Bath Road) and an area of amenity planting is also proposed to the Newall Road frontage as with the WBC4 building.

The proposed basement would provide 139 parking spaces and at surface level, 7 spaces would be provided. On this basis it is likely that a maximum total of 146 parking spaces could be provided for the proposed office building.

The application is supported by the following documents:-

Planning, Design and Access Statement:

This provides an introduction to the outline proposal and describes the site and its surroundings, the planning history on and adjacent to the site and details the proposals and the accessibility measures that are likely to come forward as part of the reserved matters. Relevant planning policies are briefly discussed and a planning assessment of the proposals provided under the headings of principle of development, visual amenity, traffic/highways, energy, air quality, drainage, contamination, archaeology and other. The statement concludes that the proposal accords with the provisions of the development plan and that subject to relevant conditions, outline planning permission should be granted.

Transport Assessment:

This provides an introduction and background to the report and considers relevant national planning policy. The accessibility of the site is assessed, with the report noting that a number of bus services pass the site, (including the free network around Heathrow) of which a number are 24 hour and that numerous bus, coach and rail services serve the nearby airport terminals, which provide links with national networks. Pedestrian and cyclist provision is also good, with network of footways, footpaths and cycle routes. Trip generation is then assessed, using a TRICS assessment, parking standards and the issues raised by TfL and the Council's Highway Engineer on the previous application for WBC4 are considered and conclusions presented. An Interim Travel Plan and a Delivery and Servicing Management Plan are included in the Appendices.

The Cunningham Consultancy Limited Letter dated 12/7/19:

This provides a response to Highways England comments.

The Cunningham Consultancy Limited Letter dated 19/7/19:

This provides a response to LBH Highways, TfL and HAL comments.

The Cunningham Consultancy Limited Letter dated 9/9/19:

This provides a response to TfL's comments contained within the GLA Stage 1 Report.

Air Quality Assessment, November 2018:

This provides an introduction to the assessment, advises on relevant environmental policy background and guidance and the national, regional and local planning policy context. The assessment methodology is described and assessed. The report goes on to assess the construction and operational phases of the development in terms of nitrogen dioxide and particulate matter pollution and goes on to make recommendations for mitigation. It goes on to assess the development in terms of being air quality neutral and then the presents its conclusions.

Archaeological Desk-Based Assessment:

This provides an introduction to the assessment, describes the site and the planning background. The assessment's methodology is presented and evidence of archaeological remains in the vicinity from archaeological/ historical and cartographical sources is presented. Site constraints are discussed and the report concludes that a watching brief undertaken on this site by the Museum of London Archaeology Service in 1995 did not identify any archaeological features and that it is probable that much of the potential archaeological resource on site has been truncated by modern services and building foundations associated with post-1950s expansion of the airport, although a further watching brief may be a way forward.

Geoenvironmental and Geotechnical Desktop Study, September 2015:

This provides the background to the report, describes the site and its environmental setting, including its geology, seismicity, hydrogeology and hydrology. The site's history has been investigated and findings presented, with a focus on contaminative uses and building/engineering operations. A preliminary conceptual model for contamination is formulated and conclusions and recommendations presented.

Surface Water Drainage Strategy, November 2018 (Issue 2):

This provides an introduction and background to the study, lists relevant policy documentation, describes the site, existing ground conditions and drainage features/ conditions. A surface water drainage strategy is presented, together with drainage calculations which involves a below ground cellular storage tank located to the south of the office building and situated beneath the proposed basement slab. Attenuated runoff will be pumped to the existing surface water sewer located to the north of the site, subject to TWU and Heathrow Airport approval, discharging at 1l/s. Discussion and conclusions are presented.

Addendum to the Surface Water Drainage Strategy Report, dated 27/2/19 (including Appendices):

This considers the feasibility of utilizing alternatives to the proposed pumped underground storage system which are mainly discounted, other than green roofs, as the report advises that it may be possible to include some green roofs within the layout, subject to determination of the precise roof area at reserved matters. It also clarifies that surface waters will feed into the public surface water sewer in the road.

The addendum also includes a Basement Impact Assessment which advises that the proposed basement would fill a 3m wide buffer to the east of WBC4 which was envisaged to be retained to allow groundwater to flow around the perimeter of the basement. With the proposed extended basement for WBC5, the gap would be filled and its width doubled. The assessment presents an analysis of geological and groundwater data and brings this together to model groundwater flows around and beneath the basements. A conceptual model is formed which predicts that there would be a maximum rise in the groundwater level north of the site of some 0.06m which is much less than the apparent month by month range of groundwater fluctuation. Furthermore, with the groundwater level more than 2.0m below ground, the change in level is insignificant with respect of flooding above ground and with the exception of WBC4, no local basements have been identified close to the site so that no structures would be at risk. The assessment concludes that there are no anticipated adverse affects on groundwater from continuing the basement beneath WBC4 and WBC5 and there is no benefit in providing a 3m buffer strip and there may be risks with providing this due to possible increased groundwater flow rates.

Energy Statement, September 2018:

This provides an introduction to the report, describes the site and its location, together with a brief description of the development proposals. The report then discusses relevant planning policy and legislation. Energy modelling and its methodology is discussed and calculations made in terms of the predicted energy consumption of the notional building and then the potential for energy efficiencies are assessed using the energy hierarchy of be lean, be clean and be green, including an assessment of the use of alternative technologies. The report concludes that energy efficiency measures such as improved building fabric materials and energy efficient lighting (be lean) would result in a reduction of 25% when measured against Part L of the 2013 Building Regulations, with a further 10.0% CO2 savings achieved with the use of 600m² of photovoltaic panels (be green) so that the scheme would achieve a reduction of 35% and be policy compliant.

Agent's email dated 10/9/19:

This provides a response to the GLA's Stage 1 Report.

3.3 Relevant Planning History

Comment on Relevant Planning History

There is no relevant planning history on this site, other than the application to demolish the previous Cardinal Point building (App. Ref. 30796/APP/2012/1014) for which it was determined prior approval was not required on 27/4/12.

The various permissions for the other World Business Centre buildings are of some relevance, particularly the adjoining outline application for the adjoining WBC4 building (App. No. 71487/APP/2015/4718 refers) which was approved on 23/5/16 and with which this proposal will share the access ramp to the proposed basement car parking. Reserved matters only related to details of landscaping which were approved on 9/12/16 (App. No. 71487/APP/2016/2029 refers). A S73 application (App. No. 71487/APP/2017/1605 refers) to amend the approved plans, comprising alternative elevational treatment to the central section of the side elevations, an increase in roof height and a reduction in height of the roof top plant enclosure and delete condition 7 (Details of Revised Roof Plant Enclosure) was approved on 17/8/17. The application for the discharge of condition 10 (Sustainable Water Management) of the S73 application which was approved on 1/9/17 is also of relevance as this proposed a 3m wide buffer zone along the boundary of this site (App. No. 71487/APP/2016/3732 refers).

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.E3 (2012) Strategy for Heathrow Opportunity Area
- PT1.E7 (2012) Raising Skills
- PT1.BE1 (2012) Built Environment
- PT1.EM1 (2012) Climate Change Adaptation and Mitigation
- PT1.EM6 (2012) Flood Risk Management
- PT1.EM8 (2012) Land, Water, Air and Noise
- PT1.T4 (2012) Heathrow Airport
- PT1.CI1 (2012) Community Infrastructure Provision

Part 2 Policies:

- NPPF- 2 NPPF-2 2018 - Achieving sustainable development
- NPPF- 6 NPPF-6 2018 - Building a strong, competitive economy
- NPPF- 9 NPPF-9 2018 - Promoting sustainable transport
- NPPF- 12 NPPF-12 2018 - Achieving well-designed places
- NPPF- 14 NPPF-14 2018 - Meeting the challenge of climate change, flooding and coastal change
- LPP 2.13 (2016) Opportunity Areas and Intensification Areas
- LPP 4.1 (2016) Developing London's economy
- LPP 4.2 (2016) Offices
- LPP 4.11 (2016) Encouraging a connected economy
- LPP 5.1 (2016) Climate Change Mitigation
- LPP 5.2 (2016) Minimising Carbon Dioxide Emissions
- LPP 5.3 (2016) Sustainable design and construction
- LPP 5.9 (2016) Overheating and cooling
- LPP 5.10 (2016) Urban Greening
- LPP 5.11 (2016) Green roofs and development site environs
- LPP 5.12 (2016) Flood risk management
- LPP 5.13 (2016) Sustainable drainage
- LPP 5.14 (2016) Water quality and wastewater infrastructure
- LPP 5.15 (2016) Water use and supplies

LPP 5.21	(2016) Contaminated land
LPP 6.3	(2016) Assessing effects of development on transport capacity
LPP 6.5	(2016) Funding Crossrail and other strategically important transport infrastructure
LPP 6.6	(2016) Aviation
LPP 6.7	(2016) Better Streets and Surface Transport
LPP 6.9	(2016) Cycling
LPP 6.10	(2016) Walking
LPP 6.13	(2016) Parking
LPP 6.14	(2016) Freight
LPP 7.1	(2016) Lifetime Neighbourhoods
LPP 7.2	(2016) An inclusive environment
LPP 7.3	(2016) Designing out crime
LPP 7.4	(2016) Local character
LPP 7.5	(2016) Public realm
LPP 7.6	(2016) Architecture
LPP 7.8	(2016) Heritage assets and archaeology
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BE35	Major development proposals adjacent to or visible from major road and rail connections to Heathrow and central London
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OE1	Protection of the character and amenities of surrounding properties and the local area
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DMT 5	Pedestrians and Cyclists
SPD-NO	Noise Supplementary Planning Document, adopted April 2006
SPG-AQ	Air Quality Supplementary Planning Guidance, adopted May 2002

5. Advertisement and Site Notice

5.1 Advertisement Expiry Date:- **10th January 2019**

5.2 Site Notice Expiry Date:- **5th February 2019**

6. Consultations

External Consultees

23 adjoining occupiers were consulted on this application on 13/12/18, 2 site notices were displayed adjacent to the site on 15/1/19, with a closing date of 5/2/19 and it was advertised in the local press on 2/1/19. No responses have been received from neighbouring occupiers.

