

<b>Item No.</b>	<b>Report of the Head of Planning, Transportation and Regeneration</b>
<b>Address</b>	DOUGLAS WEBB HOUSE, 546 SIPSON ROAD SIPSON
<b>Development:</b>	Redevelopment including the demolition of the existing building and the erection of a new building ranging between 1 and 6 storeys to provide a 302-bedroom hotel (Use Class C1) with basement and ancillary facilities including restaurant, car parking, coach parking, hard and soft landscaping and associated works.
<b>LBH Ref Nos:</b>	11068/APP/2020/1586
<b>Drawing Nos:</b>	Preliminary Risk Assessment ref: 1921271-R01 (00) PP1659 - 1 1025-P-1000 Rev. A Transport Statement ref: 1802-01 TS03A 1025-P-0001 Rev. A Basement Impact Assessment dated May 2020 1025-P-0101 Rev. A 1025-P-1017 Rev. D 1025-P-1030 Rev. C 1025-P-1031 Rev. C 1025-P-3010 Rev. B 1025-P-3000 Rev. D 1025-P-3001 Rev. D 1025-P-2100 Rev. D 1025-P-2101 Rev. D 1025-P-0100 Rev. A 1025-P-5000 Rev. B 1025-P-5001 Rev. B 1025-P-1001 Rev. D Tree Survey and AIA - Ref: JSL3065_780A JSL3065 704 Archaeological Desk Based Assessment BREEAM Pre-Assessment dated May 2020 Daylight and Sunlight Assessment dated May 2020 Energy Statement Input Table Energy Statement dated May 2020 Ecological Appraisal Phase 1 Bird Hazard Management Plan dated May 2020 Design and Access Statement Rev. B Amended Fire Report 0137_101 0137_100 Rev. B Transport Note Ref: 1802-01/TN/05 Air Quality Assessment dated July 2020 1025-P-1012 Rev. D 1025-P-1013 Rev. D 1025-P-1014 Rev. D 1025-P-1015 Rev. E 1025-P-1016 Rev. E

1025-P-1020 Rev. D  
1025-P-1010 Rev. E  
1025-P-1011 Rev. E  
1802-01 SP14  
Noise Impact Assessment dated May 2020  
1802-01 SP12  
1802-01 SP13  
1802-01 SP15  
1802-01 SP16  
1802-01 SP17  
Framework Travel Plan dated May 2020  
Assessment of Visual Impact on Green Belt dated May 2020  
Modelled Views from Green Belt  
Landscaping Approach Rev. C  
Overshadowing Addendum Ref: DS/RM/11409  
0137\_101 Rev. A  
Supplementary Letter dated 24 July 2020

<b>Date Plans Received:</b>	22/05/2020	<b>Date(s) of Amendment(s):</b>	06/07/2020
<b>Date Application Valid:</b>	22/05/2020		31/07/2020
			22/05/2020

## 1. SUMMARY

The application seeks planning permission for the redevelopment including the demolition of the existing building and the erection of a new building ranging between 1 and 6 storeys to provide a 302-bedroom hotel (Use Class C1) with basement and ancillary facilities including restaurant, car parking, coach parking, hard and soft landscaping and associated works.

It is considered that there are no objections in principle to the proposed hotel on this site. The proposed design seeks to respond to the context of the site. The scale and massing along the M4 spur replicates the context of the eastern part of the site. The proposed development is 2-storeys where it adjoins residential development to the western part of the site.

This application overcomes the issue which was raised by the Planning Inspector regarding the impact of the development on neighbouring residents located to the west and north-west of the site by reducing the scale and footprint of the proposed development. The application proposal, particularly along the western boundary of the site is confined to the footprint of the existing buildings currently on site. On this basis it is considered this proposal would not result in harm to neighbouring amenity.

Subject to recommended conditions and planning obligations, the application is considered acceptable in principle and with regard to design, access, security, highways, energy, ecology, flooding, landscaping, waste, contamination and air quality. For the reasons outlined within this report, 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:**

1. That the application be referred to the Mayor under Article 5 of the Town and Country Planning (Mayor of London) Order 2008.
2. That the Council enter into a legal agreement with the applicant under Section 106/Deed of Variation of the Town and Country Planning Act 1990 (as amended) to secure the following:

1. To secure all necessary highway works including written agreement from the Local Planning Authority on the final proposed public realm improvements to the pedestrian environment.

2. Parking Management Plan (including advising customers prior to their booking whether or not access to on-site parking is available and reserved or not).

3. The provision of a Travel Plan, including a bond of £20,000, which shall incorporate Sustainable Transport Measures such as the Hoppa Bus Service.

4. 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. Securing an Employment/Training Strategy Agreement is Council's priority. A financial Contribution will only be accepted in exceptional circumstances.

5. Hospitality Training contributions or an in-kind scheme.

6. Air Quality Contribution: in line with the SPD and given the site is located in an air quality management area then a contribution in the sum of £54,946.

7. Carbon Off-set Contribution of £1800 for every tCO<sub>2</sub>/annum that is below the zero carbon target.

8. Project Management and Monitoring Fee: a financial contribution equal to 5% of the total cash contributions towards the management and monitoring of the resulting agreement.

C) That the applicant meets the Council's reasonable costs in the preparation of the Section 106 agreement/Deed of Variation and any abortive work as a result of the agreement not being completed.

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

E) That if any of the heads of terms set out above have not been agreed and the Section 106 Agreement has not been finalised before the 30 September 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 development has failed to secure obligations relating to a travel plan, public transport improvements, hospitality, air quality and construction training. Accordingly, the proposal is contrary to Policy DMT 2, DMT 6, DMCI 7, DMEI 14.'

**F) 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 Secretary of State not calling in the application and on completion of the legal agreement under Section 106 of the Town and Country Planning Act 1990 and other appropriate powers with the applicant.**

**G) That if the application is approved, the following conditions be attached:-**

**1 COM3 Time Limit**

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

**REASON**

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

**2 COM4 Accordance with Approved Plans**

The development hereby permitted shall not be carried out except in complete accordance with the details shown on the submitted plans and documents listed below:

- 1025-P-0001 Rev. A
- 1025-P-0101 Rev. A
- 1025-P-1000 Rev. A
- 1025-P-1001 Rev. D
- 1025-P-1010 Rev. E
- 1025-P-1011 Rev. E
- 1025-P-1012 Rev. D
- 1025-P-1013 Rev. D
- 1025-P-1014 Rev. D
- 1025-P-1015 Rev. E
- 1025-P-1016 Rev. E
- 1025-P-1017 Rev. D
- 1025-P-1020 Rev. D
- 1025-P-1030 Rev. C
- 1025-P-1031 Rev. C
- 1025-P-2100 Rev. D
- 1025-P-2101 Rev. D
- 1025-P-3000 Rev. D
- 1025-P-3001 Rev. D
- 1025-P-3010 Rev. B
- 1025-P-5000 Rev. B
- 1025-P-5001 Rev. B

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0137\_100 Rev. B

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0137\_101 Rev. A and shall thereafter be retained/maintained for as long as the development remains in existence.

**REASON**

To ensure the development complies with the provisions Hillingdon Local Plan: Part 1 (November 2012) and Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020) and the London Plan (2016).

**3 COM5 General compliance with supporting documentation**

The development hereby permitted shall not be occupied until the following has been

completed in accordance with the specified supporting plans and/or documents:

Preliminary Risk Assessment ref: 1921271-R01 (00)  
Transport Statement ref: 1802-01 TS03A  
Basement Impact Assessment dated May 2020  
Tree Survey and AIA - Ref: JSL3065\_780A  
Archaeological Desk Based Assessment  
BREEAM Pre-Assessment dated May 2020  
Daylight and Sunlight Assessment dated May 2020  
Energy Statement Input Table  
Energy Statement dated May 2020  
Ecological Appraisal Phase 1  
Bird Hazard Management Plan dated May 2020  
Amended Fire Report  
Design and Access Statement Rev. B  
Transport Note Ref: 1802-01/TN/05  
Air Quality Assessment dated July 2020  
Noise Impact Assessment dated May 2020  
Framework Travel Plan dated May 2020  
Assessment of Visual Impact on Green Belt dated May 2020  
Modelled Views from Green Belt  
Energy Statement Addendum dated July 2020  
Landscaping Proposal Rev. C  
Overshadowing Addendum ref: DS/RM/11409  
Agent's Response to the GLA dated 24 July 2020

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

#### REASON

To ensure that the development complies with the objectives of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020).

#### **4 COM7 Materials (Submission)**

Prior to above ground works, details of all external materials and external surfaces shall be 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 the depth of window reveals, make, product, type, colour, photographs and images.

#### REASON

To ensure that the development presents a satisfactory appearance in accordance with Policy DMHB 11 of the Hillingdon Local Plan Part 2 Development Management Policies (2020).

#### **5 COM15 Verification of SuDs report**

Prior to occupation a Verification Report demonstrating that the approved drainage/SuDS measures have been fully implemented shall be submitted to the Local Planning Authority for approval in writing. This report must include:

- As built drawings of the sustainable drainage systems including level information (if appropriate);
- Photographs of the completed sustainable drainage systems throughout the

construction process;

- Any relevant certificates from manufacturers/suppliers of any drainage features; and
- A confirmation statement of the above signed by a chartered engineer.

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

#### REASON

To ensure that surface water run off is controlled to ensure the development does not increase the risk of flooding contrary to: Policy EM6 Flood Risk Management in Hillingdon Local Plan: Part 1- Strategic Policies (Nov 2012), Policy DMEI 10 of the Local Plan: Part 2 Development Management Policies (2020), Policies 5.12, 5.13 and 5.15 of the London Plan (2016), National Planning Policy Framework (2019), and the Planning Practice Guidance (March 2014).

### **6 NONSC SuDs Management and Maintenance**

Prior to above ground works, a management and maintenance plan shall be submitted to the Local Authority for approval in writing. This should cover the lifetime of the development (through temporary works) of arrangements to secure the operation of the scheme throughout its lifetime.

- Including appropriate details of Inspection regimes;
- Appropriate performance specification;
- Remediation and timescales for the resolving of issues; and
- Where there is overland flooding proposed, the plan should include the appropriate actions to ensure the safety of the users of the site should that be required.

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

#### REASON

To ensure that surface water run off is controlled to ensure the development does not increase the risk of flooding contrary to: Policy EM6 Flood Risk Management in Hillingdon Local Plan: Part 1- Strategic Policies (Nov 2012), Policy DMEI 10 of the Local Plan: Part 2 Development Management Policies (2020), Policies 5.12, 5.13 and 5.15 of the London Plan (2016), National Planning Policy Framework (2019), and the Planning Practice Guidance (March 2014).

### **7 COM15 Sustainable Water Management**

Prior to above ground works, 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 5.15 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 DMEI 10 of the Hillingdon Local Plan Part 2 (2020) and Policy 5.12 of London Plan (2016) .

### **8 COM31 Secured by Design**

The building and car park hereby approved shall achieve 'Secured by Design' accreditation awarded by the Hillingdon Metropolitan Police Crime Prevention Design Adviser (CPDA) on behalf of the Association of Chief Police Officers (ACPO). No building shall be occupied until accreditation has been achieved.

#### REASON

In pursuance of the Council's duty under section 17 of the Crime and Disorder Act 1998 to consider crime and disorder implications in exercising its planning functions; to promote the well being of the area in pursuance of the Council's powers under section 2 of the Local Government Act 2000 to ensure the development provides a safe and secure environment in accordance with Hillingdon Local Plan Part 2 policy DMHB 15 and Policies 7.1 and 7.3 of the London Plan (2016).

### **9 NONSC Energy**

Prior to above ground works, a detailed energy assessment shall be submitted to and approved in writing by the Local Planning Authority. The energy assessment shall demonstrate how the development will achieve a minimum 35% reduction in CO2 through the application of the London Plan energy hierarchy, Be Clean, Be Lean and Be Green in combination. An offsite contribution will be required only on the submission and agreement with the Local Planning Authority of suitable justification why the 35% target cannot be achieved on site. The assessment shall provide full details of the measures to be incorporated into the development and their impact on the baseline development (2013 building regulation compliance) in terms of energy (KwHr) and CO2 (KgCo2).

The assessment shall provide full details of the plans and specifications of any low and zero carbon technology to be used including, for example, roof plans and elevations if PVs are selected. The assessment shall clearly set out any shortfall in emissions below the 35% target. Thereafter, the development must proceed and be operated in accordance with the approved plans and specifications.

#### REASON

To ensure that the development incorporates appropriate energy efficiency measures in accordance with Policy 5.2 of the London Plan (2016) and Policy DMEI 2 of the Local Plan: Part 2 - Development Management Policies(2020).

### **10 NONSC Low Emissions Strategy**

Prior to above ground works, details of a clear and effective low emission strategy (LES) shall be submitted to and approved in writing by the Local Planning Authority. The strategy shall include, but not be restricted to:

- a) Be clean by design as per the London Sustainable Design and Construction Supplementary Planning Guidance,
- b) provision of an electric vehicle fast charging bay. This is to be implemented as part of the proposal with the minimum requirements as per the London Plan.
- c) a clear and effective strategy, aligned with the Travel Plan, to encourage staff and guest of the site to

- i) use public transport;
- ii) cycle/walk to work where practicable;
- iii) enter car share schemes;
- iv) enter cab share schemes to and from the airport and or home/work locations;
- iv) purchase and drive to work zero emission vehicles; and
- v) provision of an electric vehicle fast charging bay.

Measures to support and encourage modal shift, will include but be not restricted to incentives for residents to use public transport to reduce their car ownership. The measures in the agreed scheme shall be maintained throughout the life of the development.

#### REASON

As the application site is within an Air Quality Management Area and to reduce the impact on air quality in accordance with Policy EM8 of the Hillingdon Local Plan: Part One - Strategic Policies (November 2012), Policy DMEI 14 of the Hillingdon Local Plan: Part Two - Development Management Policies (January 2020), London Plan 2016 Policy 7.14, and paragraph 170 of the National Planning Policy Framework (2019).

#### **11 NONSC Archaeology**

No demolition or development shall take place until a stage 1 written scheme of investigation (WSI) has been submitted to and approved by the local planning authority in writing. For land that is included within the WSI, no demolition or development shall take place other than in accordance with the agreed WSI, and the programme and methodology of site evaluation and the nomination of a competent persons or organisation to undertake the agreed works.

If heritage assets of archaeological interest are identified by stage 1 then for those parts of the site which have archaeological interest a stage 2 WSI shall be submitted to and approved by the local planning authority in writing. For land that is included within the stage 2 WSI, no demolition/development shall take place other than in accordance with the agreed stage 2 WSI which shall include:

- A. The statement of significance and research objectives, the programme and methodology of site investigation and recording and the nomination of a competent person(s) or organisation to undertake the agreed works;
- B. Where appropriate, details of a programme for delivering related positive public benefits; and
- C. The programme for post-investigation assessment and subsequent analysis, publication & dissemination and deposition of resulting material. this part of the condition shall not be discharged until these elements have been fulfilled in accordance with the programme set out in the stage 2 WSI.

#### REASON

To protect and the archaeological interests of site in accordance with Policy DMHB 7 of the Local Plan: Part Two - Development Management Policies (2020), policy 7.18 of the London Plan (2016) and para 189 of the NPPF (2019).

#### **12 COM10 Tree to be retained**

Trees, hedges and shrubs shown to be retained on the approved plan shall not be damaged, uprooted, felled, lopped or topped without the prior written consent of the Local Planning Authority. If any retained tree, hedge or shrub is removed or severely damaged during construction, or is found to be seriously diseased or dying another tree, hedge or shrub shall be planted at the same place or, if planting in the same place would leave the new tree, hedge or shrub susceptible to disease, then the planting should be in



a position to be first agreed in writing with the Local Planning Authority and shall be of a size and species to be agreed in writing by the Local Planning Authority and shall be planted in the first planting season following the completion of the development or the occupation of the buildings, whichever is the earlier. Where damage is less severe, a schedule of remedial works necessary to ameliorate the effect of damage by tree surgery, feeding or groundwork shall be agreed in writing with the Local Planning Authority. New planting should comply with BS 3936 (1992) 'Nursery Stock, Part 1, Specification for Trees and Shrubs'

Remedial work should be carried out to BS 3998:2010 'Tree work - Recommendations' and BS 4428 (1989) 'Code of Practice for General Landscape Operations (Excluding Hard Surfaces)'. The agreed work shall be completed in the first planting season following the completion of the development or the occupation of the buildings, whichever is the earlier.

#### REASON

To ensure that the trees and other vegetation continue to make a valuable contribution to the amenity of the area in accordance with Policy DMHB 14 of the Hillingdon Local Plan Part 2 (2020) and to comply with Section 197 of the Town and Country Planning Act 1990.

#### **13 COM8 Tree Protection**

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

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

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

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

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

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

2.b No materials or plant shall be stored;

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

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

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

3. Where the arboricultural method statement recommends that the tree protection measures for a site will be monitored and supervised by an arboricultural consultant at key stages of the development, records of the site inspections / meetings shall be submitted to the Local Planning Authority.

#### REASON

To ensure that trees and other vegetation can and will be retained on site and not damaged during construction work and to ensure that the development conforms with

policy DMHB 14 of the Hillingdon Local Plan Part 2 (2020)

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

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

1. Details of Soft Landscaping

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

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

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

2. Details of Hard Landscaping

2.a Refuse Storage

2.b Cycle Storage for 32 spaces and changing and shower facilities alongside long stay cycle parking spaces.

2.c Means of enclosure/boundary treatments

2.d Car Parking Layouts (including demonstration that 16 parking spaces are served by active electrical charging points, 71 passive provision and 8 wheelchair accessible parking bays and 4 motorcycle parking spaces)

2.e Hard Surfacing Materials

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 DMHB 4, DMHB 11, DMHB 12, DMHB 14 and DMT 6 of the Local Plan: Part 2 - Development Management Policies (2020) and Policies 5.11 and 5.17 of the London Plan (2016).