GLA:

The GLA's Stage 1 Report is summarised at paragraph 37 which states:-

'London Plan and draft London Plan policies on opportunity areas, urban design, inclusive design, energy and transport are relevant to this application. In general, the application broadly complies with

the relevant policies, however further information and/or confirmation as detailed below for the scheme to fully accord with the London Plan:

- Principle: The applicant must demonstrate that the site is appropriate for the provision of a significant quantum of office accommodation as it is outside of a designated town centre.
- Design: Further detail is required to ensure the design of the scheme is of the highest quality. Appropriate conditions should be secured to ensure inclusive design standards are achieved by the scheme, high quality materials are used within the development and that the scheme delivers character enhancing landscaping for private and publicly accessible areas of the scheme.
- Energy: Further information is required to ensure compliance with the London Plan and draft London Plan policies, and a condition should be secured ensuring a revised energy strategy is submitted with any reserved matters application submitted pursuant to an outline permission.
- Transport: The proposal is not supported by London Plan and draft London Plan transportation policies. The proposal should reduce car parking as well as put forward measures to promote Healthy Streets, Vision Zero and sustainable travel. Options to improve crossing facilities in the vicinity of the proposal to improve bus stop accessibility should be explored. A travel plan, delivery and servicing plan and construction and logistics plan should be secured by condition.'

Highways England:

Highways England will be concerned with proposals that have the potential to impact on the safe and efficient operation of the Strategic Road Network (SRN).

In the case of this proposed development, Highways England is interested in the potential impact that the development might have on the M4, in particular Junction 4.

We have a number of queries regarding the Transport Assessment that has been submitted as part of this planning application.

1. The proposed building is a speculative airport office development that is planned to meet demand for future office accommodation subject to satisfactory confirmation of the commencement of the third runway at Heathrow. Could it be confirmed by the applicant when they view opening year to be?
2. The applicant has not assessed the number of vehicles their development would generate during the PM network peak hour. This information needs to be provided.
3. It appears that the survey trip rate is considerably higher than the TRICS trip rate (Point 4.15) - further clarification and evidence is required to show that the survey trip rate should not be used and that the TRICS rate is more suitable.
4. No information has been presented regarding trip distribution and how the proposed trips would use the road network. This information is required and traffic distribution diagrams should be submitted.

Without a full understanding of the potential impacts of the development, there is insufficient information for us to be satisfied that the proposals will not materially affect the safety, reliability and/or operation of the SRN (the tests set out in DfT C2/13 para 10 and DCLG NPPF para 32).

I trust that the above is of assistance and would be grateful if you could pass the above comments to the applicant and their consultants for further consideration and reply. This email does not constitute a formal recommendation from Highways England.

Accordingly, we formally request that your authority refrains from determining this application, (other than refusal) until such time as we have received and considered all the requested information. Once we are able to adequately assess the above and its potential impact on the SRN, and this has been agreed with the developer, we will provide you with our final formal response.

If, in the meantime, your authority wishes to determine the application, please let us know and we will provide you with a formal response based on the information available at that time.

We look forward to receiving the additional information in due course. Should you have any queries regarding our response please contact us.

Highway England (further comments):

Referring to the notification of a planning application dated 11 June 2019 referenced above, in the vicinity of the M4 that form part of the Strategic Road Network, notice is hereby given that Highways England's formal recommendation is that we:

a) offer no objection*;

b) *This is on the basis that the proposals will generate minimal additional traffic on the SRN in Peak Hours. We therefore consider that the development will not materially affect the safety, reliability and / or operation of the SRN (the tests set out in DfT C2/13 para 10 and DCLG NPPF para 109), in this location.

TfL:

After review of the submitted documents, TfL make the following comments to this outline application:

- The site is on the A4 which is part of the Transport for London Road Network (TLRN) for which TfL are the highway authority for. Access to the site is from Newall Road which is owned by Heathrow Airport Limited.

- The proposed number of 146 car parking spaces is an overprovision and should be reduced to meet policy standards, Draft London Plan policy in this Outer London Area would equate to a maximum parking provision of up to 1 space per 100 sqm (GIA) (max 129 spaces).

- The development should strive to meet Policy 1 of the Mayors Transport Strategy and actively reduce car dependency by promoting active, efficient and sustainable modes of travel. The central aim is for 80% of all trips in London to be made on foot, cycle and by public transport by 2041. Given the PTAL of the site is 3 providing a moderately good access to public transport this level of parking is unnecessary.

- The development should not impact the TLRN adversely and a Construction Logistics Plan and Servicing and Delivery Plan should be secured through appropriate conditions. A Travel Plan should be secured by condition in order to encourage travel by sustainable modes from the outset.

Greater London Archaeology Advisory Service:

Having considered the proposals with reference to information held in the Greater London Historic Environment Record and/or made available in connection with this application, I conclude that the proposal is unlikely to have a significant effect on heritage assets of archaeological interest.

An archaeological desk-based assessment prepared for a previous application (Allen Archaeology, February 2016) indicated that the World Business Centre site has a low archaeological potential as a result of previous development. This is drawn from a variety of information including the 1995 archaeological watching brief which did not record any archaeological remains, but instead showed that the below ground deposits had been severely truncated by foundations and services.

No further assessment or conditions are therefore necessary.

Recommend No Archaeological Requirement.

NATS:

NATS has evidence of existing buildings and structures in this area affecting its H10 radar due to their reflection of radar energy and as such it raised an objection to the application.

Notwithstanding the objection, NATS is satisfied that mitigation measures are available to address the impact of the building. The mitigation would require changes to the radar and NATS has engaged with the applicant around the agreement required to secure the delivery of these measures.

Accordingly, NATS is satisfied that should the LPA wish to proceed to determine the application, it may do so, provided the standard aviation conditions reproduced overleaf, are imposed on any consent.

We would like to take this opportunity to draw your attention to the legal obligations of local authorities contained in The Town and Country Planning (Safeguarded Aerodromes, Technical Sites and Military Explosives Storage Areas) (Scotland) Direction 2003, in the event that any recommendations (including those relating to conditions) made by NATS En-Route PLC are not accepted.

It should also be noted that the requirements for these conditions relate to the infrastructure and operations of NATS En Route LTD and are separate from any restrictions Heathrow Airport LTD may have requested separately.

Aviation Conditions

Condition 1. No construction shall commence on site until a Radar Mitigation Scheme (RMS), (including a timetable for its implementation during construction), has been agreed with the Operator and approved in writing by the Local Planning Authority.

REASON:

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

Condition 2. No construction work shall be carried out on site above 5m AGL unless and until the approved Radar Mitigation Scheme has been implemented and the development shall thereafter be operated fully in accordance with such approved Scheme.

REASON:

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

Condition 3. No construction work shall commence on site until the Developer has agreed a "Crane Operation Plan" which has been submitted to and has been approved in writing by the Local Planning Authority in consultation with the "Radar Operator".

Construction at the site shall only thereafter be operated in accordance with the approved "Crane Operation Plan".

REASON:

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

Heathrow Airport Limited:

I write to register comments on behalf of Heathrow Airport Limited regarding the application for a new office development at World Business Centre 5.

We have no objection to the principle of the proposed office development. However, it should be noted that the application falls within Annex A of the Airports National Policy Statement (the Airports NPS). We ask that the Airports NPS is identified and considered in the officer report as a material consideration in the determination of the application.

In relation to this specific development proposal we would support an approach where the applicant is required to produce a Transport Plan for the development that demonstrates how it contributes to the relevant requirements of the Airports NPS including those relating to vehicle reduction and

increasing public transport use. This should include specific proposals for how vehicle usage will be reduced over time and plans for increasing public transport use and active travel, in line with requirements of the Airports NPS.

This approach is consistent with the draft London Plan and the new Mayor's Transport Strategy. The proposals for car parking should be assessed in this context, and we would support a reduction in the proposed car parking levels to a provision in line with London Plan standards, at a maximum of 1 space per 100sqm GFA.

Additionally, as the site is located within the red line on the scheme boundary map at Annex A of the Airports NPS, the Council and the applicant should be aware that it may be affected by the future expansion of Heathrow Airport.

Heathrow Aerodrome Safeguarding:

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

Height Limitation on Buildings and Structures

No building or structure of the development shall exceed 41m Above Mean Sea Level (AMSL) on the southern boundary and 51m AMSL on the northern boundary. The heights vary due to a 1:7 slope known as the Transitional Surface, which passes over the site from south to north.

Reason: Development exceeding this height would penetrate the Obstacle Limitation Surface (OLS) surrounding Heathrow Airport and endanger aircraft movements and the safe operation of the aerodrome.

See Advice Note 1 'Safeguarding an Overview' for further information (available at www.aoa.org.uk/policy-campaigns/operations-safety).

Control of Lighting on the Proposed Development

The development is close to the aerodrome and therefore 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 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 below for further information*

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

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

*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 or before the removal of nests and eggs.

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
- details of any water features

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.

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.

Thames Water:

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

Following initial investigations, Thames Water has identified an inability of the existing foul water network infrastructure to accommodate the needs of this development proposal. Thames Water have contacted the developer in an attempt to agree a position for foul water networks but have been unable to do so in the time available and as such Thames Water request that the following condition be added to any planning permission. No properties shall be occupied until confirmation has been provided that either:- all wastewater network upgrades required to accommodate the additional flows from the development have been completed; or- a housing and infrastructure phasing plan has been agreed with Thames Water to allow additional properties to be occupied. Where a housing and infrastructure phasing plan is agreed no occupation shall take place other than in accordance with the agreed housing and infrastructure phasing plan. Reason - The development may lead to sewage flooding and network reinforcement works are anticipated to be necessary to ensure that sufficient capacity is made available to accommodate additional flows anticipated from the new development. Any necessary reinforcement works will be necessary in order to avoid sewer flooding and/or potential pollution incidents. "The developer can request information to support the discharge of this condition by visiting the Thames Water website at thameswater.co.uk/preplanning. Should the Local Planning Authority consider the above recommendation inappropriate or are unable to include it in the decision notice, it is important that the Local Planning Authority liaises with Thames Water Development Planning Department (telephone 0203 577 9998) prior to the planning application approval.

"We would expect the developer to demonstrate what measures he will undertake to minimise groundwater discharges into the public sewer. Groundwater discharges typically result from construction site dewatering, deep excavations, basement infiltration, borehole installation, testing and site remediation. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. Should the Local Planning Authority be minded to approve the planning application, Thames Water would like the following informative attached to the planning permission: "A Groundwater Risk Management Permit from Thames Water will be required for discharging groundwater into a public sewer. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures he will undertake to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 02035779483 or by emailing wwriskmanagement@thameswater.co.uk. Application forms should be completed on line via www.thameswater.co.uk/wastewaterquality."

Thames Water requests that the Applicant should incorporate within their proposal, protection to the property by installing a positive pumped device (or equivalent reflecting technological advances) to

avoid the risk of backflow at a later date, on the assumption that the sewerage network may surcharge to ground level during storm conditions. Fitting only a non-return valve could result in flooding to the property should there be prolonged surcharge in the public sewer. If as part of the basement development there is a proposal to discharge ground water to the public network, this would require a Groundwater Risk Management Permit from Thames Water. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures he will undertake to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 02035779483 or by emailing wwqriskmanagement@thameswater.co.uk. Application forms should be completed on line via www.thameswater.co.uk/wastewaterquality

Water Comments

With regard to water supply, this comes within the area covered by the Affinity Water Company. For your information the address to write to is - Affinity Water Company The Hub, Tamblin Way, Hatfield, Herts, AL10 9EZ - Tel - 0845 782 3333.

Supplementary Comments

Thames Water will require the points of connection to the public sewer system, for foul water, as well as the anticipated flow (including flow calculation method) into any proposed connection point. This data can then be used to determine the impact of the proposed development on the existing sewer system. Please also indicate if the flows will be gravity or pumped discharges.

Metropolitan Police Secure by Design Officer:

A condition should be applied so that SBD accreditation is achieved by the site. This is to ensure practical measures are installed to achieve an appropriate resilience to crime.

Internal Consultees

Policy Officer:

The principle of development would be in line with the Development Plan, subject to a condition restricting occupancy of the office to users who are directly involved in activities that are related to the operation of Heathrow Airport. In line with Paragraph 86 of the National Planning Policy Framework (2019), a sequential test is therefore not required.

Condition: Airport Occupancy Restriction

The development shall only be occupied by users who are directly involved in activities that are related to the operation of Heathrow Airport.

Reason

To ensure that airport related activity is confined to within the boundaries of Heathrow Airport, in accordance with Policy A4 of the Hillingdon Local Plan: Part Two - Saved UDP Policies (November 2012) and Policy DMAV 2 of the Local Plan: Part Two - Development Management Policies with Modifications (March 2019).

Highway Engineer:

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 terminals 2 & 3 are located directly south of the site.

The site is accessed off both the A4 (Bath Road) and via Newall Road. Access from the A4 is restricted to pedestrians and cyclists only with vehicle access obtained only from Newall Road. Newall Road connects to Neptune Road which in turn connects to Northern Perimeter Road via a

signalised junction. All of these roads are privately maintained and under the jurisdiction of Heathrow Airport.

This scheme seeks outline planning consent for the erection of an office building measuring 12,892sqm (excludes 4,325sqm basement parking area). 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 1b which on a scale from 0 (worst) - 6b (best) is deemed poor. It is therefore likely that patrons would be dependent 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 Council's adopted Car Parking Standards.

Although the Council's currently adopted saved Unitary Development Plan (UDP) standard for office use (Use Class B1a) indicates a parking provision of 1 space per 100sqm, the emerging DMT6 policy provides a higher standard with a parking ratio of 1 space per 50-100sqm. This would suggest a maximum parking provision of 258 parking spaces.

The submissions propose 146 parking spaces in the form of a two floor surface level and basement car park. This represents a parking ratio of 1 space per 88sqm which falls within the emerging DMT6 policy. It should be noted that at this stage in the planning process (outline) an illustrative plan has merely been submitted. Details and designs of the number of spaces should be provided during the reserved matters stage.

Electrical Vehicle Charging Points (EVCP)

Provision for electrical vehicle charging points should be in relative accordance with the London Plan Standards which require 20% active spaces and a further 20% as passive spaces. Whilst the submissions show 20% of parking (29 spaces) to include active charging points, only 10% (15 spaces) will be deemed as passive spaces. I would require provision for passive spaces to be amended to 20% via a suitable planning condition.

Disabled Parking

To accord with both the currently adopted UDP standard and the emerging DMT6 Policy, it is required that 10% of parking provision be allocated to blue badge holders. The submissions mention that only 5% (7 spaces) being allocated to disabled users which falls below the required standard. This should be addressed.

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 7 spaces be accommodated for. This has been confirmed within the Transport Assessment.

Cycle Parking

The currently adopted Unitary Development Plan (UDP) and emerging Local Plan: Part 2 requires a provision of 1 space per 250sqm totaling 52 cycle spaces. It is proposed that a total of 98 spaces be provided to serve the development in its entirety (86 spaces allocated as long stay and 12 spaces allocated as short stay spaces) which accords with the London Plan minimum standards for B1 use. This would represent an overprovision of 46 parking spaces when compared to the Council's requirement.

I would request that cycle parking be revised to accord with that contained within both the UDP and emerging Local Plan: Part 2. It should be noted that cycle parking is to be both secure and covered.

Access Provision

Access to the site is proposed to take place via an in and out access arrangement which will be linked via a one-way internal access road. Based on the illustrative site plan, access into the site will take place via the sites eastern most access with egress taking place at the most western point which appears to be shared (for egress only) with World Business Centre 4.

The one-way system will direct vehicles to a ramped access located along the western site boundary which leads directly to the basement car park. This is to accommodate parking linked to both World Business Centre's 4 & 5.

Concerns are raised with conflicting vehicle movements taking place at the ramped access at surface level in relation to the shared access (exit only) onto Newell Road as this section will accommodate 2-way movements associated with two separate sites without any formal control measures. This is also the case with the basement car park which will undoubtedly give rise to conflicting movements at the lowered section of the ramp upon entrance and exiting.

Whilst these are principle design concerns, in order to avoid a potential highways objection at a later stage, this should be addressed.

During the detailed design stage, all accesses and associated parking areas should conform to highway guidance contained within the current 'Manual for Streets' (1 & 2) document. This should be assisted with swept path analysis drawings demonstrating tracking of associated vehicles accessing, manoeuvring and egressing the site.

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 and proposed level of trips associated with the site, the applicant has carried out an interrogation of the TRICS (Trip Rate Information Computer System) database which comprised a number of selected site surveys which were deemed comparable. It should be noted that the selected parameters were agreed as part of the adjacent WBC 4 building as part of ref, 71487/APP/2015/4718 and on this basis are accepted.

It should be noted that the site at present comprises of open land which accommodates an airport car hire company as well as car repair facilities (Enterprise Rent-A-Car) owing to the demolition of the previous office building which measured 6,457sqm.

As a result of the demolition of the previous office building, survey data highlighting existing trips could not be ascertained. The trips rates derived from the TRICS database has therefore been applied to the previous buildings floor space (6,457sqm) to determine existing trips.

The results indicate that the previous building generated in the region of 308 vehicle movement per day with 40 movements in the AM peak (8:00-9:00) and 38 movements in the PM peak (17:00-18:00).

The proposed office building will generate in the region of 81 movements during the AM peak (8:00-9:00) and 76 movements in the PM peak (17:00-18:00). This results in an additional 41 movements (AM) and 38 movements (PM).

Overall, trip rates during all peak hours would be expected to be sufficiently absorbed within the existing local road network.

It is noted that since the demise of the previous office building, Enterprise Rent-A-Car has since occupied the site. The submissions should therefore provide information relating to the traffic movements linked to this use with a net comparison of the impacts associated with this current scheme. This information may be required to assess the impacts of the proposed development of air quality.

Servicing and Delivery Arrangements

A draft service and delivery plan framework has been submitted as part of the Transport Assessment. The final submission should be provided to the Council which demonstrates swept path analysis drawings with associated vehicles as well as a suitable strategy to manage vehicles servicing the site. This should be secured by way of condition.

Workplace Travel Plan

An interim Travel Plan has been included within the submissions, whilst broadly acceptable, additional 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. The Full Framework Travel Plan is to be secured via a Section 106 agreement.

Construction Logistics Plan

Prior to the implementation of the works, a full Construction Logistics 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 on-site 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 the following obligations are secured.

- £20,000,00 Travel Plan Bond to include sustainable transport measures.
- Applicant to enter into a Section 278/38 agreement for all highway works required by the Local Planning Authority/TFL to include, but not limited to associated costs and works identified in junction improvement works, resurfacing, etc.

Officer comment

As regards the Highway Engineer's concern regarding conflicting vehicle movements depicted at the base of the ramp shown on the indicative plans, a revised indicative plan has now been submitted which removes this conflict.

Trees and Landscape Officer:

This site is occupied by a piece of cleared land between Bath Road and Newall Road (Heathrow), from which it is accessed. The plot lies adjacent to the recently completed World Business Centre (WBC)4. WBC 4 is a continuation of WBC 1-3, albeit has a larger footprint resulting in a narrower tree-lined frontage. There is no vegetation on the site and no TPO's or Conservation Area designations affecting the site.

Comment

In terms of landscape setting the recently completed WBC 4 and the current proposal are weaker than the initial three buildings. Provided that WBC 5 mirrors WBC4 and the same landscape buffer is achieved along the frontage there would be no landscape objection.

Recommendation

No objection subject to COM2, COM9 (parts 1, 2, 3, 4 and 5).

Further comments:

Following a review of the street trees on Bath Road, I confirm that the root protection area of the trees will not be affected by the development due to the change in level on the northern boundary of the site. The street level is significantly higher than the site level and the root spread of the street trees will be contained by a retaining wall. In terms of the potential above ground conflict between the canopy of the tree and the building, the tree has a limited crown spread to the south.