**15 NONSC Car Parking Management**

The car parking facilities provided at the hotel shall be used by hotel staff, guests and residents only and strictly for the duration of their stay at the hotel or occupancy. Prior to occupation of the hotel, a car parking management strategy shall be submitted to and approved in writing by the Local Planning Authority in order to demonstrate how this will be managed and to ensure the efficient operation of the car park, especially at peak demand periods. The approved strategy shall be implemented as soon as the hotel is brought into use and the strategy shall remain in place thereafter. Any changes to the strategy shall be agreed in writing by the Local Planning Authority.

**REASON**

The mitigate against the use of the site for long or short stay parking for Heathrow Airport passengers is directly related to the operation of Heathrow Airport in compliance with Policy T6 of the Local Plan: Part Two (2020).

**16 NONSC External Lighting**

No external lighting shall be installed on site unless details of such lighting, including the intensity of illumination and predicted lighting contours, have been first submitted to, and approved in writing by, the Local Planning Authority prior to first occupation/use of the site. Thereafter, the scheme shall be retained and maintained in good working order for the lifetime of the development.

**REASON**

To satisfactorily protect the character and appearance of the area and the residential amenities of nearby occupiers in compliance with Policies DMHB 11, DMHB 12 and DMHB 14 of the Local Plan: Part 2 - Development Management Policies (2020).

**17 NONSC Green Roof**

Notwithstanding the plans hereby approved, details of the green roofs (including details of the species to be planted/seeded) shall be submitted to and approved in writing by the Local Planning Authority prior to any works commencing. The green roofs shall:

- a) form biodiversity-based roofs with extensive substrate bases (depth 80-150mm);
- b) cover all the areas of flat roof on these dwellings; and
- c) be planted/seeded with an agreed mix of species within the first planting season following the practical completion of the building works.

The development shall be carried out strictly in accordance with the details so approved, shall be maintained as such thereafter, and no change therefrom shall take place without the prior written consent of the Local Planning Authority.

**REASON**

In order to ensure the development undertakes reasonable measures to take account of biodiversity and the water environment in accordance with Policy DMEI 1 of the Local Plan: Part 2 - Development Management Policies (2020).

**18 OM19 Construction Management Plan**

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

- (i) The phasing of development works.
- (ii) The hours during which development works will occur (please refer to informative I15 for maximum permitted working hours).
- (iii) A programme to demonstrate that the most valuable or potentially contaminating materials and fittings can be removed safely and intact for later re-use or processing.
- (iv) Measures to prevent mud and dirt tracking onto footways and adjoining roads (including wheel washing facilities).
- (v) Traffic management and access arrangements (vehicular and pedestrian) and parking provisions for contractors during the development process (including measures to reduce the numbers of construction vehicles accessing the site during peak hours).
- (vi) Measures to reduce the impact of the development on local air quality and dust through minimising emissions throughout the demolition and construction process.
- (vii) The storage of demolition/construction materials on site.

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

## REASON

To safeguard the amenity of surrounding areas and manage highways impacts in accordance with Policies DMHB 11, DMT 2 and DMEI 14 of the Hillingdon Local Plan: Part Two - Development Management Policies (2020).

### **19 NONSC Delivery and Servicing**

Delivery and servicing may only take place between 08:00 to 18:00 Monday to Friday and 10:00 to 13:00 on Saturday and Sundays.

## REASON

To satisfactorily protect the character and appearance of the area and the residential amenities of nearby occupiers in compliance with Policies DME 5 and DMHB 11 of the Local Plan: Part 2 - Development Management Policies (2020).

### **20 NONSC Noise Levels**

Prior to above ground works, details shall be submitted to and approved in writing by the Council, of the external noise level emitted from plant/ machinery/ equipment and mitigation measures as appropriate. The measures shall ensure that the external noise level emitted from plant, machinery/ equipment will be lower than the lowest existing background noise level by at least 5dBA, by 10 dBA 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. Thereafter, Prior to use, all machinery, plant or equipment including any extract/ ventilation system and ducting at the development shall be mounted with proprietary anti-vibration isolators and fan motors shall be vibration isolated from the casing and adequately silenced and maintained as such.

## REASON

To ensure that the amenity of the occupiers of the proposed development is not adversely affected by road traffic and other noise in accordance with Policy EM8 of the Hillingdon Local Plan: Part One - Strategic Policies (November 2012) and Policy DMHB 11 of the Hillingdon Local Plan Part Two - Development Management Policies (January 2020).

### **21 RES17 Sound Insulation**

Prior to the commencement of development, a sound insulation and ventilation scheme for protecting the proposed development from road traffic, rail traffic, air traffic and other noise has been submitted to and approved in writing by the Local Planning Authority. The scheme shall meet an acceptable internal noise design criteria as specified in BS8233:2014 for internal rooms and external amenity areas. Thereafter, the scheme shall be implemented and maintained in full compliance with the approved measures.

## REASON

To ensure that the amenity of the occupiers of the proposed development is not adversely affected by noise in accordance with Policy EM8 of the Hillingdon Local Plan: Part One - Strategic Policies (November 2012), Policies DMAV 2 and DMAV 3 of the Hillingdon Local Plan Part Two - Development Management Policies (January 2020) and London Plan (2016) Policy 7.15.

### **22 NONSC Fire Strategy**

The principles of the submitted Fire Strategy Report shall be implemented on site in conjunction with a suitably qualified consultant. Thereafter the development shall not be carried out other than in accordance with the approved details.

## REASON

To ensure that the development meets Fire Safety Standards in accordance with policy D12 of the draft London Plan (Intend to Publish version 2019).

### **23 NONSC NRMM register**

1. No development shall commence until proof of the registration in GLA's database ([nrmm.london/nrmm/about/what-nrmm-register](http://nrmm.london/nrmm/about/what-nrmm-register)) and compliance with the London's Low Emission Zone for non-road mobile machinery requirements is submitted to and approved in writing by the Local Planning Authority.
2. The London's Low Emission Zone for non-road mobile machinery to comply with the standards set out at Supplementary Planning Guidance 'The Control of Dust and Emissions from Construction and Demolition'.
3. This will apply to both variable and constant speed engines for both NOx and PM. These standards will be based upon engine emissions standards set in EU Directive 97/68/EC and its subsequent amendments.

## REASON

In compliance with the London's Low Emission Zone for non-road mobile machinery as per requirements as of 1st September 2015, and London Plan Supplementary Planning Guidance 'The Control of Dust and Emissions from Construction and Demolition' (2014).

### **24 NONSC Land Contamination**

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

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

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

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

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

(iv) No contaminated soils or other materials shall be imported to the site. All imported soils for landscaping purposes shall be clean and free of contamination. Before any part

of the development is occupied, all imported soils shall be independently tested for chemical contamination, and the results of this testing shall be submitted and approved in writing by the Local Planning Authority. All soils used for gardens and/or landscaping purposes shall be clean and free of contamination.

#### REASON

To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems and the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors in accordance with Hillingdon Local Plan: Part 2 (January 2020) Policies - DMEI 11: Protection of Ground Water Resources and DMEI 12: Development of Land Affected by Contamination.

#### **25           A20           Accessibility**

Prior to above ground works, fire evacuation lifts and associated provisions should be appropriately designed and submitted to the local planning authority for their agreement in writing.

#### REASON

To ensure that people with disabilities have adequate access to the development in accordance with Policy DME 5 of the Hillingdon Local Plan: Part Two Saved Development Management Policies (2020).

#### **26           COM26           Ecology**

Prior to above ground works, an ecological protection and enhancement strategy shall be agreed in writing with the Local Planning Authority. The strategy shall identify the measures necessary to protect the current wildlife on site, through trapping and translocation, and/or through the use of artificial refugia to move wildlife away from the construction areas. The strategy shall also include full details of the enhancement measures that will be incorporated into the development to provide features of wildlife value; these measures shall include a new water feature, bat and bird boxes and areas within the landscape dedicated to protecting and enhancing opportunities for wildlife (this area should be of a sufficient size commensurate with areas lost to the development). The development must proceed in accordance with the approved strategy and thereafter retained as such.

#### REASON

In order to encourage a wide diversity of wildlife on the existing semi-natural habitat of the site in accordance with policy DMEI 7 of the Hillingdon Local Plan Part 2 (2020). and Policy 7.19 of the London Plan (2016) .

### **INFORMATIVES**

#### **1           I52           Compulsory Informative (1)**

The decision to GRANT planning permission has been taken having regard to all relevant planning legislation, regulations, guidance, circulars and Council policies, including The Human Rights Act (1998) (HRA 1998) which makes it unlawful for the Council to act incompatibly with Convention rights, specifically Article 6 (right to a fair hearing); Article 8 (right to respect for private and family life); Article 1 of the First Protocol (protection of property) and Article 14 (prohibition of discrimination).

#### **2           I53           Compulsory Informative (2)**

The decision to GRANT planning permission has been taken having regard to the policies and proposals in the Hillingdon Local Plan Part 1 (2012) and Part 2 (2020) 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.

LPP 4.5	(2016) London's Visitor Infrastructure
LPP 5.1	(2016) Climate Change Mitigation
LPP 5.2	(2016) Minimising Carbon Dioxide Emissions
LPP 5.3	(2016) Sustainable design and construction
LPP 5.7	(2016) Renewable energy
LPP 5.11	(2016) Green roofs and development site environs
LPP 5.13	(2016) Sustainable drainage
LPP 6.1	(2016) Strategic Approach
LPP 6.3	(2016) Assessing effects of development on transport capacity
LPP 6.8	(2016) Coaches
LPP 6.9	(2016) Cycling
LPP 6.10	(2016) Walking
LPP 6.11	(2016) Smoothing Traffic Flow and Tackling Congestion
LPP 6.12	(2016) Road Network Capacity
LPP 6.13	(2016) Parking
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 7.14	(2016) Improving air quality
LPP 7.15	(2016) Reducing and managing noise, improving and enhancing the acoustic environment and promoting appropriate soundscapes.
LPP 7.19	(2016) Biodiversity and access to nature
LPP 8.2	(2016) Planning obligations
LPP 8.3	(2016) Community infrastructure levy
NPPF- 12	NPPF-12 2018 - Achieving well-designed places
NPPF- 14	NPPF-14 2018 - Meeting the challenge of climate change, flooding and coastal change
NPPF- 8	NPPF-8 2018 - Promoting healthy and safe communities
NPPF- 9	NPPF-9 2018 - Promoting sustainable transport
DMCI 7	Planning Obligations and Community Infrastructure Levy
DME 4	Visitor Attractions
DME 2	Employment Uses Outside of Designated Sites
DME 5	Hotels and Visitor Accommodation
DME 6	Accessible Hotels and Visitor Accommodation
DMEI 10	Water Management, Efficiency and Quality
DMEI 11	Protection of Ground Water Resources
DMEI 12	Development of Land Affected by Contamination
DMEI 14	Air Quality
DMEI 2	Reducing Carbon Emissions
DMEI 9	Management of Flood Risk
DMHB 11	Design of New Development
DMHB 14	Trees and Landscaping
DMHB 15	Planning for Safer Places
DMT 1	Managing Transport Impacts
DMT 2	Highways Impacts
DMT 3	Road Safeguarding

DMT 4	Public Transport
DMT 5	Pedestrians and Cyclists
DMT 6	Vehicle Parking
DMAV 1	Safe Operation of Airports

### **3            I15                    Control of Environmental Nuisance from Construction Work**

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

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

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

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

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

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

### **4            I2                            Encroachment**

You are advised that if any part of the development hereby permitted encroaches by either its roof, walls, eaves, gutters, or foundations, then a new planning application may have to be submitted. The validity of this planning permission may be challengeable by third parties if the development results in any form of encroachment onto land outside the applicant's control for which the appropriate Notice under Article 13 of the Town and Country Planning (Development Management Procedure) (England) Order 2015 has not been served.

### **5            I23                            Works affecting the Public Highway - Vehicle Crossover**

The development requires the formation of a vehicular crossover, which will be constructed by the Council. This work is also subject to the issuing of a separate licence to obstruct or open up the public highway. For further information and advice contact: - Highways Maintenance Operations, 4W/07, Civic Centre, Uxbridge, UB8 1UW.

### **6            I25                            Consent for the Display of Adverts and Illuminated Signs**

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

### **7            I6                                Property Rights/Rights of Light**

Your attention is drawn to the fact that the planning permission does not override



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

## **8 170 LBH worked applicant in a positive & proactive (Granting)**

In dealing with the application the Council has implemented the requirement in the National Planning Policy Framework to work with the applicant in a positive and proactive way. We have made available detailed advice in the form of our statutory policies from Local Plan Part 1, Local Plan Part 2, 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.

## **9 173 Community Infrastructure Levy (CIL) (Granting Consent)**

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

## **10 128 Food Hygiene**

The Council's Commercial Premises Section should be consulted prior to the use of the premises so as to ensure compliance with the Food Safety Registration Regulations 1990, Hygiene (General) Regulations 1970, The Food Act 1984, The Health and Safety at Work Act 1974 and any other relevant legislation. Contact: - Commercial Premises Section, 4W/04, Civic Centre, High Street, Uxbridge, UB8 1UW (Telephone 01895 250190).

## **11 160 Cranes**

Given the nature of the proposed development it is possible that a crane may be required during its construction. The applicant's attention is drawn to the requirement within the British Standard Code of Practice for the safe use of Cranes, 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 [www.aoa.org.uk/publications/safeguarding.asp](http://www.aoa.org.uk/publications/safeguarding.asp))

## **12 163 Public Sector Equality Duty of the Equality Act 2010.**

As part of the decision making process the Local Planning Authority have taken due regard to the public sector equality duty of the Equality Act 2010.

Written schemes of investigation will need to be prepared and implemented by a suitably qualified professionally accredited archaeological practice in accordance with Historic England's Guidelines for Archaeological Projects in Greater London. This condition is exempt from deemed discharge under schedule 6 of The Town and Country Planning (Development Management Procedure) (England) Order 2015.

### **3. CONSIDERATIONS**

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

The proposal site comprises Douglas Webb House, a former Metropolitan Police Section House, which occupies an approximately 0.9 hectare broadly triangular shaped plot located on the southern side of Sipson Road and west of the M4 spur motorway. It currently accommodates three connected blocks, arranged around a central courtyard. The buildings vary in size from single to three-storey.

The basement in the southern building currently provides a firing range, with a gymnasium located on the ground floor and changing facilities at first floor level. The eastern block comprises 102 single bedrooms with shared bathroom and kitchen facilities. The central and western blocks comprise a reception, offices, canteen, kitchen and storage rooms.

A 57 space car park is located to the front (north) of the site, with a number of small storage buildings located to its east. A 16 space car park is located to the rear (south) of the site providing a total of 73 spaces across the site.

The eastern side of the site is generally soft landscaped laid to lawn, tree and hedge planting. The western boundary is defined by a mature conifer hedge. The northern and southern boundaries are defined by timber fencing. A number of planting beds are located around the edges of the building and a limited number of tree planters are located within the main car park.

The site falls on the edge of a residential area. It is bound to the west by residential properties located in Sipson Way part of Simpson Village with open land beyond that and to the north designated as Green Belt land; to the east by the M4 motorway, beyond which is the sizeable Park Inn Hotel; and to the south by a large NCP airport car park.

The Application Site is not allocated within the Development Plan as a Development Site and is not within a Conservation Area. The existing buildings are not Listed, and the Application Site is not within any protected views. It is located just south of an Archaeological Priority Area and within an Air Quality Management Area (AQMA). It is also located within Flood Zone 1, which has the lowest probability of flooding in any given year.

The eastern part of the site falls within a critical drainage area. Sipson Road is designated as a London Distributor Road and the site has a PTAL of 2-3.

#### **3.2 Proposed Scheme**

Redevelopment including the demolition of the existing building and the erection of a new building ranging between 1 and 6 storeys to provide a 302-bedroom hotel (Use Class C1) with basement and ancillary facilities including restaurant, car parking, coach parking, hard and soft landscaping and associated works.

## Land Use

The property was until 2016 owned by the Metropolitan Police and used as a section house for officer training and accommodation, with a total of circa 102 bedrooms and facilities including a gymnasium and shooting range in the basement. The use class for the existing building is Sui Generis.

Planning permission was granted under ref: 11068/APP/2016/2994 for the change of use of former police section house (Sui Generis) to 90 bedroom hotel (Use Class C1) with ancillary restaurant, car parking and associated facilities. The consent was not implemented and as such, the proposal involves the change of use from Use Class Sui Generis to C1.

## Access

The site has a single access point to the north from Sipson Road. The proposed site access measures 6.2m at its narrowest and 14m wide where it meets Sipson Road. A 1.9m wide pedestrian footway is provided within the site. This point of access is proposed to be used by both vehicles and pedestrians with segregated road and pavements providing safe access for all. The site is generally level with a steep embankment down to the M4 spur cutting to the east of the site. A drop off and collection area is provided by the main entrance for taxi's and local buses.

## Layout and Amount

The hotel accommodation is arranged in two main wings; the west wing and the east wing facing the M4 spur motorway. The total Gross Internal Area (GIA) is 17,034 sq.m (including plant space).

The proposed development comprises of 302 rooms across six floors; basement to fifth floor. Of these 302 guest rooms, 10.3% of the rooms are wheelchair accessible.

A height of 7-storeys is proposed for the eastern block. This responds to motorway edge condition and the scale and character of the Park Inn opposite. The western block is limited to 2-3 storeys ensuring that the design respects and responds to the semi-detached houses and their adjoining rear gardens along this boundary edge.

## Design

The eastern block is composed of brick - solid masonry that offers a substantial presence where the building overlooks the motorway boundary. The west facade includes textured timber, presenting a softer edge towards the neighbouring residential properties.

The primary material comprises brickwork that provides a contextual, robust appearance which unifies the scheme. Architectural metalwork, include window frames finished in a soft champagne/bronze colour.

## Trees and Landscaping

There are 31 existing trees within the site. 16 trees are affected by the development, and would be removed.

These are primarily Birch trees with two Beech trees. Six of the trees are ornamental Crab Apples, which are small and not of particularly high amenity value.

The key trees to be kept are a group of 5 Lime trees along the southeastern edge of the

site. The applicant proposes to provide details of root protection prior to commencement.

A Leylandii hedge runs the along the length of the western boundary. This has been maintained at a height of approximately 2.5-3 metres. To the northern section of the hedge, in a gap and within a raised timber planter, is a Sycamore which is to be retained.

A green roof area on the Second Floor is proposed to the western side of the building, and is overlooked by a series of hotel rooms.

The proposal includes a shared surface to the pavements and across the carriageway/drop-off using linear paving units. Structural planting, including ornamental trees, to accentuate the design and highlight the entrance, and to help screen the ramps down to the basement car parking is proposed. Wildflowers and herbaceous plants to soften the overall effect and to give colour and texture at different times of the year. Low-level and cowed lighting to emphasise the planting, trees and entrance area.

### External Lighting

Given the site's proximity to neighbouring residential properties, the applicant has provided details of the proposed lighting scheme to provide a balance between well illuminated and not a nuisance to existing residents and airport operations. Light fixtures will be fixed to the building to provide light onto adjacent pathways and access routes and at key locations such as refuse stores, and plant rooms. The western elevation, other than immediate pathways, to ensure lighting does not cause a nuisance to the adjacent properties. Along the western boundary, it is proposed to provide lighting that illuminates the access road from the hedge side of the road to avoid pointing towards residential properties. The landscaped area to the arrival forecourt will have some low level up lighting during evening hours but limited to ensure light does not cause a nuisance. Any lights on the upper floors will be limited to face east over the M4 motorway and north over the entrance areas.

### Parking

The proposal comprises the following :

- 87 car parking spaces of which 8 spaces (10%) would be wheelchair accessible.

The car parking allocation is broken down as follows:

- \* Staff Parking (Standard) 5
- \* Staff Parking (Accessible) 1 (10% of total staff parking)
- \* Guest Parking (Standard) 73
- \* Guest Parking (Accessible) 8 (10% of total guest parking)

- 16 active and 71 passive EVCP charging points;
- 4 coach parking set down and drop off spaces;
- 4 motorcycle parking spaces within the basement (5%); and
- 32 secure cycle parking spaces within the basement and 6 short stay cycle parking spaces near the front entrance.

The staff car parking spaces are proposed at surface level to the south of the site. The guest parking is proposed to be provided within the basement which would be accessed by a two lane ramp with automatic roller shutters. Cycle storage is also located in the basement with lift and stair access up to the back of house areas or main reception for hotel guests.

## Servicing and Delivery

All of the hotels servicing which includes goods, laundry, refuse collection will occur to the southern end of the site and tucked in between the two wings of accommodation.

### 3.3 Relevant Planning History

11068/APP/2016/2994 Douglas Webb House, 546 Sipson Road Sipson

Change of use of former police section house (Sui Generis) to 90 bedroom hotel (Use Class C1) with ancillary restaurant, car parking and associated facilities.

**Decision:** 21-10-2016 Approved

11068/APP/2018/1852 Douglas Webb House, 546 Sipson Road Sipson

Demolition of the existing buildings, the extension to the basement and development of a part 2/3 and part 4 to 6 storey hotel comprising 275 hotel beds centred around an atrium along with ancillary facilities including; car parking, coach parking and associated landscaping

**Decision:** 12-02-2019 Refused

**Appeal:** 20-12-2019 Dismissed

#### Comment on Relevant Planning History

Planning Permission was refused under application Ref.11068/APP/2018/1852 (20-12-19) for the demolition of the existing buildings, an extension to basement and development of a part 2/3 and part 4 to 6 storey hotel comprising 275 hotel beds centred around an atrium along with ancillary facilities including: car parking, coach parking and associated landscaping.

The application was refused for six reasons, namely:

- Overdevelopment, Design, Size and Scale
- Impact on Neighbouring Amenity
- Highways Impact
- Air Quality
- Flood and Water Management
- Section 106

Following the refusal, the proposal was considered at Appeal under Ref: APP/R5510/W/19/3224759 which was dismissed on 20 December 2019. As part of the appeal, the Council formally confirmed that it did not wish to defend reason 3, 4 and 5 relating to car parking, highways and drainage. In dismissing the Appeal, the Inspector noted:

"The northernmost point of the Western wing of the proposed building, adjacent to its main entrance. Here, the new building would rise to 3 storeys in height, close to the rear boundaries of 11, 11A and 15 Sipson Way. However, this would occur around 8.4m from the boundary of the closest rear garden, and at a point where there are no building would rise to a significantly greater height than the affected residential properties. Because of the close proximity to the shared boundary, it would be an overbearing and unduly dominant feature when viewed from these residential properties and their relevant short gardens. In consequence, the proposal would adversely affect the outlook from these properties".

The previous appeal was dismissed due to its proximity and relationship with the residential units situated to the north western part of the site. The main change between the previous scheme dismissed at appeal and this application is the removal of part of the northwest corner of the building, setting back the footprint and entrance by 16.5 metres in

plan and reduced in height from 3 to 2 storeys. The massing has been reduced to avoid impact upon the residents along Sipson Way. This pulls the proposed mass inside the neighbouring properties situated to the northwest of the site. The revised footprint does not extend beyond the footprint of the existing buildings on the western boundary of the site.

#### **4. Planning Policies and Standards**

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 - Development Management Policies (2020)  
The Local Plan: Part 2 - Site Allocations and Designations (2020)  
West London Waste Plan (2015)  
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 (Intend to Publish Version, December 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. The Panel of Inspectors appointed by the Secretary of State issued their report and recommendations to the Mayor on 8th October.

The Mayor has considered the Inspectors' recommendations and, on the 19th December 2019, issued to the Secretary of State his intention to publish the London Plan along with a statement of reasons for any of the Inspectors' recommendations that the Mayor does not wish to accept.

Limited weight should be attached to draft London Plan policies that have not been accepted by the Mayor or that have only been accepted in part/with significant amendments. Greater weight may be attached to policies that were subject to the Inspector's recommendations and have since been accepted by the Mayor through the 'Intend to Publish' version of the Plan. The weight will then increase as unresolved issues are overcome through the completion of the outstanding statutory process. Greater weight

may also be attached to policies, which have been found acceptable by the Panel (either expressly or by no comment being made).

## **Local Plan Designation and London Plan**

The following Local Plan Policies are considered relevant to the application:-

### Part 1 Policies:

- PT1.BE1 (2012) Built Environment
- PT1.CI1 (2012) Community Infrastructure Provision
- PT1.E3 (2012) Strategy for Heathrow Opportunity Area
- PT1.EM1 (2012) Climate Change Adaptation and Mitigation
- PT1.EM11 (2012) Sustainable Waste Management
- PT1.EM6 (2012) Flood Risk Management
- PT1.EM7 (2012) Biodiversity and Geological Conservation
- PT1.EM8 (2012) Land, Water, Air and Noise
- PT1.T1 (2012) Accessible Local Destinations

### Part 2 Policies:

- LPP 4.5 (2016) London's Visitor Infrastructure
- LPP 5.1 (2016) Climate Change Mitigation
- LPP 5.2 (2016) Minimising Carbon Dioxide Emissions
- LPP 5.3 (2016) Sustainable design and construction
- LPP 5.7 (2016) Renewable energy
- LPP 5.11 (2016) Green roofs and development site environs
- LPP 5.13 (2016) Sustainable drainage
- LPP 6.1 (2016) Strategic Approach
- LPP 6.3 (2016) Assessing effects of development on transport capacity
- LPP 6.8 (2016) Coaches
- LPP 6.9 (2016) Cycling
- LPP 6.10 (2016) Walking
- LPP 6.11 (2016) Smoothing Traffic Flow and Tackling Congestion
- LPP 6.12 (2016) Road Network Capacity
- LPP 6.13 (2016) Parking
- 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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- LPP 7.14 (2016) Improving air quality
- LPP 7.15 (2016) Reducing and managing noise, improving and enhancing the acoustic

environment and promoting appropriate soundscapes.

LPP 7.19	(2016) Biodiversity and access to nature
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DMT 4	Public Transport
DMT 5	Pedestrians and Cyclists
DMT 6	Vehicle Parking
DMAV 1	Safe Operation of Airports

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

**5.1** Advertisement Expiry Date:- **1st July 2020**

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

## **6. Consultations**

### **External Consultees**

The application was consulted on between 27-05-20 and 17-06-20. There were 6 objections received against this application, including one from the Sipson Residents Association which are summarised as follows:

- Concerns relating to the extra road traffic?
- Concerns relating to the local roads being used for taxis which are always parked on the bridge



on Sipson Road and further congestion another hotel in a residential area would bring.

- Concerns relating to entrance and exit of coaches.
- Concerns relating to privacy and concerns that the proposed hotel would result in an overbearing impact on neighbouring properties and gardens.
- Concerns the proposal would result in the overshadowing of neighbouring properties and gardens.
- Concerns relating to dust and noise from construction.
- Concerns that there is no case for a hotel in this location due to Covid 19 pandemic.
- Concerns relating to the impact on Air Quality within the local area.

#### Sipson Residents Association

In the current economic climate it would seem inappropriate to consider building yet another large hotel. Hotels in this village are here purely to cater to the needs of airline passengers. Since the beginning 2020 there has been a significant decline in air travel with many airlines and associated businesses looking to dramatically reduce their staffing levels as it is anticipated that there will be a significant reduction in air traffic for several years to come. This includes the Hotel industry. Another hotel offers no value to the local economy or community, in fact it is more probable it will have a detrimental impact on the daily lives of the residents. This new hotel is not offering a service to the community but adding to the frustration of the residents because we lack local amenities and experience increasing traffic flow problems on a congested Sipson Road which is already perceived as dangerous for both drivers and pedestrians. It would be fitting for this site to provide a facility for residents. The Heathrow villages is the only ward without a library and our ability to register with a local GP is near impossible because of our location and high demand generated by the massive housing developments in West Drayton. Residents of Sipson Village do not have any desire to see another hotel destroying the vista. Heathrow Village hotels do not provide employment or services for village residents, preferring to 'import' staff from other establishments within their group. Sipson village should not be exposed to any further developments which are damaging to the environment and existing community.

Officer comment: The objections and comments are addressed within the main body of the report.

#### STATUTORY CONSULTEES

##### NATS

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

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

The use of any cranes, to construct the building, requires a separate assessment.

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

##### Heathrow Aerodrome Safeguarding

We have now assessed the above application against safeguarding criteria and can confirm that

we have no safeguarding objections to the proposed development. However, we would like to make the following observation:

## Cranes

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

Due to the sites close proximity to Heathrow Airport it is paramount that the relevant permits are obtained from Heathrow Works Approval Team via [Airside\\_Works\\_Approvals@heathrow.com](mailto:Airside_Works_Approvals@heathrow.com) for the use of cranes or any other equipment used for the construction process.

## GLAAS

The Greater London Archaeological Advisory Service (GLAAS) provides archaeological advice to boroughs in accordance with the National Planning Policy Framework and GLAAS Charter.

NPPF Section 16 and the Draft London Plan (2017 Policy HC1) recognise the positive contribution of heritage assets of all kinds and make the conservation of archaeological interest a material planning consideration. NPPF paragraph 189 says applicants should provide an archaeological assessment if their development could affect a heritage asset of archaeological interest I have looked at this proposal and at the Greater London Historic Environment Record. I advise that the development could cause harm to archaeological remains and field evaluation is needed to determine appropriate mitigation.

However, although the NPPF envisages evaluation being undertaken prior to determination, in this case consideration of the nature of the development, the archaeological interest and/or practical constraints are such that I consider a two stage archaeological condition could provide an acceptable safeguard. This would comprise firstly, evaluation to clarify the nature and extent of surviving remains, followed, if necessary, by a full investigation. I therefore recommend attaching a condition as follows:

If you grant planning consent, paragraph 199 of the NPPF says that applicants should record the significance of any heritage assets that the development harms. NPPF paragraphs 185 and 192 and Draft London Plan Policy HC1 emphasise the positive contributions heritage assets can make to sustainable communities and places. Where appropriate, applicants should therefore also expect to identify enhancement opportunities.

Applicants should also improve knowledge of assets and make this public. The Heathrow area has well documented archaeological interests from early prehistory through to the medieval period demonstrated by numerous investigations carried out from the 1940s onwards. The Heathrow plateau was clearly intensively used and settled at most times since the introduction of agriculture around 4000 BC. Perhaps most relevant to the application site itself is an the excavation in advance of mineral extraction conducted by MOLA at Sipson Farm between 2010 and 2014. This revealed evidence for a Romano-British trackway and settlement and medieval settlement in its southwest corner, only some 100-150m northeast of the application site.

The application site itself will have been impacted by modern development so that the survival and preservation of remains is likely to be patchy and truncated so there is unlikely to be a need for preservation-in-situ. However, the new development proposal involves substantial and extensive basements so any surviving remains would be vulnerable to loss.

I have looked at this proposal and at the Greater London Historic Environment Record. I advise that the development could cause harm to archaeological remains and field evaluation is needed to determine appropriate mitigation. However, although the NPPF envisages evaluation being undertaken prior to determination, in this case consideration of the nature of the development, the archaeological interest and/or practical constraints are such that I consider a twostage archaeological condition could provide an acceptable safeguard. This would comprise firstly, evaluation to clarify the nature and extent of surviving remains, followed, if necessary, by a full investigation. I therefore recommend attaching a condition as follows:

No demolition or development shall take place until a stage 1 written scheme of investigation (WSI) has been submitted to and approved by the local planning authority in writing. For land that is included within the WSI, no demolition or development shall take place other than in accordance with the agreed WSI, and the programme and methodology of site evaluation and the nomination of a competent person(s) or organisation to undertake the agreed works.

If heritage assets of archaeological interest are identified by stage 1 then for those parts of the site which have archaeological interest a stage 2 WSI shall be submitted to and approved by the local planning authority in writing. For land that is included within the stage 2 WSI, no demolition/development shall take place other than in accordance with the agreed stage 2 WSI which shall include:

A. The statement of significance and research objectives, the programme and methodology of site investigation and recording and the nomination of a competent person(s) or organisation to undertake the agreed works.

B. Where appropriate, details of a programme for delivering related positive public benefits.

C. The programme for post-investigation assessment and subsequent analysis, publication & dissemination and deposition of resulting material. this part of the condition shall not be discharged until these elements have been fulfilled in accordance with the programme set out in the stage 2 WSI.

Informative: Written schemes of investigation will need to be prepared and implemented by a suitably qualified professionally accredited archaeological practice in accordance with Historic England's Guidelines for Archaeological Projects in Greater London. This condition is exempt from deemed discharge under schedule 6 of The Town and Country Planning (Development Management Procedure) (England) Order 2015.

This pre-commencement condition is necessary to safeguard the archaeological interest on this site. Approval of the WSI before works begin on site provides clarity on what investigations are required, and their timing in relation to the development programme. If the applicant does not agree to this precommencement condition please let us know their reasons and any alternatives suggested. Without this pre-commencement condition being imposed the application should be refused as it would not comply with NPPF paragraph 199.

I envisage that the archaeological fieldwork would comprise the following:

#### Geo-technical Monitoring

Archaeological monitoring of geo-technical pits and boreholes can provide a cost effective means of establishing the potential for archaeological remains to survive on previously developed land or where deep deposits are anticipated. It is usually used as part of a desk-based assessment or field evaluation.

It is possible that previous construction has either resulted in extensive disturbance across the site and/or the importation of modern fill. Monitoring of geo-technical test pits may help indicate whether natural soil horizons survive. An archaeological field evaluation involves exploratory fieldwork to determine if significant remains are present on a site and if so to define their character, extent,

quality and preservation. Field evaluation may involve one or more techniques depending on the nature of the site and its archaeological potential. It will normally include excavation of trial trenches. A field evaluation report will usually be used to inform a planning decision (pre-determination evaluation) but can also be required by condition to refine a mitigation strategy after permission has been granted.

Trial trenches would be expected in stage 1 to examine areas not already basement or shown by geo-technical investigation to be heavily disturbed. They should sample the Langley Silt - gravel interface for Palaeolithic interest. If significant surviving remains are found then further investigation would be required in stage 2. You can find more information on archaeology and planning in Greater London on our website. This response only relates to archaeology. You should also consult Historic England's Development Advice Team on statutory matters.

## GLA Stage 1 Response

### Strategic planning application stage 1 referral

Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008.

### Strategic issues

Principle of development: The principle of redeveloping this vacant site for hotel use within an opportunity area in close proximity to Heathrow airport is supported in strategic planning terms, subject to the Council confirming that the site is not required for social infrastructure use (paragraph 16-20).

Design: The revised approach to height and massing is generally supported. The applicant should demonstrate that the east and west wings will not appear monolithic and revise the ground level become less car dominant. Key details relating to architecture, materials, and inclusive design must be secured by condition (paragraph 21-32).

Sustainable development: Further information and justification are required regarding energy, urban greening, and air quality matters (paragraph 33- 51).

Transport: Further information is required on Active Travel Zone, cycle parking, and car parking. Appropriate conditions should also be secured (paragraph 52- 59).

That Hillingdon Council be advised that the application does not yet comply with the London Plan and the Mayor's Intend to Publish London Plan for the reasons set out in paragraph 63 of this report; but that the possible remedies set out in that paragraph could address these deficiencies.

On 8 June 2020, the Mayor of London received documents from Hillingdon Council notifying him of a planning application of potential strategic importance to develop the above site for the above uses. Under the provisions of The Town & Country Planning (Mayor of London) Order 2008, the Mayor has to provide the Council with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor's use in deciding what decision to make.

The application is referable under Category 1B of the Schedule to the Order 2008:

Category 1B "Development which comprises or includes the erection of a building outside Central London and with a total floorspace of more than 15,000 square metres.

Once Hillingdon Council has resolved to determine the application, it is required to refer it back to the Mayor for his decision as to whether to direct refusal; take it over for his own determination; or allow the Council to determine it itself.

## Principle of Development

The site is located in the Heathrow Opportunity Area. London Plan Policy 2.13 identifies the Opportunity Area as having a capacity to accommodate a minimum of 9,000 new homes and 12,000 new jobs. These targets are revised within Policy SD1 of Mayor's Intend to Publish London Plan to 13,000 homes and 11,000 new jobs. Intend to Publish London Plan Policy SD1 furthermore states that the Mayor will review and clarify the area's potential contribution to London's growth, including reviewing housing and jobs targets, when the Heathrow Airport expansion proposals and environmental implications are clearer. The proposed development would contribute towards meeting the current job targets for the Opportunity Area.