The agent has confirmed that the two trees adjacent to the site's Bath Road frontage are on highway (TfL) land and lie outside the control of the developer. As previously noted, it should be possible to construct WBC5 without affecting these off-site trees.

On this basis, there is no objection subject to the usual conditions COM9 (parts 1, 2, 4, 5 and 6).

Water and Flood Management Officer:

Comments on the Planning Application:

A Surface Water Drainage Strategy (CEC Limited report Issue 2, dated November 2018) has been submitted to accompany the application.

Flood Risk

The site is less than 1ha. in area, is not identified to be at risk of flooding from all sources and does not lie within a Critical Drainage Area (CDA) as defined by the London Borough of Hillingdon Surface Water Management Plan (SWMP).

Groundwater

A basement is proposed on site to provide car parking for the development. The site lies adjacent to the World Business Centre 4 building that gained permission in 2015 (71487/APP/2015/4718). The illustrative basement plan for the proposed development (WBC5-GA-B1-00001 version 1.0 dated August 2018) shows that the proposed vehicular access to the basement parking will be from the shared ramp in World Business Centre 4. As part of the permission for the discharge of Condition 13 of application 71487/APP/2015/4718 (reference 71487/APP/2016/3732 granted September 2017), a drainage strategy plan was submitted (reference). This plan identified a 3m buffer to the east of the World Business Centre 4 site that would be retained without a basement to enable groundwater to flow around the perimeter of the development. The inclusion of an extension that will double the width of the basement has the potential to disrupt shallow groundwater flow from north to south through the development.

Approval was granted for the adjacent development on the understanding that groundwater levels would be monitored for a period of two years from September 2017, with monitoring results submitted to the Flood and Water Management team every three months. We do not have any record of the groundwater monitoring results in the nearby borehole ever being submitted to the Council.

A Groundwater Assessment (Ashton Bennett Consultancy report dated August 2016) has been submitted as an attachment to the Drainage Strategy, but this assessment is for the adjacent development (World Business Centre 4) and therefore does not provide a site-specific analysis of the potential impact on local groundwater levels, and does not include the results of the local groundwater monitoring. There should now be more than 15 months of data that can be used to inform the groundwater assessment for this application. Further, the current drainage proposals are to provide geocellular attenuation storage below the basement level of the development, although this is not currently included in any assessment of groundwater for the site.

Discharge Rates

The submitted FRA also includes a Conceptual Surface Water Drainage Strategy to consider the

management of surface water on the site. The applicant will discharge from the site at 1l/s, which corresponds to just less than the calculated greenfield 1 in 100 year runoff rate. Discharge from the site at this rate is considered to be acceptable and will result in an improvement on existing runoff rates.

Discharge Location

We note, however, that discharge from the site is proposed to be for a pumped outfall connected into a private sewer that is identified in the Drainage Strategy as being maintained by Heathrow Airport along Bath Road. The outline drainage strategy does not provide any information about current licencing approvals for this discharge into the Heathrow Airport drainage network and does not provide information to confirm that this will be acceptable in the future. In addition, Thames Water records suggest that there is an existing connection from the site into the foul sewer on Bath Road with no record of an additional private drainage network. We note that while there is a Thames Water public surface water sewer in Bath Road, this is within the carriageway and would require the crossing of two pressure mains. The previous development at World Business Centre 4 discharged from the surface water network into a private surface water sewer on Newall Road. We require additional information to confirm whether the private Heathrow Airport drainage network to the north into which it is proposed to discharge is a surface water sewer and is not connected to the Foul Sewer on Bath Road. This is to ensure compliance with the drainage hierarchy set out in Policy 5.13 of the London Plan.

Drainage method

The current proposals are for collected surface water to be stored in below-ground geocellular attenuation below the proposed basement before being discharged by a pump to a private sewer. Although the proposals are conceptual, the Council fundamentally disagree with the proposed method of managing surface water on the site. The applicant has listed all of the relevant planning policy documents requiring the use of sustainable drainage measures but has not presented a drainage strategy based on the principles of sustainable drainage.

The applicant should consider the available methods of surface water disposal in greater detail to identify the opportunities for the use of more sustainable methods than currently proposed.

A pumped system is the last resort and worst option available. Pumped systems are prone to failure and carry additional risks as a result of infrastructure failure. The need for a pumped outfall in the drainage strategy is linked to the choice to provide all of the attenuation storage below the basement in a geocellular tank.

Opportunities that keep storage at a higher level, thereby reducing the need for pumping such as the use of permeable paving, tree pits, rain gardens and above ground storage have not been considered. These opportunities must be considered at this Outline Planning stage to ensure there is sufficient space within the final conceptual plans for a drainage system that meets local and regional planning policy and does not just present a design for the worst case.

Should below-ground attenuation be required in conjunction with other more sustainable approaches, the storage should not be placed below the basement, should be kept shallower and at a higher level covering a wider area (for example as part of the sub-base of the front parking off Newall Road) to reduce the need for pumping.

Exceedance Routes

Overland exceedance flow routes should be mapped and shown on a plan.

Recommendations: Objection

We object to the application as submitted as the applicant is currently proposing a surface water management scheme that does not incorporate sustainable principles. Although the applicant is proposing to discharge at greenfield runoff rates from the site, the proposals do not reflect the

requirement in Policy EM6 Flood Risk Management in Hillingdon Local Plan: Part 1 to use sustainable drainage systems.

The applicant should review the current proposals in the drainage strategy to ensure that it includes the most sustainable approaches available on the site. These will include considering the use of green roofs, rainwater harvesting for water re-use in landscaping areas, rain gardens/swales in landscaped areas along Newall Road and permeable paving (including lined permeable paving to provide shallow storage).

This analysis will also ensure that the application meets the requirements of Hillingdon Local Plan Policy EM1, which requires major development proposals to consider the whole water cycle impact which includes flood risk management, foul and surface water drainage and water consumption. We also object to the proposals as a Basement Impact Assessment has not been submitted to accompany the application to assess the potential for groundwater to be present on the development, and to recommend mitigation to reduce the impact on the risk of groundwater flooding elsewhere. The assessment should submit the results of groundwater monitoring undertaken on the adjacent development, and should also take into consideration the agreed 3m buffer to the east of the basement ramp.

Reason

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

- Policy EM1 Flood Risk Management in Hillingdon Local Plan: Part 1-Strategic Policies (Nov 2012),
- Policy EM6 Flood Risk Management in Hillingdon Local Plan: Part 1-Strategic Policies (Nov 2012),
- Policy DMEI 10 Water Management, Efficiency and Quality in emerging Hillingdon Local Plan Part 2 Development Management Policies,
- Policy 5.12 Flood Risk Management of the London Plan (March 2016) and
- To be handled as close to its source as possible in compliance with Policy 5.13 Sustainable Drainage of the London Plan (March 2016), and
- Conserve water supplies in accordance with Policy 5.15 Water use and supplies of the London Plan (March 2016).

National Planning Policy Framework (July 2018), and the Planning Practice Guidance (Flood Risk and Coastal Change March 2014).

Further comments:

The applicant has submitted an addendum to the surface water drainage strategy, which includes a Basement Impact Assessment (BIA). The BIA concludes that there will be a negligible increase in groundwater levels as a result of the construction of the basement and states that the retention of the 3m buffer between the basements was predicted to increase groundwater levels further and lead to higher velocities which increases the risks of erosion. The information is considered to be proportionate to the scale of development and is sufficient to remove the objection to the basement. A condition should be placed on the permission to ensure that groundwater monitoring continues and it is recommended, given the information to shown that groundwater flows from north to south, a further monitoring borehole should be installed along the northern site boundary. There should be a requirement for this to be submitted to the Council at 6-monthly intervals, or alternatively provide access to an online data logger.

A surface water management condition should be applied to the permission to secure additional details once the detailed design of the site is developed.

EPU (Noise) Officer:

The following condition shall apply for all external noise from machinery, extract/ ventilation ducting, mechanical gates, etc.

Condition: The external noise level emitted from plant, machinery or equipment at the development hereby approved shall be lower than the lowest existing background noise level by at least 5dBA, by 10dBA where the source is tonal, as assessed according to BS4142:2014 at the nearest and/or most affected noise sensitive premises, with all machinery operating together at maximum capacity.

Reason: To safeguard the amenity of the surrounding area in accordance with policy OE1 of the Hillingdon Unitary Development Plan.

Land Contamination Officer:

A phase 1 Desk Study, including Conceptual Site Model (CSM) and Preliminary Risk Assessment (PRA), was supplied with the application.

Observations:

The phase 1 report identifies a low-moderate risk in terms of potential contamination issues.

Potential sources of contamination at the site are identified as follows:

- electrical sub-stations along the eastern boundary and in the west of the site, along with a potential electrical sub-station off-site to the north west;
- unknown structure and vent pipe in the south eastern corner of the site;
- waste oil tank, drums and containers containing unknown substances in the south east of the site;
- minor vehicle repairs in the south east of the site;
- car washing in the south east of the site;
- current site use as a car park;
- areas of infilling and Made Ground, particularly the historic pond in the east of the site and areas of landfilling in the area surrounding the site; and,
- potential groundwater contamination associated with Heathrow Airport to the south.

The Desk Study report is considered sufficient to satisfy LPA requirements relating to land information concerning former site uses and provision of a preliminary risk assessment.

However, the assessment of land contamination is an iterative process and therefore further details will be required by the LPA. It is therefore recommended that a condition requiring a phase 2 ground investigation is applied which will facilitate further appraisal of land conditions at the site and enable the CSM and PRA to be updated accordingly.

Officer comment:

The officer's recommended condition forms part of the officer's recommendation.

Access Officer:

I have considered the detail of this planning application and the following comments should be attached to any outline planning permission:

1. The proposed plan appears not to include any WC provision for disabled people and at least one accessible unisex toilet should be provided.
2. The accessible toilet should be designed in accordance with the guidance given in Approved Document M to the Building Regulations 2010 (2015 edition).
3. The Equality Act 2010 seeks to protect people accessing goods, facilities and services from discrimination on the basis of a 'protected characteristic', which includes those with a disability. As part of the Act, service providers are obliged to improve access to and within the structure of their building, particularly in situations where reasonable adjustment can be incorporated with relative ease. The Act states that service providers should think ahead to take steps to address barriers that impede disabled people.