## Visitor infrastructure

London Plan Policy 4.5 and Intend to Publish London Policy E10 seek to support the visitor economy as well as the needs of businesses and leisure visitors to the capital and highlight a strategic demand for new visitor bedrooms in London. London Plan Policy 4.5 identifies a need for an additional 40,000 hotel bedrooms by 2036 and this target is revised in Intend to Publish London Plan Policy E10 to an additional 58,000 bedrooms of serviced accommodation in the capital by 2041.

London Plan Policy 4.5 and Intend to Publish London Policy E10 also identify appropriate locations for the provision of visitor accommodation, noting that outside of the CAZ such development should be focused in town centres and Opportunity Areas. The proposed hotel use within an opportunity area would positively contribute towards the anticipated need for additional hotel rooms and is therefore supported in strategic planning terms.

The site was formerly in use as a police section house (Sui Generis Use Class) that was decommissioned and released in 2016. The supporting text for Intend to Publish London Plan Policy S1 instructs that social infrastructure covers a range of services and facilities that meet local and strategic needs and contribute towards a good quality of life, including criminal justice facilities, and that redundant social infrastructures should be considered for full or partial use as other forms of social infrastructure before alternative developments are considered. This policy also states that where social infrastructure providers are undertaking an agreed social infrastructure re-provision or service reconfiguration, losses from redundant sites may be acceptable. Whilst it is noted that permission was granted in 2016 for hotel use at the site, that permission has since lapsed, and the Council should verify that the site is not required for any alternative forms of social infrastructure. Such evidence could include a services strategy by the Metropolitan Police confirming their program of service consolidation and/or re-provision.

The proposed hotel use in the Heathrow Opportunity Area is supported in line with London Plan Policies 2.13 and 4.5 and Intend to Publish London Plan Policies SD1 and E10, subject to the Council confirming that the site is not required for social infrastructure use per Intend to Publish London Plan Policy S1.

The design principles in Chapter 7 of the London Plan and Chapter 3 of the Intend to Publish London Plan require all developments to achieve a high standard of design. These policies seek to ensure that new buildings and spaces respond to local character, enhance the public realm, and are of the highest quality architecture such that they make a positive contribution to the street and cityscapes.

The hotel is formed of two wings, east and west, with north/south links around a central atrium. The proposed layout is based on the original refused scheme, with alterations intended to address the outstanding issues from the Inspector's reasoning for dismissing the 2019 appeal. In particular, the northwest corner of the footprint has been drawn back from the rear boundary of the properties fronting onto Sipson Way to create more space between the hotel and these properties. This area has been redistributed by way of increased infill in between the east and west wings toward the south of the site and a wider east wing towards the north of the site. This revised layout presents a sensible approach to optimising the capacity of this deep, triangular site and is

welcomed. This notwithstanding, the west wing contains ancillary functions, such as a restaurant and kitchen. The applicant should demonstrate that these functions will not result in adverse impacts on the Sipson Way residential properties.

The ground level surrounding the building is dominated by hardscaping and the provision of car parking. Vehicular and pedestrian access to the site is from Sipson Road to the north, however the servicing bays are proposed towards the south of the site meaning that delivery vehicles would have to drive the length of the site. This would likely have a detrimental effect on amenity for hotel guests and Sipson Road residents alike and should be reconsidered.

London Plan Policies 7.1 and 7.4 and draft London Plan Policies D1 and D2 both require development to have regard to the form, function and structure of an area and the scale, mass and orientation of surrounding buildings.

It is understood that the applicant consulted with the National Air Traffic Control Services (NATS) and Heathrow Ltd. early in the design process, and that this consultation informed the height of the proposed building. This is welcomed. The applicant furthermore states that the appropriate permits and approvals will be sought prior to any construction or crane operation on site. Appropriate conditions should be secured in line with NATS and Heathrow Ltd. guidance.

Like the previous scheme, the proposed building steps up from the western part of the site towards the eastern boundary with the M4. Revisions have been made to make the building appear less overbearing and dominant next to the existing residential properties in line with the Inspector's report. In particular, the massing of the northwest corner has been set back to increase distance from neighbouring buildings, the second story of the west wing has been set back away from the residential properties, the entrance/colonnade has been removed and the overall massing approach has been simplified. Whilst the modulation of heights is supported; the length of the east and west wings risk appearing large and monolithic, particularly when viewed from the east. The applicant should consider opportunities to soften the visual impact of these wings.

Although the height and massing of the proposed hotel constitute a step change from the residential properties along Sipson Way, the proposal is similar in height and density to the Park Inn by Radisson hotel on the opposite side of the M4 and several other hotels in the vicinity and for this reason does not raise any strategic concerns.

The dark brick along the eastern facade will give off a high quality and robust appearance that is anticipated to age well against the climate and pollution from the M4. The introduction of timber towards the interior of the site will soften and complement the appearance of the brick. In general, the materials and architectural approach are supported and are reflective of the high-end nature of the hotel offer. The Council is encouraged to secure key details such as window reveals, rooflines and curtain walling to ensure exemplary design quality is delivered.

The site is approximately 110m from an area of Green Belt. Accordingly, an assessment of the visual impact of the proposals on key vantage points within the Green Belt has been submitted in support of the application. Whilst the proposals would be visible from several vantage points within the nearby Green Belt, they are not considered to cause significant harm to its openness beyond the existing built context and therefore do not raise any strategic concerns.

Serviced accommodation developments are required to achieve the highest standards of accessible design in accordance with Intend to Publish London Plan Policies E10 and D5. These requirements aim to recognise the need not only for standard wheelchair accessible rooms, but also rooms suitable for people with ambulant mobility impairments or older people who could benefit from additional access features, as well as rooms suitable for people who require assistance or need to be near to a carer. To this end, developments offering serviced accommodation must provide either:

10 percent of new bedrooms to be wheelchair accessible in accordance with Figure 52 incorporating either Figure 30 or 33 of British Standard BS 8300-2:2018 'Design of an accessible and inclusive built environments, Part 2: Buildings - Code of Practice'; OR 15% of new bedrooms as accessible rooms in accordance with the requirements of 19.2.1.2 of BS 8300-2:2018 'Design of an accessible and inclusive built environments, Part 2: Buildings - Code of Practice'.

The applicant has indicated that the proposal includes 31 wheelchair accessible rooms, equating to 10.3% of the overall accommodation, designed to comply with the standards set out in the Building Regulations Part M1 2015 Disabled Access - Dwellings (with 2016 amendments) and BS 8300-2:2018 'Design of an accessible and inclusive built environments, Part 2: Buildings - Code of Practice'. Details relating to these units should be secured by condition.

The proposed strategy must be revised to ensure compliance with London Plan policies. Detailed comments, which are summarised below, have been provided to the applicant and Council under separate cover.

The applicant has indicated that they will be estimating the carbon dioxide emissions performance against London Plan Policies using SAP 10 emissions factors. This is supported.

#### Be Lean

The applicant has provided the relevant modelling output sheets for the Be Lean stage of the energy hierarchy.

Based on the information provided, the domestic element of the proposed development is estimated to achieve a reduction of 19 tonnes per annum (3%) in regulated carbon dioxide emissions compared to a 2013 Building Regulations compliant development. The applicant should note that Mayor's Intend to Publish London Plan includes a target of a 1%% improvement on 2013 Building Regulations from energy efficiency which applicants are expected to meet. The applicant should therefore model additional energy efficiency measures in aspiration of meeting this target.

The applicant is encouraged to consider the potential for wastewater heat recovery, as the domestic hot water load is high.

The applicant should carry out a Dynamic Overheating Analysis to assess the overheating risk on any naturally ventilated spaces. This should follow the CIBSE TM52 methodology for the London Design Summer Year 1 weather file: 2020s, high emission 50% percentile scenario. The applicant should also investigate the risk of overheating using the DSY 2 & 3 weather files.

#### Be Clean

The applicant has identified two potential district heating networks within the vicinity of the proposed development. They should contact relevant stakeholders including the borough energy officer, local heat network operators, and nearby developers to ask whether they know of any local heat network connection opportunities.

The proposed development is in a Heat Network Priority Area and the applicant should provide a commitment that the development is designed to allow future connection to a district heating network. Drawings demonstrating how the site is to be future proofed for a connection to a district heating network should be provided, which should include a single point of connection.

The applicant should propose a communal heat network serving space heating and domestic hot water, supplied by a centralised energy centre. The current proposal employs VRF heating and cooling which is not compatible with a future network connection. It should be confirmed that all non-domestic building uses will be connected to the heat network and a drawing showing the route of the heat network, linking all uses on site should be provided alongside a drawing indicating total floor area, internal layouts, and location of the energy centre.

## Be Green

A roof layout has been provided which confirms that the potential for photovoltaic (PV) has been maximised for the upper roof. The applicant should explore opportunities for PV on the lower roofs and provide a drawing demonstrating that the potential for PV installation has been maximised. The applicant should also propose a higher efficiency PV panel and confirm both the square metre of net PV area and anticipated kWh of electricity generation. The on-site savings from renewable energy technologies should be maximised regardless of whether London Plan targets have been met.

The applicant should consider the potential to serve the domestic hot water need through renewable energy technology such as centralised air source heat pumps, rather than gas boilers. Further information on the proposed heat pumps is required.

The carbon dioxide savings fall short of the London Plan targets. The applicant should therefore consider additional measures for achieving further carbon reductions.

## Urban Greening

The applicant should calculate the Urban Greening Factor (UGF) of the proposed development and achieve the specified target of 0.3 in accordance with Intend to Publish London Plan Policy G5. A drawing showing surface cover types should accompany the UGF calculation.

The 'Landscape Approach' (Revision B May 2020) document sets out that there are 31 trees within the site, of which 16 would be removed to facilitate the development. This does not come across in the applicant's Arboricultural Impact Assessment (AIA), or the supporting Tree Removal Plan for the Arboricultural Impact Assessment (AIA). The AIA states that a total of 6 trees would be removed. The applicant should clarify the number of trees to be removed as part of the proposed development in accordance with London Plan 7.21 and Intend to Publish London Plan Policy G7.

The applicant should provide a CAVAT assessment of the existing trees within the site boundary, the value of the trees to be removed, and the value of the trees to be introduced to demonstrate that adequate replacement is being provided in line with Intend to Publish London Plan G7.

## Air Quality

The applicant must provide further information to ensure that the proposed development complies with London Plan Policy 7.14 and Intend to Publish London Plan Policy SI 1. Detailed comments, which are summarised below, have been provided to the applicant and Council under separate cover.

The applicant has not provided enough information to determine whether the proposed development is air quality neutral. The applicant should therefore submit an assessment of the predicted development trip rate against the benchmark trip rate calculated using the TRAVL trip rate methodology for C1 use in Outer London. Should the development trip rate exceed the benchmark, mitigation measures above minimum policy compliance would be expected. This is of particular importance given the large number of predicted vehicle trips associated with the proposed development.

The applicant has not assessed the exposed of future occupants to poor air quality and therefore it cannot be determined whether the development complies with London Plan Policy 7.14 and Intend to Publish London Plan Policy SI 1 (B). This is of particular importance given the site's proximity to the M4 spur. The applicant should provide the extent of the modelled road network for evaluation purposes.

## Transport

### Walking and cycling

Intend to Publish London Plan Policy T2 indicates that all development proposals should



demonstrate how they will deliver improvements that support the ten Healthy Streets Indicators in line with Transport for London guidance. The submitted Transport Assessment does not include an Active Travel Zone (ATZ) assessment in accordance with TfL's guidance. The applicant is therefore asked to submit this information.

The proposed quantum of cycle parking meets the standard set in Intend to Publish London Plan Policy T5; however, it is not clear whether the provision meets the qualitative standards set by this policy, Policy 6.9 of the London Plan, and the London Cycle Design Standards (LCDS). According to these policies ten percent of spaces should be provided as Sheffield stands capable of accommodating larger/wider cycles, such as cargo cycles, cycle trailers, or cycles constructed for use by disabled riders. Showers and lockers should also be provided, and these details should be secured by the appropriate planning conditions.

A total of 81 guest car parking spaces and six staff spaces are proposed; however, the trip generation estimates a maximum parking demand throughout the day of 45 spaces for the hotel. The proposed car parking provision must be justified, including a demonstration of why alternative sustainable transport modes cannot be used, before it can be accepted.

A total of eight Blue Badge spaces are proposed, which is welcomed. A Parking Design and Management Plan outlining how these spaces will be designed and managed, including the use of accessible bays by Blue Badge holders only, should be prepared in accordance with Intend to Publish London Plan Policy T6 and secured by condition. Additionally, a condition should be secured ensuring that the parking will be for the sole use of hotel patrons and staff.

All operational parking must provide infrastructure for electric or other Ultra-Low Emission vehicles, including active charging points for all taxi space in accordance with Intend to Publish London Plan Policy T6.

#### Coach parking and drop off/pick up arrangements

Four coach parking bays are proposed along with one drop off/pick up bay for hotel patrons arriving by coach, taxi and car. These arrangements are acceptable in strategic terms and details of how this space will be designed and managed should be included in the Parking Design and Management Plan.

#### Management Plans

A Demolition and Construction Logistics Plan and a Delivery and Servicing Plan (DSP) should both be secured by condition in accordance with Intend to Publish London Plan Policy T7. A Travel Plan should also be secured by condition including mode shift targets and related measures.

#### Conclusion

London Plan and the Mayor's Intend to Publish London Plan policies on opportunity areas; visitor accommodation; social infrastructure; urban design; inclusive design; air quality; sustainable development; and transport, are relevant to this application. The application does not yet comply with the London Plan and the Mayor's Intend to Publish London Plan, for the reasons set out below; however, the possible remedies stated could address these deficiencies:

\* Principle of development: The principle of redeveloping this vacant site for hotel use within an opportunity area in close proximity to Heathrow airport is supported in strategic planning terms, subject to the Council confirming that the site is not required for social infrastructure use.

\* Design: The revised approach to height and massing is generally supported. The applicant is requested to demonstrate that the long east and west wings will not appear unduly monolithic and revise the ground level become less car dominant. Key details relating to architecture, materials, and inclusive design must be secured by condition.

\* Sustainable development: Further information and justification are required regarding energy,

urban greening, and air quality matters.

\* Transport: The quantum of car parking is excessive and should be reduced. A comprehensive ATZ assessment should be provided and the applicant should review the cycle parking arrangements. Further information is required on Active Travel Zone, cycle parking, and car parking. Appropriate conditions should also be secured.

## Applicant's Response

### Social Infrastructure

The Application Site was used as a police section house, which would be defined as a sui generis use. In 2016, it was reported that the building would have provided relatively short term police accommodation, in accordance with the general policy ethos of current planning policies due consideration is given to its loss and any wider impacts which might be associated with this.

In this instance, the Application Site has remained vacant for the last 4 years and prior to this, it was seldom used. In 2016, it was reported that the police have made very limited use of the Application Site since 2014 and it was evident at the time that all but a small part of it (believed to be used by the police dog handling unit) was disused and had been for some time.

It is understood that the Police Service has moved its functions to other locations. As such, the police no longer have a need for the Application Site. The Metropolitan Police have been consulted on the application and, notably, no objections have been received in this respect. Accordingly, this argument is accepted and on the basis of the above, no objections are raised in principle to the loss of the existing use.

### Urban Design

The Kitchen areas are located to the western elevation. However, the windows will not be openable (mechanical cooling / ventilation) and the only door(s) to this side are for emergency escape. All of the kitchen servicing is around the corner, at the rear of the central 'link' block(s). Servicing and delivery vehicles would reverse back into this location with the unloading / loading of goods occurring behind the western block of bedroom accommodation, shielding the adjacent residents from noise. Staff restrooms and facilities are also in this central location with any noise outbreak from the south facing doors contained within the two-bedroom wings are orientated towards the adjacent NCP car park.

There is an existing site servicing road to the western boundary as part of the current building. We are retaining this established route. As the GLA note, the shape of the Application Site is irregular. The benefits of placing the servicing and delivery areas to the rear area of greater overall benefit than if they were located to the front. A road along the Application Site would always be required to allow fire tender access to the back of the building. By placing servicing to the rear, we are able to create a more generous landscaped forecourt to the entrance area. The number of vehicle movements along this route is low, as we would note that the vast quantum of car parking and vehicle movements is located in the underground car park, accessed at the northern end of the Application Site.

There is substantial landscaping to the front of the hotel, an increase over the refused scheme. The boundary is also edged with dense and high tree planting. Speed limit signs will be included along the road. We do not believe speed bumps are advisable given the stop, speed up noises these create. Note that there is already an adjacent NCP car park to the south that generates similar vehicle noise 24/7 and in a direct line of site from the adjacent residential properties.

The eastern elevation has significant architectural detail with facade depth creating a highly modulated facade. Each window bay is angled inwards, which is alternated in direction to each floor. This creates a small-scale level of detail in the window frame and surrounding bay that relates

to the individual room width. The medium scale is considered by the way these come together as a floor plate, with horizontal bands organising the small-scale windows. The larger scale is considered by how these floors are grouped together as two elements - either side of the glazed 'slot' which identifies the main circulation core. The top three floors are combined together, creating a more vertical proportion to act as a 'top' to the building - as in more solid brick 'bottom', 'middle bands' and top. This helps to balance against the horizontal proportions inherent in the building footprint.

We do not believe the building reads as one long 'monolithic' element as it is firstly broken down into two main elements either side of the core - secondly it is broken down into top, middle and base and thirdly each 'middle' is varied in orientation and depth creating various different levels of shade or brightness to individual panels. The western elevation is also varied with its facade treatment and given its location and two storey height, would never be seen in its entirety from the west.

Existing trees to the southern end (tallest part of the building) help to set the building in a landscape context. The building faces a 7-lane motorway and large open space. The proposed 6 storey building is in keeping with the scale and surrounding area it faces and present in the surrounding airport context.

With regard to Paragraph 28 'Architecture and Materials' and Paragraph 31 'Inclusive Design', we will accept conditions to be included should planning permission be granted.

### Fire Strategy

With regard to Paragraph 32, a Fire Statement has been submitted as part of this application. The Fire Statement was prepared by Fire Risk Solutions. The Fire Statement provides details of construction methods, products and materials as well as the means of escape for a building users; features which reduce the risk to life, including sprinklers; access for fire service personnel and equipment; access for fire appliances and how modifications to the building will not compromise the base build fire safety and protection measures.

### Energy

An Energy Addendum has been submitted with this response letter. The Energy Addendum improves the on-site performance as far as physically possible with Carbon Offsetting proposed for the remainder.

The energy efficiency of the proposed development has been improved as far as possible within the Energy Statement addendum. The 15% improvement has not been achieved but all relevant items have low u-values for the Thermal Elements and Windows, high efficiency LED lighting, a low ventilation rate. WWHR is now included. Heating is in-line with the GLA Be Lean scenario therefore there is little else we can do here. When working with a building of this size, minor tweaks to say a U-Value have no to negligible impact on the BER.

The Waste-Water Heat Recovery is being reviewed with Recoup and they have provided a spreadsheet with details. Unfortunately, it cannot currently be modelled correctly in IES and they are liaising with them at this point in term to be able to do so. There is a workaround in increasing the boiler efficiency to compensate and this has been used for now however it is potentially inaccurate and will be re-assessed in terms of performance and viability at Construction Stage.

Heating and cooling demand has been provided with the Energy Statement Addendum and complies. Overheating is suggested to be a pre-commencement planning condition which will benefit from more accurate design information and main contractor input.

Stakeholders have been contacted (London Borough of Hillingdon) and they have confirmed that at

this stage, they have no active planned Dens in the Borough. Correspondence to this respect is submitted with this letter.

A future District Heat Network connection has been proposed within the current Energy Statement. No drawings or M&E design have been produced / commissioned at this stage. We suggest a suitably worded pre-commencement planning condition for a revised DEN study (local area may have changed when this comes to site in 1-2 years) to include for this information.

It is considered that gas boilers are more suited to Hot Water production due to the high temperature required which ASHP struggle to heat any more efficiently and therefore at this stage, gas for the DHW production is still allowed for.

The Heating and Cooling demand figures are on the Be Green BRUKL and 100% of Heating and Cooling is proposed via the ASHPs.

Details of how the Seasonal Coefficient of Performance and Seasonal Energy Efficiency Ratio has been inputted in-line with NCM conventions based on manufacturers data and using dynamic simulation software which includes temperature / heating patterns using NCM data.

The distribution loss factor has not been undertaken at this stage and will form part of the Stage 3 MEP design. A relevant pre-commencement Energy Strategy conditions anticipated. Hot water is separate, and no additional technology will be required during peak time.

Carbon dioxide emissions have now been reduced as far as feasibly possible with the further introduction of WWHRS and higher efficiency PV panels. The remainder of emissions are likely to be proposed to be offset via carbon offset payment.

Information regarding BE Seen will be included in the Energy Statement addendum.

#### Urban Greening

An updated Landscape Strategy document has been submitted. The updated Landscape Strategy addresses the comments raised.

#### Air Quality

An updated Air Quality Assessment has been submitted to address the points raised.

#### Transport

With regard to Paragraph 52 'Walking and Cycling' an Active Travel Assessment is currently been undertaken and will be submitted prior to planning committee on the 19 August 2020.

With regard to Paragraph 53 'Walking and Cycling' we are happy for a condition to be attached which requires further details about the cycle spaces, showers and lockers.

The level of car parking provision to be provided on the Application Site is policy compliant, being within the maximum permitted by local planning policy. The level of provision has been assessed in detail, in consultation with the local highway authority.

Parking demand has been calculated based upon surveys of comparable hotel sites, including activity associated with conference and restaurant facilities and the level of provision proposed is more than adequate to cater for expected levels of demand.

A consultation response has been received from LBH Highways department, advising that they do not object to the proposals, subject to suitable planning conditions.

Any surplus parking has been provided as requested by the local highway authority in order to safeguard the safe operation of its network. A Parking Design and Management Plan can be secured by condition and will outline how these spaces will be designed and managed, including ensuring use of the accessible bays by Blue Badge holder only.

London Borough of Hillingdon standards require 5% active and 5% passive charging, however it should be noted that the proposals provides Electric Vehicle Charging Points above policy requirements (especially passive provision). All (100%) of the operational parking will include infrastructure for electric and Ultra Low Emission Vehicles in order to conform to the Intend to Publish London Plan.

With regard to Paragraph 59, we are happy for a condition to be included regarding the need to submit a Demolition and Construction Logistics Plan and a Delivery and Servicing Plan.

### **Internal Consultees**

Contaminated Land Officer

I have reviewed the following document:

Title: Preliminary Risk Assessment: Douglas Webb House, 546 Sipson Road, West Drayton; Ref: 1921271-R01 (00); Dated: 1st May 2020; Prepared by RSK Environment Limited.

The report outlines plausible contaminant linkages which represent moderate / low risks to future users, building structures and utility services at the site, and possibly to the occupants of adjacent properties. The identified linkages indicate further work, as a phase 2 intrusive site investigation, is required in order to address site-specific land contamination issues as identified within the preliminary risk assessment report. Therefore, it is recommended the following standard conditions are imposed if planning permission is granted.

Observations:

The initial conceptual model within the report identifies the following potential sources of contamination present on the site and in the surrounding area:

- Fill materials/made ground (in-filled pond area)
- Historical heating oil tank and plant rooms
- Possible asbestos present within the fabric of existing buildings
- Potential off-site sources are landfills and works in the vicinity of the site.

The preliminary risk assessment for three currently identified potential pollutant linkages is generally described as Moderate / Low. There is no objection subject to the inclusion of a planning condition.

Access Officer

This proposal for a 302 bedroom hotel has been assessed against the requirements of the 2016 London Plan and its contained policy 3.1, 4.5 and 7.2. Reference has also been made to Policy D11 as set out in the 2019 (intend to publish) London Plan.

1. To meet the requirements of London Plan 4.5, 9% of the proposed bedrooms should be fully accessible to wheelchair user guests. A further 1% (2 rooms) should be fitted with a tracked hoist system and have an adjoining door to a standard bedroom.
2. The ensuite bathroom design appears not to be designed to an up to date standard. Plans should be amended to accord with the design and layout set out in BS 8300-1:2018, Figure 30.
3. As the majority of wheelchair users prefer showers, 75% of the ensuite bathrooms within the

required accessible bedrooms should have level access showering facilities.

4. The refuge areas shown on plan for wheelchair users are considered to be inadequate provision to facilitate safe and convenient means of escape of all building users. To be of an sufficient number given the number of accessible bedrooms. Policy D11 states unequivocally that all development proposals must achieve the highest standards of fire safety. Accordingly, this major development proposal should be supported with a Fire Statement, which is an independent fire strategy, produced by a third party suitably qualified assessor. The statement should detail how the development proposal will function in terms of:

- a) the building's construction: methods, products and materials used, including manufacturers details
- b) the means of escape for all building users: suitably designed stair cores, escape for building users who are disabled or require level access, and the associated management plan approach and associated evacuation strategy approach.

It should be further noted that the responsibility to provide proper evacuation for disabled people is the responsibility

of the hotelier, not the fire service. Therefore, inherent in the design must be facilities that permit disabled people to

leave the building in a safe and dignified way during an 'all-out' evacuation. Reference to BS 9999:2017 is advised.

5. The supporting Design and Access Statement refers to are out of date guidance documents and standards. The proposal should be amended accordingly to incorporate current best practice specifications.

Revised Comments (July 2020)

In response to the communication received from Barton Willmore dated 16th June 2020 follow up commentary on the accessibility provisions is as follows

1. The proposed 10.3% of accessible rooms, of which 1.7% would feature a tracked hoist system and interconnect with an adjacent standard room, is acceptable.
2. The upgrade of bathroom dimensions as per BS8300-2:2018 (Figure 33) is acceptable.
3. The inclusion of level access to 80% of the Type 1 accessible bedrooms which would feature a shower is acceptable.
4. The provision of one refuge space per accessible bedroom on the floor above the ground is acceptable.
5. It is accepted that a fire fighting lift may not be required in hotel buildings not exceeding 18m in height, however an evacuation lift is a requirement of the 2019 (intend to publish) London Plan as referenced in paragraph 3.12.8 " ... In all developments where lifts are installed, Policy D5 Inclusive design requires as a minimum at least one lift per core (or more, subject to capacity assessments) to be a suitably sized fire evacuation lift suitable to be used to evacuate people who require level access from the building.

Fire evacuation lifts and associated provisions should be appropriately designed and constructed, and should include the necessary controls suitable for the purposes intended". The Design and Access statement should include the provision of an evacuation lift. The details of which are required by condition.

Trees and Landscaping Officer

This site is currently occupied by buildings formerly known as the Metropolitan Police's Section House. It is broadly triangular-shaped site situated on the south side of Sipson Road, from where it is accessed. The site is bounded to the east by the M4 / Heathrow Airport spur road, to the west by the rear gardens of Sipson Way and by an airport-related car park to the south. The Park Inn,

Heathrow is situated to the east on the far side of the spur road. No access has been gained to the site but a desk-based study indicates that there are no individual trees of merit on the site. The most significant landscape feature is the tall conifer hedge which defines the west boundary and provides an evergreen screen between the residential area to the west and the site. There are no tree or landscape planning designations which affect the site.

The site has been the subject of a number of pre-applications and applications, most recently ref. 11068/APP/2019/3079. A tree report by RPS, dated April 2020, has been submitted which identifies and assesses 17 individual trees, two hedges and one group of trees. Table 1, the Tree Schedules and Fig. 1, drawing No. 703, Tree Survey Plan are missing. Drawing No. 704 provides a Tree Protection and Removal Plan. The report includes an Arboricultural Impact Assessment and Method Statement.

COMMENT: Landscape The submission is supported by a Landscape Masterplan, ref. 0137100, by ME Landscape Studio. The Landscape Masterplan includes the retention of the hedge on the northern boundary, the trees on site in the south-west corner and the off-site trees on the embankment of the spur road. New living landscape will be incorporated along the southern boundary, between the ramped access to the car park and the surface level disabled parking, in the entrance forecourt and within the garden lobby. A Landscape Approach document, Rev B, explains the landscape design concept. The report presents a draft palette of hard and soft landscape materials and reference is made to the planting / management constraints imposed by Heathrow with regard to bird strike avoidance. A roof level wildflower meadow beneath photovoltaic panels on the roof levels 3,4 and 6 is proposed. A preliminary ecological appraisal (PEA) has been prepared by Greengage. The recommendations in 1.9 note the need for wildlife-friendly planting, an area of biodiverse roof, the installation of bat boxes and the incorporation of invertebrate features within the landscape. - These features will need to be incorporated within the landscape plans. A Bird Hazard Management document has been prepared by Greengage which includes details of soft landscape management. While the site does not lie within the Green Belt, it is adjacent to it. An assessment of the visual impact on the Green Belt is presented by Scarp. It concludes that the development will not have any meaningful effect on either the perceived openness of the Green Belt or the amenity value of the views within it. This assessment is accompanied by selected modelled wireframe views. RECOMMENDATION No objection subject to pre-commencement conditions relating to tree protection and landscaping condition.

Highways Officer

You will be aware that this scheme follows that contained under ref, 11068/APP/2018/1852 for a 275 bed hotel which the Highway Authority had raised objections to on the basis of lack of detailed information. The application was subsequently refused by the Local Planning Authority on a notice dated 12 February 2019 with five reasons for refusal one of which was highways related. The decision was later appealed by the applicant who in turn produced a technical note seeking to address the issues raised. Although the appeal was dismissed on a notice dated 20th December 2019, the Highways reason for refusal was conceded.

This current application in terms of highway impacts is similar to the previous albeit with an increase in the number of bedrooms (27 bedrooms). This current proposal seeks a 301 bed hotel with restaurant/bar facilities.

The application site is located along the A408 (Sipson Road) which makes up part of the Boroughs Classified Road Network. Given the sites close proximity to Heathrow Airport terminals 2 & 3, it is envisaged that this site would predominantly serve airport visitors.

Having assessed Transport for London's WebCAT service tool, the site has been identified to provide a public transport accessibility rating of 2 which on the scale of 1 -6a (6a being the best) is deemed as poor. This would therefore heighten the dependency on the private motor vehicle.

You will be aware that the London Borough of Hillingdon has formally adopted the Local Plan Part 2 (January 2020). Policy DMT6 for a C1 use indicates assessment on an 'individual basis' with consideration of factors such as taxi pick up and set down facilities, car rental provisions, extraneous activities in addition to normal hotel operations such as hosting functions/banquets, conferences, night clubs or any other external business related uses.

Having assessed the submitted information it is proposed that this scheme provide 81 guest spaces (including 8 disabled spaces) and 6 staff spaces (including 1 disabled). Whilst the ratio of parking for this scheme is lower than that in the previous scheme. The applicant has carried out parking accumulation based on the sites previously agreed trip rate data which shows that 81 spaces to serve hotel guests is sufficient. It should also be noted that two of the surveyed sites within the raw TRICS data include function and meeting rooms which are larger to that which is currently being proposed. On this basis the number of parking spaces proposed is accepted.

Ramp gradients, access widths and general designs all appear conform with the 'Institute of Structural Engineers' standards i.e. Design recommendations for multi-storey car parks and underground car parks - fourth edition 2011 and relevant Building Regulations.

The Transport assessment mentions that the site would benefit from the Heathrow 'National Express' - Hoppa bus service which already serves multiple hotels in the vicinity. Given the positive impact this will arrangement will provide in terms of promoting sustainable travel to and from the site, this is welcomed. I trust you as the Local Planning Authority will secure this by way of condition/legal agreement.

The adopted Local Plan Part 2 (January 2020) also requires 1 coach parking space per 50 bedrooms. Although only 4 coach parking spaces are being proposed given the impact the Hoppa bus service will have on the development this provision is accepted.

To accord with the Local Plan Part 2 DMT6 policy and parking standard for a C1 use, the development should provide 10% provision of the total parking facility. This percentage should therefore be demonstrated. The total provision of 8 spaces is to be provided which is therefore considered acceptable.

A requirement for electric vehicle charging points (EVCPs) is also required which would equate to a minimum facility of 5% of the total parking quantum for 'active' provision with a further 5% acting as 'passive' provision for future activation. The submissions show that the proposals will provide 16 active spaces and 16 passive spaces for hotel guests as well as 1 active and 1 passive space for staff members. I trust this will be secured by way of condition.

In terms of cycle parking provision, the proposals will provide 32 spaces in excess of the minimum standard which requires 16 long stay spaces and 7 short stay spaces (23 spaces). This level of provision is accepted.

Motorcycle parking should be provided in line with the Local Plan Part 2 which is 5% of the overall parking provision. This totals 4 anchored spaces. This should be dealt with via condition.

In order to establish the sites trip generation potential the applicant has used TRICs data from an extant planning permission (11068/APP/2016/2994 -for a 90 bedroom hotel) at the site and has adjusted the quantum calculations accordingly.

The development would generate an increase of 26 vehicle movements during the AM peak period and 23 movements during the PM peak period compared to the consented scheme. This would equate to 1 vehicle every 3-4 minutes which is expected to be sufficiently absorbed within the background traffic already along the network.



Mindful of the above I do not have any objections subject to the following being secured via obligation/conditions.

- Construction Logistics Plan
- Service and Delivery Plan
- Framework Travel Plan
- Car Parking Management Plan

Air Quality Officer

The application site falls within the Sipson Focus Area Focus Area (FA), which is a zone identified by both the Greater London Authority (GLA) and London Borough of Hillingdon (LBH) as experiencing pollutant concentrations above the limit value to safeguard human health, with high density of population being exposed to such hazardous levels. As per the London Plan and London Borough of Hillingdon Local Action Plan, developments need to be neutral as minimum and contribute actively to reduce pollution in Focus Areas, contributing to the reduction of emissions in these sensitive areas.

Whereas the proposed development is air quality neutral for building emissions, no transport emissions were accounted for in the air quality neutral assessment. The reason being that there is no benchmark defined for C1 use. To account for the additional transport related emissions the proposed development is likely to originate throughout its operational phase and support the determination of the level of mitigation required within the Focus Area, the trip generation of the proposal was used.

The proposed development is located with the Sipson Focus Area, bringing additional air pollutant emissions which will add to current exceedances. As per the new London Plan, developments need to be neutral as minimum and positive in Focus Areas, contributing to the reduction of emissions in these sensitive areas. The total level of mitigation associated with transport emissions is £64,643. However it is noted that the air quality assessment submitted to support the planning application recommends a minimum level of mitigation is applied which included:

- The provision of at least 1 Electric Vehicle (EV) "rapid charge" point per 1000m<sup>2</sup> of commercial space. The total area of the proposed development is 17,034m<sup>2</sup>
- Provision of a travel plan (with provision to measure its implementation and effect) which sets out measures to encourage sustainable means of transport (public, cycling and walking) via subsidised or free-ticketing, improved links to bus stops, improved infrastructure and layouts to improve accessibility and safety; and
- All gas-fired boilers to meet a minimum standard of <40 mgNO<sub>x</sub>/kWh.

Therefore, a reduction of 15% has been applied to the total mitigation level required. The remaining mitigation required is to be provided through a section 106 agreement with the LAP of £54,946 to be paid for Hillingdon to deliver its air quality local action plan and or implement specific measures on/along the road network affected by the proposal that reduce vehicle emissions and or reduce human exposure to pollution levels.

There is no objection subject to the inclusion of a Section 106 legal agreement and conditions.

Planning Policy Officer

Paragraph 86 of the National Planning Policy Framework (NPPF) (2019) states that local planning authorities should apply a sequential test to planning applications for main town centre uses which are neither in an existing centre nor in accordance with an up-to-date plan. The site is not located within or on the edge of an existing town centre. The original approved planning application (11068/APP/2016/2994) and the subsequent refused planning application (11068/APP/2018/1852)

did not have sequential tests attached to them. Noting that the same requirement for sequential testing of main town centre uses was included in both the NPPF (2012) and NPPF (2018), one can infer that the officers dealing with the previous planning applications were therefore satisfied that the proposals were in accordance with the development plan at those points in time.