Conclusion: Acceptable

Sustainability Officer:

I have no objection to the broad energy strategy but would request the following condition:

Condition

Prior to above ground works, full details of at least 600m² of PV panels to be installed on the roof of the building shall be submitted to and approved in writing by the Local Planning Authority. The PVs shall demonstrate the carbon savings from the 'be green' section of the broad energy strategy (Pavey Engineering, September 2018). The details shall include elevations and final roof plans (not indicative), specifications of the PVs and a sunpath analysis to ensure the panels are free from shading and are located for optimal performance.

The development must proceed in accordance with the approved details unless otherwise agreed in writing by the Local Planning Authority.

Reason

To ensure the development contributes to carbon savings in accordance with Policy 5.2 of the London Plan.

Air Quality Officer:

The proposal is for an office building (World Business Centre 5, Newall Road) and is located within the A4 Corridor Focus Area. The review of the air quality assessment has indicated that the proposal is within a Focus Area, and it is not neutral for transport:

- 1) the proposal is not air quality neutral for transport emissions.
- 2) the proposed development is within a Focus Area.

Upon reviewing the Public Transport Accessibility Level (PTAL) rating for the development using the Transport for London WebCAT service, Highways comments indicated that "the site contains a PTAL rating of 1b which on a scale from 0 (worst) - 6b (best) is deemed poor. It is therefore likely that patrons would be dependent on the private car for journeys to and from the site."

Whereas the application propose 146 parking spaces in the form of a two floor surface level and basement car park, the Councils currently adopted saved Unitary Development Plan (UDP) standard for office use (Use Class B1a) indicates a parking provision of 1 space per 100sqm, the emerging DMT6 policy provides a higher standard with a parking ratio of 1 space per 50-100sqm. This would suggest a maximum parking provision of 258 parking spaces. In the light of the above, a S106 contribution of £152,909 is required towards the implementation and delivery of LBH Air Quality Action Plan to improve air quality in the study area.

In addition, the following conditions will apply:-

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

Reason:

As the application site is within an Air Quality Management Area and to comply with paragraph 124 of the NPPF, policy 7.14 of the London Plan, and policy DMEI 14 of the London Borough of Hillingdon Local Plan (part 2).

Condition Air Quality - Construction and demolition phase

In order to control the dust and emissions from the demolition and construction phases, the Construction Management Plan must be developed in accordance with the Air Quality Management

(IAQM) 'Guidance on the assessment of dust from demolition and construction' and the GLA, Control of Dust and Emissions from Construction and Demolition Supplementary Planning Guidance. All Non-Road Mobile Machinery (NRMM) used during construction must meet Stage IIIA criteria of EU Directive 97/68/EC and must be registered online on the NRMM website at <http://nrmm.london/>. Confirmation of the registration must be submitted to the LPA.

Reason:

To ensure the development reduces and manages its air quality impacts in an air quality management area in accordance with Policy EM8 of the Local Plan.

7. MAIN PLANNING ISSUES

7.01 The principle of the development

Policy A4 of the Hillingdon Local Plan: Part Two - Saved UDP Policies (November 2012) advises that new development directly related to Heathrow Airport should normally be located within its boundary where development that is not directly related to the operation of the airport will be excluded. The policy clarifies that directly related development includes administrative offices. This is re-iterated in emerging policy DMAV 2 of the Hillingdon Local Plan: Part Two - Development Management Policies With Modifications (March 2019) which states that development proposals within the Heathrow Airport boundary will only be supported where, amongst other criteria, they relate directly to airport use or development. The supporting text clarifies that this includes office use. As no objections have been received that challenge the main principle of this emerging policy, significant weight can be attached to it.

The GLA in their Stage 1 Report advise that the site is not located within a designated town centre but it is located within the Heathrow Opportunity Area. As the proposed office use is a town centre use, in the first instance it should be directed to the nearest town centre (either the Hayes or Feltham centres) in accordance with London Plan Policy 4.7 and draft London Plan policy SD7. In addition London Plan and draft London Plan policies also state that large office developments should be located in areas of high public transport accessibility to enable sustainable development. Therefore, to accord with the NPPF, an impact assessment is required to test the impact of the proposal on existing, committed and planned public and private investment in centres in the catchment area of the proposal; and the impact on town centre vitality and viability, including local consumer choice and trade in the town centre and wider area, up to five years ahead. The Stage 1 report goes on to note that London Plan targets for the Heathrow Opportunity Area (which the site sits within) include the delivery of new jobs and therefore the provision of office floor space in this location could be considered appropriate subject to the applicant meeting the tests set out above and addressing all other issues raised in their Stage 1 Report.

The GLA Stage 1 Report does not specifically refer to or consider local plan policies and the GLA will have the opportunity to do so as part of their Stage 2 Assessment. However, officers consider that the effect of Policy A4 and emerging policy DMAV 2 is to create a separate, self-contained market within the airport so that it would not be appropriate to consider whether there is demand for office space in the wider area. This has been the stance of the local authority since the original development plan was adopted in 1998 and this policy stance is well established. The Council's Policy Officer confirms that the principle of development would be in line with the Development Plan, subject to a condition restricting occupancy of the office to users who are directly involved in activities that are related to the operation of Heathrow Airport and therefore, as the proposal accords with the up-to date development plan, in line with Paragraph 86 of the National Planning Policy Framework (2019), a sequential test is not required. The agent in their letter dated 10/9/19 also makes the same argument.

As regards the intended use of the office building, the submitted Planning, Design & Access Statement at paragraph 4.2 advises that:-

'The proposed building is a speculative airport office development that is planned to meet demand for future office accommodation subject, at this time, to a satisfactory assessment of the anticipated commencement of the third runway at Heathrow. Development funding is only likely to be confirmed if either a single airport occupier agreed terms to occupy all, or a significant part, of the planned building or market indicators / third runway progress enabled commencement on a speculative basis. Obtaining outline permission now for such a building helps ensure that there is only a limited delay in meeting the anticipated future demand for airport office accommodation.'

The submitted documentation suggests that the occupier(s) of the proposed building would be airport related to accord with Policy A4, and the demand for such office accommodation would only be likely to increase in the future. A condition, restricting the occupation of the building to airport related companies only in accordance with local policy forms part of the officer's recommendation.

In light of the above mentioned considerations, no objections are raised to the principle of proposal within the Heathrow Airport boundary.

In conclusion to the principle of development, it is considered that contrary to the views expressed in the Mayor's Stage 1 Report, the proposed use does fully comply with the Development Plan and the scheme is acceptable in principle, subject to a condition restricting the use to airport related activities and other planning considerations.

7.02 Density of the proposed development

Not applicable to this commercial development.

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

The application site does not form part of a Conservation Area nor an Area of Special Local Character and it is sufficiently remote from any statutory and/or locally listed building so that their setting would not be adversely affected.

The site is however within the proposed Heathrow Archaeology Priority Zone. Policy BE3 of the Hillingdon Local Plan: Part Two - Saved UDP Policies (November 2012) advises that whenever practicable, sites of archaeological interest are investigated and recorded before new buildings, site works etc. are commenced. This is re-iterated by emerging Policy DMHB 7 of the Hillingdon Local Plan: Part Two - Development Management Policies With Modifications (March 2019) which advises that where disturbance can not be avoided, sites of archaeological interest are investigated and recorded where appropriate, as advised by the Greater London Archaeology Advisory Service (GLAAS).

An archaeological desk-based assessment has been submitted which has been reviewed by GLAAS and they advise that it has been adequately demonstrated that the site has low potential for archaeological remains due to previous development when it was likely that below ground deposits would have been severely truncated by foundations and services and as a result, no further assessment or conditions regarding archaeology are necessary.

Nevertheless, the archaeological assessment did suggest that cartographic studies indicate that there is some potential for remnants of pre-1900s structures to the north of the site within the footprint of the proposed building and that a watching brief may be an appropriate precautionary measure.

This requirement has been specifically included within Condition 4 which requires the development to be carried out in accordance with the submitted documentation. On this basis, the scheme is considered to be compliant with Policy BE3 of the Hillingdon Local Plan: Part Two - Saved UDP Policies (November 2012) and emerging Policy DMHB 7 of the Hillingdon Local Plan: Part Two - Development Management Policies With Modifications (March 2019).

7.04 Airport safeguarding

Policy A6 of the Hillingdon Local Plan: Part Two - Saved UDP Policies (November 2012) advises that permission will not be granted for development which results in a significant increase in the numbers of people residing, working or congregating in the public safety zones around Heathrow or interfere with the safe and efficient operation of Heathrow Airport and emerging Policy DMAV 2 of the Local Plan: Part Two - Development Management Policies with Modifications (March 2019) stipulates that amongst other criteria, development will only be permitted where there is no detrimental impact to the safe and efficient operation of local and strategic transport networks.

NATS and Heathrow Aerodrome Safeguarding have been consulted on this application and both raise an objection/concern as regards the potential impact of the building upon a radar and the implications for safeguarding criteria. However, both advise that these concerns can be overcome with the imposition of conditions and these form part of the officer's recommendation. Other aerodrome safeguarding advice has been attached as informatives.

As such, the scheme is considered to comply with Policy A6 of the Hillingdon Local Plan: Part Two - Saved UDP Policies (November 2012) and emerging Policy DMAV 2 of the Local Plan: Part Two - Development Management Policies with Modifications (March 2019).

7.05 Impact on the green belt

The application site does not form part of, nor is it located close to the Green Belt boundary so that no Green Belt issues are raised by this application.

7.06 Environmental Impact

Not applicable to this application.

7.07 Impact on the character & appearance of the area

Policy BE13 of the Hillingdon Local Plan: Part Two - Saved UDP Policies (November 2012) requires new development to harmonise with the layout and appearance of the existing street scene and other features of the area that are desirable to retain or enhance. Emerging Policy DMHB 11 re-emphasises the importance of good design in new development by A) requiring all new buildings and extensions to be designed to the highest standards, which incorporate principles of good design, such as harmonising with the local context by having regard to the scale, height, mass and bulk of surrounding buildings; using high quality materials and finishes; having internal layouts and design which maximise sustainability and the adaptability of the space; protecting features which contribute positively to the area and providing landscaping that enhances amenity, biodiversity and green infrastructure; B) avoiding adverse impacts on the amenity, daylight and sunlight of adjacent property and open space; C) safeguarding the development potential of adjoining sites and D) making adequate provision for refuse and recycling storage. Emerging Policy DMHB 12 re-emphasises the need for new development to be well integrated with the surrounding area and provides design criteria as to how this would be achieved.

This is an outline application for an office building, which the application forms states will have a GIA of some 16,701m², where all matters have been reserved for subsequent

approval. Illustrative plans have been submitted which show a five storey building with a similar footprint and siting on its site as compared to the adjoining WBC4 building.

There are no objections to the outline proposal for an office building and its illustrative siting and scale in terms of the character of the area as this section of Bath Road is completely commercial in character and the proposed building as shown on the submitted illustrative plan could have an almost identical footprint to that of the adjoining WBC4 building. As depicted on the illustrative plans, the proposed building would have an additional floor as compared to the WBC4 building (although this does have an extensive roof top plant enclosure), although the resultant five storey building would not be as tall as the part six, part seven storey Marriot Hotel immediately opposite the site.

The Planning, Design and Access Statement suggests that the proposed building is intended to reflect the new adjacent office building (WBC4) which itself is a further iteration of the 3 earlier WBC office buildings and similar external materials are likely to be used. At the rear of the building, the landscaping will reflect the existing landscape treatment along the rear of the existing WBC frontage to the A4 (Bath Road) and an area of amenity planting is also proposed to the Newall Road frontage as with the WBC4 building.

The GLA in their Stage 1 Report notes that the plans submitted are only illustrative and that the proposed design is similar to that of the adjoining office building at World Business Centre 4. However, they are of the view that further consideration should be given to the design of the building, particularly in terms of an increased setback of the building's facade from the Bath Road, together with a more diverse and enhanced facade, with improved ground level activation. They consider the entrance to the adjoining WBC4 is unclear and wayfinding is an issue along Bath Road so there is the opportunity to mitigate these elements in the design of WBC5. Also, noting the extent of glazing proposed, an overheating assessment should be provided at reserved matters stage.

The Report goes on to note that as all matters have been reserved, notably external appearance and landscaping, some assessment of the urban design of the scheme will occur at reserved matters stage. However, as the Mayor is not consulted on reserved matters applications, it is important that due consideration is given at this outline stage, with commitments secured through the imposition of relevant conditions and required detail should be provided at this outline planning stage to secure the maximum and minimum parameters of the development.

The report goes on to note that limited detail has been provided in respect of materiality, access (for cyclists, pedestrians and vehicles) and high quality landscaping of both private and publicly accessible areas to enhance the site which should be secured by condition.

The agent's response of 10/9/19 agrees with the sentiments of the GLA and considers the adjoining WBC buildings to be of high quality and that given all matters are reserved for subsequent approval and no objection is made to the proposed maximum height of the building, design matters would be appropriately addressed at reserved matters stage via the imposition of conditions on any outline permission granted.

The proposal is speculative and this does limit the extent to which the parameters and design of the building can be progressed. A condition is attached to restrict the overall size and height of the building and the GLA would have the opportunity to further consider this issue in their Stage 2 response. The need for an overheating assessment has also been conditioned.

It is therefore considered that there would be no objections to this outline proposal for an office building in terms of the character and appearance of the area, with details of its siting, design, materials and landscaping to be approved at reserved matters stage. The proposal is therefore considered to comply with Policy BE13 of the Hillingdon Local Plan: Part Two - Saved UDP Policies (November 2012) and emerging policies DMHB 11 and DMHB 12 of the Local Plan: Part Two - Development Management Policies with Modifications (March 2019).

7.08 Impact on neighbours

There are no nearby residential properties that would be affected by the proposed office development.

7.09 Living conditions for future occupiers

Not applicable to this type of commercial development.

7.10 Traffic impact, Car/cycle parking, pedestrian safety

Policies AM2 and AM7 of the Hillingdon Local Plan: Part Two - Saved UDP Policies (November 2012) advise respectively that proposals for development will be assessed against their contribution to traffic generation and impact on congestion, having regard to the present and potential capacity of public transport and that the traffic generated by proposed developments would need to be accommodated on principal roads without increasing demand along roads or at junctions already used to capacity, not prejudice the free flow of traffic, nor diminish environmental benefits brought about by other road improvement schemes or infiltrate local roads. Policy AM9 supports cycle provision, including the need for cycle storage provision within development schemes and Policy AM14 advises that development should accord with adopted car parking standards.

Policy DMT 1 of the Hillingdon Local Plan: Part Two - Development Management Policies With Modifications (March 2019) re-states that development proposals will be required to meet the transport needs of the development and address its transport impacts in a sustainable manner and to be acceptable, schemes are required to i) be accessible by public transport, walking and cycling; ii) maximise safe, convenient and inclusive accessibility; iii) provide equal access for all people; iv) adequately address servicing requirements and v) have no significant adverse transport or associated air quality and noise impacts on the local and wider environment. Further clarification and criteria are provided by emerging Policy DMT 2.

The Council's Highway Engineer has reviewed the scheme, including the supporting Transport Assessment and advises that the application 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 A4 runs east-west across the borough and links to the A312 via the Parkway roundabout which in turn links to the M4 corridor. Vehicular access is only obtainable from Newall Road which connects via Neptune Road to the Northern Perimeter Road via a signalised junction. All of these roads are privately maintained and under the jurisdiction of Heathrow Airport. The application site has a PTAL score of 1b which is deemed poor and therefore employees will be largely dependent on the private car for their commute.

The Highway Engineer advises that the TRICS (Trip Rate Information Computer System) database was used and a number of comparable sites selected which have been agreed as being representative. The Engineer goes on to note that as the previous Cardinal Point office building has been demolished (the site currently comprises open land which is used by an airport car hire company, which includes car repair facilities), survey data could not be ascertained, so the TRICS database has therefore been applied to the previous buildings floorspace (6,457sqm) to estimate its trip generation. Results suggest the

previous building generated in the region of 308 vehicle movements per day with 40 movements in the AM peak (8:00-9:00) and 38 movements in the PM peak (17:00-18:00). This compares with the proposed office building which will generate in the region of 81 movements during the AM peak (8:00-9:00) and 76 movements in the PM peak (17:00-18:00). This results in an additional 41 movements (AM) and 38 movements (PM). The Highway Engineer considers that overall, trip rates during all peak hours would be expected to be sufficiently absorbed within the existing local road network.

The Council's Highway Engineer advises that although the Council's currently adopted saved Unitary Development Plan (UDP) standard for office use (Use Class B1a) indicates a parking provision of 1 space per 100sqm, the emerging DMT6 policy provides a higher standard with a parking ratio of 1 space per 50-100sqm which with the maximum amount of floor space proposed, would allow a maximum parking provision of 258 parking spaces. The indicative submissions propose 146 parking spaces which represents a parking ratio of 1 space per 88sqm which falls within the emerging DMT6 policy. As such, the Highway Engineer is satisfied that a sufficient quantum of parking can be provided on site.

As regards electric charging points, the London Plan standards require 20% active spaces and a further 20% as passive spaces. Whilst the submissions show 20% of parking (29 spaces) to include active charging points, only 10% (15 spaces) will be deemed as passive spaces. The Highway Engineer requires provision for passive spaces to be amended to 20% via a suitable planning condition. This forms part of the officer's recommendation.

To accord with both the currently adopted UDP standard and the emerging DMT6 Policy, it is required that 10% of parking provision be allocated to blue badge holders. The submissions mention that only 5% (7 spaces) being allocated to disabled users which falls below the required standard. This has been dealt with by recommended condition.

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 7 spaces be accommodated for. This has been confirmed within the Transport Assessment.

The currently adopted Unitary Development Plan (UDP) and emerging Local Plan: Part 2 requires a provision of 1 cycle space per 250sqm of Class B1 floor space which with the maximum amount of floor space, would total a minimum requirement for 52 cycle spaces. It is proposed that a total of 98 spaces be provided to serve the development in its entirety (86 spaces allocated as long stay and 12 spaces allocated as short stay spaces) which accords with the London Plan minimum standards for B1 use. This would represent an overprovision of 46 cycle spaces when compared to the Council's requirement but no objections are raised to this level of provision, providing the cycle parking is both secure and covered.

Originally, the Highway Engineer did raise a concern regarding conflicting vehicle movements depicted at the base of the ramp shown on the indicative plans. A revised indicative plan has now been submitted which removes this conflict.

The Highway Engineer also advises of the need for a final version of the Service and Delivery Plan (a draft is currently supplied as part of the Transport Assessment) to include swept path analysis and a service vehicle management strategy. Also, a full Construction Logistics Plan is required which would need to detail the management of construction traffic (including vehicle types, frequency of visits, expected daily time frames, use of an

on-site banksman, on-site loading/unloading arrangements and parking of site operative vehicles. Both these documents could be secured under a suitable planning condition. This forms part of the officer's recommendation. An interim Travel Plan has also been included within the submissions. The Highway Engineer advises that whilst broadly acceptable, additional 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. The Full Framework Travel Plan should be secured via a Section 106 agreement, together with a £20,000 bond. This again forms part of the officer's recommendation.

The officer also requests that the applicant is required to enter into a Section 278/38 agreement for all highway works required by the Local Planning Authority/TFL to include, but not limited to associated costs and works identified in junction improvement works, resurfacing, etc. This also forms part of the officer's recommendation.

Highways England did initially raise a holding objection to the scheme as further information/clarification was required, mainly involving trip generation and the potential impact of the development on one of the nearest parts of the SRN, namely Junction 4 of the M4.