In regards to the Local Plan, Policy E2 of the Local Plan: Part 1 (2012) would remain relevant to the determination of the new proposals and states the proposals for new hotel bedrooms will be encouraged in Uxbridge, Hayes and on sites outside of designated employment land on the Heathrow perimeter and in other sustainable locations. However, the previous Saved UDP policies T2 and T4 referred to in the previous reports have since been withdrawn upon the adoption of the Local Plan: Part 2 in January 2020. This also introduced Policy DME 5, which specifically outlines that visitor accommodation will be supported in sustainable locations as defined in the Local Plan: Part 2 - Site Allocations and Designations (2019). These sustainable locations are allocated as Hayes and Uxbridge Town Centre, with the omission of sites along the Heathrow perimeter following the Inspector's Report on the Local Plan: Part 2. As the scheme is not within Hayes or Uxbridge Town Centre, it cannot be considered to be in accordance with the Local Plan.

In regards to the London Plan (2016), Policy 4.5 outlines that new visitor accommodation should be focused in town centres and opportunity and intensification areas, where there is good public transport access to central London and international and national transport termini. The proposal is located within the very broad area of the Heathrow Opportunity Area, which would suggest that a sequential test may not be required. However, following amendments to the draft London Plan (2019) after the public hearing sessions, Policy E10 now provides a clear position that whilst serviced accommodation should be promoted within Opportunity Areas, this still needs to be done in accordance with the sequential test as set out in Policy SD7. This policy mimics Paragraph 86 of the NPPF (2019) and outlines that boroughs should apply the sequential test to applications for main town centre uses. The draft London Plan (2019) therefore does not imply that locations outside of main town centres are appropriate for new visitor accommodation without a sequential test.

There is a question as to whether the planning permission granted in 2016 for a 90-bed hotel by a change of use to the existing building (Ref.11068/APP/2016/21994) was implemented, noting that the application form for the approval of details (11068/APP/2019/3079) submitted in September 2019 stated that the scheme had not commenced. Regardless, even if it had been implemented, the uplift of 212 bedrooms is considered significant and would require justification itself through a sequential test.

The applicant has submitted a sequential test with the application. The sequential test has sought to demonstrate that there are not sites within or on the edge of a town centre, which could also meet the same or similar operational requirements of the proposal, including similar or better access to Heathrow Airport terminals by public transport. The applicant has up to 9 surrounding town centres (Harlington, Hayes, West Drayton, Hounslow, Southall, Feltham, Staines, Slough and Ealing) and concluded that 6 should be taken forward for the full sequential test (Hayes, West Drayton, Hounslow, Southall, Feltham and Staines). The sequential test has concluded that, from a search of allocated and windfall sites, there are no sequentially preferable suitable and available sites for the proposal.

The proposed development would include a net increase of 212 C1 bedrooms from the previous change of use approval. The London Plan (2016) outlines in Policy 4.5 that the Mayor and boroughs should seek to achieve 40,000 net additional hotel bedrooms by 2036. In terms of the London Borough of Hillingdon, the Local Plan: Part 1 (2012) identifies in Policy E2 that projected hotel growth in the borough will be required at a minimum of 3,800 additional bedrooms between 2007 - 2026, based on the GLA's Hotel Demand Study (2006). However, the LPP1 (2012) also outlines a far higher benchmark of 5,600 additional bedrooms between 2012 - 2026, based on a subsequent Hillingdon Tourism Study (2007). The LPP1 notes the need to monitor these figures

closely in order to determine the most realistic projection. Between 01/04/2012 to 31/03/2020, the net completion figure for C1 bedrooms was 2,734. In the same time period, a further 850 C1 bedrooms were started and 944 C1 bedrooms remained in extant permissions that had not been started (Data as of Aug 2019). The data above does not include planning permissions that have been approved subject to S106 agreements. Noting this significant growth to date and the amount of time left before 2026, it is considered that the 5,600 benchmark is the more appropriate figure.

Policy 4.5 of the adopted London Plan (2016) outlines that new visitor accommodation beyond the CAZ should be focused in opportunity areas and where there is good public transport access to international and national transport termini. Policy E10 of the Intend to Publish Version of the London Plan (2019) outlines a similar policy, stressing the need for them to be in areas that are well-connected by public transport. The proposal is located within the broad area of the Heathrow Opportunity Area and has a PTAL rating of 3. The scheme also has good bus access to Heathrow Airport. It is therefore considered that the proposal would have good public transport access to Heathrow Airport terminals and the town centres of Harlington, Hayes and West Drayton.

On the basis that the sequential test has been passed, there is strategic policy support for more C1 bedrooms and the site is deemed compliant with other development plan policies regarding new hotel bedrooms, there is no in principle policy objection to the proposal.

#### Sustainability Officer

The energy strategy for the proposed development is not adequate. It fails to address an onsite 35% reduction in CO2 with a shortfall being provided through an offsite contribution. This is an incorrect approach. The development target is a minimum onsite saving of 35% unless suitable justification is provided to determining why this is not the case. This justification is not provided.

It is entirely feasible that a scheme of this size can achieve a minimum of 35% reduction in Co2 onsite and could easily achieve much higher with more effort and a better understanding of the energy saving policies. Consequently, the following condition and S106 obligations are necessary to secure an improved approach to CO2 reduction.

Prior to above ground works, a detailed energy assessment shall be submitted to and approved in writing by the Local Planning Authority. The energy assessment shall demonstrate how the development will achieve a minimum 35% reduction in CO2 through the application of the London Plan energy hierarchy, Be Clean, Be Lean and Be Green in combination. An offsite contribution will be required only on the submission and agreement with the Local Planning Authority of suitable justification why the 35% target cannot be achieved on site. The assessment shall provide full details of the measures to be incorporated into the development and their impact on the baseline development (2013 building regulation compliance) in terms of energy (KwHr) and CO2 (KgCo2).

The assessment shall provide full details of the plans and specifications of any low and zero carbon technology to be used including, for example, roof plans and elevations if PVs are selected.

Finally, the assessment shall clearly set out any shortfall in emissions below the 35% target.

The development must proceed and be operated in accordance with the approved plans and specifications.

Reason: To ensure the development contributes to a reduction in CO2 in accordance with London Plan Policy 5.2.

Applicant's response:

XXXXXXX TBC XXXXXXXXXXXXXXX

## Flood Water Management Officer

The site is in a critical drainage area, but SW flooding is not shown to affect the site. This simply means that this area contributes to an area which is affected.

The proposed development will result in a hardstanding area of 0.84 ha and a soft landscaped area of 0.10 ha. The existing drainage system appears to discharge into Sipson Road however this has not been confirmed at this stage. At this stage, the outfall location of these sewers is unknown however

Reference to Thames Water Asset Location Plans (included as Appendix E) indicates that the nearest surface water sewer is a 150 mm sewer located beneath Sipson Way.

Thames Water plans identify a further 300 mm surface water sewer located beneath Sipson Road to the east of the M4 motorway. The aforementioned sewers are joined at manhole 4304 which is located at the junction between Sipson Road and Sipson Way. Thames Water sewer plans indicate this manhole to have an undefined end. Thames Water Asset Location Plans indicate two manholes within the site.

- Finished floor levels of the proposed development are raised above surrounding ground levels.
- Cut-off drains are included within the basement ramp to prevent the ingress of water.
- The existing QBAR discharge rate has been calculated as 3.7 l/s using the ICP SuDS Method.
- Total attenuation achievable by this system is 827 m<sup>3</sup>.

However half drain of the proposed attenuation system exceeds the 24 hour half drain time requirement (approximately 27.5 hrs based on QBAR of 3.7 l/s). A common approach to deal with this is to provide additional storage (i.e for a 1 in 10 year event) on top of the overall storage provided for the design. There is limited space to provide additional storage. Whilst it may be possible to increase the overall depth of the proposed attenuation system, existing and proposed site levels would dictate that a pumped discharge will be required. It should be noted that the discharge of 5.0 l/s which represents an approximate 90% betterment over the existing situation, and significantly higher betterment compared to the 1 in 30 and 1 in 100.

As such, it is proposed to restrict surface water run-off from the site to 5.0 l/s in order to achieve an appropriate half drain time, a gravity solution and ensure that the system.

The site itself is not at risk, it is a large area in a CDA which is mostly small scale residential and unlikely to be developed on any scale and so policy compliance must be achieved.

"A further surface water sewer is located beneath Sipson Road to the east of the M4 therefore these sewers may be connected however confirmation of this would be required. Thames Water have noted that subject to agreement with the Local authority they will accept discharge of flows to their system".

It is critical that full understanding of where this system drains to so that the full catchment is understood and assessed for capacity.

"The Conceptual Surface Water Drainage Strategy proposes to provide the full balance of attenuation within a combination of porous paving and underground geocellular storage crate system as follows".

There may be an opportunity to explore rainwater harvesting at the detailed design stage.

Section 10.2.9 references proposals including green roofs but these are not referenced elsewhere or shown in the proposals but it is mentioned that these could be considered at detailed design, further reassurance that this could be addressed at detailed design and considerations of depth and

structural loading can be incorporated at that stage.

Although a management and maintenance plan has been submitted as an Appendix it is not clear which body will be responsible for the elements of the drainage systems which should be set out clearly in any plan.

Please note the London Borough of Hillingdon Local Plan Part 2 was adopted in March 2020 Policy DME110: Water Management (SuDS) Efficiency and Quality.

Details of Hillingdon requirements can be found on the Council website, including a Design and Evaluation Guide as well as detailed proformas to speed up review of technical submission.

#### Design Officer Comments

I am conscious that the inspector did not not raise any concern with the detailed design of the building nor its height and bulk and his concerns were centred around amenity issues. The external treatment of the building largely remains the same except for the alignment of the 5th and 6th and the building cut back and lowered in height on western side to overcome the Inspectors concerns with respect to neighbouring amenity.

Taking into consideration the Inspectors comments it would appear that the applicant has addressed the amenity issue. Since the detailed design bulk and massing of the scheme is not greatly different to the appealed scheme I would raise no objection to that submitted. Further to my previous design comments, provided during the most recent pre-application enquiry (11068/PRC/2020/40), I had requested that the re-aligned fifth and six floors should include fenestration on the north elevation to avoid two-storeys of featureless blank brickwork at a high level. This has been achieved in the new design and overcome my concerns.

I have reviewed the design comments within the committee report and do not have any further to add.

The success of the scheme will be dependent on the finer detailing, choice of materials and workmanship. Should the application be minded for approval then it is suggested that conditions be attached requesting samples of all external materials and detailed drawings of the windows, doors, signage, boundary treatments and roof weathering details.

## **7. MAIN PLANNING ISSUES**

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

Paragraph 86 of the NPPF (2019) requires local planning authorities to apply a sequential test to planning applications for main town centre uses which are neither in an existing centre nor in accordance with an up-to-date plan. Main town centre uses should be located in town centres, then in edge of centre locations; and only if suitable sites are not available (or expected to become available within a reasonable period) should out of centre sites be considered.

Policy 4.5 of the London Plan (2016) outlines that new visitor accommodation should be focused in town centres and opportunity and intensification areas, where there is good public transport access to central London and international and national transport termini. The proposal is located within the broad undefined area of the Heathrow Opportunity Area. However, Policy E10 of the draft London Plan (2019) notes that whilst serviced accommodation should be promoted in town centres and within Opportunity Areas, developments are required to follow the sequential test as set out in Policy SD7 of the Intend to Publish version of the London Plan (2019). This policy aligns with Paragraph 86 of the NPPF (2019) and outlines that boroughs should apply the sequential test to applications for main town centre uses.

Policy E2 of the Local Plan: Plan Part One (2012) states that the requirement for additional hotel bedrooms will be encouraged in Uxbridge, Hayes and on sites outside of designated employment land on the Heathrow perimeter and in other sustainable locations. Policy E2 identifies that projected Hotel Growth in the borough will be required at a minimum of 3,800 additional bedrooms between 2007 - 2026, based on the GLA's Hotel Demand Study (2006). However, the LPP1 (2012) also outlines a far higher benchmark of 5,600 additional bedrooms between 2012 - 2026, based on a subsequent Hillingdon Tourism Study (2007). The LPP1 notes the need to monitor these figures closely in order to determine the most realistic projection. Between 2012/13 and 2018/19, net 2,709 C1 bedrooms had been completed within the London Borough of Hillingdon. As of the 31/03/2019, there were a further 988 bedrooms under construction and 622 bedrooms with existing permissions yet to be implemented. Therefore a net 4,319 bedrooms have been completed or could reasonably be completed within the period 2012-2026. Noting this significant growth to date and the amount of time left before 2026, it is considered that the 5,600 benchmark is the more appropriate figure.

Likewise, Policy DME 5 of the Local Plan: Part Two (2020) notes that visitor accommodation will be supported in sustainable locations as defined in the Local Plan: Part 2 Site Allocations and Designations (2020). These sustainable locations are allocated as Hayes and Uxbridge Town Centre. The application site is not within either of these locations and therefore it is not in accordance with the Local Plan. As the scheme is not within Hayes or Uxbridge Town Centre, it cannot be considered to be in accordance with the Local Plan.

The planning consent under Ref: 11068/APP/2016/21994 was not implemented and as such the applicant has submitted a sequential test in support of the application. The sequential test has sought to demonstrate that there are no sites within or on the edge of a town centre, which could also meet the same or similar operational requirements of the proposal, including similar or better access to Heathrow Airport terminals by public transport. The applicant has identified up to 9 surrounding town centres (Harlington, Hayes, West Drayton, Hounslow, Southall, Feltham, Staines, Slough and Ealing) and concluded that 6 should be taken forward for the full sequential test (Hayes, West Drayton, Hounslow, Southall, Feltham and Staines). The sequential test has concluded that, from a search of allocated and windfall sites, there are no sequentially preferable suitable and available sites for the proposal.

The proposed development would include a net increase of 212 C1 bedrooms from the previous 2016 change of use approval. The London Plan (2016) outlines in Policy 4.5 that the Mayor and boroughs should seek to achieve 40,000 net additional hotel bedrooms by 2036. The Local Plan: Part 1 (2012) identifies in Policy E2 that projected hotel growth in the borough will be required at a minimum of 3,800 additional bedrooms between 2007 - 2026, based on the GLA's Hotel Demand Study (2006). However, the Local Plan: Part One (2012) also outlines a far higher benchmark of 5,600 additional bedrooms between 2012 - 2026, based on a subsequent Hillingdon Tourism Study (2007). The Local Plan: Part One (2012) notes the need to monitor these figures closely in order to determine the most realistic projection. Between 01/04/2012 to 31/03/2020, the net completion figure for C1 bedrooms was 2,734. In the same time period, a further 850 C1 bedrooms were started and 944 C1 bedrooms remained in extant permissions that had not been started (Data as of Aug 2019). The data above does not include planning permissions that have been approved subject to S106 agreements. Noting this significant growth to date and the amount of time left before 2026, it is considered that the 5,600 benchmark is the more appropriate figure. This development would contribute towards meeting the need for visitor accommodation within the Borough which is a material planning consideration that weighs in favour of the development.

Policy 4.5 of the adopted London Plan (2016) outlines that new visitor accommodation beyond the CAZ should be focused in opportunity areas and where there is good public transport access to international and national transport termini. Policy E10 of the Intend to Publish Version of the London Plan (2019) outlines a similar policy, stressing the need for them to be in areas that are well-connected by public transport. The proposal is located within the broad area of the Heathrow Opportunity Area and has a PTAL rating of 3. The scheme also has good bus access to Heathrow Airport and the Applicant proposes to be served by the Hoppa bus service which provides direct transfers from hotels within the Heathrow area to the airport. It is therefore considered that the proposal would have good public transport access to Heathrow Airport terminals and the town centres of Harlington, Hayes and West Drayton.

On the basis that the sequential test has been passed, there is strategic policy support for more C1 bedrooms and the site is deemed compliant with other development plan policies regarding new hotel bedrooms, there is no in principle objection to the proposal. Notwithstanding there being no in principle objection to a hotel within this location, however Policy DME 5 of the Local Plan: Part Two (2020) seeks to ensure the provision of a hotel would have no adverse impact on nearby land uses or on the amenity of either adjoining occupants or proposed occupants by virtue of noise, lighting, emissions, privacy, overlooking, any other potential nuisance, parking or traffic congestion. These matters are assessed within the relevant sections of the report.

#### Loss of Social Infrastructure

The site was used as a police section house, which would be defined as a sui generis use. In 2016, it was reported that the building would have provided relatively short term accommodation, in accordance with the general policy ethos of current planning policies due consideration is given to its loss and any wider impacts which might be associated with this.

In this instance, the application site has remained vacant for the last 4 years and prior to this, it was seldom used. In 2016, it was reported that the police have made very limited use of the site since 2014 and it was evident at the time that all but a small part of it (believed to be used by the police dog handling unit) was disused and had been for some time.

It is understood that the Police Service has moved its functions to other locations. As such, the police no longer have a need for the site. The Metropolitan Police have been consulted on the application and, notably, no objections have been received in this respect. Accordingly, this argument is accepted and on the basis of the above, no objections are raised in principle to the loss of the existing use.

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

Not applicable to this application.

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

Paragraph 189 of the NPPF (2019) requires applicants to provide an archaeological assessment if their development could affect a heritage asset of archaeological interest.

Paragraph 192 of the NPPF (2019) requires local planning authorities to take account of:

- a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
- b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and
- c) the desirability of new development making a positive contribution to local character and distinctiveness.

Policy 7.8 of the London Plan (2016) states that "development should incorporate measures that identify record, interpret, protect and, where appropriate, present the site's archaeology.

There are no conservation areas, listed buildings, or Areas of Special Local Character within the vicinity of the application site. The application site falls within an Archaeological Priority Zone and as such, a desk-based assessment was provided in support of the application which considered the archaeological interest of the application site.

GLAAS were consulted on the application and GLAAS advised that the development could cause harm archaeological remains and therefore field evaluation is needed to determine appropriate mitigation. GLAAS advised that considering the nature of the development, the archaeological interest and practical constraints that a two stage archaeological condition is considered to be an acceptable safeguard. This requires the applicant to provide an evaluation to clarify the nature and extent of surviving remains, followed, if necessary, by a full investigation. A condition and informative has been attached to the draft decision in line with the recommendation made by GLAAS.

#### **7.04 Airport safeguarding**

Policy DMAV 1 of the Local Plan: Part Two (2020) notes that the Council will support the continued safe operation of Heathrow Airport and RAF Northolt and will consult with the relevant airport operators on proposals in safeguarded areas. Proposals that may be a hazard to aircraft safety will not be permitted. NATS and Heathrow Airport Safeguarding have been consulted on this application and no safeguarding objections have been raised to this application and as such the proposal would not be detrimental to the safe operation of any airport.

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

The application site does not form part of, nor does it immediately adjoin the Green Belt, with the nearest Green Belt 62m to the north of the site and it separated by a road and houses between the Green Belt boundary and the site. Given the relative distance, the proposal would not impact the openness of the Green Belt.

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

Paragraph 127 of the NPPF (2019) seeks to ensure that developments will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development, are sympathetic to local character and history, including the surrounding built environment and landscape setting and create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users.

Policy 7.1 of the London Plan (2016) sets out a series of overarching design principles for development in London and Policy 7.6 (2016) seeks to promote world-class, high quality design and design-led change in key locations.

Policy BE1 of the Local Plan: Part 1 (November 2012) requires all new development to improve and maintain the quality of the built environment in order to create successful and sustainable neighbourhoods, where people enjoy living and working and that serve the long-term needs of all residents.

Policy DMHB 11 of the Local Plan: Part Two (2020) requires new developments to be designed to the highest standards and, incorporate principles of good design by harmonising with the local context by taking into account scale, height, mass and bulk, building plot sizes and widths, plot coverage and established street patterns; building lines and setbacks, rooflines, streetscape and rhythm.



Policy DMHB 12 of the Local Plan: Part Two (2020) advises that development should be well integrated with the surrounding area. It should ensure public realm design takes account of the established townscape character and quality of the surrounding area.

The hotel accommodation is arranged in two main wings; the west wing and the east wing facing the M4 spur motorway. The total Gross Internal Area (GIA) is 17,034 sq.m (including plant space). The proposed development comprises of 302 rooms across seven floors which includes 14 rooms proposed within the basement.

There is an existing site servicing road to the western boundary as part of the current building. This is being retained as this is an established route. A road along the Application Site would always be required to allow fire tender access to the back of the building. By placing servicing to the rear, the proposal creates a welcoming entrance by providing a generous landscaped forecourt. The number of vehicle movements to the service area would be relatively low as the majority of car parking and vehicle movements is located in the underground car park, accessed at the northern end of the Application Site.

The site is a transition between the airport context with large commercial buildings, wide roads and a more open context and a suburban context to the north that is characterised by two storey semi-detached dwellings. As such, the proposed development has been designed to read as a transition between the two sites. This is done by varying block heights, scale and mass.

The western part of the site is most sensitive which is why the main building volume and height at six storeys (above ground) is positioned on the east side of the site, where it is set back and acts as an acoustic shield, deflecting noise from the motorway. The proposed hotel rooms sit within the existing buildings footprint and similar height which range from one to three storeys.

The eastern wing faces the M4 spur and presents its longer elevation orientating windows towards it and stepping up to six storeys above ground. It's northern end steps down to four storeys to respond to the narrowing site width, arrival forecourt and most importantly the existing dwellings on Sipson Road and Sipson Way. The six storeys replicate the Park Inn Hotel found to the opposite side of the M4 spur.

Since the previous application was dismissed at appeal, the applicant has reduced the two storey element by 16 metres so the footprint of the building sits within the confines of the existing built footprint. The three storey element has been scaled back by 29m, which is well within the existing footprint. The proposal is therefore considered to have an acceptable relationship with the finer grain to on the western boundary of the site.

The Planning Inspector noted within their decision, that:

""In considering the overall acceptability of the design, significant weight should be placed on the appearance of the existing building on the site. As a large-scale building, this already departs from the suburban character of Sipson and related more to the commercial, tourism and aviation related uses along the Bath Road. In consequence, the motorway does not represent a significant functional break in the urban fabric of this area.

Whilst it is argued that the design of the existing building on the site related well to the remainder of Sipson, this is also true of the proposed building; primarily as a consequence of its staggered height and the largely successful visual relationship with existing residential buildings beyond its western boundary. Overall, the proposal represents a functional design solution meeting contemporary expectations of such hotel uses. In this

respect it would modernise and improve the quality of the built environment." and

"Whilst rising to a greater height than the existing built development in Sipson, given that the higher portions of the development would be set well away from the development associated with the village, it would not be of a scale that appears unduly dominant. In this respect the development would blend it to its context, and would not appear as a tall building."

The taller 6 storey (above ground) of the building would be read in the context of the airport related development. It would replicate the footprint and massing of the Park Inn Hotel to the east of the M4 spur. Its design is functional and the proposal reflects the use of the site. The proposal that broadly replicates the design principles, massing, height and scale of the previous scheme, taking into consideration the Planning Inspector's comments within the appeal decision, the proposal is considered acceptable.

The eastern elevation has significant architectural detail with facade depth creating a highly modulated facade. Each window bay is angled inwards, which is alternated in direction to each floor. The top three floors are combined together, creating a more vertical proportion to act as a 'top' to the building - as in more solid brick 'bottom', 'middle bands' and top. This helps to balance against the horizontal proportions inherent in the building footprint. The western elevation is also varied with its facade treatment and given its location and two storey height, would never been seen in its entirety from the west.

Existing trees to the southern end (tallest part of the building) help to set the building in a landscape context. The building faces a 7-lane motorway and large open space. The proposed 6 storey building is in keeping with the scale and surrounding area it faces and present in the surrounding airport context. To ensure the proposal is finished to a high quality, details of all external materials and finishes are required by condition if the application is approved.

## **7.08 Impact on neighbours**

Policy BE1 of the Local Plan: Part One (2012) requires developments to be appropriately designed so developments do not adversely affect their surroundings or the local character.

Policy DMHB 11 of the Local Plan: Part Two (2020) requires that development proposals should not adversely impact on the amenity, daylight and sunlight of adjacent properties and open space.

Policy DME 5 of the Local Plan: Part Two (2020) supports hotel and visitor accommodation in appropriate locations provide it would not result in an adverse impact on nearby land uses or on the amenity of either adjoining occupants or proposed occupants by virtue of noise, lighting, emissions, privacy, overlooking, any other potential nuisance, parking or traffic congestion.

The nearest residential dwellings that could be affected by the development are Nos 5-21 Sipson Way which are a number of semi-detached houses situated to the north west of the application site. To the east and the south sides of the development site are respectively the M4 motorway spur and the Heathrow car park. Therefore, there are no buildings to consider.

As noted above, the previous appeal was dismissed due to its proximity and relationship with the residential units situated to the north western part of the site. The main change between the previous scheme dismissed at appeal and this application is the removal of the northwest corner of the building. This application proposes to setback the footprint and

entrance by 16.5 m and reduced the height from 3 to 2 storeys. The footprint under the current application is confined to that of the existing building. The submitted daylight and sunlight report confirms that the proposal would have no impact on the daylight levels for the windows and amenity spaces of the dwelling houses situated to the north western boundaries of the site.

In terms of privacy, the part of the building nearest to existing residential units is proposed to sit entirely within the confines of the existing footprint on site. The 2- storey element is proposed to be situated 22.5m from the nearest habitable room. The proposed 3-storey element is proposed to be situated 29m from nearest habitable room and the 6-storey part of the building is situated 54m from the nearest habitable room.

A Leylandii hedge runs the along the length of the western boundary between the proposed hotel and the neighbouring residential units. This is proposed to be retained and maintained at a height of approximately 2.5-3m. The proposal would not result in the loss of privacy of neighbouring properties. Given the proposed setbacks and reduction in height along the northern boundary, it is considered the proposal would not result in an overbearing impact on neighbouring properties and this proposal overcomes the Inspector's concerns with the original proposal for this site.

Given the relative distance of the proposed hotel to the neighbouring residential boundary, external lighting could result in nuisance. As such details of an external lighting scheme including the intensity of illumination and predicted lighting contours is required by way of condition.

Matters relating to noise and disturbance are covered in Section 07.18 of the report.

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

Given this is a commercial proposal, the living conditions of future occupiers is not applicable to this development.

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

Policy DMT 1 of the Local Plan: Part Two (2020) requires development proposals to meet the transport needs of the development and address its transport impacts in a sustainable manner. Policy DMT 2 of the Local Plan: Part Two (2020) notes development proposals must ensure that safe and efficient vehicular access to the highways network is provided to the Council's standards.

The application site is located along the A408 (Sipson Road) which makes up part of the Boroughs Classified Road Network. Given the sites close proximity to Heathrow Airport terminals 2 and 3, it is envisaged that this site would predominantly serve airport visitors. The site has a public transport accessibility rating of 2 which on the scale of 1 -6a (6a being the best) is deemed as poor.

The existing vehicular access into the site is located on the A408 Sipson Road adjacent to the bridge crossing of the M4 link road. The site access has an automatic security barrier set back from the highway providing stacking space for up to five vehicles. Parking restrictions are present at the site access with double yellow lines on both sides of the junction. The access road into the site varies in width between 3.5 m to 4.7 m. A 2.1 m footway runs along the first 30 m of the access road leading into the site.

The existing access located on Sipson Road will be retained to provide access to the proposed development. The access road will be widened to provide a 6.0 m carriageway with 1.8 m footway. The access was approved for use in association with the previous hotel scheme and its use for coaches considered acceptable. On this basis the proposed access is considered appropriate for all road users.

The highways officer notes the development would generate an increase of 26 vehicle movements during the AM peak period and 23 movements during the PM peak period compared to the consented scheme. This would equate to 1 vehicle every 3-4 minutes which is expected to be sufficiently absorbed within the background traffic along the network. The highways officer has confirmed the proposed ramp gradients, access widths and general designs conform with the 'Institute of Structural Engineers' standards i.e. Design recommendations for multi-storey car parks and underground car parks - fourth edition 2011 and relevant Building Regulations.

Policy DMT6 for a C1 use indicates assessment on an 'individual basis' with consideration of factors such as taxi pick up and set down facilities, car rental provisions, extraneous activities in addition to normal hotel operations such as hosting functions and banquets, conferences or any other external business related uses.

The proposal provide 87 car parking spaces which includes 81 guest spaces (including 8 disabled spaces) and 6 staff spaces (including 1 disabled). Whilst the ratio of parking for this scheme is lower than that in the previous scheme. The applicant has carried out a parking accumulation survey based on the sites previously agreed trip rate data which shows that 81 spaces to serve hotel guests is sufficient. The level of parking provision to be provided on site is policy compliant, being within the maximum permitted by local planning policy. The level of provision has also been assessed in detail, in consultation with the highways officers.

Parking demand has been calculated based upon surveys of comparable hotel sites, including activity associated with conference and restaurant facilities and the level of provision proposed is more than adequate to cater for expected levels of demand. The highway officer notes that the two of the surveyed sites within the raw TRICS data include function and meeting rooms which are larger to that which is currently being proposed. On this basis the number of parking spaces proposed is accepted.

The Transport assessment notes the site would benefit from the Heathrow 'National Express' - Hoppa bus service which serves hotels in the vicinity of the airport. Given the positive impact this will arrangement will provide in terms of promoting sustainable travel to and from the site, the Hoppa bus service is welcome.

The adopted Local Plan Part 2 (January 2020) also requires 1 coach parking space per 50 bedrooms. Although only 4 coach parking spaces are being proposed given the impact the Hoppa bus service will have on the development this provision is accepted. To accord with the Local Plan Part 2 DMT 6 policy and parking standard for a C1 use, the development should provide 10% provision of the total parking facility. This percentage should therefore be demonstrated. The total provision of 8 spaces is to be provided which is therefore considered acceptable.

London Borough of Hillingdon's car parking standards require 5% active and 5% passive charging. The proposals provides Electric Vehicle Charging Points above policy requirements (especially passive provision). The proposal provides 16 (20%) active and 71 (80%) passive spaces for future activation. The proposal therefore complies with Policy T6C of the Intend to Publish version of the London Plan (2019) which requires "all operational parking must provide infrastructure for electric or other Ultra-Low Emission vehicles, including active charging points for all taxi spaces."

In terms of cycle parking provision, the proposals will provide 32 spaces in excess of the minimum standard which requires 16 long stay spaces and 7 short stay spaces (23 spaces). This level of provision is accepted. Motorcycle parking should be provided in line

with the Local Plan Part 2 which is 5% of the overall parking provision. This totals 4 anchored spaces. 4 spaces are being provided within the basement which will be secured by way of a condition.

The applicant has provided details of delivery and servicing arrangements demonstrating that large refuse vehicles and delivery vehicles will be able to access the site and manoeuvre within it, as shown in drawings SP13A and SP14A within Appendix D of the submitted transport assessment.

A Construction Logistics Plan would be a requirement given the constraints and sensitivities of the local road network in order to minimise/avoid potential detriment to the public realm. A suitably worded planning condition has been attached to mitigate against the construction impact on the local highway network and the amenities of the local area. The proposal is considered to comply with the provisions set out within Policy DMT 2 and DMT 6 of the Local Plan: Part Two (2020).

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

Design has been addressed in paragraph 7.07 of this report.

##### Security

Paragraph 7.13 of the London Plan (2016) requires development proposals to contribute to the minimisation of potential physical risks and include measures to deter crime and anti social behaviour. A secured by design condition has been recommended and therefore the proposal is considered to accord with Policy 7.13 of the London Plan.

#### **7.12 Disabled access**

Policy 3.1 of the London Plan (2016) requires development proposals to protect and enhance facilities and services that meet the needs of particular groups and communities.

Policy 7.2 of the London Plan (2016) requires design and access statements to be submitted with development proposals to explain how, following engagement with relevant user groups, the principles of inclusive design, including the specific disabled people, have been integrated into the proposed development, whether relevant best practice standards such as British Standard BS 8300:2009 + A1:2010 have been complied with, and how inclusion will be maintained and managed.

Policy DME 6 of the Local Plan: Part Two (2020) requires all hotel developments to incorporate to meet the requirements of the Accessible Hillingdon SPD and to ensure 10% of hotel rooms meet wheelchair accessibility standards.

Further to the submission of additional information the access officer has noted:

1. The proposal includes 10.3% of accessible rooms, of which 1.7% would feature a tracked hoist system and interconnect with an adjacent standard room, is acceptable.
2. The upgrade of bathroom dimensions as per BS8300-2:2018 (Figure 33) is acceptable.
3. The inclusion of level access to 80% of the Type 1 accessible bedrooms which would feature a shower is acceptable.
4. The provision of one refuge space per accessible bedroom on the floor above the ground is acceptable.

Details relating to a suitably sized fire evacuation lift suitable to be used to evacuate people who require level access from the building should be provided by way of a condition if permission is granted.

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

Not applicable to this development.

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

### TREES AND LANDSCAPING

Policy 3.5 of the London Plan (March 2016) requires that the design of all new housing developments should enhance the quality of local places, taking into account physical context; local character; density; tenure and land use mix; and relationships with, and provision of, public, communal and open spaces.

Policy 5.10 of the London Plan (March 2016) states that development proposals should integrate green infrastructure to contribute to urban greening, including the public realm.

Policy DMHB 11 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020) also requires that new development is high quality, sustainable, adaptable, and harmonises with the local context. Landscaping and tree planting should also enhance amenity, biodiversity and green infrastructure.

Policy DMHB 14 of the Local Plan:Part Two (2020) notes all developments will be expected to retain or enhance the existing landscape, trees, biodiversity and natural features of merit. Planning applications for proposals that would affect existing trees will be required to provide an accurate tree survey showing the location, height, spread and species of trees.

There are no individual trees of merit on the site. The most significant landscape feature is the tall conifer hedge which defines the west boundary and provides an evergreen screen between the residential area to the west and the site. There are no tree or landscape planning designations which affect the site.

The Landscape Masterplan includes the retention of the hedge on the northern boundary, the trees on site in the south-west corner and the off-site trees on the embankment of the spur road. New living landscape will be incorporated along the southern boundary, between the ramped access to the car park and the surface level disabled parking, in the entrance forecourt and within the garden lobby.

A concept landscaping scheme has been provided with the application which presents a draft palette of hard and soft landscape materials. Reference is made to the planting and management constraints imposed by Heathrow with regard to bird strike avoidance.

Given the site's proximity to neighbouring residential properties, the applicant has provided details of the proposed lighting scheme to provide a balance between well illuminated and not a nuisance to existing residents and airport operations. Light fixtures will be fixed to the building to provide light onto adjacent pathways and access routes and at key locations such as refuse stores, and plant rooms. The western elevation, other than immediate pathways, to ensure lighting does not cause a nuisance to the adjacent properties. Along the western boundary, it is proposed to provide lighting that illuminates the access road from the hedge side of the road to avoid pointing towards residential properties. The landscaped area to the arrival forecourt will have some low level up lighting during evening hours but limited to ensure light does not cause a nuisance. Any lights on the upper floors will be limited to face east over the M4 motorway and north over the entrance areas.

The application would not result in the loss of trees of merit and there are no objections to the proposed landscaping scheme. Should the application be considered acceptable, a detailed landscaping and maintenance proposal is required by way of a condition.

## ECOLOGY

Paragraph 170 of the NPPF (February 2019) states that planning decisions should contribute to and enhance the natural and local environment by: d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures.

Policy 7.19 of the London Plan (March 2016) states that development proposals should wherever possible, make a positive contribution to the protection, enhancement, creation and management of biodiversity.

Policy G5 of the Intend to Publish Version of the London Plan (2019) requires development proposals to contribute to the greening of London by including urban greening as a fundamental element of site and building design, and by incorporating measures such as high-quality landscaping (including trees), green roofs, green walls and nature-based sustainable drainage.

Policy DMEI 7 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020) states that the design and layout of new development should retain and enhance any existing features of biodiversity within the site.

A roof level wildflower meadow beneath photovoltaic panels on the roof levels 3, 4 and 6 is proposed. A preliminary ecological appraisal (PEA) has been prepared by Greengage. The recommendations in 1.9 note the need for wildlife-friendly planting, an area of biodiverse roof, the installation of bat boxes and the incorporation of invertebrate features within the landscape.