The GLA in their Stage 1 Report advise that:-

- Further work is required on trip generation and mode share assessment to reflect modal shift to sustainable travel to enable the impact of the development on the highway and on bus capacity to be properly considered, particularly to clarify peak hour trips for each mode to establish a worse case scenario with adjustments made to reflect increasing use of walking, cycling and public transport modes in recent years.
- The proposal should reduce car parking from the 146 spaces proposed to 21 to meet draft London Plan standards for Outer London Opportunity Areas (up to 1 space per 600m² gross internal area) as well as put forward measures to promote Healthy Streets, Vision Zero and sustainable travel (the initial TfL response used the other end of the range, citing 129 spaces (1 space per 100m²) as being the maximum permissible car parking space limit).
- Options to improve crossing facilities in the vicinity of the proposal to improve bus stop accessibility should be explored.
- Cycle parking and shower and changing facilities should be provided to encourage staff to commute by bike which should be secured by condition.
- A travel plan, delivery and servicing plan and construction and logistics plan should also be secured by condition(s).

HAL also advise that they would support an approach where the applicant is required to produce a Transport Plan for the development that demonstrates how it contributes to the relevant requirements of the Airports NPS including those relating to vehicle reduction and increasing public transport use and consider the approach to be consistent with the draft London Plan and the new Mayor's Transport Strategy. They consider that car parking should be assessed in this context, and a reduction in the proposed car parking levels to a provision in line with London Plan standards, at a maximum of 1 space per 100sqm GFA is supported.

The applicant has provided a response to the various highway comments/ concerns raised on this application in their letters dated 12 and 19/7/19. In response to the further information provided, Highways England have now formally withdrawn their objection.

As regards GLA/TfL highway comments, the applicant's Highway Consultants advise that the submitted Transport Statement at paragraph 4.14 does refer to surveys that were undertaken at the previous Amadeus offices at WBC3 to support the TRICS data for the Transport Assessment for the WBC4 office building. Multi-modal surveys were carried out in January and May 2016 to ascertain the likely modal split in terms of trips to the proposed development. The letter goes on to advise that surveys were fairly recent and there is little reason to expect significant changes. However, it is proposed that WBC5 will have a significantly reduced parking standard (WBC3 had a standard of 1 space per 35sqm and WBC5 1 space per 88sqm.) so that vehicular trips are likely to reduce by 40% of the surveyed levels. Also, WBC3 has a smaller floor area and the figures need to increase due to the maximum larger size of WBC5. They also advise that the PTAL of 3 cited by TfL is not high (and conflicts with Hillingdon's assessment of 1b) so there will clearly be the need for adequate parking provision for the scheme to be viable; adjoining development (eg. WBC 1 - 3 has a standard of 1 space per 35m²; WBC 4 - 1 space per 59m²) and surrounding authorities (eg. Spelthorne BC which adjoins Heathrow has a general 1 space per 35m² standard (reducing to 1 space per 50m² in Staines Town Centre Employment Area)) also tend to have more generous parking standards which the proposed office has to compete with and the level of parking complies with Hillingdon's emerging standards. The Local Planning Authority consider the TS submitted and proposed parking levels to accord with adopted and emerging planning policies and subject to conditions and a S106 for a Travel Plan, the proposals accord with relevant policy.

As regards HAL comments, in addition to response above, the applicant advises that the development will be covered by a Travel Plan which aims to reduce reliance on the private car.

The Council's Highway Engineer does not raise objection to the scheme, including the level of parking proposed which at 1 per 88m² is towards the lower end of the range within the emerging parking standards, subject to their recommended conditions and S106 obligations. These form part of the officer's recommendation and therefore it is considered that the scheme complies with Policies AM2, AM9, AM7 and AM14 of the Hillingdon Local Plan: Part Two - Saved UDP Policies (November 2012) and emerging Policies DMT 1 and Policy DMT 2 of the Hillingdon Local Plan: Part Two - Development Management Policies With Modifications (March 2019).

7.11 Urban design, access and security

Design and access issues raised by the proposals have been considered within other relevant sections of the officer's report. As advised by the Metropolitan Police's Secure by Design Officer, a condition has been attached as part of the officer recommendation to ensure that the scheme achieves Secure by Design accreditation.

7.12 Disabled access

Policy 7.2 of the London Plan (March 2016) requires that the principles of inclusive design are applied to new development. Further guidance is provided in the Council's Supplementary Planning Document 'Accessible Hillingdon' (adopted September 2017).

This is an outline application where all matters have been reserved for subsequent approval, with the submitted floor plans being illustrative with little detail.

The submitted Planning, Design and Access Statement does advise that 5% of the car parking spaces would satisfy accessibility standards and that the detailed elements of the design have yet to be decided, with access issues being addressed at the reserved matters stage. However the statement does outline the accessibility guidance and principles that will inform the development to ensure that all features and facilities are as

accessible as possible and outlines the general features that will be employed to promote accessibility such as the provision of at least two passenger lifts.

The Council's Access Officer has reviewed the application and given the outline nature of the proposals, does not raise any objections, although advises of the need to attach a number of comments to any outline planning permission. These are attached as a condition within the officer's recommendation.

7.13 Provision of affordable & special needs housing

Not applicable to this commercial development.

7.14 Trees, landscaping and Ecology

Trees and Landscaping

Policy BE1 of the Hillingdon Local Plan: Part One: Strategic Policies (November 2012) seeks high quality design of the built and external environment, Policy BE35 of the Hillingdon Local Plan: Part Two - Saved UDP Policies (November 2012) seeks a high standard of design, layout and landscaping in major development proposals visible from the main transport links with Heathrow and Policy BE38 advises that new development should retain topographical and landscape features of merit and that new planting and landscaping should be provided wherever it is appropriate. Emerging Policy DMHB 14 of the Hillingdon Local Plan: Part Two - Development Management Policies With Modifications (March 2019) continues to stress the need for appropriate landscaping in development proposals.

There is only a narrow strip of landscaping at the front of the site along the A4 frontage, with two mature street trees in front. There are no TPO's or Conservation Area designations affecting the site.

The Council's Tree/Landscaping Officer advises that in terms of landscape setting, due to their larger footprint resulting in a narrower tree-lined frontage, the recently completed WBC4 building and the current proposal are weaker than the initial three WBC buildings which had a larger 10m plus set back from the A4 Bath Road in an area where the local planning authority has been seeking landscape enhancement along the Bath Road for many years in an attempt to improve the environmental quality of this important 'gateway' road to London from the airport. However, provided that WBC 5 mirrors WBC4 and the same landscape buffer is achieved along the frontage which does provide effective landscaping, there would be no landscape objection, subject to suitable reserved matters and landscape conditions. These form part of the officer's recommendation. The Tree Officer also confirms that it will be capable to implement the construction works without damaging the highway trees.

On this basis, the scheme is considered to comply with Policy BE1 of the Hillingdon Local Plan: Part One: Strategic Policies (November 2012) and Policies BE35 and BE38 of the Hillingdon Local Plan: Part Two - Saved UDP Policies (November 2012).

Ecology

The site has negligible ecological interest. The landscaping scheme which has been reserved for subsequent approval would be capable of providing some enhancement, particularly if native species were utilized where practicable.

7.15 Sustainable waste management

London Plan Policy 5.17 requires adequate provision to be made for refuse and recycling

facilities for new development.

The scheme makes adequate provision for the storage of recycling/waste within a screened enclosure. The Council's Waste Services Manager raises no objections to this provision, subject to details of the design and construction of the waste storage area.

7.16 Renewable energy / Sustainability

Policy 5.2 of the London Plan (March 2016) establishes the energy hierarchy for minimizing carbon dioxide emissions, Policy 5.3 states that the highest standards of sustainable design and construction should be employed, Policy 5.6 requires an assessment of the use of Combined Heat and Power systems, Policy 5.7 seeks to increase the use of renewable energy and Policy 5.9 seeks to address impacts of overheating and excessive heat generation.

An Energy Statement has been submitted in support of the application which advises that with the use of enhanced building materials and energy efficiency measures such as low energy lighting, a 25% reduction of CO2 emissions can be achieved as compared with the 2013 Building Regulations and with 600m2 of photovoltaic panels provided on the roof, a further 10% saving can be achieved to give a 35% policy compliant reduction in CO2 emissions.

The Council's Sustainability Officer has reviewed the information and advises that there is no objection to the broad energy strategy, subject to a recommended PV panel condition. This forms part of the officer's recommendation.

7.17 Flooding or Drainage Issues

The NPPF (February 2019) at paragraph 163 advises that when determining any planning applications, local planning authorities should ensure that flood risk is not increased elsewhere. Policy 5.12 of the London Plan (March 2016) seeks to manage flood risk associated with development and Policy OE8 of the Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012) seeks to ensure that new development incorporates appropriate measures to mitigate against any potential risk of flooding due to surface waters. Policy DME 9 Management of Flood Risk in emerging Hillingdon Local Plan Part 2 - Development Management Policies also requires development proposals to make adequate provision for flood risk mitigation.

A Surface Water Drainage Strategy has been submitted with the application which advises that surface water flooding would be mitigated with the provision of below ground cellular storage tanks located to the south of the office building and situated beneath the proposed basement slab. Attenuated runoff will be pumped to the existing surface water sewer located to the north of the site, subject to TWU and Heathrow Airport approval, discharging at 1l/s.

The Council's Flood and Water Management Officer has reviewed the report and confirms that the site has not been identified to be at risk from flooding and does not lie within a Critical Drainage Area (CDA) as defined by the London Borough of Hillingdon Surface Water Management Plan (SWMP). The officer initially objected to the scheme as the drainage strategy had not provided evidence to show that the most sustainable approaches had been considered for use on this site; the whole water cycle impact had been considered, which includes flood risk management, foul and surface water drainage and water consumption and a Basement Impact Assessment (BIA) had not been submitted to assess the potential risk of groundwater, taking into account the results of the agreed groundwater monitoring to be undertaken on the adjacent development as part of the discharge of condition application (App. No. 71487/APP/2017/1605 refers) and the

omission of the agreed 3m buffer to the east of the basement ramp.