Officers consider there is an opportunity for the development to provide a green wall and ecological enhancements. If recommended for approval, a landscaping scheme would be secured by condition and would ensure that the proposal includes soft landscaping and improved green infrastructure provision to the benefit of biodiversity. Subject to this condition, the proposed development would not be contrary to Policy DMEI 7 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020), Policy 7.19 of the London Plan (March 2016) and the NPPF (February 2019).

### **7.15 Sustainable waste management**

Policy 5.17 of the London Plan (2016) sets out the Mayors Spatial Policy for Waste Management including the requirements for new developments to provide appropriate facilities for the storage of refuse and recycling.

The submitted plans show that integrated refuse stores would be provided. Large refuse vehicles and delivery vehicles will be able to access the Site and manoeuvre within the site, as shown in drawings SP13A and SP14A (Appendix D) of the Transport Assessment.

Whilst the hotel operator ultimately has discretion over which waste management methods are used on site, full details of refuse provision would nevertheless be required by way of condition to ensure this is fully considered and adequate facilities are provided.

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

Policy 5.2 of the London Plan (2016) requires developments to make the fullest contribution to minimising carbon dioxide emissions in accordance with the following energy hierarchy:

Be lean: use less energy

Be clean: supply energy efficiently

Be green: use renewable energy

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

Policy DMEI 2 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020) requires that: A) All developments make the fullest contribution to minimising carbon dioxide emissions in accordance with London Plan targets; B) All major development proposals must be accompanied by an energy assessment showing how these reductions will be achieved; C) Proposals that fail to take reasonable steps to achieve the required savings will be resisted. However, if the Council is minded to approve the application despite not meeting the carbon reduction targets, then it will seek an off-site contribution to make up for the shortfall. The contribution will be sought at a flat rate at of £/tonne over the lifetime of the development, in accordance with the current 'allowable solutions cost'.

The Sustainability Officer has considered the merits of the proposal and advises that the submitted energy strategy for the proposed development is not adequate. Firstly, the energy report identifies the onsite target is a 35% reduction in CO<sub>2</sub> with the shortfall from the zero carbon requirement to be payable in an offset contribution. The officer notes that this approach is incorrect as the development target is zero carbon with a minimum onsite saving of 35%. The applicants should therefore endeavour to get as close to zero carbon onsite before seeking an offsite contribution to make up for the shortfall.

The officer goes on to advise that in this instance, it is entirely feasible that a scheme of this size can achieve a minimum of 35% reduction in Co<sub>2</sub> onsite and could easily achieve much higher with more effort and a better understanding of the energy saving policies. A condition and planning obligation is attached to the consent securing a condition and S106 obligations are necessary to secure an improved approach to CO<sub>2</sub> reduction.

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

Policy 5.13 of the London Plan (2016) states that development proposals should use sustainable urban drainage systems (SuDs) unless there are good reasons for not doing so and that developments should aim to achieve green-field run-off rates. Policy 5.15 goes on to confirm that developments should also minimise the use of mains water by incorporating water saving measures and equipment.

Policy DMEI 10 of the Local Plan: Part Two (2020) applications for all new build developments are required to include a drainage assessment demonstrating that appropriate sustainable drainage systems (SuDS) have been incorporated in accordance with the London Plan Hierarchy.

The Flood and Water Management Officer has raised no objection to the proposed development subject to the applicant providing further details by way of a SuDs condition to confirm the detail. It is expected that all green space will be maximised for integration in the drainage to minimise the need for an excessively large tanked system below ground.

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

NOISE

Policy 7.15 of the London Plan (March 2016) states that development proposals should seek to manage noise by:

a. avoiding significant adverse noise impacts on health and quality of life as a result of



new development;

b. mitigating and minimising the existing and potential adverse impacts of noise on, from, within, as a result of, or in the vicinity of new development without placing unreasonable restrictions on development or adding unduly to the costs and administrative burdens on existing businesses;

c. improving and enhancing the acoustic environment and promoting appropriate soundscapes (including Quiet Areas and spaces of relative tranquillity);

d. separating new noise sensitive development from major noise sources (such as road, rail, air transport and some types of industrial development) through the use of distance, screening or internal layout - in preference to sole reliance on sound insulation;

e. where it is not possible to achieve separation of noise sensitive development and noise sources, without undue impact on other sustainable development objectives, then any potential adverse effects should be controlled and mitigated through the application of good acoustic design principles;

f. having particular regard to the impact of aviation noise on noise sensitive development;

g. promoting new technologies and improved practices to reduce noise at source, and on the transmission path from source to receiver.

Policy EM8 of the Hillingdon Local Plan: Part 1 - Strategic Policies (November 2012) states that the Council will seek to ensure that noise sensitive development and noise generating development are only permitted if noise impacts can be adequately controlled and mitigated.

The applicant has provided a Noise Impact Assessment which concludes that the proposed hotel is located in an area with a high background noise level from the northern Heathrow runway and the M4 / M4 Approach Road. The proposal includes appropriate mitigation measures to control the external noise sources and allow appropriate internal noise levels within the hotel bedrooms. All the hotel mechanical equipment including AC units, AHUs, Extract fans would have a combined noise level to ensure it does not disturb the existing residents.

Under the previous application considered at appeal, the Inspector noted "there is currently an access road associated with the existing building on the site, which runs to the rear of the properties along Sipson Way. This would be replicated in the proposed layout of the site. Whilst there may be some occasional activity associated with the restaurant which has secondary access doors facing on to this road, the main servicing and delivery area is located well away from the residential properties, in an enclosed area at the centre of the site. Overall, the levels of noise and disturbance arising from the siting of this access road are likely to be similar to the previously existing position. There would be no material harm to the living conditions of residents of neighbouring residential properties, in this respect." Given this proposal replicated the previous scheme dismissed at appeal, it is not considered the proposed activity associated with the hotel would result in an adverse noise impact on neighbouring amenity.

The applicant proposes a condition to limit deliveries to the hotel should only be undertaken between 08:00 to 18:00 Monday to Friday and 10:00 to 13:00 on Saturday and Sundays.

## AIR QUALITY

Policy DMEI 1 of the Local Plan: Part Two (2020) requires major development in Air Quality Management Areas to provide onsite provision of living roofs and/or walls. A suitable offsite contribution may be required where onsite provision is not appropriate.

The Local Plan recognises that living walls and roofs allow a number of environmental goals to be achieved in a relatively small space. They also remove particulates that improve local air quality. The Council's EPU (Air Quality) Officer has requested that a condition is added to the decision notice to ensure the proposal contributes to air quality enhancements.

Policy DMEI 14 of the Local Plan: Part Two (2020) requires development proposals to demonstrate appropriate reductions in emissions to sustain compliance with and contribute towards meeting EU limit values and national air quality objectives for pollutants. Developments are expected to be:

- Air quality neutral;
- Include mitigation to ensure there is no unacceptable risk from air pollution to sensitive receptors; and
- Actively contribute towards the continued improvement of air quality, especially within the Air Quality Management Area.

The proposed development is located with the Sipson Focus Area. The London Plan (2016) requires developments to be at the very least 'neutral' and within 'positive' in Focus Areas, contributing to the reduction of emissions in these sensitive areas.

An air quality assessment is submitted to support the planning application and it recommends a minimum level of mitigation is applied which includes:

- The provision of at least 1 Electric Vehicle (EV) "rapid charge" point per 1000m<sup>2</sup> of commercial space. The total area of the proposed development is 17,034m<sup>2</sup>;
- A travel plan (with provision to measure its implementation and effect) which sets out measures to encourage sustainable means of transport (public, cycling and walking) via subsidised or free-ticketing, improved links to bus stops, improved infrastructure and layouts to improve accessibility and safety; and
- All gas-fired boilers to meet a minimum standard of <40 mgNO<sub>x</sub>/kWh.

Therefore, a reduction of 15% has been applied to the total mitigation level required. The remaining mitigation required is to be provided through a section 106 agreement with the LAP of £54,946 to be paid for Hillingdon to deliver its air quality local action plan and or implement specific measures on/along the road network affected by the proposal that reduce vehicle emissions and or reduce human exposure to pollution levels. Subject to the inclusion of the recommended conditions and clause within the legal agreement, there are no air quality objections to this application.

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

Consultation comments and objections have been addressed within the main body of the report.

#### **7.20 Planning obligations**

The Community Infrastructure Levy Regulation 2010 (Regulations issued Pursuant to the 2008 Act) and the NPPF have put three tests on the use of planning obligations into law. It is unlawful (since 6th April 2010) to request planning obligations that do not meet the following tests:

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

The effect of the Regulations is that the Council must apply the tests much more strictly and is only to ask for planning obligations that are genuinely necessary and directly related to a development. Should planning obligations be requested that do not meet the

policy tests the Council would have acted unlawfully and could be subject to a High Court challenge.

At a regional level, policy 8.2 'Planning Obligations' of the London Plan (2016) stipulates that when considering planning applications of strategic importance, the Mayor will take into account, among other issues including economic viability of each development concerned, the existence and content of planning obligations. It also states that development proposals should address strategic as well as local priorities in planning obligations.

Policy DMCI 7 of the Local Plan: Part Two (2020) seeks to ensure development is sustainable, planning permission will only be granted for development that clearly demonstrates there will be sufficient infrastructure of all types to support it. Planning obligations are sought on a scheme-by-scheme basis to ensure that development proposals provide or fund improvements to mitigate site specific impacts made necessary by the proposal.

Relevant Officers have reviewed the proposal, as have other statutory consultees. The comments received indicate the need for the following contributions or planning obligations to mitigate the impact of the development.

1. To secure all necessary highway works including written agreement from the Local Planning Authority on the final proposed public realm improvements to the pedestrian environment.
2. Parking Management Plan (including advising customers prior to their booking whether or not access to on-site parking is available and reserved or not).
3. The provision of a Travel Plan, including a bond of £20,000, which shall incorporate Sustainable Transport Measures such as the Hoppa Bus Service.
4. 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. Securing an Employment/Training Strategy Agreement is Council's priority. A financial Contribution will only be accepted in exceptional circumstances.
5. Hospitality Training contributions or an in-kind scheme.
6. Air Quality Contribution: in line with the SPD and given the site is located in an air quality management area then a contribution in the sum of £54,946.
7. Carbon Off-set Contribution of £1800 for every tCO<sub>2</sub>/annum that is below the zero carbon target.
8. Project Management and Monitoring Fee: a financial contribution equal to 5% of the total cash contributions towards the management and monitoring of the resulting agreement.

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

There is no enforcement history relating to this site.

#### **7.22 Other Issues**

Contaminated Land

Policy DMEI 12 of the Local Plan: Part Two (2020) requires proposals for development on potentially contaminated sites to be accompanied by at least an initial study of the likely contaminants. Conditions will be imposed where planning permission is given for development on land affected by contamination to ensure all the necessary remedial works are implemented, prior to commencement of development.

The initial conceptual model within the report identifies the following potential sources of contamination present on the site and in the surrounding area:

- Fill materials/made ground (in-filled pond area)
- Historical heating oil tank and plant rooms
- Possible asbestos present within the fabric of existing buildings
- Potential off-site sources are landfills and works in the vicinity of the site.

The report outlines plausible contaminant linkages which represent moderate or low risks to future users, building structures and utility services at the site, and possibly to the occupants of adjacent properties. The identified linkages indicate further work, as a phase 2 intrusive site investigation, is required in order to address site-specific land contamination issues as identified within the preliminary risk assessment report. Therefore, it is recommended a conditions is imposed if planning permission is granted.

#### Fire Safety

Policy D12 (Fire safety) of the Intend to Publish of the London Plan (2019) states that in the interests of fire safety and to ensure the safety of all building users, development proposals must achieve the highest standards of fire safety. In this regard an Outline Fire Strategy has been submitted as part of the application. It is considered that a condition should be added to any permission to secure the implementation of a Fire Strategy for all parts of the development in accordance with draft Policy D12 (Fire safety) of the London Plan - Intend to Publish (2019).

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

#### General

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

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

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

#### Planning Conditions

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

## Planning Obligations

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

## Equalities and Human Rights

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

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

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

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

Not applicable.

## **10. CONCLUSION**

This application seeks planning permission for the redevelopment of the site to provide a 6 storey (above ground) hotel comprising 302 bedrooms with associated car parking, landscaping and associated works. The proposal would come forward on a site that was formerly occupied for training the police (Use Class Sui Generis) which has been vacant since 2016. There is no in principle objection to the loss of the facilities and on the basis that the sequential test has been passed the provision of a hotel in this location is supported by both the Local Plan and the London Plan.

The application site is situated between the suburban residential context and an airport related context. The application proposal has been designed to respond to the site's context by providing a stepped form of development that goes from 2-storeys where it is closest to residential properties to 6-storeys where it adjoins the M4 spur. The overall height whilst greater than the existing buildings, is comparable to hotels found in the surrounding area. The Council's Urban Design and Tree/ Landscape/ Flood Water Management/Air Quality Officers do not raise any objections to the proposals.

The Council's Highway Engineer also does not raise any objections to the scheme, as do not Environmental Protection Officers, subject to conditions.

The scheme has also been referred to the GLA and in their Stage 1 Report they have advised that the scheme does not raise any strategic concerns, subject to conditions and clarification. The GLA raise concerns that there is too much car parking being proposed. The applicant has clarified the proposed car parking is consistent with other similar hotels within the local area. The Highways Officers consider it is acceptable.

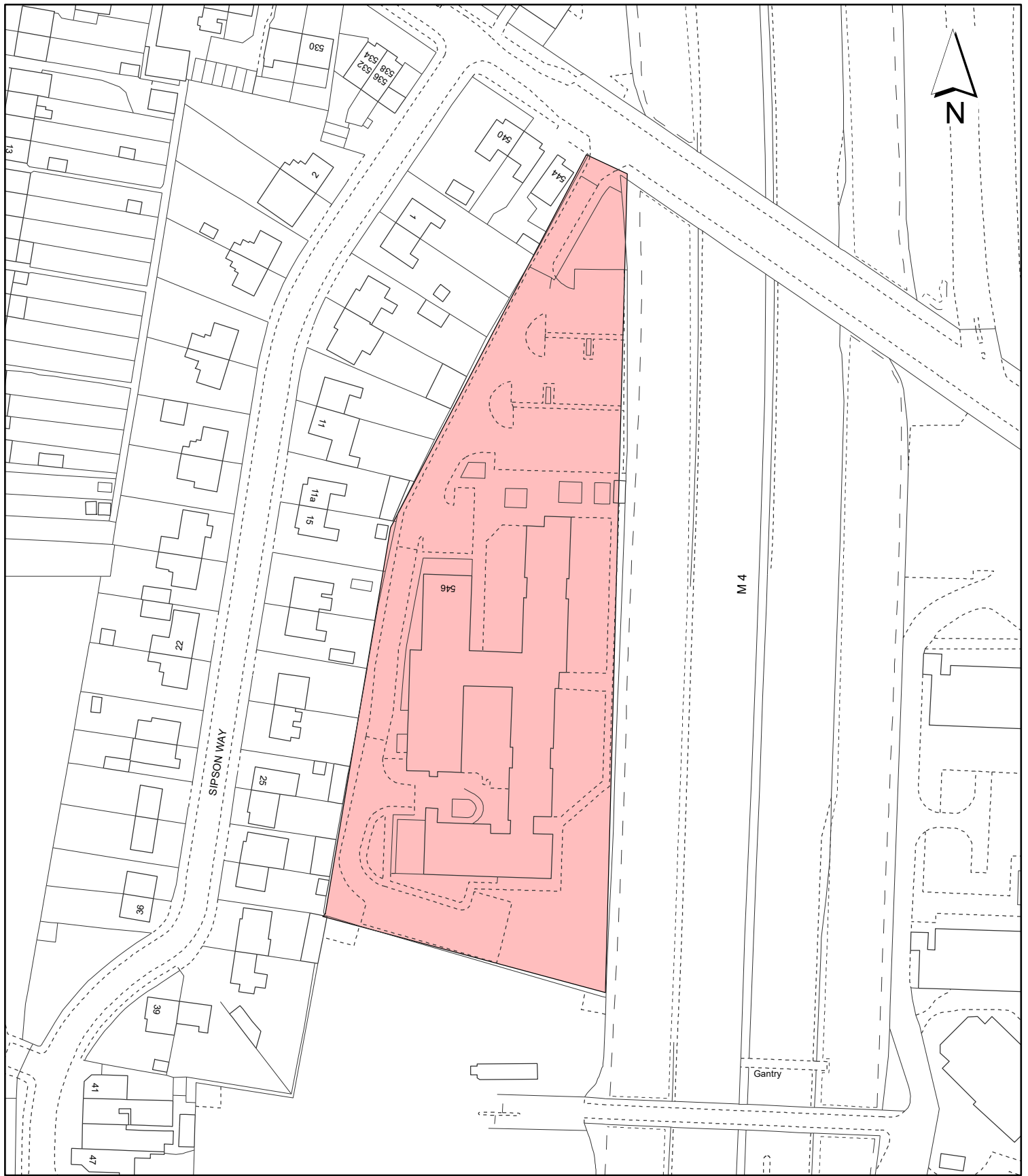
Approval is therefore recommended, subject to the recommended conditions, referral back to the Mayor and the applicant entering into an agreement with the Council under Section 106 of the Town and Country Planning Act 1990 to secure commensurate planning obligations.

## **11. Reference Documents**

Hillingdon Local Plan: Part 1 - Strategic Policies (November 2012)  
Hillingdon Local Plan: Part 2 Site Allocations and Designations (2020)  
Hillingdon Local Plan: Part 2 Development Management Policies (2020)  
Hillingdon Local Plan: Policies Map (2020)  
London Plan (2016)  
London Plan Intend to Publish (2019)  
National Planning Policy Framework (2019)

**Contact Officer:** Zenab Haji-Ismail

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**Notes:**

 Site boundary

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 Residents Services  
 Planning Section**

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 Telephone No.: Uxbridge 01895 250111

Planning Application Ref:

**11068/APP/2020/1586**

Scale:

**1:1,250**

Planning Committee:

**Major**

Date:

**August 2020**



**HILLINGDON**  
 LONDON