An Addendum has been submitted to the Surface Water Drainage Strategy which includes a justification for the proposed drainage system and also a BIA. The BIA concludes that there will be a negligible increase in groundwater levels as a result of the construction of the extended basement and that the retention of the 3m buffer between the basements was predicted to increase groundwater levels further and lead to higher velocities which could increase the risks of erosion. The Council's Flood and Water Management Officer advises that the information is considered to be proportionate to the scale of development and is sufficient to remove their objection to the basement. A condition should be placed on the permission to ensure that groundwater monitoring continues and it is recommended, given the information to shown that groundwater flows from north to south, a further monitoring borehole should be installed along the northern site boundary. There should be a requirement for this to be submitted to the Council at 6-monthly intervals, or alternatively provide access to an online data logger. A surface water management condition should be applied to the permission to secure additional details once the detailed design of the site is developed.

7.18 Noise or Air Quality Issues

Policies 7.14 and 7.15 of the London Plan (March 2016) requires development proposals amongst other criteria, to be at least 'air quality neutral' and to manage noise respectively and Policies OE1 and OE3 of the Hillingdon local Plan: Part Two - Saved UDP Policies (November 2012) advise that planning permission will not normally be granted for uses and structures that are likely to be detrimental to the area or amenities of surrounding properties due to amongst other criteria, noise and vibration or the emission of dust, smell or other pollutants unless sufficient mitigation measures are utilised.

Noise Issues

The Council's EPU (Noise) Officer advises that this scheme does not raise any noise issues, subject to the imposition of a condition to control the noise from machinery, extract/ventilation ducting, mechanical gates, etc. Whilst this request is noted, given that there are no residential occupants within the vicinity of the site, the condition is not deemed to be necessary.

Air Quality Issues

The application has been supported by an Air Quality Assessment. The Council's Environmental Protection (Air Quality) Officer has reviewed the document and advises that the scheme is within an Air Quality Focus Area and the scheme is not air quality neutral. A contribution of £152,909 is therefore required, based upon the maximum number of car parking spaces, for the implementation and delivery of an Air Quality Action Plan to improve air quality in the study area, together with recommended low emission strategy and Construction Management Plan conditions. These form part of the officer's recommendation.

7.19 Comments on Public Consultations

No comments have been received from neighbouring properties.

7.20 Planning obligations

Policy R17 of the Council's Unitary Development Plan states that: 'The Local Planning Authority will, where appropriate, seek to supplement the provision of recreation open space, facilities to support arts, cultural and entertainment activities, and other community, social and education facilities through planning obligations in conjunction with other

development proposals'.

A S106 Agreement would be needed to secure the following:-

- (i) The applicant is required to enter into a Section 278/38 agreement for all highway works required by the Local Planning Authority/TFL to include, but not limited to associated costs and works identified in junction improvement works, resurfacing, etc.
- (ii) A full travel plan with an associated £20,000 bond,
- (iii) £152,909 contribution towards air quality mitigation,
- (iv) Employment Strategy and Construction Training - either a contribution equal to the formula within the Council Planning Obligations Supplementary Planning Document (SPD) 2014, or an in-kind training scheme equal to the financial contribution delivered during the construction period of the development. Details shall be in accordance with the Council Planning Obligations SPD with the preference being for an in-kind scheme to be delivered.
- (v) Project Management & Monitoring Fee: A financial contribution equal to 5% of the total cash contributions.

The proposal is Mayoral and Council CIL liable.

7.21 Expediency of enforcement action

No enforcement issues are raised by this application.

7.22 Other Issues

Heathrow Airport Car Parking:

The issue of Heathrow Airport car parking was considered in great detail at the Terminal 5 planning Inquiry. In his decision to permit Terminal 5 in November 2001 the Secretary of State placed a condition (A85) upon the permission limiting the number of on-airport car parking spaces within BAA's controlled main car parks to 42,000 (including a maximum of 17,500 staff spaces). The condition relates to specifically allocated sites owned or controlled by the airport operator, ie. passenger car parks and to the main airport related employee car parks (mainly HAL and airport workers), but excludes car parks leased to airport tenants such as hotels, car hire, warehouses or offices. The car park cap imposed by the T5 decision does not relate to the WBC5 building parking as it will be car parking leased to an airport tenant.

As the proposed car park would be wholly used by staff working at the WBC5 building, it would be classified as "tenanted" parking for the purposes of defining car parking within the airport boundary. As such, Heathrow's car parking cap does not apply. It is also noted that HAL have not objected to the proposal on the grounds that it would impinge upon the car park cap. Accordingly, there is no conflict with the Heathrow Airport T5 car park cap condition.

Land Contamination:

The application is supported by a Geoenvironmental and Geotechnical Desktop Study which has been reviewed by the Council's Environmental Health Unit (Land Contamination) Officer. The officer advises that although this is a desk top study and no survey information is provided such as borehole analysis, the desk study is sufficiently detailed to support the application.

The officer advises that the proposal is acceptable, subject to a condition which forms part of the officer's recommendation.

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

This outline scheme for a new office building within the Heathrow boundary is considered to be acceptable in principle, subject to a condition restricting the occupation of the building to those whose activities are directly related to the operation of Heathrow Airport. Although the outline proposal reserves all matters for subsequent approval, indicative plans have been submitted, together with associated supporting documentation. Further information concerning highway impacts has also been submitted to deal with Highway England's objection to the scheme and other comments received, including those of the Mayor's Stage 1 Report. Highway England are satisfied with the additional information provided and have withdrawn their objection. The GLA will assess the LPA's analysis of the application and the further information provided in their Stage 2 Report.

NATS and Heathrow Aerodrome Safeguarding advise that the application is acceptable in relation to safeguarding criteria, subject to conditions.

The Council's specialist officers also considered the scheme acceptable, subject to conditions and various S106 obligations.

The requested conditions are included within the officer's recommendation, together with the S106 obligations which are considered appropriate and commensurate with the scale of development.

The application is therefore recommended for approval.

11. Reference Documents

National Planning Policy Framework (February 2019)

Planning Practice Guidance (March 2014)

London Plan (March 2016)

Emerging London Plan

Hillingdon Local Plan: Part One: Strategic Policies (November 2012)

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

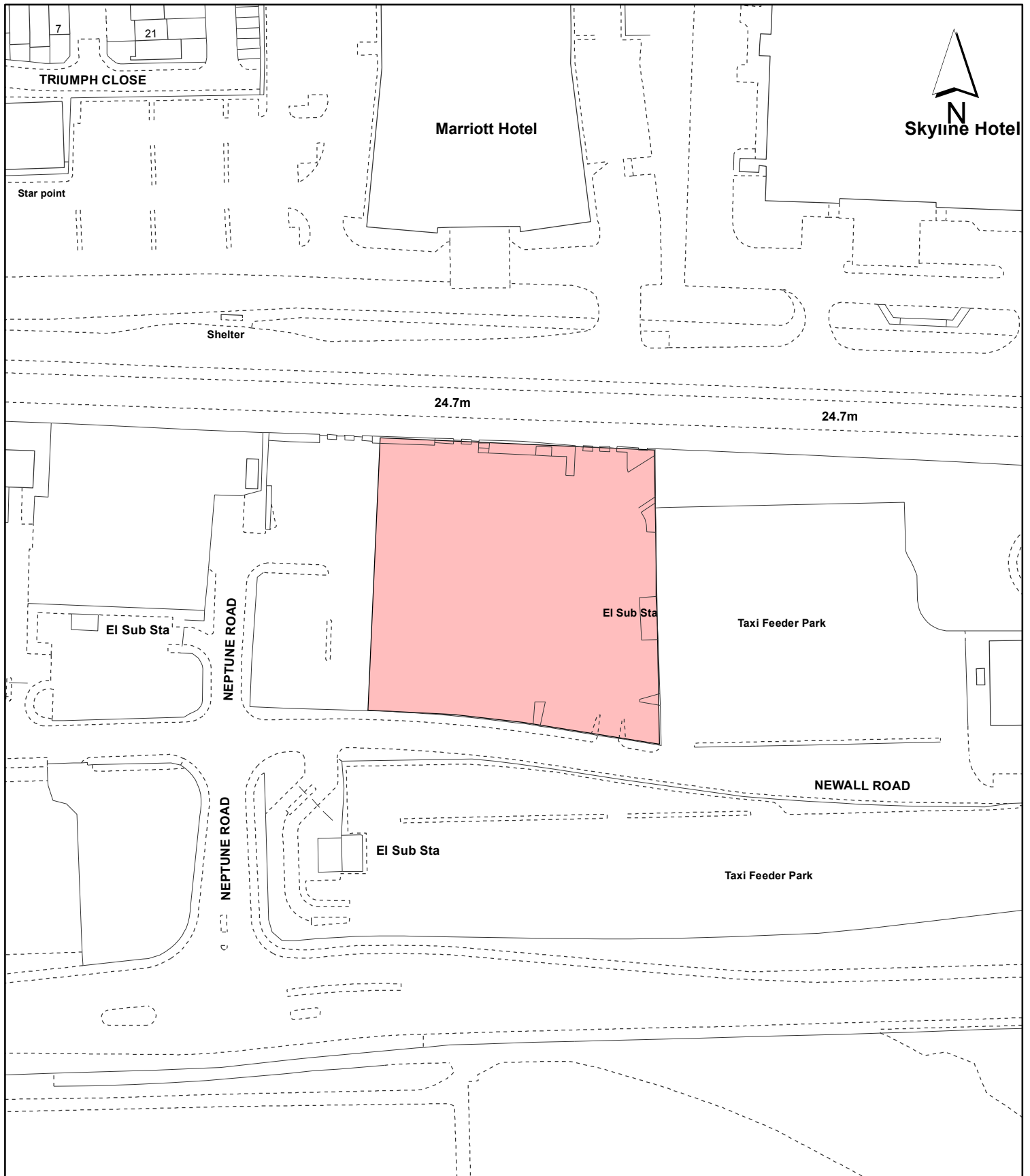
Hillingdon Local Plan: Part Two - Development Management Policies With Modifications (March 2019)

Hillingdon Local Plan: Part Two - Site Allocations and Designations (March 2019)

HDAS: 'Accessible Hillingdon'

Contact Officer: Richard Phillips

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Notes:

 Site boundary

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Site Address:
**World Business Centre
 5 Newall Road
 Heathrow Airport**

Planning Application Ref:
74351/APP/2018/4098

Planning Committee:
Major

Scale:
1:1,250

Date:
November 2019

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